



Safeguarding Sub (Community & Children's Services) Committee

Date: THURSDAY, 12 MAY 2022

Time: 2.00 pm

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Ruby Sayed (Chairman)
Helen Fentimen (Deputy
Chairman)
Joanna Abeyie
Anne Corbett
Mary Durcan
Alderman Gregory Jones, QC
Ceri Wilkins
1 x vacancy

Enquiries: julie.mayer@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

<https://youtu.be/y57qAxKMr00>

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To approve the public minutes of the meeting held on 7th February 2022.

For Decision
(Pages 7 - 16)

4. **CITY AND HACKNEY SAFEGUARDING CHILDREN PARTNERSHIP (CHSCP)
CHILD Q PRACTICE REVIEW**

Report of the Director of Community and Children's Services.

For Information
(Pages 17 - 64)

5. **THE PROVISION OF ALTERNATIVE ACCOMMODATION TO FAMILIES WHERE
CHILDREN HAVE DIED**

Report of the Director of Community and Children's Services.

For Information
(Pages 65 - 68)

6. **EDUCATION WELFARE SERVICES AND SCHOOL ATTENDANCE AND
PERSISTENT ABSENCE**

Report of the Director of Community and Children's Services.

For Information
(Pages 69 - 76)

7. **VIRTUAL SCHOOL INTERIM UPDATE REPORT**

Report of the Director of Community and Children's Services.

For Information
(Pages 77 - 82)

8. **THE EARLY YEARS SERVICE - SAFEGUARDING CHILDREN UPDATE**

Report of the Director of Community and Children's Services.

For Information
(Pages 83 - 90)

9. **SPECIAL EDUCATIONAL NEEDS AND DISABILITY (SEND) - UPDATE REPORT**

Report of the Director of Community and Children's Services.

The appendices to this document are very large and will be circulated to Members separately. They are also available on the Sub Committee's web page.

For Information
(Pages 91 - 96)

10. **CHILDREN AND FAMILIES SERVICE PERFORMANCE - MONTH 11 2021/22
(FEBRUARY 2022)**

Report of the Director of Community and Children's Services.

Members are asked to note 2 non-public appendices at agenda item 21.

For Information
(Pages 97 - 100)

11. **CHILDREN'S SOCIAL CARE AND EARLY HELP SERVICE DEVELOPMENT 2022-23**

Report of the Director of Community and Children's Services.

For Information
(Pages 101 - 116)

12. **PARTICIPATION SERVICE - CHILDREN IN CARE COUNCIL**

Report of the Director of Community and Children's Services.

For Information
(Pages 117 - 120)

13. **MULTI AGENCY CHILD EXPLOITATION (MACE) FORUM UPDATE**

Report of the Director of Community and Children's Services.

For Information
(Pages 121 - 126)

14. **MODERN DAY SLAVERY**

Report of the Director of Community and Children's Services.

For Information
(Pages 127 - 130)

15. **CHILD PERFORMANCE LICENCES**

Report of the Director of Community and Children's Services.

For Information
(Pages 131 - 152)

16. **ADULT SAFEGUARDING PERFORMANCE REPORT, Q3 YTD 2021/22**

Report of the Director of Community and Children's Services.

Members are asked to note a non-public appendix at agenda item 22.

For Information
(Pages 153 - 156)

17. **PAN LONDON - CHILDREN IN CARE COUNCIL**

Report of the Director, Partnership for Young London.

For Information
(Pages 157 - 162)

18. **QUESTIONS OF MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

19. **ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT**

20. **EXCLUSION OF THE PUBLIC**

MOTION, that – under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

21. **CHILDREN AND FAMILIES SERVICE PERFORMANCE - MONTH 11 2021/22
(FEBRUARY 2022) - NON PUBLIC APPENDICES**

(Pages 163 - 180)

22. **ADULT SAFEGUARDING PERFORMANCE REPORT, Q3 YTD 2021/22 - NON
PUBLIC APPENDIX**

(Pages 181 - 196)

23. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE
SUB-COMMITTEE**

24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND
WHICH THE SUB-COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE
PUBLIC ARE EXCLUDED**

SAFEGUARDING SUB (COMMUNITY & CHILDREN'S SERVICES) COMMITTEE

Monday, 7 February 2022

Minutes of the meeting held at 2.00 pm

Present

Members:

Ruby Sayed (Chairman)	Marianne Fredericks
Randall Anderson (Deputy Chairman)	Susan Pearson
Mary Durcan	Deputy Elizabeth Rogula
Helen Fentimen	

Officers:

Chris Pelham	- Assistant Director, People - Community and Children's Services
Sharon Cushnie	- Community and Children's Services
Pat Dixon	- Community and Children's Services
Rachel Talmage	- Community and Children's Services
Teresa Shortland	- Community and Children's Services
Ellie Ward	- Community and Children's Services
Kirstie Hilton	- Community and Children's Services
Robert Wood	- Community and Children's Services
Greg Knight	- Community and Children's Services
Julie Mayer	- Town Clerks

1. APOLOGIES

There were no apologies.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

3. MINUTES

RESOLVED, that – the public minutes and non-public summary of the meeting held on 4th November 2021 be approved, subject to an amendment under Item 8 (Adult Skills Education and Apprenticeship Service) stating that all tutors 'must have at least a Level 2 Safeguarding Certificate'; and this should not be 'assumed' as stated in the draft minutes.

4. CITY & HACKNEY SAFEGUARDING CHILDREN PARTNERSHIP (CHSCP) - ANNUAL REPORT 2020/21

The Sub Committee received the City and Hackney Safeguarding Children Partnership Annual Report for 2020/21, which reported on activity between 1st April 2020 and 31st March 2021. Members noted the change in structure from previous reports, with a stronger focus on evidence, impact, assurance and

learning; making it easier to draw on areas which are tested in respect of local safeguarding.

RESOLVED, that – the report be noted.

5. CHSCP UPDATE RE SEXUAL ABUSE IN SCHOOLS AND COLLEGES

The Sub Committee received a report of the City and Hackney Safeguarding Children Partnership which updated Members on the work being undertaken in response to Ofsted's report on sexual abuse and harassment in schools and colleges; published in June 2020. Members noted that the CHSCP has been working with partners and schools to address the learning from the report.

During the discussion, the following points were noted:

- a) The death of Sarah Everard had resulted in a much stronger focus on violence against women and girls (VAWG).
- b) Victims of harassment and abuse can post testimonials on the '*Everyone's Invited*' website, which currently has 60,000 posts, many from schools and colleges. Ofsted had made it clear that Headteachers should take an active position, even if there are no references on the website, and must not assume that it has never been an issue.
- c) The Local Authority Designated Officer (LADO) met with Headteachers and, whilst there are currently no significant concerns, had found them to be very pro-active in training, raising awareness and gaining feedback. An officer from Transport for London had spoken to the Girls' School about sexual harassment on public transport and confidential help is available. The LADO also works closely with the Public Protection Team and the Education Safeguarding Forum.
- d) A joint project with the Community Safety Team, on tackling domestic violence, had been piloted in one school and, due to its success, it would be expanded into all schools, focussing on those with special educational needs and disability (SEND) who might be more vulnerable. Additionally, the SEND Advisor has visited all schools.
- e) Safeguarding partners focus on social media and technology, as they are accelerants for harassment, together with peer-on-peer abuse and cyber bullying. The City Corporation has been actively promoting the 'Safer Schools App', which was launched after the first lockdown. The app contains information about staying safe on line and how adults can be alert to the risks.
- f) The Education Safeguarding Forum was originally set up for City of London Corporation Schools but now includes all City-sponsored Academies and education providers in the Square Mile. Schools in Hackney and Southwark have been invited to join, notwithstanding their own local authority statutory duties. This report is due to be presented

to the next Education Safeguarding Forum, with feedback from today's meeting.

- g) Students over 18 in City accommodation are covered by the same safeguarding arrangements which apply to all adults living in the City. Young people (under 18) living in the City, but educated outside, are covered by the respective local authorities and the City Corporation works closely with them.
- h) The Education Welfare Officer visits schools every term to investigate cases of persistent absence and local authority or City Corporation referrals.
- i) There is an expectation within the Safeguarding Partnership that all schools are a 'relevant agency' and have a statutory duty to co-operate with local arrangements. When the partnership was launched, there was a 6-month initial period followed by the pandemic, which might have interrupted embedding. Officers accepted that there might be more work needed to strengthen understanding and this would be raised at the next Education Safeguarding Forum.

RESOLVED, that – the report be noted.

6. CHILDREN'S SOCIAL CARE AND EARLY HELP SERVICE DEVELOPMENT PLAN UPDATE

The Sub Committee received a report of the Director of Community and Children's Services on the work of the Children's Social Care and Early Help Service, which provided an update on the current position in respect of staffing activity and the impact on children and their families.

Members noted that management capacity had been increased in response to the rise in the number of unaccompanied asylum seeking children and, once the Target Operating Model had been implemented, there would be more social workers in post. A Member commented on the City's rigorous fostering assessment criteria, and it was noted that many looked after children, including unaccompanied asylum seekers, develop lifelong relationships with their foster carers.

RESOLVED, that – the report be noted.

7. PRACTICE ASSURANCE STOCKTAKE CHILDREN'S SOCIAL CARE

The Sub Committee received a report of the Director of Community and Children's Services in respect of a review to evaluate the quality and impact of practice, against the findings and recommendations from the last Ofsted Inspection for Children's Services in March 2020. The report summarised the findings and the steps taken in relation to the recommendations.

The LADO provided the following update since the agenda had been despatched.

- a) Regulation 44 visits take place when an Independent Person visits a children's residential home, on a monthly basis, in order to check a child's safety and wellbeing.
- b) Since the Audit in October 2021, all Regulation 44 (Reg 44) documents are shared with Commissioning and placed on the young person's file. Staff are fully aware of the importance of the information contained on the Reg 44. One of the social worker students in Community and Children's Services has prepared a presentation on Reg 44 for the next team meeting.
- c) No young person under the age of 16 is placed in semi-independent provision and, since December 2021, placements have been sourced through the Commissioning Alliance, which gives additional quality assurance.
- d) Quality Assurance (QA) visits to semi-independent providers have been taking place since 2019. During the pandemic, the visits took place virtually and usually involved someone from Commissioning and a Children's Social Care Manager. A framework and rota for managers and senior leadership has been developed for future QA visits.
- e) In respect of unregulated placements, Ofsted will be registering providers in April 2023, and standards will become mandatory from Autumn 2023. Ofsted will pilot inspections during 2023, with the first inspections starting in April 2024.

In response to questions, Members noted that the City Corporation had joined a London Consortium Portal to obtain semi-independent service providers and any not known to the City are quality assured. During the 2020 Inspection, Ofsted commended the City's QA process for being over and above what they would expect. Members also noted that social workers had attended in person throughout the pandemic and, in the event of a contention, then a team manager would also attend.

RESOLVED, that – the report be noted.

8. **EDUCATION AND SAFEGUARDING REPORT**

The Sub Committee received a report of the Director of Community and Children's Services which provided an update on the Education and Early Years' Service's work over the past year. Members noted an update since the despatch of the agenda in that all 16 and 17 year olds had been given places on accredited programmes.

During the discussion, the following points were noted:

- a) The Education welfare service would be covered in more depth in the next report. There is a new provision at Bishopsgate/Liverpool St which has been invited to the Education Safeguarding Forum.

- b) The Vulnerable Children list includes all children known to the Social Care Team, those who are home educated, those at risk of missing education and Afghan children with safeguarding concerns. There used to be 40—50 in the City's cohort but this was expected to increase, in line with government guidelines.
- c) School in Afghanistan starts at 7 years and the Early Years Team had secured nursery and reception placements, despite the late notice, and health visitors had been available to meet immediate needs. All parents had been offered free entitlement to childcare, but some prefer not to take this up for cultural reasons. The Committee commended the team's sterling work in securing 220 school places in 6 weeks, noting that the population of school-age children in the City had increased by 70% last August.
- d) A playroom was opened for women and children, within days of their arrival, and this also served as a community focal point.
- e) Most of the children had settled in very well and were enjoying school. Officers were starting to work directly with schools in respect of those children who might need SEN support. Parents were also becoming self-sufficient in dealing directly with the schools.
- f) The Children's Centre are offering English lessons at their drop in centres, with creche facilities. Translators are available twice a week, together with an Early Help Worker, and the service is available on a 1-1 basis when parents need to speak to health workers and schools etc.

Officers were commended for their hard work in helping our Afghan guests, within the limited resources and infrastructure available, and Members commended an exemplar of partnership working.

RESOLVED, that – the report be noted.

9. **STRENGTHENING FAMILIES, STRENGTHENING COMMUNITIES - PILOT PARENTING PROGRAMME**

The Sub Committee received a report of the Director, Community and Children's Services, which provided a summary of the Strengthening Families, Strengthening Communities (SFSC) Pilot Parenting Programme delivered by the Early Help Service and the Adult Skills Education Service (ASES). Members noted that, out of 7 parents, 3 had found part time employment by the end of the programme.

RESOLVED, that – the report be noted.

10. SPECIAL EDUCATIONAL NEEDS AND DISABILITY (SEND) - UPDATE REPORT

The Sub Committee received a report of the Director of Community and Children's Services in respect of the work underway in supporting the needs and development of children and young people with SEND.

During the discussion, the following points were noted:

- a) Up to date figures on children and young people on SEND support/care plans can be provided to Members, on request.
- b) The recently appointed medical and clinical officers working with SEND cases are seeing progress in needs analysis.
- c) The thresholds for all services are different and can be challenging; given the different entitlements available at each age group, and a Task and Finish Group had been set up to cover 0-25 years. Housing are now agreeing to prioritise looked-after children and officers would like to see this extended into apprenticeships.
- d) Some children with SEND plans serve on the Youth Parliament, which supports the SEND Strategy objective of encouraging engagement in local communities and towards achieving good life outcomes.
- e) There will be one more meeting of the Task and Finish Group, ahead of more information being published. SEND families also have access to independent advice via the parent/carer forum.

RESOLVED, that – the report be noted.

At 15.55 Members agreed to extend the meeting by 10 minutes to conclude the business on the agenda.

11. CHILDREN AND FAMILIES SERVICE PERFORMANCE - MONTH 6 2021/22 (SEPTEMBER 2021)

The Sub Committee received a report of the Director of Community and Children's Services in respect of performance across the Children and Families Service. Members noted that more detail was available in the non-public appendices at agenda item 17.

In response to a question about young asylum seekers, officers had been very pro-active in setting up on-line Home Office interviews, and 15 out of 20 now have permanent immigration status. Members asked if future reports could include the number of care leavers with open immigration status.

RESOLVED, that – the report be noted.

12. PROVISION FOR YOUNG PEOPLE IN THE CITY OF LONDON

The Sub Committee received a report of the Director of Community and Children's Services, which highlighted universal youth and play provision in the City of London. The report set out the services, aims, providers, quarter three (Q3) highlights, and the opportunities identified for improvement. Members noted that Portsoken data related to Quarter 2, as there had been a temporary gap in provision at Quarter 3 due to a change in provider. The officer gave assurance that the service is now being delivered weekly from the new community centre, and as stated in the report.

During the discussion on this item, the following points were noted:

- a) The high levels of poverty in Portsoken, together with obesity and diabetes related health problems. In the longer term, investment in health benefits would result in a saving, as many residents have no access to affordable gyms or sports facilities, and the school in Portsoken no longer has access to St Georges Swimming Pool. The community also experiences language barriers and a lack of transport facilities to the West of the City. Officers noted the cultural sensitivities, in respect of a lack of provision of women-only swimming sessions, and Members were concerned that children might not be learning to swim. Whilst school swimming programmes are part of the review, officers agreed to look at cross-borough opportunities.
- b) A new service is being developed and consultation had identified priority areas, such as the provision of football, noting that previous attempts had failed due to the City Corporation not having a competitive youth football team or league. The City's Sports Development and Youth Service Review had specified the establishment of a club, noting that this would need a targeted piece of work with the Football Association.
- c) There is currently a good offer at the Golden Lane Leisure Centre, but the service provider does not have facilities in the East of the City. Therefore, the City Corporation will need to work with its neighbouring boroughs to expand their provisions.
- d) A large number of City school children attend the Youth City Forum and London Youth Games, as they have pre-prepared teams, but there is still a lack of City resident engagement. Both Prospects and Fusion are aware of this and are working to increase engagement. This will be monitored as part of the contract.
- e) The Youth Forum is currently in the process of running elections, and the Member of UK Youth Parliament, or the Deputy Member of UK Youth Parliament will be a city resident. There will also be a social media campaign.
- f) Work is underway with the Communications Team, to ensure accessibility across all languages, noting the new Afghan community in the City, with 300 children under 16.

- g) The Sub Committee will receive a further report addressing the issues raised at this Sub Committee meeting and filling the gaps in provision. The Chair asked that, if there are initiatives that can be implemented based on the discussions at today's meeting, they should go ahead before the report is presented.
- h) The SEND Sports Project was launched in November 21, at the Golden Lane Sports Centre, working in partnership with Fusion. The project secured £5000 of funding for swimming, football and gym sessions until March 2022.

RESOLVED, that – the report be noted.

13. QUESTIONS OF MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

Members noted that the Serious Case Review in respect of 'Arthur' was not yet available, but the Team looked at all high profile cases as soon as possible. Officers gave assurance of the City Corporation's strong core safeguarding practices, and it was noted that children are safer when the risks are held by a number of different parties.

14. ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT

The Chair advised that a long-standing vacancy on the Sub Committee would be offered to the wider Court of Common Council, as had been the case with other Community and Children's Services Sub Committees.

Officers advised that the Home Office were trying to move the Afghan guests into permanent housing, but this would not happen at pace, due to the lack of housing resources. However, the position was being actively lobbied and the GLA had input.

15. EXCLUSION OF THE PUBLIC

RESOLVED, that – under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Item	Paragraph
16-18	1,2

16. NON-PUBLIC MINUTES

RESOLVED, that – the public minutes and non-public summary of the meeting held on 4th November 2021 be approved.

17. CHILDREN AND FAMILIES SERVICE PERFORMANCE - MONTH 6 2021/22 (SEPTEMBER 2021) - NON PUBLIC APPENDICES (1 AND 2)

Members received a non-public appendix in respect of agenda item 11.

18. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

Members noted that some young people, not in employment or educational training, (NEETs) will not be able to study or work due to core health reasons which need to be addressed first. Furthermore, if they do not have immigration status, then they are not permitted to study, work or volunteer.

19. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There were no items.

The meeting closed at 4.15 pm

Chairman

Contact Officer: Julie Mayer
julie.mayer@cityoflondon.gov.uk

This page is intentionally left blank

Committee:	Dated:
Safeguarding Sub-Committee (Community and Children's Services) – For Information	12/05/2022
Police Authority Board – For Information	25/05/2022
Professional Standards and Integrity Committee – For Information	25/05/2022
Subject: City and Hackney Safeguarding Children Partnership (CHSCP) Child Q Practice Review	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2 and 3
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services Paul Betts, Assistant Commissioner, City of London Police	For Information
Report author: Chris Pelham AD People, Department Community and Children's Services DCI Claire Cresswell, City of London Police	

Summary

In 2020, Child Q, a Black female child of secondary school age, was subject to a strip-search by female police officers from the Metropolitan Police Service (MPS). The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an appropriate adult present, and with the knowledge that Child Q was menstruating. The school is in Hackney. As a result, a Local Child Safeguarding Practice Review was initiated by the City and Hackney Safeguarding Children Partnership (CHSCP). The report was published in March 2022. [Local Child Safeguarding Practice Review: Child Q](#) concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day. The report also concluded that racism was 'likely an influencing factor' in the strip-search, and that there was a high level of probability that practitioners were influenced by 'adultification' bias. This is where Black and Global Majority children are held to adult standards, but their white peers are less likely to be.

The review makes eight findings and 14 recommendations for practice improvements. Some relate to process, data and guidance: police engagement in the Local Child Safeguarding Practice Review (LCSPR) process (R1), MPS data on strip searches (R2), updating the Department for Education (DfE) guidance for schools on searching, screening and confiscation (R3 & R10), updating the MPS guidance and local policy around Appropriate Adults and the Police and Criminal Evidence Act (PACE) (R4 & R11), and both national police and MPS guidance on strip-searching children (R6), addressing the stop and search guidance (R9).

Other recommendations focus on how the system works. There is a recommendation for the MPS Central East Basic Command Unit (BCU) around engagement with their local stop and search monitoring group (R7) and, the importance of referring children to, or seeking advice from, children's social care where there are concerns about substance misuse (R8). Four recommendations are addressed to the CHSCP. These are likely to have a wider relevance and transferability to other local areas. Three recommendations relate to professional development: ensuring that Child Q and the review is referenced with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with or who are in their care (R5), develop an awareness-raising programme across schools and colleges about stop and search activity by the police (R12) and, multi-agency 'adultification' training actively focusing on practitioners from school and the police (R13). Recommendation 14 relates to developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.

In April, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all partners of the CHSCP inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (see Appendix 2).

This report updates Members on the review process, and sets out the initial response and plans to address the recommendations from the City of London Police (CoLP) and City of London Schools, and Community and Children's Services.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. In 2020, Child Q, a Black female child of secondary school age, was subject to a strip-search by female police officers from the MPS.
2. The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an appropriate adult present, and with the knowledge that Child Q was menstruating.
3. As a result, an LCSPR was initiated by the CHSCP. The report was published in March 2022.
4. [*Local Child Safeguarding Practice Review: Child Q*](#) (Appendix 1) concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day.
5. The review makes eight findings and 14 recommendations for practice improvement. It concluded that racism was 'likely an influencing factor' in the strip-search and that there was a high level of probability that practitioners were influenced by 'adultification' bias. This is where Black and Global Majority children are held to adult standards, but their white peers are less likely to be.
6. In April, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all partners of the CHSCP inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (Appendix 2).
7. This report sets out the initial response to the recommendations from the CoLP and City of London Schools, and Community and Children's Services.

The Purpose of the Local Child Safeguarding Practice Review (LCSPR)

8. The purpose of the LCSPR is to:

"identify improvements to be made to safeguard and promote the welfare of children. Learning is relevant locally, but it has a wider importance for all practitioners working with children and families and for the Government and policymakers. Understanding whether there are systemic issues, and whether and how policy and practice need to change, is critical to the system being dynamic and self-improving.

Reviews should seek to prevent or reduce the risk of recurrence of similar incidents. They are not conducted to hold individuals, organisations or agencies to account, as there are other processes for that purpose, including through employment law and disciplinary procedures, professional regulation and, in exceptional cases, criminal proceedings. These processes may be carried out alongside reviews or at a later stage.

Employers should consider whether any disciplinary action should be taken against practitioners whose conduct and/or practice falls below acceptable standards and

should refer to their regulatory body as appropriate.”

[Working Together 2018, Chapter 4, page 8](#)

9. The [Child Safeguarding Practice Review Panel](#) (CSPRP) is a national body, not a local one. It is an independent panel responsible for commissioning national reviews of serious child safeguarding cases.
10. When a serious incident becomes known to the safeguarding partners (the Council, the Police and the Clinical Commissioning Group), they must consider whether the case meets the criteria for a local review. This is done through a process known as a Rapid Review.
11. The outcome of the Rapid Review is subsequently submitted to the CSPRP. In Child Q’s case, this was done on 15 January 2021. The delegated decision to instigate the review was made by the CHSCP’s Independent Child Safeguarding Commissioner (ICSC) and ratified by safeguarding partners in line with the CHSCP’s written safeguarding arrangements.
12. The CSPRP met on 26 January 2021 and wrote to the CHSCP on 2 February 2021. Its response is covered in paragraphs 1.7-1.10 of the report of the Review.

The Timeline of the Review

13. The [statement](#) from Jim Gamble QPM, Independent Child Safeguarding Commissioner, provides an overview of the timeline of the review:
 - **11 January 2021:** Child Q first came to the attention of the Independent Child Safeguarding Commissioner and a Rapid Review meeting was convened two days later.
 - **15 January 2021:** The Rapid Review report and the decision to instigate the LCSPR was submitted, as required by statutory guidance, to the CSPRP.
 - **26 January 2021:** The National CSPRP considered the case on 26 January 2021 and responded on 2 February 2021. This response stated: “We noted your decision to carry out a local child safeguarding practice review (LCSPR) but would encourage you to think carefully about whether one is necessary as we felt that this case was not notifiable and did not meet the criteria for an LCSPR.” Despite this suggestion, an LCSPR was initiated and work began at pace.
 - **February–March 2021:** Lead authors were confirmed, a reference panel identified, and a forward plan of key interviews developed. The CHSCP was mindful of the impact on Child Q and, while the family were quickly notified of the review, it was right not to interrupt the immediate support services being provided.
 - **By mid-April 2021:** The review completed interviews with Child Q, her family and the school teachers.

- **May 2021:** The headteacher and Local Authority Designated Officer were interviewed.
- Over the next three months, the review continued to press the MPS for access to the officers involved, or at the very least, their statements. Due to the nature and range of complaints, the Independent Office for Police Conduct (IOPC) had become formally involved.
- **6 July 2021:** The ICSC wrote to the Director General of the IOPC, explaining the situation and asking if he could reconcile the issue of access. The CHSCP was made an 'Interested Party' to the IOPC investigation. This allowed for the lawful sharing of relevant information, which was received in October 2021.
- While eventually resolved, the difficulties encountered in obtaining information from the police was the reason for the review making its first recommendation for the National Child Safeguarding Practice Review Panel and the IOPC.
- Work followed, and advice from the reference panel, research and data allowed for findings and recommendations to be focused and developed.
- **From January 2022:** Fact-checking and final rounds of engagement were carried out, including with the family (and their solicitor), the reference group, the MPS and the IOPC.
- **March 2022:** The review was published.

City of London Police (CoLP)

14. Following the March 2022 publication of *Local Child Safeguarding Practice Review: Child Q*, the CoLP conducted its own internal review of juvenile strip-searches. A senior member of the Professional Standards Directorate conducted a detailed review of all juvenile strip-searches undertaken during the last three years.
15. In the period March 2019 to March 2022 there were nine strip-searches of juveniles undertaken by CoLP officers. The juveniles were all male and aged between 15–17 years old. Three searches were as a result of a further search conducted under Code A PACE 1984. All others were conducted within the custody suite after detention and were authorised post-arrest. Seven of the strip-searches led to a positive outcome (a prohibited item being found).
16. A full report was completed for review by the Assistant Commissioner Betts who is strategic lead for this portfolio. The report will be considered by the City of London Police Renewing and Rebuilding Trust and Confidence Board (chaired by Assistant Commissioner Betts) which will oversee a number of identified learning points. The Board next convenes on 19 May 2022. This will include the consideration of all the recommendations relevant to the police from the *Local Child Safeguarding Practice Review: Child Q* report.

17. A detailed communication has been compiled and made available to all officers to remind them of their powers and the key considerations when undertaking searches, particularly those that are more intimate in their nature, and also those where juveniles are being searched. It details the relevant legislation and provides guidance on process and recording to ensure that all officers comply with the requirements of the Police and Criminal Evidence Act 1984 and Force policies. The communication also discusses 'adultification' and safeguarding considerations that officers must bear in mind. It sets out clear expectations relating to safeguarding and available resources within the Force to support officers in their decision making. This communication has also been sent to all Directorate Heads to disseminate to all Inspectors to ensure that teams receive briefings from their supervisors on this matter.
18. The CoLP review identified changes to the inputting of data to improve our record keeping and audit trail of rationale for relevant decisions. These have been allocated to appropriate leads in the Force to implement.
19. The CoLP has several internal and external working groups providing oversight and scrutiny to stop and search and strip-searches. These include:
 - Professional Standards and Integrity Committee of the Police Authority Board. As part of its remit, this Committee reviews data relating to stop and search and use of force. The committee scrutinises trends and findings and provides feedback, challenge, and asks for further information where required to allow them to intrusively oversee the use of the tactic by the Force. Every Committee Member was given the opportunity to patrol with a uniformed officer from the Local Policing team to witness a stop and search being conducted so that they could better understand the process.
 - Independent Advisory and Scrutiny Group. This group considers the details of individual stop searches and whether there was a lawful reason for the stop, and whether the grounds for the stop were justified. They can view Body Worn Video to better assess the search. They 'dip sample' 10% of searches monthly and also look at trends quarterly. Relevant training was provided to all members to assist them in reviewing stop searches.
 - At an operational level within the Force, line managers provide significant scrutiny. First line supervisors reviews every stop and search record. Additionally a structured dip sampling process requires every level of supervisor completes a review of a minimum number or percentage of searches each month.
 - Statistics on stop and search are presented to the quarterly City of London Police Stop and Search Working Group where they are reviewed against set criteria such as the disproportionality index, positive outcomes and grounds given for the search.

