



Department
for Education

Consultation response form

Consultation closing date: 16 February 2016
Your comments must reach us by that date

Keeping children safe in education

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

We are interested to know your views to our proposals on the policy changes required to Parts 1 and 2 of Keeping Children Safe in Education guidance.

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

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

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

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

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Robert Baldry	
Please tick if you are responding on behalf of your organisation.	✓
Name of Organisation (if applicable): Girlguiding	
Address: Girlguiding 17-19 Buckingham Palace Road London SW1W 0PT	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please insert an 'x' into one of the following boxes which best describes you as a respondent.

<input type="checkbox"/> Local Authority	<input type="checkbox"/> Headteacher or school leader	<input type="checkbox"/> Parent or Carer
<input type="checkbox"/> Pupil	<input type="checkbox"/> Teacher	<input type="checkbox"/> Governor
<input type="checkbox"/> National representative body	<input checked="" type="checkbox"/> Other (please specify)	

<p>Please Specify:</p> <p>Girlguiding is the leading charity for girls and young women in the UK, with over 500,000 members. Thanks to the dedication and support of 100,000 amazing volunteers, we are active in every part of the UK, giving girls and young women a space where they can be themselves, have fun, build brilliant friendships, gain valuable life skills and make a positive difference to their lives and their communities. We build girls' confidence and raise their aspirations. We give them the chance to discover their full potential and encourage them to be a powerful force for good. We give them a space to have fun. We run Rainbows (5–7 years), Brownies (7–10 years), Guides (10–14 years) and The Senior Section (14–25 years). Registered Charity No 306016.</p> <p>www.girlguiding.org.uk</p> <p>Girlguiding's submission focuses on evidence from our Girls' Attitudes Surveys – our annual research into the opinions of girls and young women throughout the UK aged 7-</p>

21- and the personal testimony of young members.

The Girls' Attitudes Survey canvasses the opinions of over 1,500 girls and young women aged 7 to 21, inside and outside guiding across the UK each year. We commission expert child research agency Childwise to conduct this survey. For more information and data see www.girlguiding.org.uk/girlsattitudes

Girlguiding's response is also influenced by the Girls Matter campaign – Girlguiding's recent pre-General Election campaign that profiles girls' and young women's calls for change. <http://new.girlguiding.org.uk/report>

1 Should governing bodies, proprietors and management committees be required to ensure that all staff should not only read at least Part 1 but also **understand** it?

Yes

No

Don't Know

Comments: n/a

2 Will the new emphasis on “understand” lead to you changing process or procedure in your school? Please provide details.

Yes No Don't Know

Comments: n/a

3 Does the section “The role of school and college staff” make clear that safeguarding is **everyone’s** responsibility?

Yes No Don't Know

Comments: n/a

4 Does “What school and college staff should do if they have concerns about a child” provide a simple and easy to follow message with regards to referrals?

Yes

No

Don't Know

Comments: n/a

5 Is the new flow chart on page 10 an improvement compared to the old flow chart that it replaces?

Yes

No

Don't Know

Comments: n/a

6 What changes would you propose to improve the effectiveness of Part 1?

Comments:

Girlguiding was glad to see included in the guidance a list of locations to access guidance on specific safeguarding issues (page 12, para.36). Girlguiding would like to see specific guidance for tackling sexual bullying and harassment in schools added to this list. We are calling for the department to ensure that schools take a zero-tolerance approach to sexual bullying and harassment. To facilitate this we want to see sexual bullying and harassment explicitly and specifically addressed in the DfE's bullying guidance for schools.

Girlguiding's 2015 Girls' Attitudes Survey found that:

- 90% of girls and young women aged 13 to 21 agree that the government should make sure all schools are addressing sexual harassment and bullying in schools
- 25% of 11- to 16-year-olds say worry over potential sexual harassment makes them consider whether or not to speak out in class.

The 2014 Girls' Attitudes Survey found that :

- 70% of girls and young women aged 11 to 21 say they have experienced sexual harassment at school, including sexual taunts and unwanted touching.
- 61% of 11 - to 16-year-old girls say teachers/staff sometimes or always dismiss sexual harassment as just a bit of banter (eg 'boys mucking around').

