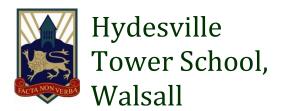
## COGNITA

Safeguarding and Child Protection Policy and Procedure: COVID-19 Addendum



April 2020

This COVID-19 addendum policy only applies during closure of the school site. It sets out changes to our main Safeguarding and Child Protection Policy and Procedure 2019/20 and must be read in conjunction with that policy, and the Department for Education's guidance Coronavirus: safeguarding in schools, colleges and other providers

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### 1. Important contacts during closure of the school site

SCHOOL CONTACTS	NAME	CONTACT DETAILS (WORK EMAIL AND/OR WORK MOBILE)
Designated Safeguarding Lead (DSL)	Manjit Chand	manjit.chand@hydesville.com
Deputy DSL (DDSL)	Lauren Jenkins	lauren.jenkins@hydesville.com
Deputy DSL (DDSL)	Antonia Odunjo	antonia.odunjo@hydesville.com
Deputy DSL (DDSL)	Njah Khan	njah.khan@hydesville.com
Early Years DSL	Sam Smith	samantha.smith@hydesville.com
Early Years DDSL	Laura Willis	laura.willis@hydesville.com
Headteacher	Warren Honey	warren.honey@hydesville.com
Director of Education	Danuta Tomasz	danuta.tomasz@cognita.com
Group Director of Education	Simon Camby	simon.camby@cognita.com
Regional Safeguarding Lead (RSL) - Europe	Alison Barnett	alison.barnett@cognita.com 07717806988 (or call via Teams)

Local Authority (LA) contacts			
Walsall			
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	Walsall Children's Services <u>www.wlscb.org.uk</u>		
The Designated Officer for child protection (Interim)	Michelle Pinnock-Ouma 01922 654040		
Local authority children's social care referral team(s)	MASH 01922 658170		
Prevent Coordinator Education Officer for Prevent	Niall Markham 01922 654499 David Chadwick 01922 652726		
Local authority's out of hours contact numbers	0300 555 2922		
Sandwell			
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	Sandwell Safeguarding Children's Board  www.sandwelllscb.org.uk		
The Designated Officer for child protection	0121 544 6033		
Local authority children's social care referral team(s)	MASH 0121 569 8453		
Local authority Prevent Lead	Sarfraz Khan – Sarfraz_Khan@sandwellchildrenstrust.org		
Local authority's out of hours contact numbers	0121 569 3100		
Dudley			
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	Dudley Safeguarding  www.safeguarding.dudley.gov.uk		
The Designated Officer for child protection	Independent Reviewing Officers 01384 813061		

MASH Teams:		
Brierley Hill	01384 813000	
Dudley	01384 813200	
Halesowen	01384 815902	
Local authority Prevent Coordinator	John Hodt	
	01384 814736	
Local authority's out of hours	0300 555 8574	
contact numbers		
Wolverhampton		
Our school follows the safeguarding protocols and procedures of our	Wolverhampton Safeguarding Children's Board	
Safeguarding Partners	www.wolvesscb.org.uk	
The Designated Officer for child	01902 550477	
protection		
A446117		
MASH Teams:		
East Park and Bilston North	01902 558794	
Bilston East and Ettingshall	01902 558794	
Blakenhall, Spring Vale, and All Saints	01902 550670	
Penn and Warstones	01902 557935	
Tettenhall, Whitemore Reans and Dunstall	01902 550609	
Bushbury, Oxley and Pendeford	01902 556010	
Low Hill and Scotlands	01902 555927	
Wednesfield, Heathfield Park and Ashmore Park	01902 555987	
Local authority Prevent Lead	Deborah Smith 01902-551214 deborah.smith@wolverhampton.gov.uk	

Local authority's out of hours	01902 552999	
contact numbers		
Birmingham		
Our school follows the safeguarding protocols and procedures of our	Birmingham Safeguarding Children's Board	
Safeguarding Partners	www.lscbbirmingham.org.uk	
The Designated Officer for child protection	0121 675 1669	
Local authority children's social care	MASH	
referral team(s)	0121 303 1888	
Local authority Prevent Lead	Waqar Ahmed – Prevent Manager	
	0121 303 7682 / 07557 203290,	
	waqar.ahmed@birmingham.gov.uk.	
Local authority's out of hours contact numbers	0121 675 4806	

