

## **Appendix 3 - Peer on Peer Full Council Recommendations – published September 2020.**

The following is a summary of the document recommendations agreed at full council. The text is a direct copy of the recording section from the initial review and the text in red is a brief summary update on each. Please be aware that this was not commissioned as a full report on all things peer on peer but a specific and time limited review of historic cases for a specified period. We have tried to make recommendations that answered the specifics of the cases but also broadened into some general observations for a general approach to contextual good practice.

The text in Red is a specific summary (May 2021) on the progress made on each one.

### **1 RECOMMENDATIONS**

3.1 The 'what could we have done differently?' section above, alongside the recommendations agreed during the spotlight review, leads to the following recommendations:

Attached to each recommendation is a suggested timeline - these are subject to comment and approval by scrutiny panel.

- Continue to improve the quality of recording on MOSAIC for any cases, including peer on peer cases. This has improved significantly since 2017 but this review found that it could be improved yet further by maintaining the quarterly audit (already in place) on all cases and adding occasional sampling exercises to identify if recording is not adequate. In particular, record keeping should indicate what advice was given and what actions were taken and there is evidence that this is now taking place.

(Monthly audits starting September 2020 and to be conducted by education safeguarding officer)

A monthly review of the quality of the recording on mosaic has been completed since September 2020. These findings are then reported up to the quarterly Performance and Challenge meetings attended by officers and councillors. The first session this would have been available to report to was in the Spring term 2021 – however as schools were closed by then and dealing with the demands of partial closure meant the agenda was full, it was agreed the next opportunity would be March 2021. This was done – the presentation is attached as Appendix 4. It shows that although the quality of recording and follow up is much improved but still stubbornly variable. There is confidence that cases are not missed and that they are dealt with accordingly, but the tensions between confidentiality and full detail still show in some records.

- Issue wider guidance than the national expectations - by looking at all legislation that may impact on such cases. There is a timely opportunity to do this now. The national guidance, Keeping Children Safe in Education, has been updated again in July 2020 and a key appointment to support this work has recently been made in Herefordshire. Whereas schools, in general, have a right to implement their own

policies (partly because the process by which any policy is agreed is a key component of any policy), a model exemplar should now be issued given the importance of this issue. Herefordshire Council cannot enforce schools to adopt it however. The context around this issue has moved on considerably since 2017 and what was deemed appropriate then is no longer adequate if we are to learn from our experiences. There is an opportunity now to set an exemplar policy which can be leading edge practice.

(policy to be re-issued by Children's and Families Directorate by the end of January 2021 to allow for external consultation)

This is now completed – The general guidance was written in partnership with the University of Bedfordshire and was made subject to a full consultation. It is intended for use by schools when dealing with cases of peer on peer sexual abuse. It was a detailed and iterative process which also involved partner agencies and national experts. It was shared with both Ofsted and DFE for information only.

The policy was issued in April 2021 (the delay was in part a lengthy but detailed consultation process and because schools were partially closed during the Spring term 2021) and associated training is now underway.

- Reconsider what we do in terms of sharing risk assessments. A risk assessment has been shared with all schools (Autumn 2019). This is not the exact one produced in 2017 and things have progressed since then. Schools are ultimately responsible for their own risk assessment processes and multiple forms and guidance are now available. More importantly, we can provide guidance in completion of the process of risk assessments. There is a danger that multiple pro formas may confuse, but training in the process of risk assessment and prevention would outweigh this danger. The newly appointed safeguarding officer will lead on this aspect.

(to be a regular process but to be established by December 2020)

This is now completed. The reviewed risk assessment requirements are included in the new model guidance and now shared with all schools. This was also delayed from December 2020 but issued in April 2021. The Education Safeguarding Lead will be delivering training on these in June and July.

- Continually review and check that information is passed between educational settings where individuals known to have been either alleged victim or alleged perpetrator and who are moving between settings is shared. To protect confidentiality and sensitivity this process should be supported by the Local Authority and not left to individual settings to complete. Although there is an existing protocol, the newly appointed safeguarding officer should hold this responsibility as part of the role. For example, an alert system should be established in MOSAIC to identify when individuals are likely to be moving settings.