- The HMICFRS conducts reviews of stop searches carried out by the Force. The previous dip sample review established that 92% of searches had acceptable grounds. This placed the Force in the top six forces in England.
- The Force has committed to reviewing all strip-searches of juveniles quarterly. This will be conducted by the Senior Force Leads for stop and search, and custody management.

City Of London Schools and Community and Children's Services

20. The City of London Corporation has one maintained primary school – The Aldgate School – and 10 sponsored academies as part of the City of London Academies Trust. It also supports three independent schools.
21. In its pursuit of educational excellence, the City Corporation has drawn these schools together, collectively known as 'the City of London Family of Schools'.
22. In addition to the 'Family of Schools', there are two schools and one college located in the City of London – St Paul's Cathedral School, Charterhouse Square School, and David Game College.
23. As noted above in paragraph 6 of this report, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all Partners of the CHSCP in April inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (see Appendix 2). This went to all CHSCP schools across Hackney and the City of London and was forwarded to all schools in 'The Family of Schools'.
24. Schools physically based in the City of London operate under the CHSCP governance arrangements. These schools meet on a termly basis as part of the City of London Safeguarding Education Forum – this is hosted by Community and Children's Services, chaired by the Assistant Director, People, and includes attendance from the City schools' Designated Safeguarding Leads, as well as officers from Community and Children's Services, and the Lead Advisor for Safeguarding from the CHSCP.
25. City of London Education Trust schools (Family of Schools) , based in other local authority areas, will operate under their own local authority area Safeguarding Partnership arrangements. However, to provide opportunities to strengthen safeguarding arrangements across the CoL education footprint, the Family of Schools are invited to attend the City of London Safeguarding Education Forum.
26. The next Safeguarding Education Forum in June will be dedicated to reviewing the learning and development requirements for all schools linked to the findings of the report.
27. A more detailed report on the Family of Schools response to Child Q will be presented to the Education Board in June.

28. The following points illustrate some of the actions that the schools have engaged in (or will engage in), in response to the review findings:

- The Aldgate School leadership have reviewed the report and shared learning with senior leaders.
- Significant work has been undertaken by The Aldgate School in relation to anti-racism, safeguarding, and the curriculum.
- Across the Family of Schools, senior leaders have read and shared the report with their leadership teams.
- Reminders have been sent to senior leaders and all staff regarding search policies within schools.
- The review findings have been shared in assemblies with all year groups.
- Staff briefings have been undertaken regarding the case of Child Q.
- Some schools have confirmed that they have written to parents to offer reassurance and an opportunity for further conversations.
- Schools have reviewed the current practice around serious child safeguarding cases in their school in light of the Child Q report.
- Schools have initiated reviews of their current practice and state that they will continue to work with the local Safeguarding Partnership as required.
- Schools noted that they continue to ensure that they use appropriate systems to record all types of police searches.
- Where relevant, schools note that they will continue to liaise with their Safer School Police Officer to ensure that their policy and practice-based systems are up to date.
- Schools will ensure that they include specific items relating to 'adultification' in future training, and explore whole-school activities relating to this topic.
- One school noted that their Senior Leadership Team had reviewed the Child Q report, and the Designated Safeguarding Lead (DSL) led a whole-staff briefing and disseminated a PowerPoint presentation to every class, so they are aware of their rights. The safeguarding team also dropped in to each class to take any questions.
- The DSL and Deputy met with the Student Council on 25 April 2022 to discuss their views on Child Q and what steps to take to reassure Council members.

29. In addition to the schools, colleagues in Community and Children's Services have also engaged in activities following the publication of the review, including:

- Across Community and Children's Services, Senior Leaders have attended a CHSCP-commissioned 'adultification' learning and development session in June 2021.
- There is an expectation that all frontline staff will attend CHSCP-commissioned training regarding 'adultification' in the coming year.

- Reflective briefing sessions took place with staff in the People Directorate following the publication of the report. These were chaired by the Children Social Care Systemic Therapist and provided a safe and supportive environment for staff to consider the findings of the review, and help reflect on and process the difficult messages related to adultification, gender and race.
- Over the last 18 months, staff in the People Directorate and Community and Children's Services have been engaged in anti-racism development work. This has included: running systemic group-based reflective sessions; action learning sets; establishing a book club for staff that provided the opportunity to work through the book *Me and White Supremacy* by Layla Saad over 25 weeks; our Independent Reviewing Service provided a video message for our children in care and care leavers providing information on how they can receive support from CoL on any issues that are impacting them directly; and managers presented our anti-racism work to the DfE.
- The CoL Multi Agency Child Exploitation (MACE) group, jointly chaired by Children's Social Care and the CoL Police, reviewed the findings from the report at the April meeting. The implementation of the recommendations by partner agencies will be reviewed via the MACE group to help strengthen safeguarding arrangements specific to child sexual and criminal exploitation.
- Finally, the CHSCP has extended an invitation to all CoL Safeguarding Partners, including CoL schools, to attend the three-day Hackney Anti-racism conference in May 2022.

Corporate & Strategic Implications

30. Financial implications – there are no financial implications regarding this report. Future training, learning and development activity will be financed within service budgets.
31. Resource implications – as stated above.
32. Legal implications – no legal implications specific to this report.
33. Risk implications – implementation of learning from the recommendations will be reviewed as part of the CHSCP governance arrangements. Any concerns regarding compliance will be escalated through this mechanism.
34. Equalities implications – this report has raised issues in respect of the need to review and ensure effective anti-racist policy and practice is in place across partner agencies. CoLP and CoL schools will be addressing equalities issues and learning from this case as part of their action planning.
35. Climate implications – no climate implications specific to this report.
36. Security implications – no security implications specific to this report.

Conclusion

37. Following the strip-search by MPS officers of Child Q in a Hackney school in 2020, an LCSPR was initiated by the CHSCP. The report was published in March 2022.
38. [The review – Local Child Safeguarding Practice Review: Child Q](#) – concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day.
39. The report also concluded that racism was ‘likely an influencing factor’ in the strip-search and that there was a high level of probability that practitioners were influenced by ‘adultification’ bias. The review made eight findings and 14 recommendations for practice.
40. CoLP and City of London Schools have carried out a range of activities to understand and share learning with colleagues from the review.
41. This report has highlighted activity to date and the plans for future learning.

Appendices

- Appendix 1 – *Local Child Safeguarding Practice Review: Child Q - March 2022*
- Appendix 2 – Mapping Recommendations Template

Chris Pelham

Assistant Director People, Department Community and Children’s Services

T: 020 7332 1636]

E: chris.pelham@cityoflondon.gov.uk

DCI Claire Cresswell

City of London Police

claire.cresswell@city-of-london.pnn.police.uk



Local Child Safeguarding Practice Review

Child Q

March 2022

Jim Gamble QPM, Independent Child Safeguarding Commissioner
Rory McCallum, Senior Professional Advisor

Contents

1. Introduction	2
2. Background and Context	6
<i>Definitions</i>	6
More Thorough Searches	7
Searches Involving Exposure of Intimate Parts of the Body	7
Intimate Searches	8
<i>The Day of the Incident</i>	8
<i>Previous Incidents of Concern</i>	9
<i>The School Context</i>	10
<i>Local Facts & Figures</i>	10
3. Views of Child Q	11
4. Views of Mother and Maternal Aunt	12
5. Findings and Recommendations	15
<i>Review Question 1: UNCRC Compliance</i>	17
<i>Review Question 2: Safeguarding Needs</i>	22
<i>Review Question 3: Law and Policy</i>	26
<i>Covid-19</i>	31
<i>Racism</i>	32

1. Introduction

- 1.1 In 2020, Child Q, a Black female child of secondary school age, was strip searched by female police officers from the Metropolitan Police Service (MPS). The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an Appropriate Adult present and with the knowledge that Child Q was menstruating.
- 1.2 Teachers told the review that on the day of the search they believed Child Q was smelling strongly of cannabis and suspected that she might be carrying drugs. On questioning Child Q, she denied using or having any drugs in her possession. A search of her bag, blazer, scarf, and shoes revealed nothing of significance.
- 1.3 Remaining concerned, teachers sought advice from the Safer Schools Police Officer. Due to the restrictions arising from Covid-19, this officer was not on site. He recommended that the school call 101 and ask for a female officer to attend.
- 1.4 A male and female officer subsequently arrived at the school, followed by another two officers (one of whom was also female). After discussions between the police and teachers, Child Q was escorted to the medical room. She was subsequently strip searched.
- 1.5 No Appropriate Adult was in attendance, teachers remained outside the room and Child Q's mother was not contacted in advance. No drugs were found during either the strip search or a search of the room in which Child Q had been waiting beforehand.
- 1.6 Child Q was later allowed to return home where she disclosed the events to her mother. Child Q described how she had been strip searched whilst menstruating. Due to the level of her distress, Child Q's mother took her to the

family GP who made a referral for psychological support. This led to contact with Hackney Children and Families Services (Hackney CFS).

- 1.7 Given these circumstances, a Rapid Review was initiated by the City & Hackney Safeguarding Children Partnership (CHSCP). The Rapid Review report was submitted to the Child Safeguarding Practice Review Panel¹ (*the Panel*) in early 2021. As part of its response, the Panel made the following suggestion.

'We noted your decision to carry out a local child safeguarding practice review (LCSPR) but would encourage you to think carefully about whether one is necessary as we felt that this case was not notifiable and did not meet the criteria for an LCSPR.'

- 1.8 Despite this suggestion, a Local Child Safeguarding Practice Review (*the review*) was nonetheless initiated. The delegated decision to do this was made by the CHSCP's Independent Child Safeguarding Commissioner (ICSC) and ratified by safeguarding partners in line with the CHSCP's written safeguarding arrangements.
- 1.9 In considering the relevant statutory guidance², the overwhelming opinion was that Child Q had been exposed to a traumatic incident and had undoubtedly suffered harm. Whilst there was less certainty about whether the precise definition of a '*serious child safeguarding case*' had been met, there was little doubt that the impact on Child Q had been profound. The repercussions on Child Q's emotional health were obvious and ongoing. Given the context of where and how the search took place, it was impossible not to view these circumstances as anything other than the most serious and significant.
- 1.10 The incident also illustrated unambiguous issues of importance that warranted independent analysis, not least the potential impact of disproportionality and racism and how these factors might have influenced the actions of organisations and individual professionals.

¹ <https://www.gov.uk/government/organisations/child-safeguarding-practice-review-panel/about>

² Working Together 2018, Chapter 4 para 15-19

- 1.11 Indeed, reinforcing the gravity with which this case was being viewed, Ofsted's National Director for Social Care and Regional Director for London were engaged by the CHSCP and verbally appraised of its details.
- 1.12 Terms of Reference were set for the review, with the methodology requiring the following questions to be addressed:
- Was the rationale and practice to strip search Child Q sufficiently attuned to the rights of children as set out in the relevant articles of the United Nations Convention on the Rights of the Child?
 - Was practice involving Child Q sufficiently focused on her potential safeguarding needs?
 - Is the law and policy, which informs local practice, properly defined in the context of identifying potential risk and furthermore, does law and policy create the conditions whereby practice itself can criminalise and cause significant harm to children?
- 1.13 To ensure the review had access to relevant expertise, a reference panel including Black and Global Majority Ethnic³ safeguarding professionals was also convened. Their input has been invaluable in helping to explore and validate the review's findings in the context of anti-racist practice.
- 1.14 These and other findings are consistent with the overall purpose of reviews. In line with statutory guidance, they are focused upon preventing or reducing the risk of recurrence of similar incidents. The review has not been *'conducted to hold individuals, organisations or agencies to account, as there are other processes for that purpose, including through employment law and disciplinary procedures, professional regulation and, in exceptional cases, criminal proceedings.'*⁴
- 1.15 With regards to the above, following a formal complaint, Child Q's school swiftly responded to this by way of a Stage 2 investigation. Investigations remain

³ This terminology is used in place of Black and Minority Ethnic (BAME).

⁴ [Working Together to Safeguard Children 2018, Chapter 4, para 4.](#)

ongoing by the Independent Officer for Police Conduct (IOPC) into the conduct of the police officers.

- 1.16 The review makes eight findings and 14 recommendations for improving practice.

Finding 1: The school was fully compliant with expected practice standards when responding to its concerns about Child Q smelling of cannabis and its subsequent search of Child Q's coat, bag, scarf and shoes. This demonstrated good curiosity by involved staff and an alertness to potential indicators of risk.

Finding 2: The decision to strip search Child Q was insufficiently attuned to her best interests or right to privacy.

Finding 3: School staff deferred to the authority of the police on their arrival at school. They should have been more challenging to the police, seeking clarity about the actions they intended to take. All practitioners need to be mindful of their duties to uphold the best interests of children.

Finding 4: School staff had an insufficient focus on the safeguarding needs of Child Q when responding to concerns about suspected drug use.

Finding 5: The application of the law and policy governing the strip searching of children can be variable and open to interpretation.

Finding 6: The absence of any specific requirement to seek parental consent when strip searching children undermines the principles of parental responsibility and partnership working with parents to safeguard children.

Finding 7: The Covid-19 restrictions in place at the time appeared to have frustrated effective communication between school staff and the Safer Schools Officer.

Finding 8: Having considered the context of the incident, the views of those engaged in the review and the impact felt by Child Q and her family, racism (whether deliberate or not) was likely to have been an influencing factor in the decision to undertake a strip search.

2. Background and Context

- 2.1 Beyond the immediate events of the strip search at school, the review has kept information relating to the background and context of Child Q's lived experience to a minimum. The reasons for this are three-fold. Firstly, to protect Child Q's identity and that of her family, secondly, to allow for the report's publication and thirdly, because the review considers much of this information to be largely irrelevant.
- 2.2 To explain this latter point further, the review has been mindful not to detract from the incident itself. It has also been careful not to introduce a perception that there might be a 'rationale' to excuse the actions of some professionals based on who Child Q is, where she lives or what her family circumstances are.
- 2.3 The review is clear that the strip search of Child Q should never have happened and there was no reasonable justification for it.

Definitions

- 2.4 A 'strip search' is a specific practice related to the overall stop and search powers available to the police. There are two distinct types of strip search that are outlined under the Police and Criminal Evidence Act (PACE) 1984.

More Thorough Searches

- 2.5 A more thorough search, as part of a stop and search, is where an officer deems it necessary that the subject removes more than an outer coat, jacket or gloves. This process does not reveal intimate parts of the body. Powers for this more thorough search are set out under PACE Code A, [paragraph 3.6](#).

‘Where on reasonable grounds it is considered necessary to conduct a more thorough search (e.g. by requiring a person to take off a T-shirt), this must be done out of public view, for example, in a police van unless paragraph 3.7 applies, or police station if there is one nearby.

Any search involving the removal of more than an outer coat, jacket, gloves, headgear or footwear, or any other item concealing identity, may only be made by an officer of the same sex as the person searched and may not be made in the presence of anyone of the opposite sex unless the person being searched specifically requests it.’

Searches Involving Exposure of Intimate Parts of the Body

- 2.6 Searches involving exposure of intimate parts of the body are where the person removes all or most of their clothing. They are, by definition, one of the most intrusive forms of search. As with searches involving less intrusion, they must only be used where it is necessary and reasonable, bearing in mind the object of the search.
- 2.7 Consultation with a supervisor is always required prior to such a search⁵. The police officer must be of the same sex as the person being searched and the process must be conducted in accordance with [paragraph 11](#) of PACE Code C, Annex A. Full powers are set out under [PACE Code A, paragraph 3.7](#).

‘Searches involving exposure of intimate parts of the body must not be conducted as a routine extension of a less thorough search, simply because nothing is found in the course of the initial search.

⁵ [College of Policing – Authorised Professional Practice](#)

Searches involving exposure of intimate parts of the body may be carried out only at a nearby police station or other nearby location which is out of public view (but not a police vehicle).

- 2.8 During a search involving the exposure of intimate parts of the body, persons are required to remove some or potentially all of their clothing. They can also be required to bend over and spread their legs. The police are allowed to require compliance in this regard if the person is suspected of concealing evidence. This might include, for example, class A drugs or an object that could cause harm. Child Q was searched under this criterion.

Intimate Searches

- 2.9 In addition to these defined 'strip searches', the police can also undertake 'intimate searches'. These involve a physical examination of a person's body orifices other than the mouth. PACE identifies that '*the intrusive nature of such searches means the actual and potential risks associated with intimate searches must never be underestimated*'. It further sets out the specific approach to consent that must be followed prior to any such search being undertaken.

The Day of the Incident

- 2.10 In trying to determine why the events unfolded as they did, inconsistencies in the accounts of those involved have hampered the review's ability to clarify these details with any precision. These variations primarily relate to the initial conversations held between the police and the school, whether school staff knew that Child Q was going to be searched (and to what extent) and who was acting as an Appropriate Adult.
- 2.11 Whilst taking account of interviews and written statements, the review does not draw any firm conclusions about each event in question. Some remain subject to investigation as part of ongoing complaints. That said, the review believes it reasonable to infer the following:

- School staff contacted the police because they remained concerned that Child Q had drugs in her possession. They had searched Child Q to the extent that was permissible, and it is likely they knew a further search of Child Q would be undertaken by the attending officers.
- Indeed, if a potential search wasn't expected, then the instruction for a member of staff to follow Child Q when being taken to another office is unlikely to have been made. This was done to make sure that Child Q didn't attempt to dispose of anything in her possession.
- It is unlikely that the school was informed by the attending police officers of the intention to strip search Child Q.
- It is likely that the importance of the Appropriate Adult role was insufficiently explained to either Child Q or the school staff present. Relevant requirements set out under para 11, Annexe A, Code C of the Police and Criminal Evidence Act 1984 (PACE) appear not to have been followed.
- There is no evidence that the officers consulted with a supervisor prior to the search.
- There is no evidence that Child Q was resistant to the search undertaken by school staff or that there were any indicators in her behaviour that she might be hiding drugs on her person.
- The rationale used by the police to initiate the strip search was primarily based on reports provided by the school – that she had smelt of cannabis, that she had previously smelt of cannabis at school and that someone known to Child Q had previously been excluded for drugs.

Previous Incidents of Concern

- 2.12 A month before Child Q was strip searched, she was similarly identified by the school as smelling of cannabis. On this occasion Child Q was described by school staff as being 'intoxicated', although on contacting her mother, she explained that Child Q had been studying late the night before and it was this that accounted for her presentation. Such background is relevant to the review given the different approach adopted by the school in managing this earlier

incident (and the likely influence of this event on the actions prior to Child Q being strip searched).

- 2.13 In the school's record log, it is noted that Child Q and her mother were advised that *'if this behaviour continues or that if she is found with weed/drugs on her she will not be able to continue her place with [the school].'* No further action followed by way of exploring this incident further, contacting the police or engaging external agencies for advice and support. Child Q's mother was, however, quickly engaged by school staff to inform her of the concerns.

The School Context

- 2.14 The most recent inspection of Child Q's school found it to be good with safeguarding effective. There are no known complaints regarding pupil well-being or the overall provision for pupils prior to the incident involving Child Q.
- 2.15 There have never been any similar incidents whereby a child has been strip searched on the school's premises. The review is not alert to any other child having been strip searched in any other local school.
- 2.16 In the school's Stage 2 investigation report, its author commented: *'The involvement of the police in this manner is an irregular occurrence at the Academy. In the 12 months prior to the incident the Academy had not requested police involvement about searches or suspicion of possession of banned/illegal items for students.'*

Local Facts & Figures

- 2.17 During 2020/2021, there were 299 *'further searches'* conducted in Hackney by local police officers from the Central East BCU of the MPS. The review was advised that *'further searches'* is the terminology used to cover strip search activity, although this does not differentiate between the specific types of searches that can be undertaken.

- 2.18 Over the same period, 25 children under the age of 18 were subject of 'further searches'. 19 were male and 18 were handcuffed during the process. The reasons for search primarily related to suspicions about drugs (20), followed by weapons (4) and stolen property (1). 22 (88%) of the searches were negative with an outcome of no further action recorded in 20 (80%) of the cases. In terms of ethnicity, (as per the codes used by the police), 15 (60%) of the children searched were Black, 2 were White, 6 Asian and 2 Arab or North African.

3. Views of Child Q

- 3.1 During her engagement with the review, Child Q was spoken to and shared a written account of her experiences. The following statements made by Child Q reflect the significant impact that this incident had upon her.

"Someone walked into the school, where I was supposed to feel safe, took me away from the people who were supposed to protect me and stripped me naked, while on my period."

"...On the top of preparing for the most important exams of my life. I can't go a single day without wanting to scream, shout, cry or just give up."

"I feel like I'm locked in a box, and no one can see or cares that I just want to go back to feeling safe again, my box is collapsing around me, and no-one wants to help."

"I don't know if I'm going to feel normal again. I don't know how long it will take to repair my box. But I do know this can't happen to anyone, ever again."

"All the people that allowed this to happen need to be held responsible. I was held responsible for a smell."

“...But I’m just a child. The main thing I need is space and time to understand what has happened to me and exactly how I feel about it and getting past this exam season.”

“..... I need to know that the people who have done this to me can't do it to anyone else ever again. In fact so NO ONE else can do this to any other child in their care.”

“Things need to change with all organisations involved. Even I can see that.”

4. Views of Mother and Maternal Aunt

4.1 Child Q’s mother and maternal aunt were also engaged by the review. During interviews, there was a clear sense of shock as to what Child Q had experienced and the ongoing impact upon the whole family. The events themselves have dented the family’s confidence and trust in those professionals tasked with caring for and protecting Child Q.

4.2 There was also an overwhelming perception by the family that Child Q had been let down badly, criminalised, and above all, a view that Child Q was treated differently because she is Black. A sample of their views reflecting the impact of the strip-search are set out below.

4.3 Comments from Child Q’s mother during interview.

“...the incident that happened (was) treated not as a safeguarding issue. (It was) treated as a criminal matter.”

“(Professionals) treated her as an adult. (She was) searched as an adult.”

“Child Q is a changed person. She is not eating, every time I find her, she is in the bath, full of water and sleeping in the bath. Not communicating with us as (she) used to, doesn’t want to leave her room, panic attacks at school, doesn’t

want to be on the road, screams when sees/hears the police, and we need to reassure her.”

“We try to get her to do things and reassure her. Child Q is not the same person. Was a person who liked to be active and get into things. Not now, she has changed. She comes home, goes upstairs in the bedroom and closes the bedroom door. Saying she is doing mock exam studies, she just locks off, saying leave me alone. When sleeping, (she is) screaming in her sleep, I have to watch her.”

“At the end of day, things like that happen, is it because of her skin, hair. Why her, now looking at the future, will she be comfortable?”

“Child Q was searched by the police and was asked to go back into the exam without any teacher asking her about how she felt knowing what she had just gone through. Their position in the school is being part of the safeguarding team, but they were not acting as if they were a part of that team. This makes me sick - the fact that my child had to take her sanitary towel off and put the same dirty towel back on because they would not allow her to use the restroom to clean herself. I was also wondering if the officers body cameras were on while my child was stripped of her clothes, are they re-watching it?”⁶

4.4 When questioned, the MPS informed the review that there is no Body Worn Camera recording of the incident.

4.5 Letter from Child Q’s mother to the review.

“Consider what is happening now diversity and racial equality around Black Lives Matter and what is happening to women out there.”

“Do you think it is appropriate for a black girl to be search without a parent or family member, when I send my child to school, I expect teachers to act as a

⁶ The MPS informed the review that there is no Body Worn Camera recording of the incident.

parental substitute. Would allow your child to be strip searched and questioned without consent or a guardian present, for a 15-year-old to be interrogated by multiple unnamed police officers.”

“Why doesn’t my daughter deserve the same rights as every other child, is this because they think she is a young girl, with no respect for her parents or adults and no fear of consequences or because she is a black child living in a poor city area.”

“As you can see clearly in the incident, they have already pointed out the area that Child Q lives in, they made where we live a boundary for Child Q. Our children have families, have names, have hearts and minds, their lives matter. They wish to be scientists, educators and mathematicians.”

4.6 Comments from Child Q’s maternal aunt made during interview.

“I see the change from a happy go lucky girl to a timid recluse that hardly speaks to me...In my personal opinion, they have got a problem with Child Q and the aftermath is that when she sees this individual (a teacher) in school, gets panic attacks. They are the main instigator of the exposure.”

4.7 Letter from Child Q’s maternal aunt to the review.

“I cannot express to you how aggrieved I am with the school and the police enforcement officers for exposing Child Q to such an undignified, humiliating, and degrading exposure. No child of her age should have to experience this without due cause.”

“Child Q was doing exceptionally well at school, top of the class and getting praised every day for her good work and good conduct. She was even the prefect of her year at one stage. She was progressing well, a happy go lucky child, well loved, and cared for. Then for whatever reason, cracks crept in and she appeared to be singled out by the teachers repeatedly for various things.”

“The family do not believe that the officers would have treated a Caucasian girl child who was on her monthly periods in the same way.”

- *“Child Q was made to take her pad off, something so personal and exposed in such a way to strangers.”*
- *“Child Q was racially profiled due to her being black and her extreme large head of locks.”*
- *“She was made to bend over spread her legs, use her hands to spread her buttocks cheek whilst coughing.”*
- *“She was not permitted to use the toilet despite asking.”*
- *“She is now self-harming and requires therapy. She is traumatised and is now a shell of the bubbly child she was before this incident.”*
- *“From the time she was pulled out of her exam to the time she returned home, she was isolated, not given food or offered water, where is the care.”*
- *“It is now being circulated in her school that she is the big-time drugs seller.”*
- *“All the above is related to the police behaviour towards her.”*

5. Findings and Recommendations

- 5.1 It has been a relatively straightforward process for the review to conclude that Child Q should never have been strip searched. Across many of the professionals involved that day, there was an absence of a safeguarding first approach to their practice. There were other ways that this incident could and should have been managed, beyond the largely criminal justice response from the police and the disciplinary response from the school.
- 5.2 Whilst school staff were right to respond to their concerns, the intervention that followed is considered by the review to have been disproportionate and ultimately harmful to Child Q.

- 5.3 Prior to addressing each of the questions as set out in the Terms of Reference, the review makes two supplementary recommendations.
- 5.4 The first, not relating to the experiences of Child Q, involves the LCSPR process itself. This has been made given the significant difficulties experienced by the review team in gaining direct access to the police officers involved in the case.
- 5.5 This was due to their practice being subject to a formal investigation by the IOPC. Whilst eventually resolved through effective collaboration between the IOPC and the CHSCP⁷, the following recommendation is made.

Recommendation 1: The Child Safeguarding Practice Review Panel should engage the IOPC with a view to developing national guidance on the IOPC's interface with the Local Child Safeguarding Practice Review process. As a minimum, this should set out the arrangements for securing cooperation, accessing key staff for interview and the requirements for the timely sharing of information.

- 5.6 The second recommendation involves the data submitted to the review by the MPS in respect of strip searches. This lacked specificity on the different types of strip searches, demographics of those searched, locations and timing. The review was informed there was no existing mechanism to retrieve this data without significant operational tasking.

Recommendation 2: The MPS should review and revise its recording system for stop and search to ensure it clearly identifies and allows for retrieval of the full range of activity under stop and search powers (including the ability to differentiate between the different types of strip searches undertaken).

⁷ The CHSCP was designated a formal party to the IOPC investigation in order to facilitate a legal basis for information sharing. Whilst this allowed access to information provided to the IOPC as part of its investigation, none of the officers were engaged in face-to-face interviews.

Review Question 1: UNCRC Compliance

- 5.7 Was the rationale and practice to strip search Child Q sufficiently attuned to the rights of children as set out in the relevant articles of the United Nations Convention on the Rights of the Child?**
- 5.8 The United Nations Convention on the Rights of the Child (UNCRC) is the most widely ratified international human rights treaty in history. *‘The Convention has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.’*⁸
- 5.9 The European Convention on Human Rights (ECHR) is an international treaty, in which Member States of the Council of Europe, including the UK, commit to upholding a number of fundamental rights.
- 5.10 As part of the review’s analysis, consideration has been given to the relevant articles under both conventions. Firstly, it has examined them in the context of the school’s decision to search Child Q.