NATIONAL CONTACTS			
DfE Coronavirus helpline  If you have a query about coronavirus (COVID-19), relating to schools and other educational establishments in England contact this helpline.  NSPCC 24/7 Helpline	Email:  DfE.coronavirushelpline@education.gov.uk Tel: 0800 046 8687 Lines are open Monday to Friday from 8am to 6pm and weekends 10am to 4pm.  Tel: 0808 800 5000 Email: help@nspcc.org.uk Text: 88858		
NSPCC Child Line	Tel: 0800 1111		
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk		
DfE Prevent helpline for schools and parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk		
National Bullying Helpline	Tel: 0845 22 55 787		
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk		
Internet Watch Foundation hotline (for reporting criminal content)	www.iwf.org.uk		
National Centre for Domestic Violence	0800 970 2070		
National Domestic Abuse Helpline	0808 2000 247		
Refuge	http://www.refuge.org.uk/		

#### 2. Scope and definitions

The government has directed that school sites can only remain open to for those children who are defined as 'vulnerable', and children whose parents are key workers and considered critical to the COVID-19 response.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those children who:

- > Have a social worker, and are subject to a:
  - child protection plan
  - child in need plan
  - looked after child plan

or

> Have an education, health and care (EHC) plan

Schools should offer children who fall into the above groups a place in emergency provision (and continue to do so whilst emergency provision is available as parental need may fluctuate). The above children do **not** have to take a place if offered. The fewer children in educational settings at this time will protect the NHS and save lives by reducing the risks of spreading the virus.

#### 3. Core safeguarding principles

## The safety and wellbeing of all our pupils is <u>still</u> our number one priority whilst the school site is closed

Although we are operating in a different way to normal due to the closure of the school site in response to coronavirus (COVID-19), we are still following these important safeguarding principles:

- > The best interests of children must come first
- ➤ If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- ➤ A Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) must be available and contactable during school hours (see section 5 for details of our arrangements)
- > It is essential that unsuitable people do not enter our school workforce or gain access to children
- > Children should continue to be protected when they are learning online
- ➤ We will still have regard to the statutory safeguarding guidance, Keeping Children Safe in Education.

#### 4. DSL (and DDSL) arrangements during closure of the school site

Details of important internal and external contacts are listed in the 'Important contacts' section at the start of this addendum.

During this time of closure of the school site, the DSLs (and DDSL), wherever their location (remote or onsite facilitating emergency provision), will continue to be responsible for safeguarding, alongside the Headteacher who holds ultimate responsibility. The DSL (and DDSL) will continue to identify who the most vulnerable children in our school are with regards to safeguarding and arrange additional support as needed (and where operationally possible). They will continue to update open Safeguarding Files and liaise with parents where concerns arise.

Should **both** the DSL and DDSL be unable to work due to sickness, or **both** be unable to take responsibility for co-ordinating safeguarding due *to any other personal reasons*, they must alert the Headteacher who will nominate another member of the Senior Leadership Team to take responsibility for safeguarding on *an interim basis* until either the DSL or DDSL is able to resume responsibility. The Headteacher should alert and seek additional support from Alison Barnett (Regional Safeguarding Lead - Europe) and the Director of Education [Danuta Tomasz] if both the DSL and DDSL be absent from work at the same time. Should the Headteacher be unable to make decisions due to their own sickness/unavailability, the SLT should contact their Director of Education who will make the decision with regards to interim DSL.

In the absence of the DSL and DDSL, the SLT nominee for Safeguarding will have responsibility to continue to:

- > Identify the most vulnerable children in school and arrange support as needed for the child
- > Update Safeguarding Files, where and when necessary
- Liaise with partner agencies, including making referrals where needed
- Notify the local authority of any children who are 'missing in education'
- ➤ Notify the Police of any criminal offences that we believe have taken place e.g. online distribution of inappropriate images

- > Signpost parents to external organisations that may be able to offer them support and advice at this time
- >On site during the school closure period there will also be the Head or a member of the DSL Team.