(to be established by the education safeguarding team by the end of December 2020) (to be established by December 2020 to allow time for consultation)

This is complete. This practice is now in place although two aspects since have emerged as needing further consideration. The first is where pupils move between counties when they move schools. This is more complex and we are considering how best to manage this. It is currently done via e mails, largely completed by the education safeguarding officer. The obvious risk is that cross council communication is less well monitored. The various referral routes do not make this easy.

The second is where pupils leave schools and then quickly return. This rare but important situation is now being managed by a notification process which mirrors the original process. In reality the schools are aware but the process of notification could be made more rigorous in this context.

- Establish a planned approach to engaging with families (and children) impacted by peer on peer abuse. This is to include the seeking of their views and from a starting point of belief and with the consent of the families. This would include the schools involved. The level of engagement needs to also take account of equalities legislation and allow for appropriate extra counselling to be offered.

(to be completed by January 2021 - safeguarding officer)

This is now in place but not yet publicised widely – which it now needs to be – and was delayed by the pandemic and the response of partner agencies and other local authorities. The recommendation was that an agency independent of the council undertook this on our behalf. Various partners were approached and eventually either disengaged or rejected the request. A successful partnership was agreed in May 2021. Then delay in publicising it is whilst the best possible approach to them is agreed. We expect this to be finalised by the end of May 2021. This also relates to the process of reconciliation – see later.

- Establish a school support network (using existing groups) to provide help and advice in the event of any cases, but particularly long standing cases. For example, this could include a network of expert Designated Safeguarding Leads (DSLs) to advise and new DSLs, support schools and families.

(to be established virtually by December 2020)

This is now complete and all schools will be made aware via the current training modules. New DSLs are paired with experienced DSLs to ensure that they have further support should they require it.

- Propose, via a development with DfE (and Ofsted), a methodology of capturing high quality data to allow authority areas to benchmark the incidence and severity of peer on peer sexual abuse cases. The national system is not transparent enough as yet and Herefordshire, given recent efforts and advice, is well placed to contribute to improving the quality and clarity of data on peer on peer sexual abuse.

(initial proposal to be shared with DFE and Ofsted by end of November 2020 – completed)

This is complete – DFE and Ofsted have been kept informed of our work via monthly contact. DFE are in approval of the model guidance and associated training. Regrettably, they do not yet plan to change the way they collect or use data and are not yet able to share county level data (which was the hope) – this may now change as they have invited us to be involved in monitoring the delivery of their new Sex and Relationships Education (also delayed by the pandemic) and have recently begun an investigation into their response to the 'Everyone's Invited sexual abuse in school website data. This is a proposal which is still in the very early stages of consideration but offers an opportunity to re-engage.

Ofsted do not share data beyond occasional inspection outcomes which is an unsatisfactory approach. This may also change as they have been asked to undertake the review into the 'Everyone's Invited' website and sexual abuse allegations in maintained and independent schools. This report is due by the end of May but is proving controversial ('are Ofsted appropriately expert to conduct such a review' – opinion is divided).

- Ensure that all new members of staff appointed to the Directorate are given a wider safeguarding strand in their induction, which should include peer on peer sexual abuse. This should be aimed at prevention and risk assessment rather than historic analysis. It would help make Herefordshire a benchmark for good practice in this regard.

(initial induction activity to be in place by end of September 2020)

This is largely complete but two aspects have developed since this recommendation. Induction was conducted by individual sessions with new permanent staff. This thus missed agency staff and temporary staff. In recent weeks there has been much activity in this regard. The Education Safeguarding Lead worked with HR and business support to deliver safeguarding training including peer on peer abuse to all new starters from January 2020. An on line module is being developed by the principal social worker to ensure a more efficient way of inducting staff into safeguarding and peer on peer training is in place. This is not yet completed.