Finding 1: The school was fully compliant with expected practice standards when responding to its concerns about Child Q smelling of cannabis and its subsequent search of Child Q’s coat, bag, scarf and shoes. This demonstrated good curiosity by involved staff and an alertness to potential indicators of risk.

- 5.11 The identified concerns about the smell of cannabis, the concern that this was a repeated incident and the additional context about someone known to Child Q⁹ all provided a rationale for the school to act. The school also held concerns that if Child Q did have drugs in her possession, then this could present a

⁸ <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

⁹ A person known to Child Q had previously been excluded for drugs and there were concerns about this individual and gang affiliation.

potential risk to other pupils in the school. Given these circumstances, there were reasonable grounds for the school to be worried.

- 5.12 Under the UNCRC, the decision of the school to investigate further and conduct a search of Child Q's bag, scarf, coat and shoes reflects compliance with Article 33 (protecting children from the illegal use of drugs and from being involved in the production or distribution of drugs) and Article 3 (best interests).
- 5.13 Practice by the school at this point was also fully in line with its powers defined in government guidance¹⁰. This describes how school staff can search a pupil for any item if the pupil agrees, alongside setting out the statutory power to search pupils or their possessions, without consent, '*where they have reasonable grounds for suspecting that the pupil may have a prohibited item*'. Prohibited items include illegal drugs.
- 5.14 Actions taken by the school in searching Child Q demonstrated an adherence to obligations under Article 8 of the ECHR. Whilst this defines a pupil's right for respect to their private life, the 'interference' by way of the initial search was fully justified and proportionate.
- 5.15 Whilst evidencing positive practice, the next steps were characterised by a level of ambiguity and a diluted focus on Child Q's safeguarding needs. This is addressed later in the report.
- 5.16 Whilst no recommendations are made in respect of Child Q's experiences at this stage, the review has identified a need for the government's guidance, '*Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies, DfE, January 2018*' to be updated. In the opinion of the review, this guidance could be strengthened by including much stronger reference to the primary need to safeguard children.

¹⁰ ['Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies, DfE, January 2018'](#)

- 5.17 As framed, its tone is largely about discipline and is likely to lead front-line staff down this path of practice. By including relevant narrative about, for example, extra-familial risks and contextual safeguarding, this might help concentrate practice on helping and protecting children.
- 5.18 Indeed, the section covering what should happen after a search contains no reference to Keeping Children Safe in Education 2018 or the expectation that schools should escalate their concerns when indicators of abuse, harm or exploitation are identified. Being in possession of drugs is one such indicator, although the only external agency identified in the guidance for contact is the police.
- 5.19 The guidance also includes worryingly outdated terminology that should be urgently corrected. For example, on pages 12 and 13, the guidance refers to ‘*child pornography*’ and ‘*pornographic images of a child*’ respectively.

Recommendation 3: The Department for Education should review and revise its guidance on *Searching, Screening and Confiscation (2018)* to include more explicit reference to safeguarding and to amend its use of inappropriate language.

Finding 2: The decision to strip search Child Q was insufficiently attuned to her best interests or right to privacy.

- 5.20 There is valid critique about whether the decision and execution of the strip search were consistent with Child Q’s best interests¹¹ and her right to privacy¹².
- 5.21 An example of this can be seen in the approach to engaging an Appropriate Adult for Child Q. Practice was ambiguous and appears not to have aligned with the defined legal application of stop and search (concerning searches

¹¹ Article 3 (best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children. UNCRC

¹² Article 16 (right to privacy) Every child has the right to privacy. The law should protect the child’s private, family and home life, including protecting children from unlawful attacks that harm their reputation. UNCRC

involving exposure of intimate parts of the body) as set out by the College of Policing¹³. This guidance states:

'Unless there is a risk of serious harm to the person or to someone else, there must be a minimum of two persons present in addition to the person being searched. One of those must be the appropriate adult if the person is a child or vulnerable adult unless, in the case of a child, the child and appropriate adult both agree that the adult should not be present during the search.'

- 5.22 In Child Q's circumstances, whilst two people were present, they were both police officers. In the account of one of these officers seen by the review, they comment that Child Q '*indicated*' that she didn't mind one of the teachers acting as an Appropriate Adult but was uncomfortable about them being in the room. The officer further states that this teacher (and another) '*seemed*' happy to be outside whilst the search was undertaken. 'Indicated' and 'Seemed' do not suggest a thorough process whereby specific clarification was being sought about how Child Q's best interests would be protected.
- 5.23 Indeed, school staff dispute having ever been told about the planned strip search. In this sense, even if they knew they were the Appropriate Adult for Child Q, their ability to effectively advocate for her was seriously undermined.
- 5.24 On initiating the review, the MPS quickly recognised this as an area of improvement, issuing a revised guidance note to its officers across London in February 2021. This reinforced the following requirements with regards to Appropriate Adults.
- *Arrange for an Appropriate Adult to be present in the case of a child or young person or vulnerable adult (except in cases of urgency where there is a risk of harm to the detainee or others).*

¹³ <https://www.app.college.police.uk/app-content/stop-and-search/legal/legal-application/>

- *If the subject is under 18 and does not wish an Appropriate Adult to be present during the actual search, ensure they explain this in the presence of the Appropriate Adult and obtain the agreement of the Appropriate Adult.*

5.25 Whilst positive, this guidance could be strengthened by fully reflecting the procedure set out under the revised Code C, PACE, Annex A, paragraph 11 (C)¹⁴.

'Except in urgent cases ... a search of a juvenile may take place in the absence of the appropriate adult only if the juvenile signifies in the presence of the appropriate adult that they do not want the adult to be present during the search and the adult agrees. A record shall be made of the juvenile's decision and signed by the appropriate adult.'

5.26 No evidence has been seen by the review indicating that any of the above expectations were actioned by the police during the strip search of Child Q. The review makes the following recommendation:

Recommendation 4: The MPS should update its guidance note and local policy to better emphasise the requirements for engaging an Appropriate Adult under the revised Code C, PACE, 1984.

5.27 In terms of the wider responsibility of all practitioners to protect and promote the rights of children, the review makes the following finding:

Finding 3: School staff deferred to the authority of the police on their arrival at school. They should have been more challenging to the police, seeking clarity about the actions they intended to take. All practitioners need to be mindful of their duties to uphold the best interests of children.

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117589/pace-code-c-2012.pdf

- 5.28 As a learning point, this has been fully accepted by the school staff involved. Many reflected their sadness and disappointment at what Child Q had experienced, with comments made as part of the school's Stage 2 investigation report echoing these feelings:

"In hindsight I put my trust in the law; I know now that I need to understand the law better... For example, insisting on staying with a student at all times..."

"This is the hardest thing that we've had to go through and for anyone to think that the school might be complicit is very stressful and difficult to deal with."

"In my experience with police [at her previous schools], where there has been a suspicion of carrying drugs or a weapon, and police found it necessary to conduct a search, it would only be a 'pat down'. I have known drugs to be found in socks or a waistband as I had witnessed that before, twice in my career. I have never known any more than that on site or known a student to be taken off site."

"I am an experienced Designated Safeguarding Lead with over 6 years' experience of safeguarding and liaising with the police to support young people. I have never known, nor would I condone a strip search of a young person on a school site."

<p>Recommendation 5: The CHSCP should review and revise its awareness raising and training content to ensure the Child Q case is referenced, with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with / who are in their care.</p>

Review Question 2: Safeguarding Needs

- 5.29 Was practice involving Child Q sufficiently focused on her potential safeguarding needs? In circumstances where young people are being engaged due to concerns about drug use / possession, is the safeguarding of children a recognised and evidenced priority in practice?

- 5.30 Concerns about strip searching children are not new, having previously attracted scrutiny from a range of different sources. Whilst not practical to highlight every relevant article or document, the following provides a snapshot of some of this material.
- 5.31 In 2014, a report by Joe Sandler Clarke¹⁵ for the Guardian newspaper identified that *'...4,638 children aged between 10 and 16 were asked to remove their clothes and then searched by police between April 2008 and the end of last year. Just over a third were released by police without charge.'*
- 5.32 This article also highlighted the attempts of Julian Huppert, a Liberal Democrat MP for Cambridge who unsuccessfully campaigned for children to be strip searched only if an adult other than police officers was present.
- 5.33 In 2015, Just for Kids Law and Children's Rights Alliance for England (CRAE) published a briefing note¹⁶ detailing their serious concerns about an *'alarming increase in the number of children being strip searched by the police'*. This note also highlighted concerns that in 45% of strip searches of children, no Appropriate Adult was present.
- 5.34 More recently, the practice of strip searching within the CHSCP's footprint has also been critiqued. Whilst involving an adult, the case of Dr Koshka Duff¹⁷ evidences the impact and trauma that can be caused when practice falls well outside of defined standards.
- 5.35 Whilst some may argue that the strip searching of children should never be done at all, the review acknowledges its place in practice, with the caveat that this needs to be firmly embedded in a culture that addresses the safeguarding needs of children.

¹⁵[Metropolitan police strip searched more than 4,500 children in five years](#), Joe Sandler Clarke, The Guardian, March 2014

¹⁶ <http://www.crae.org.uk/media/76504/FINAL-Strip-Searching-at-Police-Station-Briefing.pdf>

¹⁷ <https://www.bbc.co.uk/news/uk-60141559>

- 5.36 The senior leaders at both the school and the police have fully acknowledged they could and should have done better in this regard. It is accurate to describe the senior leadership teams as being appalled at what Child Q experienced.
- 5.37 If children are suspected of carrying drugs or weapons, it is more likely than not that they are being exploited in some way or form. So, whilst stop and search powers '*enable officers to allay or confirm suspicions about individuals without exercising their power of arrest.*'¹⁸ – they should equally be used as a tool to identify risk and give children the help and protection they might need.
- 5.38 Taking a binary approach as to whether a crime has been committed or not runs the risk that important aspects of a child's life will be missed. Important aspects that may make the difference between that child being protected or not.
- 5.39 In terms of the strip search of Child Q, practice that day appears to have been far too weighted towards a criminal justice response. This may be explained in part by the deference of school staff to the police. It might relate to the relative junior police staff involved or the fact that officers didn't seek the advice of their supervisor. It might also relate to elements of disproportionality and racism leading those involved to make certain assumptions about Child Q and what response was required.
- 5.40 It was also the lack of action taken after the strip search that shows Child Q was primarily being seen as 'the risk' as opposed to being 'at risk'. Because of this, little to no thought was given as to whether a referral to external agencies might be required. Indeed, if the rationale to strip search Child Q was based on fears about exploitation, then it should have followed that this concern was escalated as a safeguarding referral¹⁹. As it was, Child Q was sent home in a taxi.

¹⁸ [Revised code of practice for the exercise by: Police Officers of Statutory Powers of stop and search, Home Office 2014](#)

¹⁹ The MPS did create a Merlin report, however, this was RAG rated as BLUE. These are not ordinarily submitted to Hackney CFS as risk is assessed as not being a factor. The Merlin was received by Hackney CFS 14 days later as part of a request for information from the police following the referral from Health. The Merlin made no reference to the strip search.

Recommendation 6: Relevant police guidance (both local and national) governing the policy on strip searching children should clearly define a need to focus on the safeguarding needs of children and follow up actions that need to be considered by way of helping and protecting children at potential risk.

Recommendation 7: The Central East BCU should engage the local stop and search monitoring group, ACCOUNT, and other representative bodies to consider the lessons from this review and how the effectiveness of safeguarding (as part of stop and search practice) can be overseen through their respective activities.

Finding 4: School staff had an insufficient focus on the safeguarding needs of Child Q when responding to concerns about suspected drug use.

- 5.41 When evaluating practice by the school, lessons also emerge about the need to maintain a clear line of sight on the safeguarding needs of children. Neither the incident of the strip search nor the previous concerns about Child Q smelling of cannabis resulted in any contact with external agencies.
- 5.42 Practice during both these incidents was similarly binary in approach, with the focus appearing to be on whether Child Q had breached the rules as opposed to what the alleged substance misuse might mean for her safety and welfare. The review makes the following finding in this respect:

Recommendation 8: Where any suspicion of harm arises by way of concerns for potential or actual substance misuse, a safeguarding response is paramount. Practitioners should always contact Children's Social Care to make a referral or seek further advice in such circumstances.

Review Question 3: Law and Policy

- 5.43 Is the law and policy, which informs local practice, properly defined in the context of identifying potential risk and furthermore, does law and policy create the conditions whereby practice itself can criminalise and cause significant harm to children?**

Finding 5: The application of the law and policy governing the strip searching of children can be variable and open to interpretation.

- 5.44 Home Office guidance²⁰ explains that the use of powers relating to stop and search '*must be used fairly, responsibly, with respect for people being searched and without unlawful discrimination*'. Under the Equality Act 2010, section 149, officers also have '*a duty to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between people who share a 'relevant protected characteristic' and people who do not share it, and to take steps to foster good relations between those persons.*' It further emphasises section 11 of the Children Act 2004 that requires chief police officers and other specified persons and bodies '*to ensure that in the discharge of their functions they have regard to the need to safeguard and promote the welfare of all persons under the age of 18.*'
- 5.45 The Home Office policy framework also acknowledges that if the fundamental principles (governing the discharge of stop and search powers) are not observed, the use of powers to stop and search '*may be drawn into question*'. For any search undertaken by the police, the guidance is clear that it must be based on reasonable grounds for suspicion that the person has a particular article in their possession²¹.
- 5.46 Whilst there is no disagreement with many aspects of this guidance or the broad principles of the law, it is here that the review believes further emphasis could help support improved practice with children.

²⁰ [Revised code of practice for the exercise by: Police Officers of Statutory Powers of stop and search, Home Office 2014](#)

²¹ Except when officers are authorised under section 60 Criminal Justice and Public Order Act 1994.

- 5.47 Indeed, with regards to Child Q's experiences, having a previous associate who used drugs and being noted to have smelt of cannabis twice, should not have led an officer to conclude a strip search on school grounds was the right course of action. This and subsequent actions did not have regard to Child Q's safeguarding or welfare. They were not the most proportionate tool available, and the extent of the strip search did not keep the degree of intrusion to the minimum.
- 5.48 It is also worth highlighting the IOPC finding²² of a complaint in September 2020 that emphasised '*the use of the smell of cannabis as a single ground is not good practice as set out in the College of Policing's Authorised Professional Practice on stop and search.*'
- 5.49 Whilst fully acknowledging the complexities that face front-line policing and the challenges in making definitions 'too tight', it seems to the review that better guidance and training covering 'reasonable grounds' would benefit decision making, particularly where this involves children. Practice was undertaken by officers believing they were operating in line with law and policy. Even by doing so, their actions arguably criminalised Child Q and caused her significant harm.

Recommendation 9: The MPS should engage The College of Policing to explore potential improvements to the guidance concerning reasonable grounds involving stop and search activity with children.

Finding 6: The absence of any specific requirement to seek parental consent when strip searching children undermines the principles of parental responsibility and partnership working with parents to safeguard children.

- 5.50 A clear theme of practice on the day of the strip search was the lack of any parental engagement. One account from the police states that Child Q was asked if she wanted her mother to be contacted, which they say she declined.

²² <https://www.policeconduct.gov.uk/news/iopc-upholds-cyclist%E2%80%99s-stop-and-search-complaint-against-metropolitan-police-officer>

Child Q disputes this and states that she did in fact ask for her mother on both this and other occasions that day. In the opinion of the review, little thought appears to have been given to the importance of contacting someone with parental responsibility for Child Q.

5.51 This was first seen in the school's response. Despite Child Q's mother being contacted following the previous incident, this wasn't done immediately on this occasion. It is likely that the involvement of the police influenced this being considered in the depth that would have reflected best practice. School staff appear to have deferred to the decisions of the police. That said, the DfE guidance on searching screening and confiscation²³, is also light on the inclusion of parental consent as an issue of importance. Section 16 of this guidance includes the following relevant statements:

- *'Schools are not required to inform parents before a search takes place or to seek their consent to search their child'*. The review agrees with this position.
- *'There is no legal requirement to make or keep a record of a search'*. This statement is permissive and whilst likely to be accurate from a legal sense, it runs the risk of promoting poor practice. There will be equally no legal impediment to recording a search. Any guidance that steers practitioners away from making records on safeguarding matters is poor and should be changed.
- *'Schools should inform the individual pupil's parents or guardians where alcohol, illegal drugs or potentially harmful substances are found, though there is no legal requirement to do so.'* In the absence of this document sufficiently referencing the requirement to safeguard children and engage external agencies, this point needs strengthening. Whilst noting that schools should inform parents or guardians, permissive statements such as this risk schools not doing anything. In Child Q's case, she was the one who had to tell her mother she had been searched by the school and

23

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

stripped searched by the police. In the opinion of the review, this ‘legally permissible practice’ is not good practice.

Recommendation 10: Alongside Recommendation 3, the Department for Education should review and revise its guidance on *Searching, Screening and Confiscation (2018)* to include much stronger reference to the importance of keeping records and engaging parents as part of best safeguarding practice.

5.52 In terms of the strip search of Child Q, her mother was neither engaged to seek consent nor informed by the police that the search was going to take place or had taken place. In the opinion of the review this was poor practice.

5.53 However, as set out within PACE 1984, there is no specific requirement to gain parental consent prior to a strip search – even those that might involve the exposure of intimate parts of the body. For intimate searches, this position is different. Annex A, 2B of the Revised Code C, PACE 1984 states:

*‘In the case of a juvenile or a vulnerable person, the seeking and giving of consent must take place in the presence of the appropriate adult. **A juvenile’s consent is only valid if their parent’s or guardian’s consent is also obtained** unless the juvenile is under 14, when their parent’s or guardian’s consent is sufficient in its own right.’*

5.54 Both the review and the reference group struggled to understand the rationale behind these differing approaches to consent. On the face of it, the law appears to suggest that the requirement for a child to expose their intimate body parts is insufficiently significant to require their parents to be told it is going to happen.

5.55 This fundamentally fails to acknowledge the dehumanising and traumatic impact that such searches can have on children, and again, the important role that parents / carers have in terms of protecting their own children. It potentially minimises the ability of parents / carers to provide immediate support. The

review struggled to see how the absence of any requirement to even tell parents that a strip search was going to take place could be in a child's best interests.

Recommendation 11: The Home Office and the National Police Chiefs Council should seek to strengthen the Revised Code C, PACE 1984 to better define the engagement of parents / carers / guardians when strip searches that involve the exposure of intimate parts of the body are undertaken on children.

- 5.56 The review considers that benefits could also be accrued by educating and empowering young people to better understand their rights in respect of stop and search activity by the police.
- 5.57 Indeed, Child Q was fully compliant with the school's search of her possessions and compliant with the request to be strip searched by the police. Whilst not advocating she should have been disruptive, she appeared unable to challenge any of the actions being undertaken and is unlikely to have known about what she could expect, even by way of procedure (i.e. such as the requirement for both her and an Appropriate Adult to agree and sign for the Appropriate Adult not to be present during the strip search). She responded in this way, despite being adamant that she had no drugs in her possession and being upset about not being allowed to take her mock examination.
- 5.58 The reference panel considered the arrival of the police at school and how Child Q might have reacted to this trauma. Whilst well-known behavioural responses are the fight, flight, or freeze responses, Child Q may have experienced a fawn response²⁴. Flight includes running away, fight is to challenge aggressively, and freeze is when someone becomes unable to move physically or make choices. The fawn response involves rapidly moving to try to please a person to avoid any conflict. This could have accounted for Child Q's compliance.
- 5.59 Whilst only a hypothesis, the circumstances nonetheless highlight evidence of where improvements could be made in directly raising awareness and

²⁴ <https://www.psychologytoday.com/us/blog/addiction-and-recovery/202008/understanding-fight-flight-freeze-and-the-fawn-response>

knowledge amongst children about their rights. A range of material²⁵ already exists that could be developed in this context.

Recommendation 12: The CHSCP should engage ACCOUNT, Safer Schools Police Officers and other community organisations to develop an awareness raising programme across schools and colleges about stop and search activity by the police.

Covid-19

Finding 7: The Covid-19 restrictions in place at the time appeared to have frustrated effective communication between school staff and the Safer Schools Officer.

- 5.60 The Safer Schools Police Officer (SSPO) was not on the school premises due to the Covid-19 restrictions in place at the time. In usual circumstances, it is likely that the SSPO would have been directly involved with Child Q and this may have led to a different response. Whilst only a hypothesis, the review is alert to the fact that the attending officers that strip searched Child Q had no experience of working in schools.
- 5.61 The SSPO's absence may also have contributed to a dilution in the accuracy of information sharing and a collective understanding about what was being asked for and what would happen. There remain differing accounts provided by teachers and the SSPO as to what exactly the police were being contacted for and the expectations of their subsequent actions.
- 5.62 Whilst no specific recommendations are made in respect of Covid-19 arrangements, there is relevant learning to be accrued about how the SSPO role can help promote a wider understanding about stop and search powers and how these relate to children.

²⁵ https://www.london.gov.uk/sites/default/files/kyr_inner_april_19_v5_new.pdf

Racism

- 5.63 Finding 8: Having considered the context of the incident, the views of those engaged in the review and the impact felt by Child Q and her family, racism (whether deliberate or not) was likely to have been an influencing factor in the decision to undertake a strip search.**
- 5.64 The actions of professionals involved on the day of the strip search have been evaluated in the context of Child Q's ethnicity and whether she was treated differently because she is Black.
- 5.65 The importance of this line of enquiry is starkly reflected in several events that took place around the same time. Significantly, some six months prior, George Floyd was tragically killed in the USA and there were repercussions around the globe, including in the UK. It brought into sharp focus some of the negative experiences that Black and Global Majority Ethnic communities can experience when interacting with the police. Valid questions have been raised about racism within the police and other agencies, the priority given to tackling this and whether organisational commitment ever rises above the rhetoric.
- 5.66 The strip search of Child Q also took place two months before HMICFRS²⁶ published its report into the disproportionate use of police powers²⁷. In her introduction to the HMICFRS report, Wendy Williams CBE, HM Inspector of Constabulary stated:

'Some of the most intrusive and contentious police powers are those that allow the police to use force and to stop and search people. Some view stop and search as a valuable tool in the fight against crime, while others argue that its use has little effect on crime rates and can in fact increase disorder. For some, particularly Black, Asian and Minority Ethnic people, it can reinforce the perception that there is a culture of discrimination within the police. And, now

²⁶ Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

²⁷ [Disproportionate use of police powers - A spotlight on stop and search and the use of force, HMICFRS Feb 21](#)

that we have some long-awaited data on the police use of force, similar concerns are arising about this area of practice.'

- 5.67 In framing the rationale for this finding, the review has intentionally avoided the use of '*unconscious bias*'. In the opinion of both the review and its reference group, as a term, this somewhat excuses the actions of those involved. It gives the perception that agencies and its practitioners aren't accountable for what they say or do and that they are unable to pause, reflect and consciously control their actions. It similarly suggests that the behaviour and culture within organisations can't be changed. The review disagrees.
- 5.68 Furthermore, Child Q and her family strongly believe that the strip search of Child Q was a racist incident. Whilst acknowledging the ongoing debate concerning definitions²⁸, the review and reference group were clear that the perception of the victim is central to how racism is defined.
- 5.69 Indeed, the review and reference panel held a firm view that had Child Q not been Black, then her experiences are unlikely to have been the same. This view is broadly supported when looking at the disproportionality evidenced in a previous inspection of custody suites in the MPS. Undertaken by HMICFRS and HM Inspectorate of Prisons in 2018²⁹, this inspection found clear evidence of a disproportionate approach in this area of practice.

'Force data indicated that the numbers of strip searches were high and included many children and a significantly higher proportion of black and minority ethnic detainees compared against the overall throughput. We concluded that overall not all strip searches were warranted or properly justified.'

- 5.70 The full reasons behind why racism continues to feature in professional safeguarding practice are without doubt wide-ranging and complex. The review is simply unable to de-construct all these areas within this report.

²⁸ [Commission on Race & Ethnic Disparities 2021](#)

²⁹ [Metropolitan Police Service police custody suites, Jan 2019](#)

- 5.71 That said, one feature believed to have a significance to the experience of Child Q is that of adultification bias. This concept is where adults perceive Black children as being older than they are. It is *‘a form of bias where children from Black, Asian and minoritised ethnic communities are perceived as being more ‘streetwise’, more ‘grown up’, less innocent and less vulnerable than other children. This particularly affects Black children, who might be viewed primarily as a threat rather than as a child who needs support’*³⁰.
- 5.72 A US study by Georgetown Law’s Center on Poverty and Inequality in 2017³¹ found that Black girls as young as five years old were seen *‘as being less in need of protection and nurturing compared to their white counterparts.’* Research also showed that Black girls were 2.7 times more likely to be referred to the juvenile justice system, 2 times more likely to be disciplined for minor violations at school and 20% more likely to be charged with a crime. Whilst a US study, these experiences won’t be isolated there.
- 5.73 In reflecting on how adultification bias might have been evident in practice with Child Q, this can be seen in the fact that she received a largely criminal justice and disciplinary response from the adults around her, *‘rather than a child protection response’*. This firmly echoes the findings of Davis and Marsh, 2020³². The review believes there to be a high level of probability that practitioners were influenced in this regard. The disproportionate decision to strip search Child Q is unlikely to have been disconnected from her ethnicity and her background as a child growing up on an estate in Hackney.
- 5.74 Recognising the need to immediately influence practice in this regard, the CHSCP commissioned a 12-month programme of multi-agency training sessions on adultification bias. Initially delivered to senior leaders across the safeguarding partnership, this training covers the broad concepts of racism, intersectionality and adultification bias, helping practitioners understand notions

³⁰ <https://learning.nspcc.org.uk/safeguarding-child-protection/children-from-black-asian-minoritised-ethnic-communities#heading-top>

³¹ <https://www.law.georgetown.edu/news/research-confirms-that-black-girls-feel-the-sting-of-adultification-bias-identified-in-earlier-georgetown-law-study/>

³² Davis, J. and Marsh, N. (2020) Boys to men: the cost of ‘adultification’ in safeguarding responses to Black boys, *Critical and Radical Social Work*, 8(2): 255–259.

of vulnerability and childhood and how these are applied to some children more than others. Specific sessions have been held for the police to facilitate maximum attendance, with scheduled sessions also set up for schools.

- 5.75 The review is also alert to significant activity ongoing across the partnership to create the right conditions for anti-racist practice to thrive and be the norm. Whilst safeguarding partners recognise there is more to do, the review acknowledges both the leadership commitment supporting this work and the rapid training response as positive practice. It makes the following two recommendations:

Recommendation 13: The CHSCP should continue with its rolling programme of multi-agency adultification training. Participation should be actively focused on practitioners from the police and schools, with the Training, Learning & Development Sub group developing a process to specifically evaluate impact across these sectors.

Recommendation 14: The CHSCP should expedite its work on developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.