#### 5. Reporting concerns about children

All staff must continue to act on any concerns they have about a child immediately, and report and record these concerns as per the existing Safeguarding and Child Protection Policy and Procedures 19/20; there must be **no** delay in reporting and recording concerns just because the school site is closed. It is still vitally important for staff to do this in order to safeguard any vulnerable children and/or parents who may be at risk, and it remains everyone's responsibility to be vigilant. Some children may be at increased risk at this time due to stressors in their home. Others may be higher risk due to increased time spent online. See section 10 for online safety issues.

#### 6. Reporting concerns about staff members

With regards to any concerns about a staff member's conduct during closure of the school site, we will continue to follow the principles set out in our existing Safeguarding and Child Protection Policy and Procedures 19/20 and part 4 of Keeping Children Safe in Education.

- Should parents or children raise concerns about a staff member's conduct during closure of the school site, then this will be managed as per procedure set out in our main policy.
- > Staff should continue to act on any concerns they have about any colleague by talking to the Headteacher and/or DSL in the first instance. Where *operationally possible*, they should complete a Low-Level Concern form (this document must be password protected and sent to the Headteacher; concerns about the Headteacher should be sent to the Director of Education).
- We will continue to refer staff who have deliberately harmed or pose a risk of harm to a child to the Designated Officer.
- We will continue to refer staff who have harmed or pose a risk of harm to a child to the Disclosure and Barring Service (DBS).
- We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this using the email address <u>Misconduct.Teacher@education.gov.uk</u> for the duration of the COVID-19 period, in line with government guidance.

#### 7. Inter-agency working

We will continue to work with Children's Social Care, Police, and all other external agencies involved with the care of our children, for example CAMHS/other professionals involved in supporting children's mental health. DSLs/DDSLs will continue to make referrals to partner agencies and contribute to meetings such as Core Groups and CIN/LAC Reviews (remotely or by sending documentation). Safeguarding Meetings will still take place at a minimum of 6 weeks during site closure and will be held remotely.

We will continue to update this addendum where necessary, to reflect any updated guidance from:

- ➤ Our 3 local safeguarding partners
- The Local Authority regarding children with education, health and care (EHC) plans, the local authority Designated Officer and children's social care, reporting mechanisms, referral thresholds and children in need

#### 8. Monitoring attendance

#### 8.1 Contact details

During closure of the school site, we will make sure we have up-to-date emergency contacts for all children. These will include contacts for their parents/carers, but we may also obtain additional

emergency contact details *wherever possible* just in case the parents are unexpectedly unavailable due to illness/other due to COVID-19.

<u>In addition to the above</u>, where children have <u>left the UK</u> with their parents/carers to live in another country due to COVID-19 and/or the temporary closure of the school site, or *where they have moved to a different part of the UK*, we will request the new address at which the child is residing so that we have this for our records.

Where children have <u>left the UK</u> with their parents to live in another country due to COVID-19, and are *not* intending to return to the UK or school site when re-opened, and where they have formally expressed a desire to terminate their contract, we will request the new address at which the child is residing *plus* the name and address of their onward school so that we have this for our records. This information is also required by the Local Authority. Should this information not be provided, then consideration may be given to reporting the child as 'missing from education' to the Local Authority as per statutory guidance.

Where children remain in the UK, but are *not* accessing online learning during school site closure, and/or where they have formally expressed a desire to terminate their contract, we will request the name and address of their onward school so that we have this for our records. This information is also required by the Local Authority. Should this information not be provided, and where the parent/carers have not provided a reason as to why their child is not attending school for ten days (see below), then consideration may be given to reporting the child as 'missing from education' to the Local Authority as per statutory guidance.

#### 8.2. Registering attendance

Most children will not be attending school *on the school site* at this time unless they are accessing emergency provision i.e. children whose parents are key workers, and/or they are assessed as 'vulnerable' as per the government's definition (see section 1). Numbers of children attending emergency provision must be reported to the government *and Cognita* by midday, every day. Please see short form notifying the Department for Education.