Testimonies from Girlguiding young members:

'The number of teenage girls I know who have been abused, assaulted, or simply made to feel uncomfortable in the presence of a teacher or other authority figure is too high. And what's worse is that they're expected to keep quiet about such 'minor' things and not complain.' Megan, 17, Stourbridge

'Every day, many girls' lives are made a misery by an onslaught of sexist comments, sexual harassment and abuse at school. These girls don't feel safe, which affects their education. By ensuring schools take a no-tolerance approach to this kind of behaviour, the government would be improving the day-to-day lives of these girls, as well as reducing sexual harassment and violence in the future.' Amy, 16, Glasgow

7 Does it help to publish Part 1 as a standalone document?

Yes

No

Don't Know

Comments: n/a

8 Will the proposed changes to Part 1 require you to adjust your safeguarding policies and procedures? Please provide details.

Yes

No

Don't Know

Comments:

In relation to the safeguarding policies - such as our recommendation on sexual bullying and harassment guidance – a whole school approach is required to help tackle violence against women and girls and keep children safe.

9 Is the guidance clear as to the cover arrangements for “the designated safeguarding lead”?

Yes

No

Don't Know

Comments: n/a

10 Should “designated safeguarding lead” training be provided annually- as a minimum?

Yes

No

Don't Know

Comments:

11 We are proposing staff should receive regular safeguarding refresher training, annually as a minimum. Would this result in you having to provide training more frequently?

Yes

No

Don't Know

Comments: n/a

12 How often do you provide training currently?

More than one a year Once a year Once every two years
 Other

Comments: n/a

13 Is it reasonable to expect schools and colleges to ensure they have appropriate online filters and monitoring systems in place to protect children from harmful online material?

Yes No Don't Know

Comments:

Girlguiding welcomes the introduction of the section concerned with online safety, ensuring appropriate filters and appropriate monitoring systems are in place (page 22, para.75). Girlguiding research shows that staying safe online is a major concern for girls and young women.

The 2015 Girl's Attitudes Survey found that:

- 28% of girls say they have experienced bullying by someone via their mobile phone (such as abusive texts or calls), and among girls at secondary school this rises to 36%.
- 24% of girls have been bullied on websites/chat forums. Although it is less common among younger girls, a third of 7- to 10-year-olds have also experienced cyberbullying – on social media (13%), by mobile phone (12%) and on a website (8%). This is despite social media platforms requiring users to be 13 or older.

The Girls' Attitudes Survey 2014 found that among those aged 7 to 10, 78% have learned at school about personal safety on the internet

- The 2015 Girls' Attitudes Survey found that 45% of girls aged 11 to 16 report experiencing bullying through social media
- 87% of girls think they should learn about staying safe online at school.
- For girls aged 13 to 21, 37% said bullying or trolling on social media was one of their top concerns.

The effects of this online bullying can be serious and lead to harm, with 44% of girls aged 13 plus that were bullied saying that the cyberbullying led them to self-harm to some extent, while 27% of 17- to 21-year-olds say the pressure of bullying made them use drugs or alcohol and 24% said bullying pressured them into having sex with someone.

14 Would it help schools and colleges if online guidance/an online portal was created that set out what "appropriate" filters and monitoring systems looked like and advice as how to satisfy themselves that they have them?

Yes

No

Dont Know

Comments: n/a

15 Is it reasonable to change the emphasis from “should consider” to “should ensure” with regards to teaching about safeguarding, including online?

Yes

No

Don't Know

Comments:

Girlguiding is pleased to see personal, social health and economic education (PSHE), and sex and relationship education (SRE) mentioned within the statutory guidance (page 22, para.77). Girlguiding believes that teaching PSHE and SRE could be a powerful tool to discussing many of the issues mentioned in the guidance. By making PSHE and SRE statutory - and updating the curriculum to include healthy relationships, sexual consent, online safety, violence against women and girls, and lesbian, gay, bisexual and transgender relationships - schools could guarantee that these issues were discussed.

The 2014 Girls' Attitudes Survey found that 74% of girls aged 11-21 think that all schools should have to teach about sex and relationships and that parents should not be allowed to choose whether their child learns about these topics at school. Despite girls and young women being strongly in favour of Sex and Relationships Education (SRE) in schools, only 39% said that what their school provided was good and 37% of those aged 16 to 21 reported that sex education at school had not prepared them well.

Girlguiding agrees with the Sex Education Forums submission when they call for “PSHE, including SRE, to be offered both as a specialist and supplementary subject for initial teacher training. This is vital to end the current situation where teachers are sometimes handed SRE lessons simply because they have a free period, rather than

because they have expertise in the subject. We support the recommendation from the Education Select Committee (Life Lessons, 2015) that the Government produces a workplan “setting out its strategy for improving the supply of teachers able to deliver this subject and a timetable for achieving this”.