#	Recommendation	Activity undertaken before incident involving Child Q	Activity undertaken following incident involving Child Q and pre-publication of report	Planned Activity
1	<p>ANY RELATED ACTIVITY INVOLVING ENGAGEMENT WITH THE NATIONAL CSPRP AS PART OF THE SYSTEM FOR REVIEWING SERIOUS CHILD SAFEGUARDING CASES</p> <p>The Child Safeguarding Practice Review Panel should engage the IOPC with a view to developing national guidance on the IOPC's interface with the Local Child Safeguarding Practice Review process. As a minimum, this should set out the arrangements for securing cooperation, accessing key staff for interview and the requirements for the timely sharing of</p>			
2	<p>ANY RELATED ACTIVITY INVOLVING RECORDING AND OVERSIGHT OF ALL TYPES OF POLICE SEARCHES INVOLVING CHILDREN.</p> <p>The MPS should review and revise its recording system for stop and search to ensure it clearly identifies and allows for retrieval of the full range of activity under stop and search powers (including the ability to differentiate between the different types of strip searches undertaken).</p>			
3	<p>ANY RELATED ACTIVITY INVOLVING GUIDANCE / POLICY / PROCEDURE FOR SCHOOLS AND OVERSIGHT OF SCREENING, SEARCHING & CONFISCATION</p> <p>The Department for Education should review and revise its guidance on Searching, Screening and Confiscation (2018) to include more explicit reference to safeguarding and to amend its use of inappropriate language.</p>			
4	<p>ANY RELATED WORK CONCERNING THE USE OF APPROPRIATE ADULTS IN ANY CONTEXT</p> <p>The MPS should update its guidance note and local policy to better emphasise the requirements for engaging an Appropriate Adult under the revised Code C, PACE, 1984.</p>			
5	<p>ANY RELATED ACTIVITY COVERING PRACTITIONER UNDERSTANDING OF THE PRINCIPLES OF SAFEGUARDING FIRST (INCLUDING DISEMINATING LESSONS FROM PREVIOUS REVIEWS), CHALLENGE & ESCALATION, ROLES AND RESPONSIBILITIES & PARAMOUNT FOCUS ON CHILDREN</p> <p>The CHSCP should review and revise its awareness raising and training content to ensure the Child Q case is referenced, with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with / who are in their care.</p>			
6	<p>ANY RELATED WORK INVOLVING POLICY, GUIDANCE, TRAINING, OVERSIGHT OF ALL SEARCH ACTIVITY INVOLVING CHILDREN.</p> <p>Relevant police guidance (both local and national) governing the policy on strip searching children should clearly define a need to focus on the safeguarding needs of children and follow up actions that need to be considered by way of helping and protecting children at potential risk.</p>			
7	<p>ANY RELATED WORK COVERING ENGAGEMENT / INVOLVEMENT WITH COMMUNITY ORGANISATIONS AND OTHER PARTNERS TO OVERSEE POLICE SEARCH ACTIVITY INVOLVING CHILDREN</p> <p>The Central East BCU should engage the local stop and search monitoring group, ACCOUNT, and other representative bodies to consider the lessons from this review and how the effectiveness of safeguarding (as part of stop and search practice) can be overseen through their respective activities.</p>			

8	<p>ANY RELATED WORK INVOLVING GUIDANCE, TRAINING, SUPPORT ON PROFESSIONAL RESPONSE TO SUSPECTED / KNOWN SUBSTANCE MISUSE BY CHILDREN.</p> <p>Where any suspicion of harm arises by way of concerns for potential or actual substance misuse, a safeguarding response is paramount. Practitioners should always contact Children's Social Care to make a referral or seek further advice in such circumstances.</p>			
9	<p>ANY ACTIVITY - SUCH AS DEVELOPING GUIDANCE / TRAINING ON WHAT CONSITUTES REASONABLE GROUNDS FOR INITIATING A SEARCH OF A CHILD</p> <p>The MPS should engage The College of Policing to explore potential improvements to the guidance concerning reasonable grounds involving stop and search activity with children.</p>			
10	<p>ANY RELATED WORK ON RECORD KEEPING AND PARENTAL ENGAGMENT WHEN WORKING WITH CHILDREN.</p> <p>Alongside Recommendation 3, the Department for Education should review and revise its guidance on Searching, Screening and Confiscation (2018) to include much stronger reference to the importance of keeping records and engaging parents as part of best</p>			
11	<p>AS ABOVE</p> <p>The Home Office and the National Police Chiefs Council should seek to strengthen the Revised Code C, PACE 1984 to better define the engagement of parents / carers / guardians when strip searches that involve the exposure of intimate parts of the body are undertaken on children.</p>			
12	<p>ANY WORK UNDERTAKEN WITH CHILDREN TO PROMOTE THEIR UNDERSTANDING OF THEIR RIGHTS IN TERMS OF STOP & SEARCH</p> <p>The CHSCP should engage ACCOUNT, Safer Schools Police Officers and other community organisations to develop an awareness raising programme across schools and colleges about stop and search activity by the police.</p>			
13	<p>ANY TRAINING MADE AVAILABLE ON ADULTIFICATION / RACISM + NUMBERS TRAINED</p> <p>The CHSCP should continue with its rolling programme of multi-agency adultification training. Participation should be actively focused on practitioners from the police and schools, with the Training, Learning & Development Sub group developing a process to specifically evaluate impact across these sectors.</p>			
14	<p>ANY RELATED ACTIVITY INVOLVING THE DEVELOPMENT / PROMOTION OF ANTI-RACIST PRACTICE</p> <p>The CHSCP should expedite its work on developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.</p>			

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: The Provision of Alternative Accommodation to Families Where Children Have Died	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	Y/N
Report of: Director of Community and Children's Services	For Information
Report author: Liam Gillespie, Head of Housing Management, DCCS	

Summary

Following the accidental deaths of two children in their homes in Hackney, the City and Hackney Safeguarding Children Partnership (CHSCP) requested that relevant housing protocols were reviewed to ensure that sufficient regard was given to a household's circumstances when a traumatic child death occurs, specifically the mental health impact on the family in remaining in the home where the death took place.

The City's Housing Allocations Scheme already gave officers a wide discretion to assist families in such traumatic circumstances through the 'Management Transfer' route, however the Scheme has now been amended to explicitly state that families suffering a child bereavement will be eligible for Management Transfer, the highest category of priority on the housing register.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. Following the tragic accidental deaths of two children in their homes, concerns were raised by professionals supporting their families about the impact on their

mental health and wellbeing from remaining in the home in which the accidents occurred.

2. The CHSCP requested that relevant housing protocols were reviewed and, where necessary, amended, to ensure that they have regard to the mental health impact on families when children die at home.
3. Under our Housing Allocations Scheme (“the Scheme”), officers have wide discretion to offer alternative housing in situations of urgent or critical need. Should a tragic event occur in the home, such as the traumatic death of a child, this would be deemed a pressing reason to offer alternative accommodation as soon as possible.
4. ‘Management Transfer’ status means that a household is awarded the highest priority for rehousing and would be offered a suitable alternative home as soon as one became available. This is outside the usual choice-based lettings system, meaning the household does not have to place bids and compete with other households for available properties.
5. If the household were unable to continue to occupy their current home while waiting, officers would ensure they received appropriate advice about their options and would do everything possible to assist them in the interim.

Current Position

6. In response to the request from CHSCP to review our housing protocols, and to further strengthen our current arrangements, the Scheme was amended and now specifically states that households suffering a child bereavement in the home will be offered Management Transfer status.
7. The practical implication of Management Transfer status is that the household will be transferred to a suitable alternative home as soon as one becomes available to let.
8. Officers will continue to exercise their discretion in awarding Management Transfer status, or additional welfare points, in circumstances not specifically covered by this amendment.
9. This change, and other minor unrelated changes to the Scheme, came into effect on 22nd February 2022.

Corporate & Strategic Implications

Strategic implications

10. This amendment supports the following Corporate Plan outcomes:

- 1: People are safe and feel safe
- 2: People enjoy good health and wellbeing

Conclusion

11. In response to a request from CHSCP to review relevant housing protocols relating to the assistance provided to households which suffer the traumatic death of a child, the City's Housing Allocations Scheme has been updated. The Scheme now explicitly states that, in these circumstances, families will be offered a Management Transfer, which is the highest level of priority for rehousing under the Scheme.

Appendices

- None

Liam Gillespie

Head of Housing Management
Department of Community & Children's Services

T: 020 7332 3785

E: liam.gillespie@cityoflondon.gov.uk

This page is intentionally left blank

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: Education Welfare services and school attendance and persistent absence	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	<p>Contribute to a flourishing society</p> <ol style="list-style-type: none"> 1. People are safe and feel safe 2. People enjoy good health and wellbeing. 3. People have equal opportunities to enrich their lives and reach their full potential. <p>Support a thriving economy</p> <ol style="list-style-type: none"> 8. We have access to the skills and talent we need. <p>•</p>
Does this proposal require extra revenue and/or capital spending?	No
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Theresa Shortland, Head of Service Education and Early Years Kirstie Hilton Lead Advisor – Universal Education Services	

Summary

- The last couple of years have been unprecedented for schools. As a direct result of the COVID-19 pandemic, schools have experienced higher-than-average absences due to COVID-19 and other illness.
- The Education Welfare Service fulfils the statutory legal functions invested in the local authority that relate to school attendance, including direct one-to-one education welfare support, and has ensured that schools benefit from having

access to City of London officers who can help with advice, signposting and referrals where applicable. This has allowed schools to ensure that pupils are able to access the multi-agency services they need.

- Nationally the persistent absence rate is 4.6%. The Aldgate School's overall attendance 96% and most recent persistent absence rate from the spring term 2022 is 4%, a rate relatively low in comparison to, and lower than, the national rate of absence.
- Some children who are missing from education are identified and supported back into education quickly. In the City of London we monitor children missing education regularly. Reports are shared with the Assistant Director, People monthly and with the Executive Director Community and Children's Services termly. In the City of London there are currently eight children at risk of missing education for medical or other reasons.
- The Education Welfare Service also maintains an overview of the children who are electively home educated. This is a term used to describe a choice by parents to provide education for their children at home or in some other way they desire, instead of sending them to school full time. There are many reasons why parents may decide to educate their child at home. In the City of London we maintain regular contact with the parents of children who are educated at home, of which there are currently three. This figure increased over the COVID-19 period, but has now returned to pre-pandemic figures.

Recommendation

Members are asked to:

- Note the report

Main Report

Background

1. The City of London has a unique educational landscape in that it has only one maintained primary school and no maintained secondary schools. There are four independent schools and one independent college (David Game College); the majority of children attending these schools are non-City residents. Most of the City of London's primary-age children and all secondary-age children, in the maintained sector, are educated outside the City of London.
2. Many children, especially in the London area, attend schools located in a different borough to the one in which they live. For City of London children this is no exception. Our latest figures show that around 400 children of statutory school age who live in the City of London attend approximately 80 different schools in and around the London area. This is mainly due to the wide range of secondary school options available to City of London children in neighbouring areas and good transport links.
3. The parent of every child of compulsory school age is required to ensure that the child receives a full-time education suitable to the child's ability, age, aptitude and any special education needs the child may have, either by regular attendance at

school or otherwise. Local authorities and schools have legal responsibilities regarding accurate recording of a pupil's attendance.

4. All maintained schools are required to provide two possible sessions per day, (morning and afternoon), to all pupils. Schools must meet for at least 380 sessions or 190 days during any school year to educate their pupils. Persistent absence is when a pupil overall absence equates to 10% or more of their possible sessions.

Current Position

Persistent Absence

5. A child is considered to be persistently absent from school if they miss 10% or more of all possible schools sessions, regardless of whether the absence is authorised or unauthorised.
6. All maintained schools are required to provide two possible sessions per day, (morning and afternoon), to all pupils. The length of each session, break and the school day is determined by the school's governing body. Schools are required to take attendance registers twice a day: once at the start of the first/morning session of each school day; and once during the second/afternoon session.
7. Securing good attendance and tackling persistent absence is a constant challenge for schools and local authorities alike.
8. Generally, attendance below 95% would be the threshold at which point schools would intervene and raise the issue with parents/carers. This has proven difficult during COVID-19 where children were having to self-isolate in order to follow government guidance. More recently schools have had to focus their attention on pupil's attendance that is below 90% and monitor attendance to identify patterns and trends and support parents and pupils to be in school.

The National Picture

9. In March 2022, the government produced its latest statistical release on persistent absence. This release provides a national picture and considers pupil absence across the 2020/21 academic year. It includes information on the reason for absence, the types of school, and pupil characteristics.
10. The key headlines nationally reveal that 21.3% of possible sessions in the 2020/21 academic year were recorded with pupils not attending in circumstances related to COVID-19. This includes pupils self-isolating and shielding, including when a class or 'bubble' has been required to stay at home, and includes the period of national restrictions in the spring term 2021 when 57.5% of sessions were recorded with pupils not attending. Schools were expected to provide immediate access to remote education. The overall absence rate in state-funded primary, secondary and special schools in the spring term 2020/21 was 4.6%.

Persistent Absence Rates Within Schools Located in the City of London

11. Nationally the persistent absence rate in the City of London is measured on the school attendance and absence data for The Aldgate School. This is the one maintained primary school in the City. All other schools are Independent Schools. The Aldgate School's overall attendance is 96%, and most recent persistent absence rate from the spring term 2022 is 4%, rate relatively low in comparison to the national rate of absence.

12. The Aldgate School has been very successful in ensuring that all children returned to school after both lockdowns in 2020 and 2021, and has continued to maintain good levels of school attendance, mainly through strong leadership and working with parents effectively.

Statutory Responsibilities

13. The parent of every child of compulsory school age is required to ensure that the child receive a full-time education suitable to the child's ability, age, aptitude and any special education needs the child may have, either by regular attendance at school or otherwise. Failure of a parent to secure regular attendance of their school registered child of compulsory school age can lead to a penalty notice or prosecution.
14. All schools should have access to Education Welfare services. This could be in the form of an attendance officer based within the school or a local authority based officer who oversees a number of schools.
15. Local authorities and Education Welfare services operate within a statutory framework:
- The Education Act 1996 – sections 434(1)(3)(4)&(6) and 458(4)&(5)
 - The Education (Pupil Registration) (England) Regulations 2006 as amended.

In addition, the guidance and legislation related to Children Missing Education (CME) and Elective Home Education (EHE) is considered. Every local authority has to ensure that it delivers its functions related to pupil attendance, CME and EHE. The City of London provides an Education Welfare Service in this context. The service provides advice and support to all schools in the City local area.

16. For children who live in the City of London but who attend schools in another local authority area, education welfare is the responsibility of the local authority where the school is located and the pupil attends. When there is a persistent absence problem that requires additional support, schools will escalate through their own local processes. This could be in the form of an attendance officer based within the school or local authority. Referrals can be made to the City of London Early Help Service, or the Children's Social Care Service supports these children.
17. The City of London has commissioned an Education Welfare Service as part of the Education and Early Years Service. The key responsibility of this role is making sure that all children of the age to receive formal education are sufficiently educated, be it in school or from home.
18. In the context of supporting the welfare of children in school, the City of London Education Welfare Officer (EWO) has a strong relationship with schools, education services, children's social care and partner agencies.
19. The Education Welfare Service in the City also provides advice and support to the City of London's one maintained primary school to support their efforts to maintain a good level of attendance at school. The school has robust school attendance policies

and protocols in place to monitor and support pupils with persistent absenteeism. These policies and processes are reviewed regularly.

20. The EWO in the City of London will have, on average, a school-based caseload of approximately four active cases, and will be monitoring approximately 20 cases. Most issues are dealt with by providing advice to the schools, but direct interventions are also made. These include home visits, direct contact and correspondence with parents. All schools make use of the service offered. The EWO attends meetings on a fortnightly basis with the line manager and picks up cases and issues in those meetings.
21. The City of London resident caseload fluctuates according to need, and some cases require the attention of the EWO for extended periods of time. This includes cases with school attendance elements (including health-related absence), permanent exclusion support, prevention of exclusion, supporting and advising a child on elective home education. After a prolonged intervention, cases where there are ongoing medical concerns may require support and advice from the Special Educational Needs and Disability (SEND) team around whether there is a need for educational assessments or even an Education, Health and Care Needs assessment.
22. Local councils and schools can use various legal powers if a child is missing school without a good reason. They can give:
 - a Parenting Order – This means parents/carers have to go to parenting classes and do what the court says to improve the child's school attendance.
 - an Education Supervision Order (ESO) – If the local authority thinks a parent needs support getting their child to go to school and they are not co-operating, they can apply to a court for an ESO. This means that a supervisor will be appointed to help parents/carers get their child into education.
 - a School Attendance Order – a School Attendance Order can be issued if the local authority think a child is not getting an education. The parent/carer has 15 days to provide evidence that they have registered their child with the school listed in the order. If this is not done, then parents/carers can be prosecuted or given a fine which is sometimes known as a 'penalty notice'.
23. The Education Welfare Service fulfils the statutory legal functions invested in the local authority that relate to school attendance, instigating legal proceedings where required against parents/carers who have not ensured their children's regular attendance through the use of Penalty Notices (PN), applications for ESOs, and the issuing school attendance orders. The local authority only has the power to issue PNs to state maintained schools, therefore the independent schools located in the City are out of this remit.
24. To date, the City's Education Welfare Service has not been required to issue any legal orders. This is mainly due to the collaborative work that the service does with The Aldgate School, including early intervention and preventative work. The aim of any intervention will always be to encourage and, where necessary, enforce attendance to safeguard and promote the welfare of the children in order that they may reach their full potential.

25. The Education Welfare Service also works with children missing education. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.
26. Some children who are missing from education are identified and supported back into education quickly. In the City of London, we monitor children missing education regularly. Reports are shared with the Assistant Director, People monthly, and with the Executive Director Community and Children's Services termly. In the City of London, there are currently eight children at risk of missing education for medical or other reasons.
27. The Education Welfare Service also maintains an overview of the children who are electively home educated. This is a term used to describe a choice by parents to provide education for their children at home or in some other way they desire, instead of sending them to school full time. There are many reasons why parents may decide to educate their child at home. In the City of London we maintain regular contact with the parents of children who are educated at home, of which there are currently three. This figure increased over the COVID-19 period but has now returned to pre-pandemic figures.

Future Priorities

28. Our main priorities over the next year are to:
- continue to work with the schools in the City of London to offer advice and support where needed, and to ensure that all cases of persistent absence are monitored and addressed
 - continue to ensure that families are supported to maintain good attendance at school and referred or signposted to relevant services where needed
 - monitor the trends and maintain an overview of all school attendance and school absence issues.

Corporate & Strategic Implications

29. This work supports priorities 1 and 2 in the Children and Young People's
- Our children and young people are safe and feel safe
 - Our children and young people have equal opportunities to enrich their lives and are well prepared to achieve in adulthood.
30. Financial implications – N/A
31. Resource implications – N/A
32. Legal implications – N/A
33. Risk implications – N/A
34. Equalities implications – N/A
35. Climate implications – N/A

36. Security implications – N/A

Conclusion

37. Over the last year, our key priorities within the Education and Early Years Service remain the safeguarding and wellbeing of City-resident children accessing education, and to offer educational welfare support to our City of London schools. We are committed to providing an excellent service to all our families who require support, and we continue to anticipate what challenges families may have in transitioning back to school following the lockdowns caused by the COVID-19 pandemic.

Appendices

- None

Theresa Shortland
Head of Service – Education and Early Years

T: 07711919718
E: theresa.shortland@cityoflondon.gov.uk

Kirstie Hilton
Lead Advisor – Universal Education Services

T: [07803437510]
E: kirstie.hilton@cityoflondon.gov.uk

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: Virtual School for children with a social worker: Interim Report for Academic Year 2021–2022	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	3, 8
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain’s Department?	n/a
Report of: Andrew Carter, Director of Community and Children’s Services	For Information
Report author: Andrew Russell, Headteacher of the Virtual School for Children with a Social Worker	

Summary

This report presents an overview of the activities and impact of the City of London Virtual School for the academic year September 2021 to March 2022.

The work of the Virtual School expanded hugely in September. There was awareness of the expansion to include all children with a social worker, and it was well planned. The unplanned expansion to the Virtual School roles and activities included work to provide an education for 250 Afghan children who arrived in the City in September.

Our children, for whom we are corporate parents, continue to make progress in their education this academic year.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. In the summer of 2021, the Department for Education (DfE) announced that the role of Virtual School Headteachers would be expanded once again, this

time to cover all children with a social worker. The expanded role would bring extra responsibilities around the education of children on a Child Protection Plan and Children in Need Plan. The new duties are not the same as they are for looked-after children, because we are not the corporate parent for the new children. The role focuses on a strategic oversight of cases, providing challenge and support to schools and social workers where necessary.

2. To support this expansion, the DfE also announced a grant to fund extra capacity in Virtual Schools. We used the grant to secure the services of Helen Priest, a recently retired and very experienced Virtual School Headteacher to become the education lead for Children in Need. Helen joined the team on 1 September 2021, expecting to work for two days a week.
3. Just as Helen joined, we received more than 600 Afghan arrivals into the City, of which around 250 were school age. Helen and I quickly found that our roles expanded enormously as we needed to source education for all the children. We both needed to work four days a week instead of two to deal with the volume of extra work.
4. We quickly had to decide how to meet the children's educational needs in the short and medium term. We had limited information from the families. What became clear was that they had a wide range of education experience in Afghanistan, but mainly low or no English language skills. The same was true of the parents.
5. We decided to set up a learning centre in the City where we could start English as an Additional Language (EAL) teaching and try to prepare the children to join schools. We had to find a suitable nearby venue, determine a structure for delivering lessons, commission a teaching team, and consider all the logistics that contribute to successfully establishing what was effectively a small school.
6. Working with conference and event group, etc.venues, we rented an old tea warehouse which had been newly refurbished as offices and meeting rooms – perfect for teaching our children and easy to get to. We commissioned Winchmore Tutors to deliver teaching to the children in two shifts of three hours a day each. We purchased all the materials needed to run a school and then planned how we would organise registration and helping children find their way to the centre.
7. We were successful in doing all this due to the wonderful support we had from partners, both within the Corporation and beyond. The Procurement team and our lawyers helped arrange contracts in time. We were able to tap into a pool of volunteers who did travel training and chaperoning with the children and parents. The Guilds were also supportive – for example, when we asked for help in obtaining school uniforms, we received donations which meant we could procure uniforms for all the children when they started at their new schools. We also commissioned support with parental communications from a charity called Paiwand. This is a charity that works with Afghan refugees and asylum seekers. Their education lead continues to be invaluable for facilitating

communication between Virtual School headteachers, the schools and the parents.

8. As soon as the centre was open and running smoothly, we had to start planning for phase two – to get all the children registered in schools. Registration had to happen by 9 October 2021 in order for schools to receive funding for the new students from April 2022. We had to negotiate with schools in Tower Hamlets, Hackney, Islington, and Southwark as well as the Aldgate School here in the City. We were supported by the Education team here and by some amazing headteachers who went above and beyond expectations to extend a warm welcome to our new arrivals. We then had to work quickly with a uniform supplier who measured all the children and supplied their uniforms for each school. Again, we used wonderful volunteers to help children and parents work out their new bus routes to the different schools.
9. All this was achieved in the first six weeks of this academic year.
10. After half term, all the children started in their schools. We were able to use the funding we had received to maintain the teaching team from Winchmore. This time, they were allocated to all the schools to provide in-situ support. Schools were also given per-pupil funding through us to help them with their additional staffing costs and the cost of free school meals.
11. Once we had all the Primary and Secondary children placed, we had to sort out education for the 16- to 18-year-olds who were all placed into colleges in the area.
12. Helen and I have continued to keep in touch with the schools and colleges to iron out any issues and to monitor how well students have settled in. We also delivered training to some of the schools to help them understand the trauma the children have suffered in escaping from Afghanistan, and that they continue to suffer as they await transfer to more permanent housing.
13. The children are very keen to learn. When we visited one school a couple of weeks ago, the children were excited to see us and show us how much their English skills had progressed in speaking and listening, and also in reading and writing too.
14. We are just starting to plan a celebration event to bring together all the children and parents, possibly at the City of London School for Boys. This would take place in July, subject to confirmation.
15. The day-to-day work of the Virtual School continues. For Helen, that is about advising on a handful of cases of Children in Need. Within the directorate, we established a system to manage her involvement in cases as her work straddles education and social care, and she needs to work with a range of professionals. There is a referral process that social workers follow, and oversight comes through me and the social work team leader.

16. The funding for Helen's post has been extended for another year. I will report further on how we plan to manage the extended role in a future meeting.
17. The looked-after children cohort remains fairly stable. So far this year there have been four new arrivals, which is lower than in previous years. Schools and colleges are running as normal. I monitor teacher absence at the termly Personal Education Plan (PEP) meetings. To date there has been little impact of staff absence on our children who continue to generally make good progress.
18. Attendance is always a key focus. For the second year running I am using an incentive of vouchers for those who end the year above 90% attendance. Most of the learners are above this figure, but some are not. I work closely with the social workers and the education settings to investigate absences and keep on top of trends. I know in detail which student's attendance is rising or falling, and why.
19. The Virtual School Dashboard is attached below as Appendix 1. This shows the breakdown of the cohort by key stage and gives a summary of PEP and attendance data.

Options

20. N/A

Proposals

21. N/A

Key Data

22. See Dashboard at Appendix 1.

Corporate & Strategic Implications

23. Financial implications – N/A

24. Resource implications – the additional responsibilities of the Virtual School are funded by a DfE Grant.

25. Legal implications – N/A

26. Risk implications – N/A

27. Equalities implications – N/A

28. Climate implications – N/A

29. Security implications – N/A

Appendices

- Appendix 1 – Virtual School Dashboard

Andrew Russell

Headteacher of the Virtual School for Children with a Social Worker

T: 07793049767

E: andrew.russell@cityoflondon.gov.uk

Appendix 1

Virtual School Dashboard 2021–22

29/03/2022

Key Stage	Number on roll	Number in school/ college/ uni	Working or training	Tuition class	NEET	New/ to be placed	Missing	CiN/ CP
EYFS	0	0				0	0	2
KS1	0	0				0	0	2
KS2	0	0				0	0	8
KS3	1	1				0	0	5
KS4	2	2		0	0	0	0	3
KS5	19	17	0	0	1	1	0	2
18–25	45	26	10	0	9	0	0	n/a
Total	67	46	10	0	10	1	0	22

Arrivals since start of academic year

4

PEPs								
Term	Required	Completed so far	% in time	% Good+		Attendance** / <90		Excl
Term 1	19	19	100%	75%		89%	7 of 20	0
Term 2	16	12	75%	68%		90%	8 of 20	0
Term 3	16	0	-	-		-	-	-
% attended by AR this year to date		78%						

Ofsted ratings*	
Outstanding	43%
Good	24%
Requires Improvement	33%
Inadequate	0%

67% good or better

% making expected progress		
No	Yes	TBC
10%	72%	18%
Based on information in PEP meetings		

Notes:

Ofsted ratings are for those in education up to Key Stage 5 = 21 learners

PEP % in time – the deadline is the end of term, which is this week.

Three PEPs not completed and one due this week.

Agenda Item 8

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: The Early Years Service – Safeguarding Children Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	<p>Contribute to a flourishing society</p> <ol style="list-style-type: none"> 1. People are safe and feel safe 2. People enjoy good health and wellbeing. 3. People have equal opportunities to enrich their lives and reach their full potential. <p>Support a thriving economy</p> <ol style="list-style-type: none"> 8. We have access to the skills and talent we need.
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
<p>Report authors: Theresa Shortland – Head of Service – Education and Early Years</p> <p>Isabelle Britten Dennie – Lead Early Years Advisor</p>	For Information

Summary

- The purpose of this report is to update Members on the work of the Early Years Service in the context of safeguarding children.
- The City and Hackney Safeguarding Children Partnership (CHSCP) undertook safeguarding self-assessments for the Early Years providers in the City of London.
- The Education and Early Years team works closely with all City of London Early Years settings to ensure that children develop in the best possible learning environment so they become resilient, capable and confident individuals.
- The Education and Early Years team has prepared an updated leadership and management audit in line with the 2021 Early Years Foundation Stage Statutory Guidance. This audit will now take place on a yearly basis and will complement the CHSCP self-assessment safeguarding tool.

Recommendation

Members are asked to note the report.

Main Report

Background

1. The purpose of this report is to update members on the work of the Early Years Service in the context of safeguarding children. It also provides an update on the range of training available and delivered to Early Years settings in the City of London. Children learn best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them.
2. The City of London Early Years settings must have regard to a range of statutory guidance, including:
 - Department for Education's (DfE's) 'Early years foundation stage (EYFS) statutory framework' September 2021
 - The DfE's statutory guidance 'Working together to safeguard children'
 - The Home Office 'Prevent duty guidance'.
3. All Early Years settings must have a trained Designated Safeguarding Lead (DSL) who leads on safeguarding policy and procedures, (including an explanation of the action to be taken when there are safeguarding concerns about a child, and in the event of an allegation being made against a member of staff), and cover the use of mobile phones and cameras in the setting. Providers must train all staff to understand their safeguarding policy and procedures and ensure that they have up-to-date knowledge of safeguarding issues.