For **all** children on roll, our taught curriculum is continuing, and online learning is our method for delivery at this time. It is critical that we maintain attendance registers so that we can be sure that children are engaging with our online learning curriculum, but also in order to ensure they are safeguarded.

We will be registering children's attendance by 9.15 am and at the start of the afternoon session each day.

#### 8.3 Non- Attendance during closure of the school site

During this period of closure of the school site, it is expected that **all** children on the school roll should attend school **every day** and engage with their online sessions and set learning activities (whether they have remained in the UK, OR we have been informed that the family left the UK to reside in another country)

If any child does **not** attend their online school learning, we will:

- > Follow up on their absence in the normal manner with their parents or carers (or other emergency contact) by contacting them, on the same day where operationally possible
- > Notify their allocated Social Worker, where they have one

We will continue to do this every day that the child does not attend, and where their parent/carer **does not** inform us that the child is unwell/other reason for not attending where operationally possible

\*Schools will bear in mind the potential impact of the current situation on children's attendance. It is likely that some children may not be able to access online learning if their parent (s) become unwell or are required to care for others (or scenarios where one parent is working and the other is unwell). In these situations, attempts will be made to sensitively contact the parent (s)/carers/emergency contacts to ascertain the current family situation and identify who is the adult caring for the child. Where a

member of the family is seriously ill in hospital, it will not be expected that the child will be in attendance, and the situation should be monitored.

#### 8.4 Children Missing in Education

Where children do not engage with their online school learning for a period of 10 days despite school attempts to contact the parents and engage the child, and where we have **not** been notified by their parent/carer/emergency contact the reason for the child's absence, then we will notify the Local Authority and report the child as 'missing in education' as per our statutory duty.

If this child is assessed as currently vulnerable, or where there were safeguarding concerns about the child prior to the closure of the school site (but they did **not** have an existing Social Worker), then consideration *may* be given to referring our concerns to Children's Social Care, as per our main Safeguarding and Child Protection Policy and Procedure 19/20 when we have concerns about the safety of a child.

### 9. Supporting children's emotional wellbeing during closure of the school site

Although we are operating in a different way to normal due to closure of the school site in response to coronavirus (COVID-19), we will continue to support the emotional wellbeing of all pupils in partnership with their parents/carers who hold main responsibility for meeting their child needs. Additional support will be offered where operationally possible, and in term time only.

Schools will follow the protocol included in "Guidance in relation to supporting children's emotional wellbeing during school site closure"

#### 9.1 Pastoral provision

Some children, prior to the closure of the school site, were receiving *pastoral* support in the form of informal daily or weekly check-ins with nominated staff. For any child who was receiving such support prior to closure, or who now has identified pastoral need, provision will be put in place to support them at this time of closure of the school site.

Teachers will use opportunities during small group sessions to establish any pastoral concerns. In the event they do find a concern, the teacher should contact their Head of School to enable a Teams meeting to be set up with two staff members and the child to address the concern. Support could include offers of two to one check-ins with the child with parental permission, signposting to external organisations or helplines.

#### 9.2 Group weekly 'Wellbeing Check-ins'

**All** children will be offered <u>weekly</u> 'Wellbeing Check-ins where operationally possible during the closure of the school site. These sessions will require parental permission, be held in **groups**, and will take place via Microsoft Teams. These sessions will be recorded in order to protect the children and staff.

#### 9.3 Individual wellbeing check-ins

Those children who are identified as requiring further emotional wellbeing support, in addition to the above group sessions, will be offered additional *individual* support (where operationally possible) during the closure of the school site. These sessions will be facilitated by two members of staff in order to safeguard the child and professionals. This session will require parental permission and take place via Microsoft Teams.

We will also signpost all pupils, parents and staff to other resources to support positive emotional wellbeing at this time.

#### 10. Online Safety (including peer on peer abuse)

Whilst there is no statutory guidance relating to facilitating online lessons, children should continue to be protected when they are online during school site closure. Existing policies and procedures should be followed as far as reasonably and operationally possible, plus new guidance with regards to remote and online learning. The starting point for online teaching should be that the same principles apply as set out in the school's Code of Conduct, particularly with regards to maintaining clear professional

boundaries. The DSL should be available and contactable during school hours in case an issue is encountered in remote/online teaching. Staff should **not** use any personal IT equipment.