- That the council consider funding additional resources to support further peer on peer abuse training, in particular to support the educational specialist safeguarding post covering peer on peer abuse work (this post now exists - but additional resources available for peer on peer abuse training should be considered).

This is complete but the funding is coming from an existing school improvement budget. Although this is an appropriate use of such funding it is not additional but a refocus of funding. The next stage of this work is to move the focus of peer on peer sexual abuse to more broadly into contextual safeguarding rather than a simple

focus on schools. This will widen the need and a such additional resources may need to be made available.

(additional training is already arranged by Safeguarding Officer)

- That Herefordshire produces an exemplar peer on peer safeguarding guidance and model policy which is issued to all settings. It is acknowledged that whilst all schools deal with Peer on Peer abuse in their safeguarding policy as well as in other policies (such as a school behaviour policy, the anti-bullying policy and the online safety policy - cyberbullying and sexting) schools now need to be more clear and specific about their strategies around wider behaviours relating to sexist and sexual bullying, sexual harassment and sexual violence. In all cases adoption of such a policy is inevitably voluntary (schools will have much in place already) but an exemplar will help with review work. There is the opportunity that given the experiences thus far, Herefordshire can become a centre for excellent practice in this area, in particular by adopting the good work done in this issue, such as by Suffolk and Nottinghamshire Local Authorities. This cannot be easily achieved without the following recommendation however.

(this is in train already - the model guidance is attached and will be issued once final partner consultation is completed. This guidance has been written in partnership with other specialist organisations - but will be reviewed annually in the light of additional expertise provided by a wider set of organisations.)

Complete – training associated with the policy and guidance is underway. (May 2021). The model guidance has been shared widely but will be kept under review as expertise develops and commentaries are added.

- Finally - Herefordshire Council needs to further acknowledge that the impact of such cases on the families and the children involved (irrespective of any findings) is likely to be profound. An apology has already been given for some of the early work - but we could do more. The council should strongly consider establishing and adopting a **process of reconciliation**; offering any family who wishes to use it an opportunity to share their experiences in a safe space with independent and expert support. Although we recognise there is as yet no formal process for such a statement (and as such the reconciliation process would need to be established and is likely to differ for each case), the opportunity it would present is the key. This is not intended to take the form of counselling sessions - that process differs - but rather a space where those who wish it can speak freely to have their voices listened to). If anything positive can come from such experiences then giving a voice to those who have experienced it can be something. It is also a better way of harnessing the experiences within the county to develop more leading edge practice. This cannot be achieved unless the voices of those affected are heard.

(timeline for consulting, engaging and establishing this process needs to start as soon as scrutiny / council agree)

This recommendation has been delayed, for which we apologise, but is now approaching finalisation. There were three main reasons for the delay. The first was that such a process is unique and had not been developed. The second was caused by delayed responses from organisations and partners approached as a result of the pandemic and the third was in finding a suitable partner who would agree to do this.

It was intended to be a blend of counselling for those who needed / requested it (however long after any incident it was asked for) – it was also potentially a need for an independent legal context where individual could discuss in confidence the circumstances of the family need and thirdly an awareness of the socio, educational, legal and emotional support services that may be required whilst acknowledging that each approach would require a bespoke response. It required a partner who could triage each case and have the full set of expertise and awareness to do so successfully. They also had to be fully independent of the council.

We have now sourced such a partner who is able to undertake this work on our behalf (late April 2021) and their suggestion is that the process would involve the following:

Stage 1 – make an offer and monitor how many respond and what the level of need is (hard data for the council but with no personal details).

Stage 2 – Remain fully independent – their responsibility is to the families not the council

Stage 3 – Listen – this may take more than one session.

Stage 4 – assess or triage the need for help and signpost accordingly.

Stage 5 – feedback to the council outside of the individual cases to strengthen lessons learned.

The initial contact will be via a web address and a reconciliation and mediation process by a service based out of county.

This is a significant offer and commitment by the council and whilst we regret the delay it is intended to be a permanent service and contractual arrangements are underway. There is also a second alternative being planned with a service closer to home which may help for families who need face to face support. The arrangements are almost complete.