Safeguarding audits

4. The City of London has six Early Years settings funded to receive the Free Early Education Entitlement and one workplace nursery which does not receive any of this funding.
5. As part of the CHSCP's ongoing work, all Early Years settings are asked to complete a safeguarding self-assessment. This assessment allows managers to ensure that they comply with all statutory guidance as well as with CHSCP recommendations. The 2021 audit was completed by all City of London early years settings. Furthermore, the CHSCP will undertake a compliance campaign with self-assessments in the coming months.
6. Early Years settings that completed safeguarding audit highlighted three main actions:
 - Review the setting's development plan, including safeguarding policy and procedures, in line with the 2021 Early Years Foundation Stage Statutory Framework

- Implement specific supervision for the DSL/Deputy DSL
- Use the NSPCC Pants programme to support children's understanding of safeguarding. See: <https://www.nspcc.org.uk/keeping-children-safe/support-for-parents/pants-underwear-rule>

Training

7. The Education and Early Years Service has prepared an updated leadership and management audit in line with the 2021 Early Years Foundation Stage Statutory Guidance. This audit will now take place on a yearly basis and will complement the CHSCP self-assessment safeguarding tool. The audit will focus on all aspects of leadership within Early Years. This will include ensuring that:
 - a) all settings have a single central record which details staff names, roles, qualifications, Disclosure and Barring Service (DBS) number (and, if applicable, annual update service registration details), first aid and safeguarding training details
 - b) the DSL is empowered to play an effective role in protecting children
 - c) an effective key person system is in place so that children who are too young to effectively share their concerns form strong attachments to a trusted adult
 - d) as part of children's personal, social and emotional development, practitioners teach young children the language of feelings, helping them to appropriately develop their emotional literacy
 - e) the daily experience of children in Early Years settings and the overall quality of provision is high, with practitioners having appropriate qualifications, training, skills, knowledge, and a clear understanding of their roles and responsibilities
 - f) an effective induction programme is implemented for new staff, including emergency evacuation procedures, safeguarding, child protection, and health and safety issues
 - g) managers have a good understanding of data protection regulations, and therefore all appropriate records are in place and kept for the required length of time
 - h) providers have a written procedure for dealing with concerns and complaints from parents and/or carers.
8. Face-to-face safer recruitment training was offered to all Early Years settings pre-pandemic. A refresher session will be offered as part of the training programme for Early Years in autumn 2022.
9. Training sessions on the implications of the new Early Years Foundation Stage Framework were delivered in the autumn term 2021 to support practitioners to review their practice and policies in line with the new statutory and non-statutory guidance. The Education and Early Years Service provides a range of training for providers. (See Appendix 1: Training provided in autumn 2021 and spring 2022.)

10. As part of the Early Years Foundation Stage statutory requirements, settings must provide access to an outdoor play area or, (if that is not possible), ensure that outdoor activities are planned and taken on a daily basis. All settings in the City of London organise regular outings within the local area. This also ensures that children discover the world around them and have access to additional learning opportunities.
11. Settings must also take all reasonable steps to prevent unauthorised persons entering the premises, and have an agreed procedure for checking the identity of visitors. The Action Counters Terrorism (ACT) training was delivered by the City of London Police at the Providers' Forum on 18 March 2021. This ensured that all providers were aware of the procedures to follow in case of a terrorist attack, as well as how to make certain their premises were as safe as possible.
12. All Early Years settings are expected to identify a member of staff to act as Special Educational Needs and Disability Co-ordinator (SENDCO). Since 2020, the Education and Early Years team has offered the Level 3 Certificate for SENDCOs in Early Years – a DfE recognised qualification. Eight Early Years practitioners started this qualification in February 2022.
13. As part of their safeguarding practices, providers are responsible for managing children's behaviour in an appropriate way. This was identified as an Early Years practitioners' training need in the autumn 2021 training and skills audit. Therefore a 'Behaviour for Learning' course was delivered on 9 October 2021, and 16 practitioners attended to develop their knowledge and skills on how to positively deal with children's challenging behaviour.
14. In the City of London, the CHSCP offers safeguarding training sessions for Early Years staff as well as a regular newsletter (*Things You Should Know*). All City of London settings have registered to receive this newsletter, but most managers find that staff attendance at training is difficult due to the timing of the sessions. They are therefore relying on online training offered by a range of providers such as Educare, Flick, and so on. However, some managers have acknowledged that face-to-face training has a bigger impact on staff as it allows them to ask questions and get a better understanding of the local context.
15. All settings need to have at least one qualified first-aider on site at all times. To ensure this, a programme of first aid training is made available by the Education and Early Years team. In 2021–2022, 14 practitioners received this training.
16. The regular visits from the Early Years Advisors have had a positive impact on the understanding of the importance for Early Years settings to refer to Social Care and the City of London Local Authority Designated Officer (LADO) in a timely manner. All City of London Early Years settings now have a very good understanding of what to record and who to make referrals to. As a result, contacts between Early Years settings and the LADO went from two between 2007–2017 to six between 2017–2022. This included three referrals that met the LADO threshold. All incidents were thoroughly investigated, parents informed and action plans put in place.

17. During the COVID-19 pandemic, and until 21 February 2022, Early Years settings needed to inform Ofsted of all COVID-19 cases as part of their serious incident procedures. The clear Standard Operating Procedures produced by the City of London ensured that all cases were shared with the Education and Early Years team, City & Hackney Public Health, and Ofsted.
18. The January Early Years Census provides the City of London with an overview of the qualifications held by staff in all Early Years settings. As part of the Early Years Foundation Stage statutory guidance, providers must also put appropriate arrangements in place for the supervision of staff who have contact with children and families.
19. All City of London settings provide healthy meals, snacks and drinks for children, and record all children's dietary needs. Furthermore, six out of our seven Early Years settings are registered with the Healthy Early Years London Initiative, and two settings have already completed their Bronze Award; the other four have completed their First Step Award.
20. All City of London Early Years settings publish and regularly update their Local Offer on the Family Information Service website, explaining how they support children with special educational needs and disabilities to access the learning within the Early Years Foundation Stage.

Key Data

21. The Early Years census contains information on children attending any private, voluntary and independent sector nursery where one or more children receive funding from the Department. The City of London provides these data returns to the DfE on a termly basis.

Corporate & Strategic Implications

22. **Strategic implications** – This proposal supports the delivery of the first aim of the Corporate Plan: Contribute to a Flourishing Society, outcomes: 1. People are safe and feel safe; 2. People enjoy good health and wellbeing; and 3. People have equal opportunities to enrich their lives and reach their full potential. It also supports the second aim: Support a thriving community, outcome 8: We have access to the skills and talent we need.
23. **Financial implications** – The cost of additional key training sessions for Early Years providers will be covered by the Early Years part of the Dedicated Schools Grant to improve the quality of childcare services in the City.
24. **Resource implications** – Time is allocated within the Early Years Advisors' schedule to visit settings and deliver identified training.
25. **Legal implications** – None
26. **Risk implications** – None
27. **Equalities implications** – None

28. Climate implications – None

29. Security implications – As mentioned above, Early Years staff have been trained to ensure that their settings are secure and procedures are in place in case of a sudden attack or intrusion.

Conclusion

30. The Education and Early Years team will work closely with the CHSCP and all City of London Early Years settings to ensure that children learn and develop in a safe and welcoming learning environment. Continued an ongoing support will include regular visits from the Early Years advisors and yearly safeguarding and management audits. A broader training programme is delivered annually and adapted to the needs of local practitioners.

Theresa Shortland

Head of Service – Education and Early Years

T: 020 7332 1086

E: theresa.shortland@cityoflondon.gov.uk

Isabelle Britten-Denniee

Lead Early Years Advisor – Education and Early Years

T: [e.g. 020 7332 3566]

E: isabelle.britten-denniee@cityoflondon.gov.uk

Appendix 1

Training provided in autumn 2021 and spring 2022

Training	Date	Context	Attendees	Delivered by
Infant feeding	23/09/2021	Providers' Forum online	8	Laura Crane – Homerton University Hospital
Curriculum for the Early Years Foundation Stage (EYFS)	30/09/2021	Online	9	Early Years Advisor
Behaviour for Learning	09/10/2021	Online	16	External Provider – Carla Cornelius
Working with families with Domestic Violence	21/10/2021	Providers' Forum online	7	Ali Burlington – Community Safety Officer & Ayesha Fordham – Domestic Abuse/Vulnerability & Risk Policy Officer
Coltale Conference	23/10/2021	Guildhall	35	Range of external speakers, including Ofsted
Next Steps – Developing Children's Skills & Interests	03/11/2021	Online		Early Years Advisor
Attention Autism	27/11/2021	Face-to face	9	External provider
Picture Exchange Communication System Overview	01/12/2021	Online	2	External provider
Overview of the Early Help Service and the new Strengthening Families Strengthening Communities course	15/12/2021	Providers' Forum	4	Sadie Carnegie – Early Help Manager
SENDSCO Level 3	05/02/2022 23/04/2022 11/06/2022	In person	8	External Provider – Eastern Partnership
Female Genital Mutilation & Breast Flattening	08/02/2022	Online	Course cancelled	CHSCP
Local Child Safeguarding Practice Review (Child R) Learning Seminars	24/02/2022 10am to 12pm 28 Feb 2022 1pm to 3pm	Online	Course cancelled	CHSCP
Children with Communication and Interaction Needs: How to Plan for Their Learning and Development	03/03/2022 4.30pm to 6pm	Online	8	External provider – Carla Cornelius
What is Attention Deficit Hyperactivity Disorder	09/03/2022	Online	4	External Provider – Soli Lazarus

and strategies to support children	4.30pm to 6pm			
Designated Safeguarding Leads webinar	10/03/2022 10am to 1pm	Online	4	CHSCP

Agenda Item 9

Committee:	Dated:
Safeguarding Sub Committee	12/05/2022
Subject: Special Educational Needs and Disability (SEND) – Update Report	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	<p>Contribute to a flourishing society</p> <ol style="list-style-type: none"> 1. People are safe and feel safe 2. People enjoy good health and wellbeing. 3. People have equal opportunities to enrich their lives and reach their full potential. <p>Support a thriving economy</p> <ol style="list-style-type: none"> 8. We have access to the skills and talent we need.
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Andrew Carter, Director of Community and Children’s Services	For Information
Report authors: Theresa Shortland, Head of Service – Education and Early Years Sharon Cushnie, Lead SEND Advisor – Education and Early Years	

Summary

The purpose of this report is to update Members on the current work of the City of London (COL) special educational needs and disability (SEND) service and on the plans to respond to the Government’s green paper *SEND Review: right support, right place, right time*. In September 2019, five years after the implementation of the Children and Families Act 2014 and the SEND reforms, the Government launched a review to evaluate the impact of these reforms.

The SEND local area inspections, which started in 2016, and consultations with parents and carers, provided evidence that, while the 2014 reforms had the right

aspirations and there were many examples of good practice, the outcomes for children and young people were still often poor, parents and carers were frustrated by navigating a complex system to access support, and financial challenges for local governments were increasing.

On 29 March 2022, the Government published its green paper *SEND Review: right support, right place, right time*, which sets out its proposals for a system that they consider will offer “children and young people the opportunity to thrive, with access to the right support, in the right place, and at the right time, so they can fulfil their potential and lead happy, healthy and productive adult lives.”

The full consultation report, a summary report and the consultation questions are provided as appendices to this report.

The Education and Early Years Service will be co-ordinating a response to the consultation, which will include engagement with partners across Education, Health and Social Care, the City Parent Carer Forum and service areas such as Housing. This report sets out how we will be responding to the consultation.

On 29 March, the Government also issued the schools white paper, *Opportunity for all: strong schools with great teachers for your child*. This sets out their long-term vision for a school system that helps every child to fulfil their potential, by ensuring that they receive the right support, in the right place, at the right time. A copy of the white paper is included in the appendices for information.

This report also provides an update on some of the work that has taken place over the last half term, and which will be progressed to ensure that COL children and young people continue to thrive and to achieve their potential.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. The SEND Strategy 2020–2024 sets out three key outcomes to be achieved by 2024:
 - I. We have a robust and inclusive multi-agency approach to identifying, assessing, and meeting the needs of children and young people with SEND.
 - II. All children and young people with SEND are well-prepared for and have successful transitions to adulthood.
 - III. Children and young people with SEND are integral and valued members of the City of London community.

These outcomes accord with the Government's vision as set out in the green paper, of children and young people's needs being met in a timely way, and that they are prepared to lead healthy, happy and productive lives.

2. Summary of the Government's proposals:

The green paper sets out three key challenges and five proposals to address these:

The challenges

- I. Navigating the SEND system and alternative provision is not a positive experience for too many children, young people and their families.
- II. Outcomes for children and young people with SEND or in alternative provision are consistently worse than their peers across every measure.
- III. Despite the continuing and unprecedented investment, the system is not financially sustainable.

The proposals

- I. Establish a new national SEND and alternative provision system setting nationally consistent standards for how needs are identified and met at every stage of a child's journey across education, health and care – parents and carers will be confident that their child's needs will be met effectively in the most appropriate local setting, they will be clear about what support their child is receiving and will be engaged in decision-making at every stage.
- II. Create new local SEND partnerships bringing together education, health and care partners with local government to produce a local inclusion plan setting out how each area will meet the national standards – when specialist support is needed, the local inclusion plan will set out the provision that is available within the local area, including units within mainstream, alternative and specialist provision.
- III. Support parents and carers to express an informed preference for a suitable placement by providing a tailored list of settings, including mainstream, specialist and independent – they will continue to have the right to request a mainstream setting for their child.
- IV. Introduce a standardised and digitised EHCP [Education, Health and Care Plan] process and template to minimise bureaucracy and deliver consistency.
- V. Streamline the redress process to make it easier to resolve disputes earlier, including through mandatory mediation, whilst retaining the tribunal for the most challenging cases.

Responding to the consultation

3. The consultation process will run nationally until 1 July 2022. We are arranging for Inclusive Solutions, an external company we have commissioned previously, to facilitate the co-production work with children, young people and their families, to facilitate an interactive workshop with key partners across education, health and social care, parents and carers and other key services such as housing, to consider the proposals and to respond to the 22 consultation questions. We will also consider how we can begin to prepare for the changes.

4. The workshop will take place during May 2022 and will be reported to the SEND Programme Board in June before it is submitted as part of the consultation to meet the 1 July 2022 deadline.

Current Work

SEND Review at The Aldgate School

5. In February, the SEND Consultant led a review at The Aldgate School, with the Lead Early Years Advisor focusing on the Early Years, (including the Children's Centre), the Principle Educational Psychologist focusing on the areas of need identified by the school across SEND Support, as well as Education, Health and Care Plans (EHCPs) and developments to meet those needs, and the SEND Consultant focusing on whole school issues.
6. The review found The Aldgate School to be inclusive with a strong vision and passion across its senior leaders and staff and that, during the pandemic, staff worked hard to ensure that the needs of all children were met, particularly those with SEND.
7. The report focuses on the areas of SEND leadership, the allocation and deployment of resources, the quality of education, the use of data, assessments and outcomes, and makes a number of recommendations in terms of how these areas can be further developed.
8. The new Ofsted framework and recent inspection experiences are said to have highlighted the need for governors to be accountable for the curriculum, equalities objectives and understanding the quality of provision for children and young people with SEND. The governors and headteacher at The Aldgate School welcomed the report, and the governors have identified SEND as an area of focus for them.
9. This review is to support the school in further developing their practice and to prepare for any Ofsted inspections. It will also support the school community and the COL as we begin to consider the implications of the outcome of the SEND Review.

Preparing for Adulthood

10. Preparing children and young people to lead happy, health and fulfilling lives is at the heart of what we do. A Transitions Task and Finish Group that focuses on preparing COL children and young people with SEND for adult life from the earliest years was established in 2021. The group includes a parent representative and colleagues from education, health, social care, housing services, schools, and colleges. Through this group, the SEND Service have developed a guidance document for parents and professionals on preparing children and young people with SEND for adult life, and have attended the City Parent Carer Forum meetings to consult on this document. The final document will be presented to the next meeting of the Safeguarding Sub-Committee.

Listening to Voices of Children and Young People

11. We have been developing a short film with children and young people who have EHCPs. This is so that their views are at the heart of decision making when services are being developed to meet their needs. The film is now ready and will be screened at the COL Local Offer, alongside the SEND Strategy. It will inform the services we commission and how we deliver them.
12. We will arrange for Members to view the film at this Committee meeting.

Hidden Disabilities

13. Not all disabilities are visible and are not immediately obvious. These include autism, chronic pain, and learning difficulties as well as mental health conditions, mobility, speech impairments, and sensory loss such as speech difficulties, sight loss, hearing loss, or deafness. People living with these disabilities often face barriers in their daily lives, including a lack of understanding, and negative attitudes. So some choose to wear the Sunflower lanyard to discreetly identify that they may need support, help, or just a little more time in shops, transport, or public spaces.
14. The City of London SEND service now has the Sunflower lanyards and pins available for all children and young people living in the City who want one, including those with autism. We also have supporters' lanyards for those that want to support the scheme.

Corporate & Strategic Implications

15. Strategic implications – corporate outcome: Contribute to a flourishing society by ensuring that all children and young people with SEND and their families have equal opportunities to enrich their lives and reach their full potential.
16. Resource implications – the SEND functions are resourced through the Dedicated Schools Grant – High Needs Block.
17. Financial implications – the SEND functions are resourced through the Dedicated Schools Grant – High Needs Block.
18. Legal implications – the duties on local areas regarding provision for children and young people with SEND are covered in the Children and Families Act 2014. This legislation sits in the context of the Equality Act 2010. The Ofsted/Care Quality Commission Inspection Framework sets out the legal basis and the principles of inspection.
19. Risk implications – if children's SEND issues are not identified early, assessed and supported, this will impact on young people's educational attainment, progress and wider lifetime chances.
20. Equalities implications – all children and young people, regardless of their SEND, will be part of a community where they can learn, achieve and participate in activities with other children and young people, and will be prepared to have a fulfilled adult life.

21. Disability and race are protected characteristics in the Equality Act 2010.

22. Climate implications – N/A

23. Security implications – N/A

Conclusion

24. The SEND Service is continuing to progress implementing the SEND Strategy to achieve the outcomes by 2024. The Government's vision for children and young people, as set out in the green paper, is in line with the COL's vision and is reflected in the three key outcomes which are set out in the SEND Strategy. We will continue to progress these with our partners across education, health, social care and other services such as housing. We will also begin to consider the implication of the green paper's proposals and how the final recommendations will be implemented in the COL to best meet the needs of COL children and young people.

25. The SEND self-evaluation form and action plan, which are in place to plan and track progress, will be amended in due course to reflect any changes needed. We will continue to monitor these through the SEND Programme Board, and to report progress to the Safeguarding Sub-Committee.

Appendices

- Appendix 1 – White paper – *Opportunity for all: strong schools with great teachers for your child*
- Appendix 2 – Green paper – *SEND Review: right support, right place, right time*
- Appendix 3 – SEND Review Consultation Questions
- Appendix 4 – SEND Review Summary Report

Theresa Shortland

Head of Service – Education and Early Years

T: 020 7332 1086

E: theresa.shortland@cityoflondon.gov.uk

Sharon Cushnie

Lead SEND Advisor – Education and Early Years

T: 020 7332 1537

E: sharon.cushnie@cityoflondon.gov.uk

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: Children and Families Service Performance – Month 11 2021/22 (February 2022)	Public Appendix 1 & 2: non-Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1, 2 and 3
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Andrew Carter, Director of Community and Children’s Services	For Information
Report author: Ellie Ward, Head of Strategy and Performance	

Summary

This report updates Members on service performance across the Children and Families Service. It demonstrates where performance meets our statutory obligations and targets, and identifies where action was taken for improvement in specific areas.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. The Children and Families Service at the City of London Corporation provides a range of services including Early Help, child protection, and supporting care leavers.
2. The service collects and monitors a range of performance information to ensure that statutory duties are being met, and that services are delivering the best possible outcomes for children, young people and families.

3. Appendix 1 presents the performance dashboard from 1 April to 28 February 2022 month 11 (February) 2021/22. It provides an overall summary of performance in each of the service areas and then more detailed information in each area.
4. Appendix 2 provides a glossary of some of the terms used in the performance dashboard.

Current Position

5. Overall, performance across the service is good, meeting a range of statutory requirements and local targets, and comparing well with regional or national benchmarks.
6. It should be noted that, due to small numbers in children's services cohorts in the City of London Corporation, there can sometimes be significant variance in out-turns. These are noted where this is an issue.

Headlines

7. Levels of demand increased further since the end of Quarter 3 (Q3) 2021/22. At the end of Q3 there were 160 contacts compared to 139 in Q2. In January and February, there were 47 and 55 contacts respectively. Year to date there have been 518 contacts compared to 257 for the whole year 2020/21.
8. Whereas the number of Children in Need in the City of London decreased further, from 15 at the end of Q2 to eight at the end of Q3 2021/22, there were 11 Children in Need in January and February 2022.
9. Visits to Children in Need have remained fairly constant at 22 in Q2 and 35 in Q3 2021/22 and then 11 in both January and February 2022.
10. The number of children looked after (CLA) by the City of London Corporation decreased over the quarters (Q1 –19; Q2 – 16; and Q3 – 12). At the end of February, the number of CLA was 11. Of these, 82% were Unaccompanied Asylum-Seeking Children (UASC).
11. There were 48 CLA visits in Q2 2021/22 and 41 in Q3. In January and February, there were 14 and eight visits respectively, so the trajectory is that there will be fewer visits overall for Q4.
12. The Multi-Agency Safeguarding Hub (MASH) recorded four contacts in February 2022, with 7% of the 55 contacts received at the front door. For the year to date, 22 of the 518 contacts (4%), had passed through the MASH.
13. There were eight Early Help referrals in Q2 and 16 in Q3. In January there were three referrals, and six in February. Year to date there have been 34 Early Help referrals compared to 12 in 2020/21. Many of the referrals reflect the support provided to families as part of the Afghan Resettlement Programme.

14. At the end of Q3, 92% (23 from 25 assessments) in the period were authorised within 45 days. Year to date, 47 out of 50 assessments were authorised in 45 days (94%).
15. There were 55 care leavers at the end of February, compared to 53 at the end of Q3, and 47 at the end of Q2. For comparison, there were 42 as of 31 March 2021.

Corporate & Strategic Implications

16. Financial implications – N/A
17. Resource implications – N/A
18. Legal implications – N/A
19. Risk implications – N/A
20. Equalities implications – Monitoring intelligence on all of our social care processes and associated demographics allows us to assess and then investigate if there are any unintended impacts of any processes or practices. A more detailed analysis of this will be included in the end-of-year report.
21. Climate implications – N/A
22. Security implications – N/A

Conclusion

23. This report provides a summary of performance data from the Children and Families Service from 1 April to 28 February 2022, comparing it to the previous month, quarter or year's performance and other benchmarks where appropriate.
24. It demonstrates strong performance across the service, with some specific areas where some action was taken for improvement. These areas are all now back on a positive trajectory.

Appendices

- Appendix 1 – Children and Families Service Performance Dashboard February YTD 2021/22 (Non-Public)
- Appendix 2 – Glossary for Performance Dashboard (Non-Public)

Ellie Ward

Head of Strategy and Performance

E: Ellie.ward@cityoflondon.gov.uk

Committee: Safeguarding Sub Committee	Dated: 12 May 2022
Subject: Children's Social Care and Early Help Service Development 2022-23	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Contribute to a flourishing society 1. People are safe and feel safe. 2. People enjoy good health and wellbeing.
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter	For Information
Report author: Rachel Talmage	

Summary

The Service Development Plan has been fully refreshed for 2022-23 and sets out the overarching programme of work for the Children's Social Care and Early Help Service. Key pieces of work include a review of threshold application and strengthening our multi agency safeguarding hub, parenting programme evolution, CV writing and interview practice as well as strengthening our work with and for black children.

The report shows plans for the forthcoming year in our drive to achieve and maintain excellence for every child and family known to our service.

The purpose of the report is to enable members to be sighted on the array of work supporting resident children in need of help and protection in the City of London. Work that had good impact in 2021-22 such as the Family Therapy Clinic jointly run with Kings College London and Action Learning Sets for both staff and managers is being continued.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. The Service Development Plan 2022-23 sets out objectives that aim to improve outcomes for children and their families. Objectives are drawn from listening to children and families, from staff, from audit, from the Achieving Excellence Board and from Serious Case Reviews.
2. The Target Operating Model completed in September 2021 and as a result our additional permanent three social workers are in post (April 2022), the Deputy Team Manager is now established, and three social workers promoted to the role of senior social worker (reflecting their experience and level of expertise required, as well as being part of our retention strategy). The TOM changes offers consistency for children, as locum staff were relied upon whilst waiting for the Model to complete, having been paused due to covid.
3. The Annual Self Evaluation (SEF) of the Children's Social Care and Early Help Service is undertaken every August. The Evaluation leads to a plan, and this is appended (appendix 2) with an update as to progress.
4. Ofsted made two recommendations in their judgment on our practice¹ published two years ago in April 2020. These recommendations remain in the plan to ensure due focus and attention.

Current Position

5. A new 2022-23 plan has been created following the completion of actions from the 2021-22.
6. Key achievements from 2021-22 include:
 - i. Establishing additional permanent social workers and a deputy team manager, given the increase in Unaccompanied Asylum Seeking Children
 - ii. Responding to the Afghan children and families who arrived in the City in September 2021, creating an early help clinic and extending our early help offer for these families to ensure children received timely health care, were in school/nursery and had mental health support amongst other care.

¹ <https://files.ofsted.gov.uk/v1/file/50149902> accessed 28 April 2022

- iii. Successful pilot of Strengthening Families Strengthening Communities Parenting Programme, with accreditation by the Race Equality Foundation being awarded in April 2022.
 - iv. All looked after children being in education, training and employment.
 - v. Completion of our Immigration Interview Project, with all Unaccompanied Asylum Seeking Children who had been waiting having had their initial home office interview by March 2022. This led to permanent immigration status for the majority of young people – which represented the largest worry from care leavers.
 - vi. Monthly Action Learning Sets for all staff to bring in research and expertise into the service around topics such as intimate partner violence and including fathers. Meaning staff are well motivated and skilled in responding to children and families.
7. The new plan sets out our response to serious case review Child Q, to ensure Black children are seen, heard and responded to as children, and are not harmed at school or by police. Thresholds of need, decision making at the 'front door' – at the start of our service, and participation of children in service design and review are key objectives in the next year.

Key Data

8. Performance data for the service is being considered separately within the Safeguarding Sub Committee. Data is used to drive the actions in the plan and to evaluate progress for children.

Corporate & Implications

9. Children in care and care leavers are our children as a Corporation. More can be done in respect of work experience and job opportunities and the plan includes this.
10. The corporation across every department is a parent to our children in care and care leavers.

Strategic Risk Implications

11. Child safeguarding involves assessment and mitigation of risk. The service aims to protect and support the most vulnerable children in our society. The Achieving Excellence Board is in place to further scrutinise and extend our work for these children.

Equalities implications

12. The 'social graces' are used in individual and group supervision, looking at similarity and difference in every piece of casework. Equalities implications are core in every interaction. The 'social graces' include gender, geography, race, religion, age, ability, appearance, class, culture, ethnicity, education, employment, sexuality, sexual orientation and spirituality. Systemic relationship based practice is central to our work, and the social GRACES (eg Gender, Race, Religion, Ethnicity, Employment, Class etc) offer us a framework for considering disproportionality and equity.
13. The monthly Action Learning Sets and Monthly group supervision support the service in responding well to similarity and difference within our client group.
14. Child Q has implications for Education and Police services in the City and is being overseen by the City and Hackney Safeguarding Children's Partnership. Child Q had a profound effect on the wellbeing of Black staff, and support is being treated as a health and safety matter.

Financial implications - none

15. Children's social care is a statutory service. If, for example, children arrive in the city with additional needs, such as the Afghan arrivals, and/or further children with disabilities arrive, then a service must be provided. If risks escalate, then court action might be required. These unexpected needs will have financial implications.

Resource implications - none

16. Children's Social Care and Early help is a responsive service and is has established additional social work posts as part of the TOM. The Early Help Lead is acting up as Team Manager for Children's Social Care. A locum has been appointed to cover the Early Help lead's post for the acting up period.

Legal implications - none

Climate implications - none

Security implications - none

Conclusion

17. The Service Development Plan sets out the actions for the next year, with an overall ambition of providing the right help in the right place at the right time, to promote safety and wellbeing of children and their families. This is a live document and will grow in response to family and staff feedback, national research and audit.

Appendices

Appendix 1: Service Development Plan 2022-23

Appendix 2: Self Evaluation Plan September 2021-August 2022

Rachel Talmage

Head of Service

Children's Social Care and Early Help

T: 020 7332 3621

E: Rachel.Talmage@cityoflondon.gov.uk

This page is intentionally left blank

Service Development Plan 2022-23

Children's Social Care & Early Help

Author: Rachel Talmage
Date: April 2022
Date for review: July 2022

Note: Progress on the plan from our Self Evaluation (September 2021) is included in the second tab of this worksheet. The SEF will be updated in August 2022.