### 10.1 In schools where emergency provision is being offered for children of key workers, those children who have an EHCP, and those children who have a Social Worker:

We will continue to have appropriate filtering and monitoring systems in place *in school* during this time of closure of the school site but where emergency provision is offered. If local IT staff are unavailable for support, our contingency plan is to send request into Cognita helpdesk (servicedesk@cognitaschools.co.uk).

Where staff are in school but interacting with children online e.g. facilitating teaching sessions, they will continue to follow our existing Safeguarding and Child Protection Policy and Procedures 19/20 and other relevant school policies e.g. Digital Learning/Acceptable Use.

#### 10.2 Outside school

Where staff are interacting with children online during school site closure from a remote setting (i.e. their home), they will continue to follow our existing Safeguarding and Child Protection Policy and Procedures 19/20 and other relevant school policies e.g. Digital Learning /Acceptable Use policy, plus new guidance with regards to remote and online learning. Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 5 of this addendum.

We will make sure children know how to report any concerns they have by using the Chat function in Teams or by sending or recording a message to their teacher in Seesaw.

**One to one working** one to one teaching should take place other than that agreed by the Headteacher. Anyone to one working should be facilitated via Microsoft Teams and the session must be recorded in order to safeguard the child and professional. The parent and facilitator of the lesson will be asked to read, understand and agree to follow the protocol provided in the following guidance:

- Guidance for Headteachers in relation to supporting children with an Education, Health and Care Plan (EHCP) and those with additional learning needs
- > Guidance around peripatetic teachers delivering one to one online sessions
- > Guidance in relation to supporting children's emotional wellbeing during school site closure

Where existing contracts existed between peripatetic teachers/private counsellors and parents, but were facilitated on school premises, these should continue to take place as outlined in the guidance above where absolutely possible. If this is not possible, due to the year group of the child and/or platform for learning, then the peripatetic teacher/counsellor and the child's parents can continue their private arrangement outside of Cognita policy; this private arrangement will not be arranged or involve Cognita staff, and all parties should be made aware of the changes.

#### 10.3 Supporting parents and carers

We will make sure parents and carers:

- > Are aware of the potential risks to children online and the importance of staying safe online
- ➤ Understand the balance between taking an interest in what the child is doing online whilst respecting their child's a right to privacy (older children)
- ➤ Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- ➤ Know where else they can go for support to keep their children safe online, including how to set parental controls and filtering (<a href="https://www.internetmatters.org/parental-controls/">www.internetmatters.org/parental-controls/</a>)

#### 10.4 Peer on Peer abuse

Whilst arguably *direct* peer on peer abuse *may* be less likely to occur during this time of closure of the school site, and the government directive around social distancing, we are mindful that our children *may* be increasingly vulnerable to *online* peer on peer abuse. This may arise in the form of cyber bullying, coercion, sexting, and the sharing of indecent images/inappropriate content. We will continue to follow the principles set out in our main Safeguarding and Child Protection Policy and Procedures 19/20 and part 5 of Keeping Children Safe in Education when supporting victims of online peer-on-peer abuse. Staff should continue to act on any concerns they have immediately by following normal process and informing the DSL.

We will support the children to know:

- Who they can contact for help and support with regards to online bullying and/or online peer on peer abuse
- How the school will manage the above if occurring during school lessons, including sanctions if pupils transgress guidelines

#### 11. Staff recruitment, training and induction

#### 11.1 Recruiting new staff and volunteers

We continue to recognise the importance of robust safer recruitment procedures, so that Cognita employees, third party contractors and volunteers who work in/for school are safe to work with children.

Whilst school sites are not open, other than for emergency provision, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at our school.

#### 11.2 Staff 'on loan' from other Cognita schools

Staff 'on loan' from other Cognita schools, and Cognita owned companies e.g. the Active Learning Group working in our school will have received the appropriate checks so there is no need to complete a risk assessment. Where a risk assessment is already in place for that staff member, this will need to be reviewed prior to that staff member being able to be 'on loan'.

