



Department  
for Education

**Consultation Response Form**

**Consultation closing date: 20 June 2013**  
**Your comments must reach us by that date.**

**Keeping Children Safe in Education**  
**Consultation Response Form**

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

**Please tick if you want us to keep your response confidential.**

Reason for confidentiality:

Name	Natalie Williams
Organisation (if applicable)	The Children's Society
Address:	Edward Rudolf House Margery Street London WC1X 0JL

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can telephone: 0370 000 2288 or send an email via the Department's ['Contact Us'](#) page.

Please mark the category which best describes you as a respondent

Headteacher/Principal Teacher Governor School/college support staff Local authority Union Charity **Voluntary group** Other

Please Specify:

**About us:**

The Children's Society is a leading national charity, providing vital help to the most vulnerable children, young people and families in our society through a range of services. We work with over 48,000 children each year, supporting them and advocating on their behalf to tackle discrimination or disadvantage in their daily lives. We have campaigned to protect young runaways through policy and practice for over 25 years.

**Our work with young runaways and children at risk of sexual exploitation**

We run nine projects working with children who run away or are at risk of sexual exploitation, supporting more than 1000 children every year. We provide a range of targeted services including return home interviews, one-to-one intensive support to both young people and their families and awareness raising sessions for professionals and children. Our services provide a safe haven where children can go for independent and confidential help, advice and support.

We have chosen to respond only to Question 3 as it is most relevant to our work. Our response is informed by learning from our direct work with children and young people and our research.

1 a) Do you support the removal of the regulation that requires Secretary of State approved safer recruitment training for at least one member of a recruitment panel?

Yes       No       Not Sure

Comments:  
N/A

1 b) If no, why do you believe it is necessary to keep the requirement?

Comments:  
N/A

2 a) Have you taken the safer recruitment training course in the last year?

Yes

No

Comments:

N/A

2 b) If yes, do you think that the nationally prescribed training met your training needs or would your needs have been better met with a programme tailored to your requirements?

Comments:

N/A

3 a) Do you agree that *Keeping Children Safe in Education* guidance should set out the minimum legal and statutory requirements and beyond that give schools and further education colleges autonomy to use their own judgement to decide how to keep children safe?

Yes

No

Not Sure

Comments:

3 b) If no, why do you believe it is necessary to retain centrally prescribed guidance and training?

Comments:

We agree that schools and further education colleges should have the autonomy to use their own judgement to decide how to keep children safe but we believe that only including the minimum legal and statutory requirements risks omitting vital safeguarding procedures that staff should be aware of and apply to be able to identify children at risk of abuse or exploitation as early as possible. This particularly relates to procedures regarding children who run away or go missing which are not legal requirements. Schools have a vital role in identifying and supporting these children.

The Home Affairs Select Committee's report *Child Sexual exploitation and the response to localised grooming* published in June this year highlights evidence that schools are often the first to become aware of things not being right in child's life but that they do not always act on these concerns or communicate them further to people who can respond.

The Children's Society's recent report *Lessons to Learn* (The Children's Society, 2012) found that schools professionals are often not aware of the warning signs that a child has run away from home and might be in danger. The report found that that schools staff often fail to spot the signs when a young person is running away but still attending school – such as tiredness, lateness, dirty clothes, being hungry or displaying challenging behaviour.

It also found that schools professionals were not picking up or acting on patterns of frequent unauthorised absence which could mean that a child is running away and in great danger. Our research has shown that children who have problems with attendance at school are three times more likely to run away. (*Lessons to Learn*, The Children's Society, 2012).

Every year, 100,000 children run away from home or care in the UK (*Still Running 3*, The Children's Society, 2011). They often run from serious problems at home such as family breakdown, abuse, neglect or problems at school such as bullying or unmet special educational needs. Some children run away because they are under the influence of controlling individuals who target them for sexual exploitation or criminal activity.

When children run away they are at risk of physical abuse, sexual exploitation or being forced to resort to highly dangerous survival strategies such as stealing or begging to survive (*Still Running 3*, The Children's Society, 2011). The recent Office of the Children's Commissioner's inquiry found that 65% of the sexually exploited children who were interviewed were not attending school (*I thought I was the only one in the word*, The Office of the Children's Commissioner's Inquiry into Child Sexual Exploitation In Gangs and Groups Interim Report, 2012).

According to the DfE guidance on attendance, schools are also required to collect and monitor data on frequent unauthorised absences and send these to the local authorities but our research found this was not always happening. This can mean staff can fail to identify patterns of absence which may be a sign that a young person is running away and at great risk.

The Home Affairs Select committee makes a recommendation which states *'Teachers are more likely to see victims on a regular basis than almost any other professional. They will notice recurrent or prolonged absences and significant changes in behaviour. They are therefore key in identifying children at risk at an early stage and, by raising concerns at an early stage, being able to potentially stop the grooming process before the sexual exploitation has begun. We have asked the Minister to look, once again, at the relationship between schools and local authorities in regards to highlighting concerns about missing children. We recommend that the Government ensure that all teachers are provided with the list of warning signs for child sexual exploitation and the contact details of a named individual within the local authority that they can contact with any concerns. We again recommend that schools should be reminded annually of their statutory responsibilities in this matter by the Secretary of State.'*

**We believe that *Keeping Children Safe in education guidance* should set out more than just the minimum legal and statutory requirements. It should include the list of all relevant procedures and processes, i.e. those that relate to missing children and children absent from education that can support teachers adequately safeguard children and protect children from harm by identifying these vulnerable children early and working together with other professionals to respond to the needs of the child.**

4 Please use this space for any other comments you would like to add.

Comments:

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

**E-mail address for acknowledgement:** [Natalie.williams@childrenssociety.org.uk](mailto:Natalie.williams@childrenssociety.org.uk)

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before;
- departments will need to give more thought to how they engage with and consult with those who are affected;
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 20 June 2013

Send by post to: Safeguarding in Education Team, Department for Education, Area F, Level Ground, Mowden Hall, Staindrop Road, Darlington DL3 9BG.

Send by e-mail to: [Safeguarding.CONSULTATION@education.gsi.gov.uk](mailto:Safeguarding.CONSULTATION@education.gsi.gov.uk)