Why?	Who?	Does what?	By when?	How will we know it has been done?	What will be the experience of children?	RAG rated progress	Comments on progress
Early Help & Short Breaks							
Need identified by parents, recommending the programme to other parents.	EH Lead	Runs Strengthening Families Strengthening Communities Programme x 2. Once in each of the two key areas in the City	First by July 2022. Second by December 2022	Accreditation by Race Equality Foundation achieved. Programme attendance sheets completed. Evaluation Report provided to Early Help Sub Committee.	Children experience their parents responding kindly, more consistently and clearly.		Accreditation awarded 26 April 2022. Second pilot session nearly complete.
Covid impact on mental health, and family relationships being a common area of need in Early Help.	EH lead	Refers and supports children & families to use the Systemic Family Therapy Service	end Sept 2022	At least 2 EH referrals made per quarter. Clinic data shows EH families attending at least 90% of their sessions. One case summary that shows impact of clinic.	Children's stress levels are reduced as their parental stress is reduced.		
Identified via Afghan Project Partners	Afghan Project Lead	Creates and runs parenting in the UK groups	April - July 2022	The weekly timeable listings. Programme Plan created. Attendance logs.	Children have supervision in the street and are supported with homework, with school and leisure time.		2 parenting sessions have been run so far as part of a wider weekly offer. Regular programme will be in place after Ramadan.
Request from Paiwand (Afghan charity) and Afghan Resettlement Organisational group.	Afghan Project Lead	Runs early help clinics for all families in the two hotels at least weekly	April - July 2022	Clinic logs evidencing family support undertaken. Performance data: number of children/families making enquiries - bi annually	Children are taken to medical appointments by parents who have support to do so, little children have the opportunity to go to nursery, older children are taken to leisure activities.		Clinics up and running. Staff sickness has meant three sessions have been cancelled.

Families have been disappointed with the payment cards not working, need to fix.	EH Lead	Reviews Short Break Pre Payment Card effectiveness	end Sept 2022	Minutes of Short Breaks Meeting evidence review	Children with disabilities take part in leisure activities regularly.		1 family declining to use new card as so upset the old ones didn't work - low expectations which need support. Other families using new card.
Respite Innovation Bid unsuccessful to explore services in square mile: therefore need to review our offer with children and parents to see what is possible.	EH Lead	Review short break offer together with children and families	end March 2023	Short Break Offer is co produced with children and carers. Short Break offer goes to the SEND board. Short break offer is refreshed and on our website	Children with disabilities have access to good quality leisure opportunities that their adults can take them to.		
Children have been in the hotel for 7 months, need to gather their views separately to adults.	Afghan Project Lead	Listen to children in the Bridging Hotels as to their experience.	end April 2022	Session notes received. Views listened to and responded to.	Children can share their wishes and feelings and have a sense of control over what happens in the hotel.		nearly 50 children and young people joined in a views session 7 April. Views taken forward to Afghan Project Group.
Afghan project work has extended, with new Early Help Offer, review needed to see if effective and anything to amend.	Afghan Project Lead	Reviews first four months of enhanced early help offer to the families in the Bridging hotel.	end Sept 2022	2 page review to Early Help Subcommittee & CSMT. To include data on the drop in and casework.	Children receive the support they need in the hotel, with friends, with leisure, with school and with health.		
Early Help Lead has moved to Manage Social Care Team. Early Help lead vacancy.	Head of Service	Recruits and inducts new Early Help Lead to take forward the above work	end June 2022	Early Help Lead in post	Children experience secure, timely well paced early help support. They have a trusted adult.		Interviews taken place. New postholder to start 6 June. Afghan EH lead is supervising the EH worker until this time. HOS is chairing shortbreak panel meetings until postholder arrives so no gap in decision making & staff support.
Ofsted recommendations from judgment in February 2020	CSC & EH Management Team	Reviews EH step downs at weekly management meeting.	Weekly.	Management Meeting notes evidence overview. Data shows step down is timely. Data shows speed of first visit because of thorough transfer, and from transfer into/out of Early Help.	Children don't need to re-tell their experiences, likes and dislikes because of thorough transfer, and they don't have to wait to see their new Early Help or Social Worker. To reduce anxiety.		complete - (kept in to retain oversight)

Children's Social Care

Children in Need & those in need of protection

Referral data shows that children need better parenting.	Team Manager	As above: parenting programme. Ensure at least 2 families are referred per programme cycle	First by July 2022. Second by December 2022	Casenotes evidence liaison between parenting group & social worker. Evaluation Report provided to Achieving Evidence Board with quantitative and qualitative evidence.	Children experience their parents responding kindly, more consistently and clearly.		
Data shows an increase in strategy meetings. Review of thresholds needed.	Head of Service	Commissions external professional to review threshold on every contact over last three months. To run 2 Action Learning Sets for Managers on thresholds.	01-May-22	Report to be provided to Head of Service	Children's privacy and information is respected and proportionately shared.		1 x Action Learning Set on thresholds for managers held.
Threshold document due for review. Following research on infant harm for under 1s during covid, need to update document on Sudden Death of Infant (SUDI). Need to include any particular case examples from the above review of thresholds.	Head of Service	External professional to gain feedback from managers on areas to update, and to review the Threshold document with partners.	end July 2022	Threshold Document published on the internet	Children will be able to look back on their records and understand why decisions were made - the decisions will refer to the threshold document.		
Review of MASH, given London wide review of MASH	HOS	Learns about pan london changes as they evolve, reviews our MASH processes. Use external consultant for capacity.	May-22	Two page paper to CSMT (Children's Senior Management Team), including a summary of London wide changes. MASH data is equivalent to our London neighbours. Audit of MASH evidences	Children receive timely support at the right level. Children have professionals who communicate clearly and are safer because of trusted adults working together.		Jan 2022: Review project underway Pushed back due to Afghan Refugee project. PAIR/Audit on subject is took place October 2021. Additional strenghtening work taking place Jan-June 2022 around MASH/front door. March 22: first action learning set with managers on MASH/front door held.
Develop CIN/CP work to be outstanding in terms of impact and outcomes.	Managers	Actively include CIN/CP families in Family Therapy Clinic	Dec-21	Midway report evidences takeup	Families at home who are struggling get help in their home (online) together. Children are supported in their own safety by their families. Excellence in Practice		in place. CP/CIN families taking up therapy. Clinic contract extended 22-23
Ofsted recommendation 2020: The recording of management decision making at all stages of a child s journey. Retained to keep	Assistant Director & Service Manager	Build management capacity. Draft review in place, need to take forward.	complete	Revised structure chart published. Staff in place.	Children and families experience an exceptional service, with access to speak with managers.		Jan 2022: TOM complete. DTM position is now permanent and postholder in the role permanently.

Head of Service	Extend Deputy Team Manager Pilot, to retain capacity whilst CV-19 has put service review on hold.	complete	DTM postholder is in place throughout CV-19 and to end of service review	as above	<div></div>	complete	
CSC & EH Management Team	Has recording as a standing item on management meeting agenda. Team to remind each other on recording reasons as well as decisions on case files.	complete	Management meeting notes show discussion.	Children and families experience consistent and timely decision making.		<div></div>	
CSC & EH Management Team	121s with each level of managers includes a section on recording, with spot checking.	complete	121s evidence spot checking and discussion.	Children and families experience consistent and timely decision making, if staff are on leave or absent.			as above. Note managers now have their own Action Learning Set on the front door and recording.
Head of Service	Facilitates action Learning Sets on supervision and recording.	April-June	Session notes available. Managers to share supervisions they are proud of monthly to build practice.	as above			1 Action learning set on recording in April.
Head of Service	Offers further management training to DTM.	01/06/2020	Place is booked on course.	as above			1 coaching session for DTM on recording. options have been shared with DTM. Need choice by May 2022.
MANAGERS	QUESTIONS BEING ASKED IN 121. WORKERS TO THINK ABOUT THE WHOLE FAMILY IN EXTENDED SYSTEM. HOS part of 'invisible men' workstream with CHSCP, raising inclusion ideas for men across Partnership	01-Jun-22	Supervision notes evidence this. Audit findings show it. 'Invisible Men' workstream plan, once complete, shared with staff. 2 x Action Learning Sets on including men held.	Children know that all their family are seen, and all considered as part of safety planning, whether they be risks/resources. Children are understood in their context.	<div></div>	This is in place. Kept on 2022/23 Tracker as	
HoS & Management team	Listens to any audit recommendations/findings and adds to this plan.	15/05/2022	A specific audit action plan regarding Child in Need and Child Protection	Children will receive an attuned service, with learning from their stories and experience reflected and acted upon.	<div></div>	Audit in progress - staff have had their meetings with auditors end April. Findings awaited.	

Children in Care and Care Leavers

Young People said in March 2022 at their CV and Interview workshop that they would like more opportunities to practice and more help to get the job they want.	HoS	Works with participation service to run CV/interview sessions regularly throughout the year. Invites Prospects to run at least 4 sessions per year, and to offer 121 sessions.	01/08/2022	Sessions will have run. Young people will say that they have had support via the CiCC and in their pathway plans. 1 case study on how a young person has used their CV/interview practice to get a job or work experience.	Children will feel more prepared to get a job. Young people will have a job.	March 22 - 1 x job and CV session held
Our data shows young people not wanting to have any vaccine, not just covid. Important as vaccine histories are unknown and there is a risk of for example measles/polio etc which are unavoidable.	Lead SW for UASC	Arranges workshop for looked after children and care leavers in Summer 2022 (rearranged from Spring) with LAC nurse.	Aug-22	Attendance list and session notes. At least 20% of attendees have vaccines.	Children will have correct information on vaccines. Children will be vaccinated and safe from preventable harm.	
Increase in mental ill health in care leavers observed, with two under section of MHA in hospital since January 2022, a big change.	HoS	Reviews two young people's cases. Encourages use of early wellbeing support amongst staff. Identifies more culturally matched mental health support via community sector - for Sudanese young people.	01-Aug-22	Paper to CSMT. Sudanese specific mental health support identified and offered.	Children will be able to access support that they will understand and connect with. Children won't need to go into hospital for mental health reasons.	
Mental health of local children and families is supported.	Head of Service	Extend CoL trainee systemic family therapy clinic programme to 2022-23. Joint project with Kings College London.	01-May-22	Contract in Place Care leavers and children in care are shown to have attended the clinic in their quarterly data. One qualitative example of impact of the clinic for a child in care/care leaver presented to CSMT.	Children and parents are able to emotionally manage day to day life better, with therapy being offered in their homes. Excellence in Practice.	
Young people tell us they are frustrated there is not more choice	HoS	Participates in the Innovation Incubator which will have a focus on	01-Jul-22	Departmental Leadership Team has a report on risks/resources.	Children will have somewhere they want to live and are clear about	
2022/23 Self Assessment to be completed	HoS	To write SEF	31/08/2022	SEF in place	Full accountable review of overall service to children and their families. Excellence in Practice	

Findings from Annual Survey
October 2021

Note: This section is retained for accountability into 22-23, as the next annual survey will be ready by August 2022

CIN/CP						
Employability support	SWs & managers	Adult Education/Prospects/CoL Champions	Nov-21	Monthly ETE review notes show prospects know of every YP	young people have timely ETE support, with professionals working together Excellence in Practice	All services work together every month for every child NEET in LAC/CL. Vulnerable children's list monthly between EEY and CSC/EH. Virtual School Head supports all children with a social worker. One long term not in school supported across CSC/EEY/VSH
Care Leavers						
Housing. Good quality. Permanent housing.	SM & Housing	workshop with housing and tenancy support	Nov-21	Video and session on tenancy support has taken place	young people have realistic expectations on housing Excellence in Practice	Jan 2022: video's shared, tenancy support sessions held. Latest ones in August 2021, feedback given on housing queries. Jan 2022, have been asking YP to search for their own flats to get an understanding of money.
Pledge awareness	SWs	Staff session. Participation officer.	Dec-21	Pledge session undertaken. CiCC session.	children confident in our promises	
Knowledge of advocacy/complaints	SWs	At PPM/LAC Review/Visits	Nov-21	LAC review minutes record reminder of advocacy/complaints	Young people know how to complain and argue if they disagree	advocate argued for 1 YP against NTS in December 2021
Loneliness	SWs	Independent visitors. Perhaps link with Strengthening Families, Strengthening Communities? Waging Peace.	Mar-22	Independent visitor numbers higher at next quarterly review and sustained each quarter. Waging Peace have our YP to work with.	Young people have at least one trusted adult Excellence in Practice	Have increased capacity for Independent Visitors. Waging Peace procurement checks underway, and they are working with YP now. Retained on plan to extend and secure offer.

	SM	Review opportunity with new Family Action service, a support line every evening till midnight	Oct-21	A decision will have been made to use or not use the support, if it will be of use to our young people and if it is possible in budget, or if funding can be found. An update to CSMT in October, with minutes to evidence if this is the right service for COL	Young people have someone to call if lonely/worried		Not the right service.
Immigration support	SWs	Waging Peace to help with applications for Sudanese children	Mar-22	Waging Peace work with our boys. And see above re legal support.	culturally appropriate immigration support. Excellence in Practice		as above
<u>BLACK LIVES MATTER</u> Child Q serious case review shows systemic racism causing harm to children. Black children need seeing as children, with safeguarding considered first.	Head of Service	Treats racism as a health and safety issue for black staff. Runs Support Sessions for staff. Culture where staff discuss racism on a daily basis. White staff use the reading group and film club to 'look in the mirror' as well as out of the window on our own racism. Ensures staff attend adultification training by CHSCP. Runs a MACE session on Child Q with CHSCP. Raises profile of drug support for children, and support for children whose parents use substances.	01-Aug-22	MACE session minutes evidence work. Team and Senior Management Meeting minutes evidence health and safety approach. Attendance records show 80% staff have attended adultification training in 2022.	Children will receive safeguarding first support. Children will not experience harm from teachers or police or harm from the absence of action by adults.		MACE work undertaken. Staff support sessions happened. Recognition that to talk about racism is painful, and to not talk about racism is painful. To provide support and love and care to black staff and children and families.
To include children and families in co producing all our strategies. To include children and parents in all our board meetings.	Head of Service	Reviews co production work across Early Help, Child in Need and Child Protection, and across our board work to identify gaps and provide a plan.	Aug-22	Children and parents voices will be directly heard at the Achieving Excellence Board, in the Early Help Strategy and Short Breaks strategy and a plan will go to Children's Senior Management Team.	Children will be included, and have no service for them without them.		At the moment we use videos of children and national research, we can improve.

Plan following Self Evaluation (September 2021)

Progress as at April 2022

Areas for improvement identified in 2021	Progress
Responsive and robust MASH (multi agency safeguarding hub) process with timely response to queries and referrals to ensure child safety	<p>In January 2022 a review project was underway for MASH processes. An Audit on subject took place in October 2021. Additional strengthening work is due to take place between January and June 2022 around the MASH and Front door.</p> <p>There has been a London-wide review of MASH, which is being considered in the review of the CoL MASH review</p> <p>100% MASH responses have been shown to be timely, and MASH is checked consistently.</p> <p>Work is also currently taking place on thresholds learning tracks for managers. More work can be done to ensure MASH processes are efficient</p>
Consistently outstanding work to ensure that children and young people are not experiencing or at risk of harm	<p>In January 2022 a systemic therapist change occurred due to the workload of the former and new therapist due to illness and slowing down plans. A CIN tracker was added in November 2021 following an audit. The Achieving Excellence Board Chair is undertaking a thematic audit on Early Help / Children in Need and Child Protection in October 2021.</p> <p>The Children's social care team, SEND Team and Education and Early Years maintain a list of children who may be at risk, and this is reviewed on a regular basis. Key information from this is shared to ensure a joined-up approach.</p> <p>LADO referrals have changed over the course of the pandemic with more referrals relating to teaching and health agencies rather than schools.</p>
Identification of level of need for support post Child Protection Procedures and how fathers could be further involved in the process and plans	<p>CP plans are either stepped down to CIN or stepped up</p> <p>A task and Finish group "invisible men" has run from December to date with an action learning set working with men and fathers. 2 Systemic sessions on working with men have been delivered, and 2 new male social workers have been hired.</p> <p>The first father has attended the parenting programme</p>
Strengthened preparation for independence with young people equipped and confident to take on own tenancy and independent life	<p>A training programme was created and put in place, which young people have joined. The first programme took place in August 2021, and it is now a recurring programme.</p> <p>Face-to-face work with Care Leavers has resumed in 2022 and additional support has been put into place to support care-leavers with issues arising from the pandemic.</p>
Better sleep and better mental health for young people	<p>Sleep training has been delivered to front line and keywork staff online. The project is now working directly with young people and their support systems to improve sleep, with sessions on a weekly basis and 1-2-1 work is currently taking place. The plan is now to develop this work across London. Coram and City of London presented this to DFE on 24th January 2022.</p> <p>A contract has been agreed and the work will also be research evaluated.</p>
All members understand their roles as Corporate Parent in the wider context	<p>An update to the Corporate Parenting strategy in 2021 outlines the Member's roles as Corporate Parents.</p> <p>Training has been delivered to current members, and a development session has been held with the Safeguarding Sub Committee. There is another training session planned for new members after the Elections in March</p>
Ensure Online Tuition adds value and impact	<p>There have been some challenges with finding supply teachers, and some classes have had to be merged temporarily. The virtual offer is now available for all children with a social worker, and the cohort has expanded to include those from the Afghan Resettlement Project. In September 2021 an additional member of staff to have oversight over CiN and CP children was recruited.</p> <p>ASES has developed a Digital Strategy to address digital exclusion by including non-digital forms of learning</p>
Effective Children in Care Council which meets the needs of Young People	<p>The CiCC has reviewed the Corporate Parenting Pledge, and the feedback was positive.</p> <p>The work of the CiCC is now fully linked with the Pan-London Offer and staff and young people are working together on governance arrangements for this.</p> <p>The CiCC is meeting face-to-face which has allowed young people to develop their skill, there are now plans to implement a Young Inspectors programme.</p>
Unaccompanied Asylum-Seeking Children cohort needs better reflected in care plan documentation	<p>A lead UASC worker is now in place and understanding of immigration and cover of associated legal costs increased throughout the team. Virtual interviews were carried out and have generated positive responses and excellent outcomes for young people.</p> <p>LAC reviews and Pathways have been merged to reduce the duplication of work and reduce the impact on UASC</p>
IRO visits scheduled and booked between each LAC review meeting	<p>IRO visits have been a mix of both face-to-face and virtual. The majority of meetings since January 2022 are being held face-to-face, and are continuing</p>

Systemic model applied to LAC review process as appropriate	LAC Reviews and Pathways have been merged to reduce duplication. Workers attend group supervision sessions and IRO's have access to the process
City of London Corporation Pledge, Advocacy and complaints procedure available in all main languages	A pledge session was undertaken in February 2021 and kept on 2021 tracker to ensure consistency with newly arriving UASC.
Children Looked After have a full range of opportunities for enrichment and work experience to impact their future	<p>In 2020-21 the London Careers Festival (LCF) was carried out virtually</p> <p>London Careers Festival for 21-22 is planned to take place both virtually and in-person.</p> <p>Barriers with young people being work ready and having appropriate English language skills has been identified. Interview skills training sessions are being rolled out as of March 2022</p> <p>More work can be carried out to improve opportunities available to young people.</p>
Strengthened Transitions Pathway which is clearly understood by professionals and young people. Resulting in reduced stress and more empowerment for families and young people	<p>A written pathway document with clearly outlined expectations and resources for children and young people has been completed by Social Work lead and Education and Early Years and Adult Education teams. The outcome of this has seen that children experience a seamless transition between teams, and families are not left on hold or experiencing delays. Data has shown that there were no delays in transitions between September and December 2021.</p> <p>A draft document "SEND Preparation for Adulthood Guidance" has been produced for parents, carers and young people. This will go to the transitions group for sign off</p>
Strengthened, robust offer to children and young people with SEND and their families	<p>Reviews have been carried out from feedback on Audits around disability, with included feedback from the SEND Board and updates from council for Disabled Children. Reviews have shown the need for a Designated Social Care Officer for SEND.</p> <p>The SEND team have visited off the schools where city residents with an EHCP attend and this has strengthened the positive relationships with these schools.</p> <p>SEND Children and young people have created a short documentary style video to help provide information about the local offers.</p> <p>LCF 2020-21 took a special focus on supporting opportunities for SEND pupils with 50 organisations delivering 55 webinars across the week for specialist SEND providers and young people.</p>
Healthy, achieving, empowered children and young people with reduced family stress	<p>Reviews of feedback received from Audits around disability have been carried out. A new Designated Social Care officer has been hired.</p> <p>Work is currently being carried out regarding generic vaccine hesitancy, encouraging families to attend information and vaccination sessions with food provided.</p> <p>Participation by young people in Health strategies has been positive.</p> <p>Family Therapy clinics are being held virtually and after work to allow more access for parents</p>
More confident and empowered parents and safer, happier homes	<p>A parenting programme (Strengthening Families Strengthening Communities) was set up and this programme is currently underway with its second cohort.</p> <p>The first cohort have set up their own support network and continue to support each other outside of the sessions. A creche has been provided in order to accommodate parents of pre-school aged children.</p> <p>This programme has also been accredited by the Race Equality Foundation.</p> <p>There are now discussions taking place to develop a specific basic parenting programme for new Afghan residents</p>
Service development and delivery informed by user feedback	Work has started on this, but it continues to require improvements as it has been shown that there are issues with the return of forms and emails. Early Help has taken the decision to make the final session with clients a feedback session to ensure that feedback is received, and Social Care followed suit from January 2022.

Committee:	Dated:
Safeguarding Sub-Committee	12/05//2022
Subject: Participation Service – Children in Care Council	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Outcome 1
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Andrew Carter, Director of Community and Children’s Services	For Information
Report author: Pat Dixon, Head of Safeguarding and Quality Assurance Service	

Summary

The key priorities for the Participation Service this year will be to move from virtual meetings of the City of London Children in Care Council (CiCC) to face-to-face meetings. In May 2022 the young people will be revisiting the pledge, reviewing the progress that has been made, and updating the priorities for 2022–2023. The Participation Service will also be offering training for the young people on becoming Young Inspectors. This training is likely to be delivered in July 2022 and it is envisaged that they could be inspecting providers as early as August or September 2022. However, this would be dependent on their availability due to college and other commitments. Summer activities that have been arranged include: a film project led by the young people, with support from a film company that has experience in working with young people; and several trips during the summer holidays, to ensure that all the young people have an opportunity to go on a summer outing.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. Since January 2022, the Participation Service has been moving towards face-to-face meetings with young people; during the pandemic, there were limited opportunities for young people to meet with their peers on a regular basis. The participation lead for this area has developed and maintained strong links with

the young people, which has helped them to feel connected to the group. However, the ability to meet face-to-face and have contact with other members has significantly improved their experience and connection to the City of London. The first face-to-face CiCC meeting took place in February this year. At this meeting, the young people were informed about the Young Inspectors programme and the film project. The group agreed that they would like to participate in these projects, so steps have been made to bring in training for young people and participation leads on the Young Inspectors programme.

2. The February CiCC was well attended, and the young people had an opportunity to voice their views to a senior leader and Member who attended the latter part of the meeting. Following the meeting, the young people had an opportunity to go out together and try go karting, which they all enjoyed. The young people who raised issues at the CiCC meeting were listened to and their requests were acted on. One request was for training on interview techniques. A workshop on interview skills was organised by the Independent Reviewing Officer, with support from Prospects in early April of this year. It was well attended by young people, and feedback after the workshop was positive.
3. In May 2022 the City of London CiCC will be reviewing the pledge, looking at how the City of London is meeting the commitments it made to the young people at that time. It has been a while since the pledge has been reviewed and many of the young people who were originally involved in developing the pledge have now left the programme. Therefore, it gives the new members of the CiCC the opportunity to add their views and opinions to the pledge, so that it reflects the current needs of the young people cared for by the City of London.

Current Position

4. The training for the Young Inspectors Programme will be provided through the London CiCC, although it will be funded by the City of London. This should not incur any additional cost for the City of London: opening up training to other young people across London will mean the resource is used more effectively and offer the opportunity for shared learning and support across other London boroughs. The training for this programme involves a one-day training session for participation leads and a two-day training session for the young people.
5. Once the training has taken place, the young people will be able to be involved in inspecting service providers. However, clear guidance will be needed on the inspection scope, and how feedback is given. Most of the young people either attend work, college or school, so any inspections will need to be time-limited to ensure that this does not impact on their education or employment. The strengths of this model will give the young people an opportunity to have a voice regarding the services being provided for young people, as well as the confidence to voice their views.

6. This year the Participation Service will also be progressing a film project to give young people the opportunity to work together on a combined project. It will also give them an opportunity to reflect on something that is important to them, that they can retain as part of their life story and journey in this country. The young people will decide what the film is about, with support from the film company and participation lead. They will also be involved in the production and editing of the film, which will be open to all the young people. This project was discussed at the last CiCC meeting in February, and the young people were excited about the opportunity to be involved.
7. Activities for the young people are arranged following the CiCC meetings and these events are well attended by the young people, as they enjoy meeting up with their peers. This year the Participation Service will be arranging some summer day trips for the young people. These trips will ensure that all the young people have the opportunity to attend one of the summer trips during the summer break. Possible destinations will be discussed and decided at the next CiCC meeting in May 2022.

Options

8. N/A

Proposals

9. N/A

Key Data

10. N/A

Corporate & Strategic Implications

11. Financial implications – N/A
12. Resource implications – N/A
13. Legal implications – N/A
14. Risk implications – N/A
15. Equalities implications – N/A
16. Climate implications – N/A
17. Security implications – N/A

Conclusion

18. The pandemic has been a challenging time for the young people, as much of their contact with peers and the Participation Service has been virtual. The participation lead has stayed in close contact with the young people through WhatsApp group chats and individual contact, although this has not been ideal. The young people's engagement during this time has involved a proactive approach to involve them with the service. The participation lead who started in her role during the pandemic has also managed to maintain close relationships with the young people by virtual means during this period.
19. This year there has been a significant move to bring back face-to-face contact, with the arrangement of the CiCC meetings and activities. The young people's involvement and feedback would indicate that the ability to have face-to-face social interaction significantly improves their wellbeing and their connection to the City of London. Therefore, the activities arranged for this year aim to create a more inclusive approach that supports all young people being involved. Through having a variety of projects and trips, the young people will have more choice and opportunities to be involved.

Appendices

- None.

Pat Dixon

Head of Safeguarding and Quality Assurance Service
Department of Community and Children's Services

T: 020 7332 1215

E: pat.dixon@cityoflondon.gov.uk

Committee: Safeguarding Sub Committee	Dated: 12 May 2022
Subject: Multi Agency Child Exploitation Forum Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Contribute to a flourishing society 1. People are safe and feel safe. 2. People enjoy good health and wellbeing.
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter	For Information
Report author: Rachel Talmage	

Summary

The purpose of the report is to enable members to be sighted on issues around child exploitation in the City of London.

The City of London holds a Multi-Agency Child Exploitation and Vulnerable Adolescent Forum on a bimonthly basis. This report outlines the work of the Forum and the action plan as set out for 2022-23.

The Forum was established to develop a detailed overview of Child Exploitation (including sexual and criminal) within the City of London and to use this profile to inform multi agency work priorities including the development of appropriate prevention and intervention strategies.

Whilst MACE focuses primarily on young people under the age of 18 years; the group also considers cases of young people up to the age of 25 years who are care leavers or young people with learning difficulties receiving services from City of London.

The group aims to reduce the risk to children and young people at risk of or experiencing exploitation (including criminal and sexual) by building an understanding of the links between victims and perpetrators, identifying emerging themes and trends, and using these to inform diversionary measures and interventions.

Discussion focuses on emerging trends, issues, and learning. The group is used, where needed and purposeful, to discuss cases.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. The MACE agenda was amended in 2018 to be followed by a specific Vulnerable Adolescents agenda which has been developed to expand the oversight of the group to cover the strategic and operational response to a wider range of issues that young people face.
2. The decision to widen this scope simply reflects the fact that young people often face multiple risks. Dealing with the response to certain threats in isolation can potentially hinder the understanding of vulnerabilities that frequently intersect and overlap. For example, young people who go missing from home could be missing due to violence in their home. Young people who are exploited by gangs could have vulnerabilities in terms of their mental health and emotional wellbeing and adolescents who are at risk from CSE may be more susceptible due to their limited and/or limiting experiences of growing up in a household where domestic violence has skewed their understanding of healthy relationships.
3. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (Definition Department of Education 2017)
4. Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:
Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18.