Testimonies from Girlguiding young members:

‘PSHE lessons should include more on behaviour and emotions in relationships, and talk openly about mental, verbal and physical abuse, including female genital mutilation and domestic violence.’ Hannah, 25, London

‘We need to prepare children and teens for the challenges and joys of respectful relationships by debunking myths and having open and frank discussions about trust, consent, respect and equality, as well as “taboo” issues like pornography, online relationships and domestic violence that aren’t currently covered in lessons.’ Julia, 19, Ashby de la Zouch

‘So many girls in my peer group have been mistreated by boys who think they are in control in sex and relationship situations, and girls feel that they cannot tell anyone or leave.’ Anon, 16, Devon

Girlguiding agrees with the recommendations of the Sex Education Forum – of which we are a member - in their submission to this consultation:

‘The change from “should consider” to “should ensure” is a step in the right direction but does not sufficiently strengthen the guidance. It would be much more helpful to change the wording from “should consider” to “must ensure” as this would create clarity that teaching about safeguarding is a duty for all schools.

‘Evidence shows that currently too many schools are failing to teach vital information that helps to safeguard children. Ofsted have highlighted concerns that some primary schools are failing to teach correct terms for sexual parts of the body (PSHE – not yet good enough, 2013) and a survey of 2000+ young people found that 16% had not learnt correct terms for genitalia at primary school and 50% did not learn how to get help if they were abused (Sex Education Forum, 2016).

‘This evidence runs contrary to the inaccurate assumption made in page 11 of the guidance for this consultation that “the vast majority of governing bodies and proprietors will already be ensuring the children in their school are suitably equipped with regards to safeguarding”. Thus there is a need for stronger action to ensure that all schools teach about safeguarding.

‘Ensuring that teaching about safeguarding takes place in all schools is not the same as ensuring the provision of good quality sex and relationships education in schools, but it can contribute to it.

‘It would be very helpful to explain that teaching about safeguarding is best placed in the context of a comprehensive and age-appropriate programme of sex and relationships education as part of personal, social, health and economic (PSHE) education.

It would also help to provide some explanatory text about what teaching about safeguarding covers, for example information about the difference between abusive and healthy relationships and behaviour, and that this teaching must begin early in primary school.

‘The Sex Education Forum’s curriculum design tool provides a flexible framework that schools can use to design their own curriculum and to ensure that opportunities are taken across all age groups to teach about safeguarding. See for example ‘questions to explore’ with children age 3-6 years old such as ‘Which parts of my body are private?’, ‘When is it OK to let someone touch me?’, ‘Who should I tell if someone wants to touch my private parts?’. It would be helpful if this resource is recommended to schools within ‘Keeping children safe in education’.

‘We support the recommendation made by the Education Select Committee (Life Lessons, 2015) that “DfE clarify that children in primary schools should be taught the proper names for genitalia as part of the National Curriculum”.

‘Clear guidance is needed about how schools evidence their provision of teaching about safeguarding and Ofsted inspections need to report on cases where the teaching about safeguarding is inadequate.

‘It would be very helpful to explain that teaching about safeguarding is best placed in the context of a comprehensive and age-appropriate programme of sex and relationships education as part of personal, social, health and economic (PSHE) education.

‘It would also help to provide some explanatory text about what teaching about safeguarding covers, for example information about the difference between abusive and healthy relationships and behaviour, and that this teaching must begin early in primary school.’

16 Will the change in emphasis from “should consider” to “should ensure” lead to an increase in costs? Please provide details.

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Don't Know
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Comments: n/a

17 What, if any, information would help governing bodies and proprietors develop appropriate peer on peer abuse policies and procedures?

Comments: n/a

18 What changes would you propose to improve the effectiveness of Part 2?

Comments: n/a

19 Will the proposed changes to Part 2 require you to adjust your safeguarding policies and procedures? Please provide details.

Yes

No

Don't Know

Comments: n/a

20 Do you have any comments on the changes made to the Annexes?

Comments: n/a

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

Please acknowledge this reply.	<input checked="" type="checkbox"/>
E-mail address for acknowledgement: Robert.baldry@girlguiding.org.uk	

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

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please email: consultation.unit@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 16 February 2016

Send by post to: address, Michael Bell, Level 3, Bishopsgate House, Department for Education, Feethams, Darlington, DL1 5QE

Send by email to: Safeguarding.SCHOOLS@education.gsi.gov.uk