

Child Safeguarding Practice Review Action Plan: C80

Acronym's key:			
CSPR: Child Safeguarding Practice Review CSC: Children's Social Care EYFS: Early Years Foundation Stage HSB: Harmful Sexual Behaviour HoS: Head of Service KCSIE: Keeping Children Safe in Education LA: Local Authority		LADO: Local Authority Designated Officer MACA: Multi-Agency Case Audit MASH: Multi-Agency Safeguarding Hub S&SF Teams: Safeguarding and Supporting Families TESS: Torbay Education Safeguarding Service TSCP: Torbay Safeguarding Children Partnership	
CSPR Recommendation	Action	Agency and Timescale for Completion	Impact
1. Develop a partnership wide restorative / trauma informed approach in systems for care experience children, specifically: <ul style="list-style-type: none"> • Education (pre and post 16) relating to behaviour / disciplinary approaches. • Placements and suitability assessments. • Working with hostile and coercive parents. • Language used and recording concerns. 	Quality Assurance Task and Finish group to seek initial feedback from agencies on their current progress in this area and then work alongside CSC Regulated Services to agree and implement a roll-out of restorative / trauma informed practice across the partnership. Learning and Development group to review current training access and open-up relevant training to all local agencies.	HoS Regulated Services / TSCP Quality Assurance Group chair / TSCP Learning and Development Group chair 7 th June 2022	All children in Torbay will gain a better service from agencies, as professionals will have a greater understanding of need and how to respond to this.
2. Raise awareness of the impact and indicators of child sexual abuse with practitioners and carers of care experienced children.	TSCP to formulate a briefing document on the impact and indicators of child sexual abuse for sharing across the partnership.	TSCP Learning and Development Group chair 8 th March 2022	Improved understanding of child sexual abuse will aid improved identification, victim support and care planning.

<p>3. Seek assurance of partners responses to sexual abuse particularly the communication of a child's experience in referrals, plans and assessments.</p>	<p>MASH to undertake a dip sample of contacts/referrals to check quality of partners responses. Children's Services Safeguarding and Supporting Families Team to undertake the related dip sample regarding plans and assessments.</p>	<p>HoS Front Door and HoS S&SF teams 8th March 2022</p>	<p>Improved agency responses to sexual abuse that include the voice of the child.</p>
<p>4. Ensure timely delivery of Life Story Work with care experienced children, and that where therapy is commissioned for a care experienced child that:</p> <ul style="list-style-type: none"> • It is completed when there is placement disruption • Recommended assessments take place • Progress of this informs care planning 	<p>CSC Regulated Services to undertake a dip sample to check and inform practice where Life Story books are completed. Audit to be used to ensure compliance with prescribed timescales and therapy, if commissioned, occurs, and has outcomes that are acted on.</p>	<p>HoS Regulated Services 25th April 2022</p>	<p>Further opportunity to ensure identification of historical abuse of care experienced children and associated care planning that will better meet need.</p>
<p>5. Consider ways to improve the confidence of local practitioners in distinguishing between 'normal' age-appropriate relationships and behaviour that may cause concern.</p>	<p>TSCP have completed a Harmful Sexual Behaviour MACA and linked Best Practice Forum that supports practitioners to distinguish between normative and concerning behaviours. TSCP Learning and Development group to share the contents of the Best Practice Forum with practitioners who were unable to attend.</p>	<p>TSCP Learning and Development Group chair 8th March 2022</p>	<p>Higher quality local services in respect of identification and support where harmful sexual behaviour is present and the avoidance of labelling where it is not.</p>
<p>6. Ensure that consideration is given to implement best practice tools for assessment (incl. Brook Traffic Light Tool) within TSCP's current review of HSB policy / procedures.</p>	<p>Funding to be reviewed to include potential purchasing of the Brook Traffic Light tool. If purchase of the tool is agreed a planned implementation phase is required that will need to be time focussed.</p>	<p>TSCP Harmful Sexual Behaviour Group chair 7th June 2022</p>	<p>Agencies will be better able to assess need and risk from an evidence-based perspective.</p>
<p>7. Seek assurance of the implementation of improvements to the post 16 offer to care experienced children – specifically personal advisor provision, pathway planning and virtual school.</p>	<p>Children's Social Care to dip sample and review post 16 provision to ensure the improvements required are met or planned for implementation.</p>	<p>HoS Regulated Services 8th March 2022</p>	<p>Improved support and care planning for post 16 care experienced children.</p>
<p>8. Request assurance of quality and timeliness of handover of safeguarding information between secondary and post 16 education providers.</p>	<p>TESS to dip sample and review current Torbay process to ensure it complies with statutory guidance and disseminate guidance to relevant school and post 16 education providers to ensure compliance.</p>	<p>TESS Team Manager 8th March 2022</p>	<p>Safer practice regarding the management of need and risk in post 16 settings.</p>