The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft. Definition (Department of Education 2017)

5. To effectively safeguard children and young people, understanding both the complexity and the context in which they live their lives is essential. The City and Hackney Safeguarding Children's Partnership (CHSCP's) developed position that children being abused, or at risk of abuse, should be seen heard and helped will be central to the overall approach of the MACE and Vulnerable Adolescent Forum:
 - **Seen**; in the context of their lives at home, friendship circles, health, education, and public spaces (including social media).
 - **Heard**; in the context of professionals taking time to hear what children and young people are saying and put themselves in their shoes and think about what their life might truly be like.
 - **Helped**; in the context of professionals remaining curious and by implementing effective and imaginative solutions that help children and young people and make them safer.
6. Practice knowledge increasingly suggests that it is unhelpful in our response to separate out and ascribe priority to diverse vulnerabilities. In this sense, the Vulnerable Adolescent Forum will develop improved integrated arrangements that actively consider and effectively respond this complexity.
7. Factors in scope include (but not limited to):
 - Child Sexual Exploitation (including Harmful Sexual Behaviours)
 - Children missing from home, care and education
 - Children and young people exposed to risk through gang involvement, county lines and serious youth violence.
 - Domestic Violence and Abuse (DVA)
 - Violence Against Women & Girls (VAWG)
 - Adolescent Neglect
 - Self-harm and Suicide
 - Substance Misuse
 - Radicalisation
 - Special Educational Needs and Disabilities (SEND)
8. Safeguarding children and young people in the context of their access to technology and use of social media will underpin the focus on the strategic and operational responses to adolescent vulnerability.
9. The forum further maintains oversight of the operational effectiveness of the partnership response to vulnerable adolescents and the direct impact on improving outcomes and the safety and welfare of young people in the City of London.

10. Membership consists of:

- City of London Police
- Children's Social Care and Early Help Service
- Health CSE Lead – CHYPS Plus
- Health CSE Lead - Safeguarding Nurse
- Education CSE Lead
- Youth Services – commissioning lead
- Drug and Alcohol Services
- Safer City Partnership representative
- Housing
- Community Engagement Service
- CHSCP representative

Current Position

1. The forum met last on 5 April 2022 and agreed an overarching plan for the financial year.
2. The forum Decided against further action on AirBnBs, as it is a non achievable action. There has been no pattern to dealing from AirBnBs, or under 18s using parental/adult credit cards to book and stay. No pattern of location within the city and from investigation, each incident is unconnected.
3. The serious case review on Child Q was fully considered, and actions recommended put forward to the City and Hackney Child Safeguarding Partnership. The team leader for substance abuse services, to whom child Q should have been referred is keen for more referrals from the City and will be visiting the Guildhall in May 2022.
4. All cases open to Children's Social Care and Early Help will be considered in the light of parental substance misuse as well as child/young person substance misuse. All children and families will have had a refreshed opportunity for support by end July 2022. All social care and early help staff will have attended Adultification training to ensure that black children are responded to properly as children, with a safeguarding first approach. The service development plan coming to this sub committee details support for staff. The Service Development Plan will be updated accordingly with data on referrals to the substance service and for the training.
5. Extinction Rebellion (XR) was considered in the light of risk of criminal exploitation, absent parents due to incarceration. A joint plan for XR was in place to respond to children's needs during the protests was in place, and was fortunately not needed.
6. All children looked after and care leaver contracts are being reviewed to ensure that our children are not criminalised for any damage to their homes. This is to avoid needless criminalisation and to ensure we treat our children in care as our own.

7. A City of London Police conference will be held in May. The focus will be on all strands of vulnerability, including child sexual exploitation of criminal exploitation. All relevant staff will be encouraged to attend.

Key Data

8. Data collection for MACE needs to be extended and consistent; from May 2022 quarterly data on CCE and CSE as identifiers in referrals into children's social care will be made possible. It is recognised that these will largely if not wholly be external residents travelling to and through the City. With the City being an end of line with drugs imported for City workers/visitors. At the moment it is not possible to run an automated data collection for child criminal and sexual exploitation, only manual time-consuming searching is viable. It is noted that only four children have been presented to MACE in 2021-22.
9. The City of London Police will provide data on unaccompanied asylum-seeking children having their fingerprints taken as part of Operation Innerste at the next MACE forum. One child was stopped by British Transport Police, who do not have the required inkpads to take Op Innerste prints. The CoL Police will ensure the young person has their fingerprints taken and that MACE is updated. This makes young people less likely to be trafficked from home in London, as they are identifiable if stopped.

Corporate & Strategic & Risk Implications

10. Operation Innerste is a police operation that is established in the City since 2021, the purpose is to prevent children from being trafficked from London within the UK/Europe. Quarterly data to MACE will enable the Corporation to be confident the Operation is working.

Corporate & Strategic and Equalities implications

11. Child Q has implications for Education and Police services in the City and is being overseen by the City and Hackney Safeguarding Children's Partnership.

Financial implications - none

Resource implications - none

Legal implications - none

Climate implications - none

Security implications - none

Conclusion

12. There is no clear pattern of criminal or child exploitation in the City. This is checked often and well, and the police profile for the City is updated. Cocaine

use in the City fuels children delivering substances, and causes criminal exploitation of non-resident children. Child Q has challenges for all our systems in respect of being anti racist and seeing and hearing and responding to vulnerable black children. The City and Hackney Safeguarding Children's Partnership is co ordinating all agency responses so they are aligned and duplication is avoided.

Appendices

- None

Rachel Talmage

Head of Service

Children's Social Care and Early Help

T: 020 7332 3621

E: Rachel.Talmage@cityoflondon.gov.uk

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: Modern Day Slavery	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Outcome 1
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Pat Dixon, Head of Safeguarding and Quality Assurance Service	

Summary

Because of the hidden nature of Modern Day Slavery (MDS) it is difficult to have an accurate measure of the prevalence of this exploitation, as there is no definitive source of data or suitable method available to accurately quantify the number of victims involved. This report identifies the five main types of exploitation associated with MDS, looking at the national and London statistics on modern slavery in the UK. The City of London has an MDS group which consists of representatives from the Department of Community and Children's Services, Police, Licensing, and external partners. Information from this group is included in the MDS Statement and reported to the City and Hackney Safeguarding Adults Board, who have identified MDS as a priority for 2022. The number of MDS cases in the City of London remain low but, given the hidden nature of this crime, it is likely that this does not reflect the true prevalence of MDS in the City of London.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. Victims of MDS can be men, women and children of any age across the world. There is an assumption that victims of MDS are often trafficked to the UK from other countries, but residents of the UK are also among the victims who are exploited in the UK and other countries. The crime is often hidden from the

authorities and the general public. Victims may struggle to leave their situation because of threats, punishment, violence, coercion and deception, and some may believe that they are not in a situation of exploitation.

2. There are five main types of exploitation that victims of MDS may experience:
 - a) Labour exploitation: victims are forced to work for nothing, low wages or a wage that is kept by their owner; work is involuntary, forced and/or under the threat of a penalty, and the working conditions can be poor.
 - b) Sexual exploitation: victims are exploited through non-consensual abuse or another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-legitimate purpose.
 - c) Domestic servitude: victims are domestic workers who perform a range of household tasks (for example, cooking and cleaning); some live with their employers and have low pay, if any at all.
 - d) Criminal exploitation: victims are forced to work under the control of criminals in activities such as forced begging, shoplifting, pickpocketing, cannabis cultivation, drug dealing and financial exploitation.
 - e) Organ harvesting living or deceased victims are recruited, transported or transferred, by threat or force for money, for their organs.
3. The number of potential victims referred through to the National Referral Mechanism (NRM) has risen from 2,340 in 2014 to more than 10,000 in 2020. The profile of victims and the worst threats have also changed, with labour and criminal exploitation now the most prevalent forms of MDS identified in the UK. This increase is also replicated in the data from the Metropolitan Police, where offences relating to MDS have increased from 173 in April 2021 to 274 in April 2022.

Current Position

4. The City of London's MDS group is chaired by the Head of Safeguarding and Quality Assurance, who is the single point of contact (SPOC) for MDS, with support from the Domestic Abuse, Vulnerability and Risk Policy Officer. This group meets on a quarterly basis and is attended by MDS leads from across the Department of Community and Children's Services, Police, Fire Brigade and Lead on MDS Statement for the City of London Corporation. Support is also offered from the Human Trafficking Foundation – the Foundation hosts the London-wide network for MDS, which reviews London-wide data and intelligence from other local authorities and the Metropolitan Police.
5. The City of London MDS group reviews intelligence on incidents of MDS that have occurred in the past year. However, no reports or referrals of MDS have been received. Due to this low level of data, focus will be prioritised on potentially vulnerable groups, and areas within the City where individuals may be at risk of exploitation. The City of London has many businesses within its

boundaries, and the larger institutions are required under the Modern Slavery Act 2015 to produce a slavery and human trafficking statement. The statement must set out what steps they have taken during the financial year to ensure that MDS is not occurring within their supply chains or organisation. There are, however, many smaller businesses and agencies based in the City of London that would not meet the requirement of producing a slavery and human trafficking statement.

6. Section 54 of the Modern Slavery Act 2015 gives the Secretary of State the power to issue guidance.
7. Section 54 requires that any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the UK, and is above a specified total turnover, must produce a slavery and human trafficking statement for each financial year of the organisation. For the purposes of this requirement, 'supply chain' has its everyday meaning. Regulations have set the total turnover threshold at £36 million. The statement must set out what steps the organisation has taken during the financial year to ensure that MDS is not occurring in their supply chains and in their own organisation.
8. Information and data from other local authorities has shown that raising awareness and training on MDS does increase people's potential to identify cases and report incidents. In 2022/23 the MDS group is planning to send out information on MDS, which will be disseminated across the City of London Corporation and to partner agencies, and offer training on MDS. A referrals pathways document is also being finalised to support staff and other agencies in making referrals once they have identified a case of MDS. The impact of the multi-agency awareness-raising sessions and training will be reported back to Members of the Safeguarding Sub-Committee at the end of 2022.

Corporate & Strategic Implications

9. There are no strategic implications directly related to this report:

- Financial implications – N/A
- Resource implications – N/A
- Legal implications – N/A
- Risk implications – N/A
- Equalities implications – N/A
- Climate implications – N/A
- Security implications – N/A

Conclusion

10. As identified within this report, MDS is not always visible, and data sources in relation to MDS are not easily accessible. There are many pathways where individuals who are subject to MDS can receive support, and many people either do not see themselves as being subject to MDS, or they are too frightened to come forward. Therefore, that fact that there have not been any referrals of MDS does not mean that it is not happening in the City of London. Data obtained from the Metropolitan Police identifies the areas where there has been the most growth in MDS, which is the labour market, with a slight increase in cases relating to domestic servitude.
11. The situation in the Ukraine will also likely have an impact, as there is the potential for the risks of MDS escalating as more people offer homes to Ukrainian refugees. Several councils have raised concerns with the Human Trafficking Foundation about the potential for exploitation through the Homes for Ukraine scheme. A key factor in reducing these risks will be in relation to the checks on those individuals offering their home, and the level of support the refugees receive once they enter the UK.

Appendices

- None

Background Papers

- Modern Slavery Act 2015

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Pat Dixon

Head of Safeguarding and Quality Assurance Service
Department of Community and Children's Services

T: 020 7332 1215

E: pat.dixon@cityoflondon.gov.uk

Committee:	Dated:
Safeguarding Sub-Committee	12/05/2022
Subject: Child performance licences	Report is Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	<ul style="list-style-type: none"> • Contribute to a flourishing society <ol style="list-style-type: none"> 1. People are safe and feel safe 2. People enjoy good health and wellbeing. 3. People have equal opportunities to enrich their lives and reach their full potential. • Support a thriving economy <ol style="list-style-type: none"> 8. We have access to the skills and talent we need.
Does this proposal require extra revenue and/or capital spending?	No
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Theresa Shortland, Head of Service – Education and Early Years Kirstie Hilton Lead Advisor – Universal Education Services	

Summary

This purpose of this report is to update Members on the revised local policy and processes for performance licences for Children in the City of London.

National child employment guidance, which oversees the administration of child work permits, the issue of performance licences, Body of Persons Approvals (BOPAs) and chaperone licences, is available to all local authorities through the National Network for Children in Employment and Entertainment (NNCEE). However, local guidance specific to individual local authorities is less well known.

In October 2019, the Safeguarding Sub-Committee was advised that, due to the increased number of applications received, the Education and Early Years Service was reviewing its suite of policies and processes. The review included:

- the review of practice and policies as guided by national and local legalisation and established good practice
- a benchmark of practice against Camden and other local authorities
- updated policy and practice documents, where necessary.

Recommendation

Members are asked to:

- note the points raised in the report.

Main Report

Background

1. There are statutory laws to help safeguard children of statutory school age while they are performing. The relevant primary legislation is Part II of the Children and Young Persons Act 1933 and Part II of the Children and Young Persons Act 1963.
2. The Children (Performances and Activities) (England) Regulations 2014 came into effect on 6 February 2015. These regulations replaced the Children (Performances) Regulations 1968 as amended, which were repealed in their entirety together with all guidance that related to them. The law applies to all children from birth until they reach compulsory school-leaving age.
3. A licence must be obtained before a child can take part in certain types of performance and activities, unless an exemption applies. These include:
 - any performance for which a charge is made, whether for admission or otherwise
 - performances on premises licensed to sell alcohol – for example, in a hotel, a pub, or theatre
 - any live broadcast performance – for example, a television or radio broadcast, or internet streaming
 - any performance recorded (by whatever means) with a view to its use in a broadcast or such service, or in a film intended for public exhibition – for example, a live stage performance recorded for a cinema screening, a feature film, a video or sound recording of a performance on a website.

Child Performance Licences

4. A production company must apply for a child performance licence via a child's home local authority. The licence is registered to an individual, which sets out the conditions of a performance. Wherever a performance is taking place, the local authority issuing the licence must send a copy of the licence to the child employment officer at the local authority where the performance is taking place for inspection purposes. The City of London receives approximately 60 notifications of performances taking place each year.

Exemptions

5. Exemptions are set out in section 37(3) of the 1963 Act, which applies when a child is not being paid for participating in a performance (or another person), other than expenses. These exemptions do not apply to paid sport or paid modelling. The exemptions are:

- **The 'four-day rule'**

If a child has not performed on more than three days in the last six months, they will not need a licence for performance on a fourth day. Once a child has performed on four days in a six-month period (in any performance, regardless of whether a licence was in place on any of those days, or the child was taking part in a performance under the exemption rule) then a licence is required for any further performances. If a child is to be absent from school, this exemption cannot be relied on, and a licence will be required (unless the child attends an independent school, academy or free school where the headteacher can authorise absence for participating in a performance under the four-day rule).

- **Performances given under arrangements made by a school**

This is when a performance is solely organised by a school with no third-party involvement.

- **Performance given under arrangements made by "a body of persons approval (BOPA)"**

A BOPA is approved by the local authority where the performance is taking place, or – in some exceptional circumstances – by the Secretary of State. A BOPA, if granted, removes the need to apply for an individual licence for each child; it is granted to the organisation that is responsible for the performance. A local authority can grant the approval, even if the children taking part do not live within its boundaries. A BOPA can be issued when a large number of children are performing in one place and can only be issued when children are not receiving any payment and when the rehearsals and performances are taking place outside of school hours (unless the child attends an independent school, academy or free school where the headteacher can authorise absence for participating in a performance under a BOPA). Historically, BOPAs were only allowed to be issued to amateur groups such as theatre groups, however, more recently, the change in legislation has allowed production companies such as the BBC to request BOPAs where a large number of children are taking part in one performance.

Child Performance Inspections

6. A piece of paper, such as a licence, does not safeguard the child. To ensure that conditions of a performance and safeguarding is being adhered to, an authorised officer of the local authority where the performance is taking place has the power to carry out an inspection at venues and locations within the local authority boundary. A City of London Officer is required to inspect all new production companies who are putting on performances in the City of London and revisit them every three years.
7. The inspections are pre-organised and, on arrival, officers will expect to receive copies of the paperwork, as well as meet with chaperones and the children taking part in the performance. Other health and safety inspections take place, including checking that there are suitable changing areas for children to use.
8. In the extreme event that a performance is deemed unsuitable for children, or children are in anyway at risk, then the officers have the power to stop and cancel the performance.

Current Position

Increase in the number of performances

9. Prior to 2015, the service was receiving one or two BOPA applications per year. The number of BOPA applications has since increased, with seven processed in 2015, 10 in 2016, and more than 39 applications since 2016.
10. Due to the increase in the number of applications, a more streamlined and improved application process was required. This was to ensure that children are fully safeguarded. The Head of the National Network for Children in Employment and Entertainment (NNCEE) was commissioned to review the City of London's processes and to formalise a new local policy.
11. The methodology used for the review was as follows:
 - Initial and ongoing discussions with the City of London Education Service officers.
 - Review of the Policy and Procedures used in the City of London.
 - A gap analysis to check what policies and practices needed to be updated, and identifying where policies were incomplete.
 - All newly drafted policies and practice were checked against national legislation.
12. In the autumn of 2019 the new policy was drafted and sent to all relevant stakeholders, including colleagues working within the entertainment industry for comment (for example, the Barbican Centre).
13. In March 2020, a few weeks before the initial COVID-19 lockdown, the new suite of policies was presented at the Education Safeguarding Forum by the Head of the NNCEE. The revised policy was accepted.

14. As a result of the COVID-19 pandemic, all performances were cancelled in the subsequent months, and the implementation of the new policy was delayed. The published policy was sent to production companies on 24 November 2020.
15. One of the main changes to the policy was an added provision for further safeguarding measures for each performance. Production companies are now required to ensure that children arrive and leave the venue safely. There is an expectation on all production companies to carry out travel risk assessments for children travelling long distances, especially those who are very young and vulnerable.

COVID-19

16. The COVID-19 pandemic had a significant impact on the number of performances taking place between March 2020 and April. The number of applications fell as a direct result of the pandemic, with BOPA applications falling to 13, and the number of performance notifications falling by a third to 40 in 2021.
17. The timeframe to measure the impact of the changes has been limited due to COVID-19, however, we are already experiencing situations where production companies and organisations requesting to put on performances are having to think more about their accountability and the wellbeing of children taking part in their performances.

There are no strategic implications directly related to this report

- Financial implications – N/A
- Resource implications – N/A
- Legal implications – N/A
- Risk implications – N/A
- Equalities implications – N/A
- Climate implications – N/A
- Security implications – N/A

Conclusion

18. The Education and Early Years Service is committed to ensuring the safeguarding of children of statutory school age taking part in performances, that they are not exploited, and that their health and wellbeing is paramount, including access to education where necessary. The City is now fully compliant with its policies and practices, being one of the only local authorities in the country with its own suite of local policies and procedures. Having robust policies ensures that children are always safeguarded, whether travelling to a venue, at the performance, or returning back home.

Appendices

- Appendix A – Child Performance Licensing and Inspection Policy

Theresa Shortland
Head of Service – Education and Early Years

T: 07711919718
E: theresa.shortland@cityoflondon.gov.uk

Kirstie Hilton
Lead Advisor – Universal Education Services

T: [07803437510]
E: kirstie.hilton@cityoflondon.gov.uk

City of London Child Performance Licensing and Inspection Policy



Contents

Section 1: Introduction 3

Section 2: Overview of child performance licensing legislation 3

2.1 Primary legislation 3

2.2 Secondary legislation 3

2.3 Licensing requirement 3

2.4 Exemptions from the licensing requirement for performances 4

2.4.1 Performances given under arrangements made by a school 4

2.5 Who should apply for a licence or BOPA? 5

Section 3: Requirements for a child performance licence 5

3.1 Performance licences 5

3.2 Applying for a child performance licence 6

Section 4: Body of Person's Approval (BOPA) - 37(3)(b) of the 1963 Act 7

4.1 Who can apply? 7

4.2 Who issues a BOPA? 8

4.3 Performance under a BOPA 8

4.4 BOPA timeframe 9

Section 5: Performance licence inspections taking place in the City of London 9

5.1 Making an inspection 9

5.2 What happens during an inspection? 9

5.2.1 The children 10

5.2.2 The chaperones, parent and tutor 10

5.2.3 What needs to be seen? 10

5.2.4 How to deal with problems 11

5.2.5 Writing an inspection report 11

Section 6: Other areas to consider 11

6.1 Tuition 11

6.2 Absence from school 12

6.3 Chaperones 12

6.4 Restrictions in relation to all performances 13

6.5 Variation to minimum break between performances and rehearsal 14

6.6 Other requirements 14

6.7 Performance compliance: licences, BOPA or four-day rule 15

Section 1: Introduction

Working in the entertainment industry can be a rewarding and valuable experience for children. However, legislation exists to ensure that children are not exploited, are employed safely and that their education and health does not suffer. It is illegal for any child to work in entertainment without a performance licence or authorisation from their local council, unless an exemption applies.

The local authority has statutory responsibilities for safeguarding the welfare of children working in the entertainment industry. These responsibilities fall into three areas and are explained in more detail within the body of this policy:

- a. Issuing performance licences
- b. Issuing Body of Persons Approvals (BOPAs)
- c. Inspecting performances taking place with the City of London Corporation (the City) locality

Section 2: Overview of child performance licensing legislation

2.1 Primary legislation

The Children and Young Persons Act 1933 and The Children and Young Persons Act 1963 (as amended) form the primary legislation that covers child performance, and this underpins the licensing system. It is this legislation which determines whether a licence is required and gives local authorities the power of enforcement.

<http://www.legislation.gov.uk/ukpga/Geo5/23-24/12>
<http://www.legislation.gov.uk/ukpga/1963/37>

2.2 Secondary legislation

The Children (Performances and Activities) (England) Regulations 2014 came into effect on 6 February 2015. These Regulations set out requirements in relation to licences sought under the 1933 and 1963 Acts, and replace earlier regulations.

<http://www.legislation.gov.uk/id/uksi/2014/3309>

The legislation applies to any child or young person who is of statutory school age or younger, which is 0-16.

A young person is of statutory school age until the last Friday in June, within the academic year they turn 16. This means that a young person can be aged 15 and no longer be of statutory school age if they turn 16 in July or August.

2.3 Licensing requirement

Under section 37 of the 1963 Act, a licence must be obtained before a child can take part in certain types of performance and activities in Great Britain.

These include:

- any performance for which a charge is made, whether for admission or otherwise;

- performances on premises licensed to sell alcohol, for example, in a hotel, a pub, or theatre;
- any live broadcast performance, for example, a television or radio broadcast, internet streaming;
- any performance recorded (by whatever means) with a view to its use in a broadcast or such service or in a film intended for public exhibition. For example, a live stage performance recorded for a cinema screening, a feature film, a video or sound recording of a performance on a website. (Note that this does not extend to user-generated content, for example, where young people or a family record themselves and share it on a website or social media);
- taking part in a sport or modelling for which payment is made (to the child or to someone else in respect of the child taking part) other than for defraying expenses.

2.4 Exemptions from the licensing requirement for performances

Exemptions are set out in section 37(3) of the 1963 Act, which only apply where **no payment in respect of the child taking part in the performance is made to the child or another person**, other than expenses. These exemptions do not apply to paid sport or paid modelling. The exemptions are:

- The 'four-day rule' - 37(3)(a) of the 1963 Act
If a child has **not performed on more than four days in the last six months**, they will not need a licence for performance on a fourth day. Once a child has performed on four days in a six-month period (in any performance, regardless of whether a licence was in place on any of those days or the child was taking part in a performance arranged under a BOPA) then a licence is required for any further performances.

If a child is to be absent from school, this exemption cannot be relied upon and a licence will be required.
- Performances given under arrangements made by a school - 37(3)(b) of the 1963 Act.

2.4.1 Performances given under arrangements made by a school

Department for Education guidance states the following:

Under section 37(3)(b) of the 1963 Act, a licence is not required where the performance in which the child is taking part is given under **arrangements made by a school**. The deciding factor is whether the school is responsible for organising and producing the performance. The school in question must fall within the meaning of a 'school' in the relevant Education Acts – i.e. an educational institution that provides primary and/or secondary education. The table below sets out when a performance would meet the criteria for this exemption and when it would not.

Who is making the arrangements	Is a licence required?
The child's school	No

<p>A school within the meaning of the relevant Education Acts (but which the child does not attend) – this can include: a performing arts school which also provides a child's main education; and a school providing a child's main education working alongside a performing arts school (education is jointly provided), providing each is a school.</p> <p>A child who is home educated could qualify under this exemption if the arrangements for the performance are made by a school. This exemption would not be affected by a broadcaster filming the event as part of an observational documentary – as long as the children are not directed to act in a particular way.</p>	No
<p>Dance schools, circus schools, conservatoires and similar organisations where the child is attending purely for training in that performance activity (as opposed to receiving their main education).</p>	Yes (assuming no other exemption applies)
<p>A third party. For example, where children from a school or several schools take part in a performance where arrangements are made by a third party such as a broadcasting company or a local authority or arts group – i.e. the third party is responsible for the production.</p>	Yes (assuming no other exemption applies)

2.5 Who should apply for a licence or BOPA?

The responsible person must apply for the licence. Examples of a responsible person would include the producer of a performance or the person responsible for organising an activity or, in either case, the person to whom this responsibility has been delegated. Applications should not be signed by a child's agent.

Section 3: Requirements for a child performance licence

3.1 Performance licences

An individual performance licence is assigned to a child. The person responsible for the proposed production, not the parent, applies for the licence on behalf of the child through the City. Applicants do this by completing the child performance licence application form and submitting it along with the required supporting documentation. The child must usually be a resident of the City. If the child does not reside in the City, then the licence should be issued by the local authority where the child lives.

If a child is taking part in a performance abroad, the application will need to be made to a magistrates' court and not the local authority. The issuing of licences for children performing abroad is outside the remit of a local authority and under no circumstances is a local authority able to issue a licence. It should be noted that the Republic of Ireland is not classed as 'abroad' by the magistrates' court. If a child resident in Great Britain is performing in the Republic of Ireland, a licence should be issued by the local authority where the child resides.

Given the wide range of possible performances and differing levels of involvement of children, it is not always immediately clear when a licence is required. The following table (Examples of Best Practice – Child Performance and Activities Licensing by Local Authorities in England) gives examples of when a licence may be required and when it may not. It is for illustrative purposes only and should not be considered an authoritative or complete list.

Examples of Best Practice – Child Performance and Activities Licensing by Local Authorities in England

A licence may be required for	A licence may <u>not</u> be required for
Performances that meet the criteria in section 37(2) of the 1963 Act. These can include: acting; singing; dancing; playing in an orchestra; stand-up comedy; magic act; and any production where the activity is contrived or constructed for dramatic effect.	Observational documentaries where a child is filmed carrying out normal day-to-day activities, e.g., playing in the street, participating in an ordinary lesson, training for their sport.
So-called 'reality' television where the activity in which the child participates is manipulated/controlled or directed for the purpose of the entertainment.	Elements of a programme where the child is not being directed but is being observed doing normal activities are treated as observational documentary provided the child is filmed being themselves without direction.
Presenting or compering (where this has an element of contrived performance).	Daily news reporting, news reports (including investigations in the public interest, e.g., testing if shops sell goods to a child underage).
Entertaining or performing where the performance meets any of the criteria under section 37(2) of the Act, e.g., for a paying audience, on licensed premises, a recording for broadcast or public exhibition.	Being interviewed as a member of the public; self-generated content, e.g., a child records themselves and puts that on the internet; castings and auditions that are not recorded for public exhibition; being part of an audience (watching a show either in a studio, theatre or stadium).
Dancing at a community dance festival or performance that meets any of the criteria set out under section 37(2) of the Act.	Dance workshops held on the same day of the performance at a different venue. (Practical dance sessions led by a dance teacher or artist. They may explore an idea or practise some dance movement; they introduce the participants to different dance styles or techniques; and encourage interaction between participants from different schools or groups).
Photo shoots and modelling where the child (or someone else in respect of the child taking part) receives payment.	Photo shoots and modelling where no payment is made in respect of the child's participation.
Taking part in a sport where the child (or someone else in respect of the child taking part) receives payment, other than expenses.	Being a ball boy or girl. (If they were playing football or tennis and payment other than expenses was made then they could well fall within the remit of the child performance legislation. But they are not playing and therefore we do not think they could be said to be taking part in a performance or a paid sport).