#### 11.3 Safeguarding induction and training

We will make sure any new staff employed during the closure of the school site are aware of changes to our procedures and local arrangements.

New staff will continue to receive:

- > A safeguarding induction from the DSL
- ➤ A copy of our Safeguarding and Child Protection policy and procedure (and this COVID-19 addendum)
- > A copy of our Code of Conduct
- ➤ Keeping Children Safe in Education part 1

<u>All new starters during</u> the closure of the school site <u>will also be required to sign the Annual Declaration.</u>

We will decide on a case-by-case basis what level of safeguarding induction staff 'on loan' from other Cognita school's need. In most cases, this will be:

- ➤ A copy of our school's Safeguarding and Child Protection policy and procedure (and this COVID-19 addendum)
- > A copy of our school Code of Conduct

- ➤ Confirmation of **our** school's local processes
- > Confirmation of our school's DSL arrangements

#### 11.4 Keeping records of who is on site when offering emergency provision

We will keep a record of which staff are on site each day offering emergency provision and ensure that appropriate checks have been carried out for them.

We will continue to keep our Single Central Record (SCR) up to date.

We will use the SCR to log everyone working at our school each day including staff 'on loan'

## 12. Emergency Provision- where a child is attending a different setting

#### **OPTION 1: where you do NOT offer emergency provision**

Where it has been agreed that a child on our roll is temporarily attending another Cognita school's emergency provision (due to this setting being closer to their residence, or if we are **not** operationally able to offer emergency provision), we will make sure the receiving school is provided with all emergency contacts for that child and their address, plus any relevant learning need/safeguarding information. Our DSL (or DDSL) and/or special educational needs co-ordinator (SENCO) will share, as applicable:

- > The reason(s) why the child is being offered emergency provision (keyworker child/vulnerable child)
- > Why the child is considered vulnerable and any arrangements in place to support them
- > The child's EHC plan, child in need plan, child protection plan, Looked After plan, or personal education plan
- > Details of the child's Social Worker
- > Details of any virtual school head (where applicable for LAC)

Where the DSL, DDSL or SENCO cannot share this information, the senior leader(s) identified in section 4 will do this. This information will be shared before the child arrives as far as is possible, and otherwise as soon as possible afterwards. The child's parents will be notified that we have a duty to share this information, unless to do so would place the child at risk (where the child is Looked After, and the parents are not privy to their location whilst they are in care).

#### **OPTION 2: where you DO offer emergency provision**

Where it has been agreed that a child, who is not normally on our roll but whom attends another Cognita school, can temporarily attend our school's emergency provision (due to our setting being closer to their residence, or if their normal Cognita school is unable to offer emergency provision), we will request all emergency contacts for that child, plus any relevant learning need/safeguarding information from their normal setting. Our DSL (or DDSL) and/or special educational needs co-ordinator (SENCO) will request;

- > The reason(s) why the child is being offered emergency provision (keyworker child/vulnerable child)
- > Why the child is considered vulnerable and any arrangements in place to support them
- >The child's EHC plan, child in need plan, child protection plan, Looked After plan, or personal education plan
- ➤ Details of the child's Social Worker
- > Details of any virtual school head (where applicable for LAC)

Where the DSL, DDSL or SENCO are not available to request this information due to illness/other personal reason for being off work, the senior leader(s) identified in section 4 will do this. This information will be received from the child's normal school setting before the child arrives at our emergency provision, and otherwise as soon as possible afterwards in cases of emergency. The child's parents/carers will be notified by their child's normal Cognita school that we have requested this information, unless to do so would place the child at risk (where the child is Looked After, and the parents are not privy to their location).

#### 13. Policy review arrangements

This policy will be reviewed centrally by Cognita as guidance from the Department for Education is updated, and/or as a minimum every four weeks by Alison Barnett (Regional Safeguarding Lead – Europe). At every review, any changes or amendments will be approved by Simon Camby (Group Director of Education) and Jayne Pinchbeck (Group Legal Counsel)