9. Seek assurance that robust commissioning processes are in place for independent residential care providers and that this includes requirements of the placing LA to meet needs of child in standard operating procedures as well as use of the TSCP Allegations Management Procedure.	Torbay Children's Services to review and if necessary, update placement procurement procedures to ensure these are compliant with statutory requirements.	HoS Regulated Services 24 th April 2022	Higher quality residential services that better meet children's needs and comply with statutory guidance for care providers.
10. Ensure all practitioners, including early years and childcare settings, understand how to respond to concerns relating to under 18's / apprentices working in positions of trust, and the role of the LADO.	Torbay Early Years team to hold a specific training event and a focussed good practice programme of events for Early Years providers beginning w/c 22nd November 2021. The programme will cover actions 10, 11, 13, 14, 15, 17, 18 and 21. Programme has been shared and agreed with the CSPR panel.	Torbay Early Years Safeguarding Officer 7 th June 2022	Safer services for children, as concerning staff can be better identified and their actions responded to proportionately.
11. Ensure 'out of hours' access to LADO related advice and support.	See Action 10	Torbay Early Years Safeguarding Officer (Action completed)	Safer services for children, as concerning staff can be better identified and their actions responded to proportionately.
12. The Department for Education (DfE) should provide statutory guidance for post 16 education providers relating to safer recruitment procedures for students enrolling on childcare courses.	TSCP Business Manager to write to the DfE requesting that they provide statutory guidance for post 16 education providers regarding safer recruitment for students enrolling on childcare courses and feedback to the TSCP confirming this action has been agreed.	TSCP Business Manager 8 th March 2022	Statutory guidance will support the creation and maintenance of a safer childcare work force.
13. Ensure all early years and childcare settings are aware of TSCP Safe Recruitment procedures specifically in relation to standards relating to seeking pre-employment references.	See Action 10	Torbay Early Years Safeguarding Officer 7 th June 2022	Following safer recruitment procedures will enable childcare settings to employ higher quality, safer staff.
14. Seek assurance from schools and colleges to ensure there is proactive contact with employers when references are refused or sent incomplete as a student is deemed as not suitable for work in a position of trust with children or other vulnerable people.	See Action 10	Torbay Early Years Safeguarding Officer 7 th June 2022	Following safer recruitment procedures will enable childcare settings to employ higher quality, safer staff.
15. Provide clarity to education settings and other partners regarding GDPR and what can be included in references relating to students.	See Action 10	Torbay Early Years Safeguarding Officer 7 th June 2022	Following safer recruitment procedures will enable childcare settings to employ higher quality, safer staff.

<p>16. DfE should review the EYFS framework in the light of this review, specifically in terms of:</p> <ol style="list-style-type: none"> Providing statutory guidance on safe recruitment requirements and pre-employment checks to mirror expectations in KCSIE for schools and colleges. Defining further what is meant by 'competent and responsible' in terms of those under 17 working in early years settings. Clarity of use and purpose of CCTV in early years settings. Identifying safeguarding concerns relating to the layout and design of toilets and areas used for intimate care. 	<p>TSCP Business Manager to write to the DfE requesting that they review the EYSF framework in line with this recommendation and feedback to the TSCP once completed.</p>	<p>TSCP Business Manager 8th March 2022</p>	<p>Reviewing the current framework at a national level will reduce the chances of unsuitable staff entering the childcare workforce and also support the ongoing maintenance of a safer workforce.</p>
<p>17. Early years settings and childcare providers should reflect on the learning points highlighted in this review, evaluating their safeguarding practice, and setting culture, through a lens of 'it could happen here'.</p>	<p>See Action 10</p>	<p>Torbay Early Years Safeguarding Officer 7th June 2022</p>	<p>Reflective practice will support identification of service weakness and highlight the changes required.</p>
<p>18. Raise awareness of whistleblowing procedures and the national Whistleblowing Advice Line specifically targeting frontline, early years practitioners.</p>	<p>See Action 10</p>	<p>Torbay Early Years Safeguarding Officer 7th June 2022</p>	<p>Raising awareness of whistleblowing procedures and supporting staff who need to follow this process will improve the wellbeing and safety of children.</p>
<p>19. Consider ways to develop safeguarding assurance work with Early Years settings, such as 'deep dive' audit work and practitioner involvement to address themes from this review and adherence to safeguarding related elements of the EYFS guidance, specifically regarding:</p> <ul style="list-style-type: none"> Inclusion of under 17's in staff: children's ratios Supervision of under 17's Safeguarding within supervision and observation of practice Staff feedback and monitoring of practice (including CCTV) Record keeping where physical intervention used / process for informing parents Whistleblowing practices including record keeping and Ofsted notification where statutory criteria met. 	<p>Early Years team to undertake a focussed safeguarding audit in February 2022 to address these themes, address concerns and provide the TSCP with assurance that the recommendation has been met.</p> <p>Themed C80 MACA proposed for Autumn 2022 to review and close the learning cycle.</p>	<p>Torbay Early Years Safeguarding Officer 8th March 2022 and 24th November 2022</p>	<p>Focussed audits will evidence the level of change made in respect of the themes identified in the CSPR report and provide families and professionals a level of assurance regarding the quality and safety of local early years services.</p>

<p>20. Develop a framework for responding to complex and high-profile safeguarding issues that includes from the outset.</p> <ul style="list-style-type: none"> • Assigning a single officer to take a ‘helicopter or balcony’ view of the process • Providing a single point of contact for parents / stakeholders • Ensuring communication is sent from an independent organisation • Sending proactive, coordinated communication that reaches all stakeholders • Providing specialist support to those affected. 	<p>TSCP to review local policy and process to ensure it is fit for purpose via a partnership led task and finish group.</p>	<p>TSCP Quality Assurance Group chair</p> <p>25th April 2022</p>	<p>Developing an improved framework for responding to complex safeguarding concerns will enable effective identification of staff roles. A framework will also provide better support and clearer information pathways for families.</p>
<p>21. Ensure practitioners and leaders are aware of and utilise TSCP escalation policy, and that this and other escalation routes are used as necessary to safeguard children.</p>	<p>See action 10 plus TSCP to review, update and disseminate the partnership's Professional Differences policy.</p>	<p>Torbay Early Years Safeguarding Officer and TSCP Business Manager</p> <p>25th April 2022</p>	<p>Promoting awareness of the escalation policy will encourage its use when required to ensure any concerns about a child are elevated promptly.</p>
<p>22. Ofsted should use the lessons learnt from the independent review to influence regulatory policy and practice, and to brief inspectors in responding to serious incidents and/or allegations in regulated settings.</p>	<p>TSCP Business Manager to write to Ofsted requesting that they review the lessons learned from this review and use this to update practice when responding to serious incidents in the future. Ofsted to provide feedback to the TSCP once completed.</p>	<p>TSCP Business Manager</p> <p>8th March 2022</p>	<p>Improvements to Ofsted practice will support more effective future inspections and investigations.</p>
<p>23. Ofsted and the National Police Chiefs' Council should develop a joint protocol to support working together when responding to serious incidents in regulated settings, including:</p> <ul style="list-style-type: none"> • Opportunities for joint work within parameters of investigation • Contact points for both parties • Information sharing to enable full consideration of thresholds for interventions • Participation in local multi agency meetings • Escalation routes for local partners within Ofsted. 	<p>Devon and Cornwall police to review if there is a national lead working on this protocol and feedback to next C SPR panel.</p> <p>Action to remain open until the protocol has been developed and implemented.</p>	<p>Devon and Cornwall Police C SPR Panel representative</p> <p>8th March 2022</p>	<p>A joint working protocol will ensure more effective and quicker responses to future potential serious incidents in childcare settings.</p>