3.2 Applying for a child performance licence

If a complete application is required, this must include all of the following documents:

- 1) A completed application form with both Part 1 (Applicant) and Part 2 (Parent) completed
- 2) A full rehearsal and performance schedule clearly listing the time of arrival, activity times, break times and departure time
- 3) Electronic photograph of the child

- 4) A copy of the child's birth certificate or other evidence of the child's age (such as a copy of the child's passport) to the satisfaction of the City
- 5) A copy of the contract/draft contract or other documents containing particulars of the agreement regulating the child's appearance in the performances
- 6) A school permission letter (if absence from school is required)
- 7) A copy of the child protection policy
- 8) A copy of the risk assessment.

All information must be sent to us within at least **10 working days** of the date of the performance. Failure to do so may result in the licence not being issued.

It is the responsibility of the applicant and parent to ensure that all documentation is submitted correctly and within the time scales. If you have any further queries relating to the application process, please contact us.

Section 4: Body of Persons Approval (BOPA) - 37(3)(b) of the 1963 Act

Under the Children (Performances and Activities) (England) Regulations 2014, the City has the authority to issue an exemption to an organisation that would normally be required to individually license any children taking part in performances. Depending on the type of school a child attends, this exemption can allow children to take part in performances without the need for individual licences being applied for. These are known as Body of Persons Approvals (BOPAs). A full list of applicable school types can be found in section 6.2.1 of this policy.

A BOPA can be issued for an organisation for a specific performance located within the City or for a limited period as set out in the approval, to put on performances involving children.

4.1 Who can apply?

The organisation responsible for putting on the performance, and for ensuring the safety and wellbeing of the children taking part may apply for a BOPA.

All information must be sent to us within at least **10 working days** of the date of the performance. Failure to do so may result in the licence not being issued.

A complete application is required, and this must include all of the following documents:

- 1) A completed application form
- 2) Total number of Disclosure and Barring Service (DBS) registered chaperones – they must be briefed on safety procedures such as: fire assembly points; where the accident book is kept; first aid box location; and safeguarding concerns reporting channels. Note that the City requires at least one local authority registered chaperone to accompany children during the performance
- 3) A copy of a general risk assessment of the performance
- 4) A copy of a safeguarding risk assessment, which should include:
 - (a) an account of what the children will be doing and how they are safeguarded when they are not performing
 - (b) whether or not there is a first-aider on site

- (c) details of travel arrangements to the venue and back home. Is there parental consent if travelling alone?
- (d) arrangements for designated toilets for children
- (e) a sign-in, sign-out system in place
- (f) the likelihood of children being exposed to an adult environment inappropriate for children (language, viewing materials)
- (g) whether consent has been received for photos/video or interviewing children
- (h) how opportunities for adults to behave inappropriately with children are minimised
- (i) a full rehearsal and performance schedule, clearly listing the time of arrival, activity times, break times and departure time
- (j) confirmation that parental consent has been received that children are fit and healthy to perform
- (k) a copy of the organisation's safeguarding policy.

The contract will be issued to the organisation once the City is satisfied with the application and safeguarding arrangements. A BOPA award notification will be sent as soon as the contract is signed and sent back to the City.

4.2 Who issues a BOPA?

The decision of whether to issue a BOPA is at the discretion of the local authority (or Secretary of State in exceptional circumstances, for example, where there are multiple performances by a large number of children across various local authority areas). The City requires that applicants have clear, robust and well-embedded policies for safeguarding children.

The City can place conditions on any approval as it considers necessary in order to ensure the wellbeing of children, for example, stipulations in relation to the travel arrangements, the hours a child can perform and the breaks they must have.

4.3 Performance under a BOPA

The applicant must be able to demonstrate adequate competency in safeguarding practices. The City's conditions for issuing a BOPA are listed below:

- (a) Children or young people have performed on four or more occasions, whether licensed or unlicensed in a six-month period.
- (b) No payment is made to the child or anyone else in respect of the child taking part in the performance (except expenses). If a child (or someone on their behalf) is being paid to take part in a performance (other than expenses), a licence is required.
- (c) The production must have five or more children.
- (d) The production company agrees to comply with Regulation 11 and Regulations 15 to 29 of The Children (Performances and Activities) (England) Regulations 2014.

If performances are in multiple locations and across multiple boroughs, applicants must approach the Secretary of State for a BOPA in the first instance.

4.4 BOPA timeframe

A BOPA application must be made for each individual performance. The City will consider processing an annual BOPA for an organisation that has four or more performances scheduled in the City within a 12-month timeframe.

An organisation that operates on an academic calendar and has four or more performances planned can make a request for a 'one-off' short BOPA approval until 31 August. A new annual application must be made that runs from 1 September.

Section 5: Performance licence inspections taking place in the City of London

The City has responsibility for enforcement of the licensing requirements and has a number of powers (including powers of entry under section 28 1933 Act) to carry out inspections within its locality to ensure that a child's welfare is maintained. It is essential that the City recognises this statutory duty and actively fulfils its safeguarding responsibility towards children taking part in performances, paid sport and modelling. A piece of paper – that is, the licence – does not protect the child, and it is only by carrying out unannounced inspections that we can be sure that licence conditions are met and children are protected.

5.1 Making an inspection

An authorised officer from the City can carry out an inspection at venues and locations within the local authority's geographical boundaries. The authorised officer cannot carry out inspections at venues within another authority's boundaries, even if children resident in the City are taking part. The inspecting authority may invite a child licensing officer from a neighbouring authority to accompany them on an inspection if they so wish.

It is important that the inspection is unannounced. If the date and time of the inspection are known, it is very likely that all will be in order. A far better picture of what is going on will be determined if the officers are not expected.

5.2 What happens during an inspection?

There are several stages to carrying out an inspection. When possible, two City officers will attend an inspection to ensure that any findings are corroborated, particularly if there are issues to be resolved.

Officers will need to ensure that the following are brought to the venue:

- ID badge and authorisation
- Inspection report checklist
- Copies of the children's licences
- List of names and contact numbers of colleagues from other licensing authorities who have issued licences
- A copy of the performance regulations
- Spare Daily Record Sheets
- Full address of venue/location including postcode
- Contact details for licence applicant.

5.2.1 The children

Officers should ensure that they are introduced to the children and given an explanation as to why they are there. It is the duty of the officer to check that the children are content and well cared for.

5.2.2 The chaperones, parent and tutor

All chaperones and any parents who are present should be introduced to the officers. All the chaperone licences should be checked, noting the local authority which issued the licence and the expiry date. Checks should be made to determine if there are any DBS checked additional helpers.

Measures should be taken to clarify which children the chaperone is responsible for and check there are sufficient chaperones for the number of children present. A discussion is required between the officer and the chaperones about fire exits, first aid and to check what information they are holding. It is equally important to observe what is happening, how good the supervision is and make notes.

If there is a tutor available then it will be important to see what work the children are doing and to check tutoring record sheets to ensure the correct amount of tuition is being given at the appropriate time.

5.2.3 What needs to be seen?

The licences

Copies of licences should be available whilst carrying out the inspection. There should be a licence for every child. The details of any children performing under an exemption – that is, the four-day rule – should be taken.

Daily record sheets

Daily record sheets should be available during the inspection, preferably the ones the chaperones are completing in real time. Officers must check they are complying with the regulations. Other, previous days' records should be reviewed too – arrival and departure times should be examined and checked to ensure that suitable breaks in accordance with age are being complied with.

Facilities

Key things to look at:

- That dressing rooms are big enough, not too hot or too cold and are clean. There should be blinds at the windows. Dressing rooms for the children should be separate from the adults – adults should not be able to pass through or walk into the children's room.
- The school room should be suitable and the children should have all they need in terms of resources.
- The toilets should be clean, working and sufficient in number and are designated for children. If there are no separate toilets, then procedures should be in place to manage this.
- If 'quick change' areas are being used, then how this happens should be checked; when and where, and can the child be viewed by others.

- If the children are using the 'green room' and adults are using the room too, then arrangements need to be in place to manage this.
- Arrangements should be in place for meals and refreshments. Are the children getting the required breaks, what happens between matinee and evening performances, and are the children suitably chaperoned? For broadcast performances, are the children getting a one-hour meal break, is the food provided suitable, are suitable drinks and water available?
- Adequate first aid/medical provision should be available, are trained staff on duty? On film sets there is usually a paramedic on site.

Observation and curiosity are key when making an inspection; as much time as possible should be spent watching what is going on and how the children are reacting to the chaperones and with other key people.

5.2.4 How to deal with problems

During an inspection, it may become apparent that there are issues with the way that the production company or organisation manages the safety and welfare of children. Challenging current practice and offering advice is always worthwhile during the inspection. All identified problems and issues will need to be addressed with the production and how they have been or need to be resolved. If appropriate, advice should be offered on whether they are in breach of the regulations and that there is a duty to inform the child's local authority who may take legal action.

5.2.5 Writing an inspection report

Local authorities tend to use a similar report template which is a comprehensive list covering all aspects of the inspection. The report must be accurate – it is a legal document and may be used as evidence in the event of any legal action. It should be as detailed as possible and should give the licensing authority a flavour of what was happening on the day.

The report should include the details of all the children, the chaperones and parents. It is acceptable to state Yes/No to the more basic questions, however, details should be expanded where possible and, in the comments sections, the following details should be provided:

- what areas were explored
- what the inspector did
- who was spoken to
- what was observed
- any concerns and why. This should include any actions that were taken on the day and any actions that need to be taken in future. It should be clear who needs to ensure that these actions are implemented.

A copy of the report should be sent by secure email to all the licensing authorities with children involved in the production. A copy, together with a covering letter, should also be sent to the licence applicant/producer.

Section 6: Other areas to consider

6.1 Tuition

The regulations do not state how long a child should be absent from school before arrangements for education by a private teacher must be made.

The decision must be based on whether the child's education will suffer by taking part in the performance. This must be taken based on the performance in question and the needs of the individual child. What is suitable for one child may not suit another.

6.2 Absence from school

For local authority maintained schools, and special schools not maintained by the local authority, a child may **not** be absent from school in order to perform or to take part in paid sport or modelling unless a licence has been obtained from the child's local authority. The following table sets out the circumstances when absence from school **may** be permitted under the exemptions in section 37(3). Headteachers of certain types of schools can authorise absences for performances without a licence being required. In other cases, an application will generally be accompanied by a permission letter from the school, but it is the local authority that ultimately decides whether a licence may be issued.

6.2.1 The following table details when a licence is required, or an exemption can be applied:

When a child performance licence is needed – and exemptions

Type of school	Exemption	Can absence be authorised?
Local authority maintained school	BOPA	No – a licence will be required
Special school not maintained by the local authority	BOPA	No – a licence will be required
Independent school, academy or free school	BOPA	Yes – if the headteacher choses to do so
Local authority maintained school	Four-day rule	No – a licence will be required
Special school not maintained by the local authority	Four-day rule	No – a licence will be required
Independent school, academy or free school	Four-day rule	Yes – if the headteacher choses to do so

If the performance and rehearsals (on the same day of the performance) are being organised by a third party, then a child performance licence will need to be obtained for children and young people who are attending a local authority maintained school or a special school not maintained by the local authority.

6.3 Chaperones

It is the responsibility of the production company to ensure that an appropriate number of suitable enhanced Disclosure and Barring Service (DBS) checked adults and local authority registered chaperones are engaged to care for the children employed, having specific regard to their sex and age, and ensuring that each child is supervised at all times. As a minimum, this must be at a 1:12 ratio.

The appropriate number of suitable enhanced DBS checked adults and local authority registered chaperones must be maintained at both rehearsals and performances.

Where a performance is taking place under the auspices of a BOPA, the legislation does not require that the child be supervised by a chaperone approved by the local authority. However, local authority chaperones have knowledge and expertise about child performance licensing regulations and have experience working with children in the entertainment

industry, and therefore are better suited to maintaining the safeguarding and wellbeing of children. For this reason, The City has made it a condition that at least one local authority registered chaperone must be present during any production; the rest of the chaperones can be made up of suitable enhanced DBS checked adults.

Chaperones must have details of all children they are supervising, including emergency contact details and keep a record of the times of arrival, performances, breaks and departure times.

Chaperones must have sight of the children they are supervising **at all times**.

Further guidance on chaperones can be found in the City of London's Chaperone Approval Policy v1.

6.4 Restrictions in relation to all performances

The following timings, which are based on statutory timings, apply where the child is at the place of performance or rehearsal.

Topic	Age 0 to 4	Age 5 to 8	Age 9 and over
Maximum number of hours at place of performance or rehearsal	5 hours	8 hours	9.5 hours
Earliest and latest permitted times at place of performance or rehearsal	7am to 10pm	7am to 11pm	7am to 11pm
Maximum period of continuous performance or rehearsal	30 minutes	2.5 hours	2.5 hours
Maximum total hours of performance or rehearsal	2 hours	3 hours	5 hours
Minimum intervals for meals and rest	Any breaks must be for a minimum of 15 minutes. If at the place of performance or rehearsal for more than 4 hours, breaks must include at least one 45-minute meal break.	If present at the place of performance or rehearsal for more than 4 hours but less than 8 hours, they must have one meal break of 45 minutes and at least one break of 15 minutes. If present at the place of performance or rehearsal for 8 hours or more, they must have the breaks stated above plus	If present at the place of performance or rehearsal for more than 4 hours but less than 8 hours, they must have one meal break of 45 minutes and at least one break of 15 minutes. If present at the place of performance or rehearsal for 8 hours or more, they must have the breaks stated above plus

		another break of 15 minutes.	another break of 15 minutes.
Education	N/A	3 hours per day (maximum of 5 hours per day). 15 hours per week, taught only on school days. Minimum of 6 hours in a week if aggregating over a 4-week period or less.	3 hours per day (maximum of 5 hours per day). 15 hours per week, taught only on school days. Minimum of 6 hours in a week if aggregating over a 4-week period or less.
Minimum break between performances and rehearsal	1 hour 30 minutes	1 hour 30 minutes	1 hour 30 minutes
Maximum consecutive days to take part in performance or rehearsal	6 days	6 days	6 days

6.5 Variation to minimum break between performances and rehearsal

Where the earlier performance or rehearsal is less than one hour in duration, and:

(a) the following performance or rehearsal takes place at the same place of performance or rehearsal; and

(b) there is no time required for travel between the earlier and consecutive performance or rehearsal

– the break between those performances (or rehearsals) may be reduced to a minimum of 45 minutes.

A request for 'night work' can be made for all types of performances – that is, stage, television and filming. It is anticipated there will be minimal demand for stage productions as these performances usually end between 10pm and 11pm. The request can apply to a performance that is taking place either indoors or outdoors.

6.6 Other requirements

The applicant must have an adequate and active child protection policy in place.

The applicant must have an adequate DBS policy.

The applicant must submit all required documents and information at least 10 working days prior to the performance taking place. The application and contract must be signed by an appropriate person who has safeguarding responsibilities for the children.

A risk assessment must be submitted, which sets out an assessment of the venue, safeguarding and travel arrangements.

The applicant is responsible at all times for maintaining the safety and wellbeing of the children taking part. The applicant must have details of all the children they are responsible for and submit an anonymised list of children with their application. The list must indicate that:

- they have sought signed/confirmed parental declaration that the children are fit and healthy to perform
- they are aware of any health conditions that children have
- they have checked if the children and young people have brought their medication with them upon arrival to the venue, etc.
- they have clarified travel arrangements with parents or guardians, ensuring vulnerable children are dropped off and picked up by a responsible adult.

The City will expect to see the full version should an officer carry out a site visit inspection.

The production company will ensure that signing-in and signing-out sheets and daily record sheets are completed for each performance.

The production company will ensure that a list is available at the place of performance of emergency contact details in respect of each child, including any medical issues or additional needs.

A first-aider should be present at each place of performance where a child has a severe medical condition, such as allergies that result in anaphylaxis. Suitable first aid arrangements must be in place such as:

- an accessible fully equipped first aid box on site
- a responsible adult who is aware of how medicines should be administered – such as an Epi Pen or correct dosage of medicines.

A list of all children with medical conditions that require medication must be kept on site and checks carried out to ensure that children have their medication on them whilst taking part in rehearsals and performances.

6.7 Performance compliance: licences, BOPA or four-day rule

The production company agrees to any authorised officer of the City having unrestricted access at any dress or technical rehearsal or performance taking place at any venue that the production company uses for such purposes.

The City will review concerns raised against a production company and may not issue future BOPAs based on the outcome.

Failure to comply with any of the above agreements or conditions is likely to result in the local authority revoking the BOPA exemption with immediate effect.

Failure to comply with Children and Young Persons Act 1963 s.37 and The Children (Performances and Activities) (England) Regulations 2014 is a criminal offence, which carries a maximum penalty of £1,000 or three months imprisonment, or both, for each offence.

This page is intentionally left blank

Committee:	Dated:
Safeguarding Sub-Committee (Community and Children's Services) – For information	12/05/2022
Adult Safeguarding Sub-Committee – For information	25/05/2022
Subject: Adult Safeguarding Performance Report, Q3 YTD 2021/22	Public Non-Public Appendix
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2 and 3
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Glory Nyero, Performance Analyst	

This report's appendix is exempt by virtue of paragraph 2 of Part 1 of Schedule 12A of the Local Government Act 1972. Specifically, Appendix 1 of the report contains sensitive information which may be exempted under the Act, and as this cannot be presented to Members as a separate appendix, this report needs to be considered in closed session. It is considered that information falling under the following paragraphs outweighs the public interest in disclosing information:

2)	Information which is likely to reveal the identity of an individual.
----	--

Summary

This report informs Members of the level and nature of adult safeguarding concerns received by the City of London Corporation during quarter three (Q3) of 2021/22 as well as the year to date (YTD) figures for the Q3 2021/22 reporting period.

During this period, the Adult Social Care (ASC) team received 22 new safeguarding concerns, 18 of which were within the authority. Four of the Q3 concerns progressed to an enquiry stage, but two Q3 concerns concluded during this period, and the remaining two Q3 concerns are yet to conclude following a S42 enquiry.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. This report sets out information relating to adult safeguarding for the Q3 and YTD data for the period April to December 2021.
2. Safeguarding concerns are raised where concern is expressed for an adult at risk, either by the individual themselves, their family or friends, care workers, volunteers, or other professionals.
3. An adult at risk is a person aged 18 years or over who needs care and support, regardless of whether they are receiving it. This may be because of a mental health issue, learning or other disability, age or illness, or because they are (or may be) unable to take care of themselves against significant abuse or neglect. There are approximately 124 adult service users of the ASC team.
4. The Care Act 2014 places a duty on the City of London Corporation to make enquiries – known as Section 42 (S42) enquiries – if it is reasonable to suspect that an adult is at risk or is being abused or neglected. Risk is evaluated and re-evaluated throughout the process – from the concern stage through to protection plans and closure – according to defined thresholds.
5. The City of London Corporation's safeguarding practice is focused on Making Safeguarding Personal (MSP) by working with the individual to identify the difference or outcome that they want to achieve to improve their safety and wellbeing. The process is evaluated by assessing whether the individual feels that these outcomes have been achieved. Measures used to demonstrate that safeguarding is personalised are:
 - people are asked for their desired outcomes
 - people are satisfied with the outcomes.

Current Position – Safeguarding Concerns During the Quarter

6. During Q3 of 2021/22, City of London Corporation received 18 new safeguarding concerns within the authority, compared to 22 within received during Q2. A further four referrals were received, relating to a safeguarding concern outside the Square Mile, and were referred to the appropriate authority, making 22 in total during Q3 (compared with Q2's total of 25 [Q2 = 22 within 3 outside boundaries]).
7. During this period, the 18 concerns reported equated to 13 people and included concurrent concerns for three people. Of those three people, one person had four concurrent concerns, and two people had two concurrent concerns during this period. Four of the 18 concerns within the City met the S42 criteria and progressed to an enquiry stage.

8. There have been 49 safeguarding concerns YTD received within City of London boundaries; and eight received outside the Square Mile. In 2020/21 YTD, there were 63 concerns within and 10 concerns outside the City's boundaries.
9. During Q3 2021/22, of the nine S42 enquiries, seven concluded by the end of the reporting period. During this period, the conclusions that transpired after a S42 enquiry amounted to 15 in total.
10. In terms of MSP, of the 15 concluded S42 cases, eight were asked about MSP and, of those: five (62.5%) were fully or partially achieved (of which three (37.5%) were fully achieved and two (25%) were partially achieved; none were recorded as not achieved; and three were regarded as 'not applicable' as their outcome was not expressed (hence why no percentage is given).
11. Of the 38 concluded S42 cases YTD, 26 were asked MSP questions and of those, 16 expressed their outcomes: - 15 (94%) were fully or partially achieved; of which seven were fully achieved (44%); eight (50%) were partially achieved; one (6%) was not achieved. There was a YTD total of 10 for those who were asked but no outcomes were expressed, thus regarded as 'not applicable' (hence why no percentage is given).

Corporate & Strategic Implications

12. Financial implications – N/A
13. Resource implications – N/A
14. Legal implications – the framework for Adult Social Care and safeguarding is set out in the Care Act 2014.
15. Risk implications – N/A
16. Equalities implications – Monitoring intelligence on safeguarding processes and associated demographics allows us to assess and then investigate if there are any unintended impacts of any safeguarding processes or practices. A more detailed analysis of this will be included in the end of year report.
17. Climate implications – N/A
18. Security implications – N/A

Conclusion

19. Comparisons show that the SAC activity as at Q3 2021/22 YTD appears to be evident of an increase in safeguarding activity, which may be largely attributed to an increase in awareness of safeguarding – even more so during the ongoing global pandemic. As a result, there have been a number of cases where a person may have more than one concern running concurrently.

20. The increased number of younger people (people aged 18-64 years) with safeguarding concerns is partly due to the younger person either being homeless or a rough sleeper. Appendix 1 provides more granular age categories for those aged 18-64 now being reported with the following age cohorts: 18-25; 26-35; 36-49; and 50-64.

Appendices

- Appendix 1 – Q3 and YTD 2021/22 Adult Safeguarding Activity (Non-Public)

Glory Nyero

Performance Analyst

E: glory.nyero@cityoflondon.gov.uk

Committee:	Dated:
Safeguarding Sub- Committee	12/05/2022
Subject: Pan London Children in Care Council	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 3, 4, 8, 9
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Partnership for Young London	For Information
Report author: Sharon Long, Director, Partnership for Young London	

Summary

This report provides an update on the Pan London Children in Care Council (CiCC) which is sponsored by the Corporation of London in conjunction with the Association of London Directors of Children's Services (ALDCS). The report covers progress on the Pan London CiCC in terms of deliverables, outcomes and partnerships developed.

The programme is facilitated by Partnership for Young London as part of a contract via the City of London Corporation. The Pan London CiCC aims to improve outcomes for young people who experience care across the region. It ensures that young people are at the core of regional planning and decision-making and focuses on developing cross-sector partnerships that collaborate to ensure that care-experienced young people have access to jobs, financial support, emotional health, and wellbeing services to support them to achieve their ambitions and thrive. This work is part of the Pan London Corporate Parenting Responsibilities and is supported by London Councils, ALDCS, Health, and local authorities.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

The Pan London CiCC is funded by the ALDCS and sponsored by the City of London Corporation. Partnership for Young London facilitates the Pan London CiCC, with the remit to:

- recruit two young people who are care-experienced to run the Pan London CiCC
- support care-experienced young people to engage in policy and practice decisions across the region
- bring together regional partnerships to enhance the regional offer for care-experienced young people
- take a lead role with London Councils and ALDCS on the Pan London Offer for Care Leavers, including running working groups and supporting youth engagement
- facilitate regional research with young people on issues they are keen to explore
- run the pan London CiCC sessions on a bimonthly basis, and facilitate the youth advisory board
- run training and capacity-building programmes for young people and staff working in the sector.

In the last six months we have:

- recruited two young people to lead the work
- facilitated a youth-led event with ALDCS on the Pan London Offer with more than 90 participants
- run a panel session with the National Network for Virtual Headteachers on young people's needs in education
- researched and presented at the Healthy London Partnership Board on the need for free prescriptions for care leavers
- worked with London councils and ALDCS to establish the governance arrangements for the Pan London Offer
- recruited two young people who are care-experienced to sit on the Youth Recovery Board for the Greater London Authority (GLA)
- commenced research across London on the provision of mentoring
- facilitated five Participation Workers Network meetings
- worked with the GLA to host three networks on supporting care leavers: Health, Business Sector, Universities

Current Position

1. Currently the following work is underway:

- Pan London Offer – Young people will be co-chairing the Pan London Offer work streams. These groups cover: Housing, Health, Financial Offer,

Transport, Education and Training, and Data. These will be cross-sector working groups who will report into ALDCS.

- Pan London CiCC – we will be facilitating the Pan London CiCC with representatives from across all London boroughs in May and August.
- Advisory Board – monthly meetings of the youth advisory board to help shape the work of the Pan London CiCC
- Participation Workers Network – there will be monthly meetings for all representatives from across London, sharing practice, undertaking training and research.
- Leaving Care Networks Leads – with the GLA we will be supporting three regional events with key partners on thematic areas such as support for care-leavers at university.
- Young Inspectors training – we will be running training for workers and young people on becoming Young Inspectors so they can inspect other CiCC services.
- Mentoring research – we will be reviewing the mentoring offer across London for care-experienced young people and presenting that to the GLA and London councils.

Options

2. The work covered in the current position outlines all the outcomes. They are all budgeted for in the existing contract. The agreed outcomes for this work are:
 - a) Increased engagement across London of young people in care and care leavers in regional decision-making, including:
 - case studies on key events such as Mayoral Hustings, Meetings at the GLA
 - timeline of the activities and the results
 - feedback from regional partners
 - increased attendance at meetings by young people.
 - b) Increased skills, and abilities to influence regional and national priorities for young people in care and care leavers, including:
 - training feedback forms on distance travelled
 - blogs or podcasts from young people
 - feedback at CiCC sessions.
 - c) London-wide collaboration in identifying and working to address the needs of young people in care and care leavers, including:
 - case studies on work completed
 - database and timeline on activities undertaken and the cross-section of partners engaged
 - reports and data from research and events
 - evidence of implementation of recommendations across London boroughs

- youth-led research creating a higher profile of key issues being faced by young people in care and care leavers.
- d) Raising awareness and increasing the profile of key issues faced by young people in care and care leavers, including:
- data capture on engagement
 - quarterly update reports including feedback from meetings
 - case studies – that is, interviews with decision-makers.
- e) CiCC engagement in City Children Services Provision and monitoring, including:
- feedback from participants
 - quarterly update report

Proposals

N/A

Key Data

3. Outputs

- six regional CiCC meetings with more than 120 young people
- six youth advisory board meetings with up to 30 young people
- 11 meetings with participation workers from across all London boroughs
- outreach work to up to five London borough CiCCs per year
- four training sessions for the Pan London CiCC members with 80 young people
- two youth-led research projects facilitated with 50 young people – to be set (that is, Pan London Offer and transitions to independent living to be agreed with young people)
- three roundtable meetings with policy leads across London and nationally
- gathering data on the local offer across all London boroughs
- 20 email bulletins on policy and practice to participation workers, showcasing opportunities for young people.

Corporate & Strategic Implications

4. Strategic implications – None.

5. Financial implications – This project has restricted funding for two years.

6. Resource implications – This project is funded for two years.
7. Legal implications – None.
8. Risk implications – All programmes are supported by risk assessments across the organisation, and this is presented to trustees on a bimonthly basis.
9. Equalities implications – This work aligns with the Public Sector Equality Duty, and we are clear that the work will be focused on supporting those who are protected by existing equality legislation – age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.
10. Climate implications – All this work is aligned with the organisation environmental policies, and we work to ensure that we assess the climate impact across all of our respective work streams. Staff and young people use public transport to get to work, we facilitate a range of our programmes online to reduce environmental impact.
11. Security implications – None.

Conclusion

12. This report contains an update on the work of the Pan London CiCC and our proposals for the future. The work is closely aligned with the City of London Children in Care Council, and we continue to work together to improve outcomes for young people.

Appendices

- None.

Sharon Long

Director, Partnership for Young London

T: 077 8067 4311

E: sharon.long@cityoflondon.gov.uk

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank