



## Safeguarding Policy Addendum During Covid-19

*Due to the closure of school sites to the majority of pupils (excluding vulnerable children and the children of key workers) certain issues need to be highlighted, or the policy clarified, for the current situation: remote learning for the majority combined with continued school access for the minority. NCS will review and revise its child protection policy and keep it under review as circumstances continue to evolve.*

### 1. Rationale

The way schools and colleges are currently operating in response to coronavirus (COVID-19) is fundamentally different from business as usual, however, a number of important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children must always continue to come first
- if anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately
- a DSL or deputy should be available
- it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- children should continue to be protected when they are online

NCS (as part of New College) will, as far as is reasonably possible, take a whole institution approach to safeguarding. This will allow us to be satisfied that any new policies and processes in response to COVID-19 are not weakening our approach to safeguarding or undermining our child protection policy. NCS will continue to follow:

- any updated advice received from the local three safeguarding partners
- any updated advice received from local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need
- what staff and volunteers should do if they have any concerns about a child
- the continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns
- DSL (and deputy) arrangements
- the continued importance for school and college staff to work with and support children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children

- guidance on peer on peer abuse - given the very different circumstances schools and colleges are operating in a revised process may be required for managing any report of such abuse and supporting victims – see below. (The principles as set out in part 5 of KCSIE should continue to inform any revised approach)
- what staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or college responds to any such concerns)
- any arrangements to support children we are concerned about who do not meet the ‘vulnerable’ definition
- arrangements in place to keep children not physically attending NCS safe, especially online and how concerns about these children should be progressed

## 2. Designated safeguarding leads (DSLs)

It is important that all school and college staff and volunteers have access to a trained DSL or deputy and know on any given day who that person is and how to speak to them. NCS aims to follow the optimal scenario for any school or college providing care for children, which is to have a trained DSL or deputy available on site. Rosemary Cox (DSL) ([rosemary.cox@newcollegeschool.org](mailto:rosemary.cox@newcollegeschool.org)) and/or Brett Morrison (DDSL) ([brett.morrison@newcollegeschool.org](mailto:brett.morrison@newcollegeschool.org)) are, for the majority of the time, on site during the ‘closed’ period. It is recognised this may not always be possible, in which case: they are available to be contacted via phone or online video - for example working from home.

Where a trained DSL or deputy is not on site, in addition to one of the above options, the Headmaster or the Deputy Head Academic takes responsibility for co-ordinating safeguarding on site. This may include updating and managing access to child protection files, liaising with the offsite DSL (or deputy) and as required liaising with children’s social workers where they require access to children in need and/or to carry out statutory assessments at NCS.

It is acknowledged that DSL training is very unlikely to take place during this period (although the option of online training can be explored). For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

If the matter is urgent and it is not possible or desirable to contact senior staff, direct contact should be made with the LADO (01865 815956) or, for Prevent concerns, the local police (01865 335200).

## 3. Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding Policy. They should contact the DSL or the Deputy DSL **Staff are reminded of the need to report any concern immediately and without delay.** Where staff are concerned about an adult working with children in the school, they should report the concern to the Headmaster. If there is a requirement to make a notification to the Headmaster whilst away from school, this should be done verbally and followed up with an email to the Headmaster. Concerns around the Headmaster should be directed to the Chair of Governors: Miles Young ([warden@new.ox.ac.uk](mailto:warden@new.ox.ac.uk); 01865 279524).

#### **4. Vulnerable children**

Ensuring that vulnerable children remain protected is a top priority for the government. Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans, read more in the [guidance on vulnerable children and young people](#) for further information. Local authorities have the key day-to-day responsibility for delivery of children's social care. Social workers and VSHs will continue to work with vulnerable children in this difficult period and should support these children to access this provision. There is an expectation that children with a social worker will attend provision, unless in consultation with the child's social worker and family it is agreed this is not in the best interests of the child. Senior leaders, especially DSLs (and deputies) know who their most vulnerable children are and have the flexibility to offer a place to those on the edges of receiving children's social care support. School staff should continue to work with and support children's social workers to help protect vulnerable children. This will be especially important during the COVID-19 period.

#### **5. Attendance**

Local authorities and schools do not need to complete their usual day-to-day attendance processes to follow up on non-attendance. Schools/colleges and social workers should be agreeing with families whether children in need should be attending education provision – and the school or college should then follow up on any child that they were expecting to attend, who does not. Schools and colleges should also follow up with any parent or carer who has arranged care for their children and the children subsequently do not attend. To support the above, schools and colleges should take the opportunity when communicating with parents and carers to confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available. In all circumstances where a vulnerable child does not take up their place at school or college, or discontinues, the school or college should notify their social worker. The Department for Education has introduced a [daily online attendance form](#) to keep a record of children of critical workers and vulnerable children who are attending school. This allows for a record of attendance for safeguarding purposes and allows schools to provide accurate, up-to-date data to the department on the number of children taking up places.

#### **6. Staff training and safeguarding induction**

All existing NCS staff will already have had safeguarding training and will have read part 1 of KCSIE. The important thing for these staff will be awareness of any new local arrangements, outlined here, so they know what to do if they are worried about a child. Where new staff are recruited, or new volunteers enter the school or college, they will continue to be provided with a safeguarding induction. An up to date child protection policy (described above) will support this process as will part 1 of KCSIE. If the NCS workforce moves between schools and colleges on a temporary basis in response to COVID-19, the receiving school or college should judge, on a case-by-case basis, the level of safeguarding induction required. In most cases, the existing workforce will already have received appropriate safeguarding training and all they will require is a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of DSL arrangements. The same applies in the event of non-NCS staff being on-site at NCS.

## 7. Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. If NCS recruits new staff during this period, it will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of KCSIE. In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

If NCS utilises volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Regarding members of NCS already engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained if that colleague temporarily moves to another school or college to support the care of children. The type of setting on the DBS check, for example a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should risk assess as they would for a volunteer (see above). Whilst the onus remains on schools and colleges to satisfy themselves that someone in their setting has had the required checks, including as required those set out in part 3 of KCSIE, in the above scenario this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.

**Schools and colleges must continue to follow their legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.**

Schools and colleges should continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's Teacher misconduct advice for making a referral. During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk). All referrals received by the TRA will continue to be considered. Where referrals on serious safeguarding matters are received and it is deemed that there is a public interest in doing so consideration will be given as to whether an interim prohibition order (IPO) should be put in place. The TRA will continue to progress all cases but will not schedule any hearings at the current time.

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that any school or college is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, schools and colleges must continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE. The SCR can, if a school or college chooses, provide the means to log everyone that will be working or volunteering in a school or college on any given day, including any staff who may be on loan from other institutions. The SCR can also, if a school or college chooses, be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

## 8. Mental health

Negative experiences and distressing life events, such as the Covid-19 circumstances, can affect the mental health of pupils and their parents. Teachers should be aware of this in setting expectations of pupils' work where they are at home.

Where we are providing for children of critical workers and vulnerable children on site, NCS ensures appropriate support is in place for them. Mental health issues can bring about changes in a young person's behaviour or emotional state which can be displayed in a range of different ways, and that can be an indication of an underlying problem. Support for pupils and students in the current circumstances can include existing provision at NCS (although this may be delivered in different ways, for example over the phone) or from specialist staff or support services. There is further guidance on [mental health and behaviour in schools](#). The school counsellor, [Katia.Houghton@newcollegeschool.org](mailto:Katia.Houghton@newcollegeschool.org) remains available during this time, as does the rest of the school's normal pastoral network for pupils as well as staff. Colleagues may find the resources here especially useful (<https://www.cwmt.org.uk/working-from-home>) as well as those resources already sent by the school counsellor. The Headmaster is also available to discuss issues at any time, either by email or phone, or via a platform like Skype.

## 9. Supporting children not in school

NCS is committed to ensuring the safety and wellbeing of all its children and young people. Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person. Details of this plan must be recorded, as should a record of contact made. The communication plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded. We will work closely with all stakeholders to maximise the effectiveness of any communication plan. This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate. The school will share safeguarding messages on its website and social media pages. NCS will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child.

## 10. Online Safety

NCS will be doing what it reasonably can to keep all of our children safe. The majority of children will not be physically attending NCS site. It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy and where appropriate referrals should still be made to children's social care and as required the police.

It is more important than ever that NCS provides a safe environment, including online. NCS will continue to ensure that appropriate filters and monitoring systems (read [guidance on what "appropriate" looks like](#)) are in place to protect children when they are online on the school or college's ICT systems or recommended resources. NCS continues to monitor has the technical knowledge to maintain safe IT arrangements – these individuals include the Director of Digital Learning, the ICT officer, New College's Head of ICT Services, and the Headmaster and his deputies. There are enough people here to provide a contingency should one or some of those individuals become unavailable.

The [UK Council for Internet Safety](#) provides information to help governing boards and proprietors assure themselves that any new arrangements continue to effectively safeguard children online. The [UK Safer Internet Centre's professional online safety helpline](#) also provides support for the children's workforce with any online safety issues they face. Local authorities may also be able to provide support.

**It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police. Online teaching should follow the principles as set out in the staff guide to remote learning.**

NCS will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Online face-to-face teaching must only happen with the express written permission of the pupil's parent and the permission of the Headmaster (signaled by the release of an official NCS policy)
- There must never be an occasion when, during a face-to-face online session, there is no appropriate adult (e.g. parent/guardian) present with the pupil
- In the event that the adult leaves the room, the record function should be used and the video held on an institutional NCS cloud account (i.e. @newcollegeschool.org through Google Meet/Hangouts), never on a personal device
- Lessons must take place on an NCS-certified platform e.g. Google Meet/Hangouts, using the teacher's @newcollegeschool.org account
- Teachers must not under any circumstances use personal accounts or personal email addresses, nor save any footage or photos from the lesson to a personal device
- All relevant safeguarding policies and guidelines apply, as well as the school's ICT Acceptable Use Policy, as they would in an in-person meeting
- When webcams are being used, the teacher must ensure that they are wearing appropriate professional clothing. They must also be aware that the camera will pick up whatever is in the background; all inappropriate materials must be removed.
- All those engaged in the lesson should be in an open 'shared' space at home (e.g. a living room, not a bedroom)
- Relevant considerations must still be made for SEND pupils and those with IEPs
- The teacher must also ensure that the pupil is fully dressed appropriately (e.g. not in pyjamas). The lesson must end immediately if that is not the case, and the parent must be notified immediately
- The same standards of professionalism apply to online teaching as they do to in-person teaching

It is good practice for teachers to keep a log of the date/time/length and pupils present for any online meeting or lesson.

The Department for Education is providing separate guidance on providing education remotely. It will set out 4 key areas that leaders should consider as part of any remote learning strategy. This includes the use of technology. Recently published [guidance from the UK Safer Internet Centre on safe remote learning](#) and from the [London Grid for Learning on the use of videos and livestreaming](#) could help plan online lessons and/or activities and plan them safely.

NCS considers the safety of our children when they are asked to work online. The starting point for online teaching is that the same principles apply as set out in the NCS staff behaviour policy

or code of conduct. NCS policies include, amongst other things, acceptable use of technologies, staff pupil/student relationships and communication including the use of social media. The policy applies equally to any existing or new online and distance learning arrangements which are introduced. The principles set out in the [guidance for safer working practice for those working with children and young people in education settings published by the Safer Recruitment Consortium](#) may help schools and colleges satisfy themselves that their staff behaviour policies are robust and effective. In some areas schools and colleges may be able to seek support from their local authority when planning online lessons/activities and considering online safety.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to NCS this should also signpost children to age appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

NCS will be in regular contact with parents and carers. Those communications will be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from NCS (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the school or college online offer with support from online companies and in some cases individual tutors. In their communications with parents and carers, NCS will emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children. Support for parents and carers to keep their children safe online includes:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and carers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

The usual NCS policies on pupils' computer and internet use apply:

By logging onto the School's computer system, you confirm you have read and understood this acceptable use policy. Pupils at New College School (NCS) are allowed a great deal of freedom in using ICT for study and in leisure. However with freedom comes responsibility. We cannot control what people around the world may post or make available on the internet and some material which it is possible to access is not acceptable in school, while other material must be treated with great sensitivity and care.

We expect all users of our ICT facilities in school to take responsibility in the following ways:

1. Not to access or try to access any material that is:
  - Violent or that which glorifies violence
  - Criminal, terrorist or glorified criminal activity
  - Racist or designed to incite racial hatred
  - Of extreme political opinion
  - Inappropriate in content (pictures or text)
  - Crude, profane or with otherwise unsuitable language
  - Blasphemous or mocking of religious and moral beliefs and values
  - In breach of the law, including copyright law, data protection and computer misuse
  - Belongs to other users of ICT systems and which they do not have explicit permission to use
2. Not to use any form of IT to intimidate or mock others (cyberbullying)
3. Not to search for or use websites that bypass the school's internet filtering
4. Never to login or attempt to login to any personal web-based accounts, with the exception of the school VLE
5. Not to use or attempt to use removal media including USB drives, CDs or DVDs without the explicit permission of Mr Hardy-Lenik
6. Not to download or attempt to download software of any kind without the explicit permission of Mr Hardy-Lenik
7. Not to attempt to install any software
8. To be extremely cautious when using blogs and never to reveal personal details such as home address, telephone number or email address
9. Not to interfere with, attempt to access or cause malicious damage to the ICT resources, facilities and infrastructure
10. Not to remove any ICT facilities from the room(s) in which they are being used, without permission
11. Not to use another person's username or password, even with their permission
12. Not to use mobile phones in school. If it is essential for you to bring a phone to school because you need it to contact parents on your way home, then such phones should be signed into the School Office on arrival and signed out when you leave the premises.
13. To report immediately any breach (deliberate or accidental) of this policy to Mr Hardy-Lenik or Ms Ulett

In order to protect responsible users the school employs an electronic monitoring system to prevent access to unsuitable material. All use of the ICT systems in the school is monitored and logged and you must be aware that whatever you do on the computer can be recalled at a later stage. NCS reserves the right to access all material stored on its ICT system, including that held in the personal areas of pupil accounts for the purposes of ensuring appropriate use, data protection, computer misuse, child protection and health and safety.

Any boy who is found not to be acting responsibly in this way may expect to be sanctioned according to the School's rewards and sanctions policy. Irresponsible users may be temporarily denied access to the ICT facilities and reckless or harmful behaviour will be treated appropriately. Persistent offenders may be denied access to the ICT facilities on a permanent basis. Where applicable, police or local authorities may be involved, or other legal action taken.

*The following summary is based on information for parents on cybersafety prepared by Childnet. For additional information, there are leaflets available in the School Office or you can log on to the Childnet website ([www.childnet.com](http://www.childnet.com)).*



- The general principle for parents of young children is to encourage them to **tell** you if there is anything they are unsure of when using the Internet.
- Have an open dialogue about the use of the internet at home – ask questions and encourage children to talk to you about what they are using it for, what they have found, etc.
- Encourage children to be **SMART** about giving out personal information:

**S= Safe** (never give out personal info when chatting or posting online - including email address, phone number, passwords). Encourage them to use a nickname, rather than a real name.

**M= Meet** (children should not meet anyone they have encountered online without parents' permission)

**A = Accepting** (they should avoid accepting emails, files and messages from anyone they don't know)

**R = Reliable** (only chat to those you know – friends and family)

**T = Tell** (tell an adult if anything makes you feel uncomfortable or worried)

- **Digital footprint:** children need to be aware of the impact of their online activity on themselves and others, and should know who is able to view and share the information they have posted. 'Think before you post!'
- **Internet content:** children should be encouraged to question the reliability of online content.
- **Illegal downloading:** it is illegal to download copyrighted material and it can lead to prosecutions; it is also a way in which viruses are transmitted, and may contain hidden messages from strangers. To be sure of where you can download legally, go to [www.contentmap.com](http://www.contentmap.com)
- Set up a **family email address** which can be used if a child wants to sign up to a particular site
- **Social networking is illegal** for all those under 13. For teenagers and adults, use **privacy** options carefully in order to allow access to your information by friends and family only. In **Facebook**, you can manage access to your timeline entries via '**custom**'. There are specific guides to 'customising' your Facebook page available on the website.
- **Twitter** – use Privacy option 'Protect my tweets'. Posting on Twitter needs to be done with great care – think of the consequences.
- **YouTube** – use the Filter button to stop inappropriate material
- **Cyberbullying** – Have an open discussion about this and encourage children to report any concerns. Report misconduct to social networks. Contact the school. Contact the police if the law has been broken.
- If children do access adult content / extremist content / games with extreme images, it is **important not to overreact**. Have a measured conversation with them and give them a strategy to use to avoid such material.
- In selecting appropriate **Games:** use age ratings and content icons.
- **Grooming:** if you have any concerns that this may be happening, contact the police ([www.ceop.police.co.uk](http://www.ceop.police.co.uk))
- **Apps** often used by young people to send messages and pictures. Parents are advised to keep a close eye on these:- Kik – Instagram - WhatsApp

## 11. Supporting children in school

NCS is committed to ensuring the safety and wellbeing of all its students. We will continue to be a safe space for all children to attend and flourish. The Headteacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety. NCS will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19 (see below). NCS will ensure that where we care for children of critical workers and vulnerable children on site, we ensure

appropriate support is in place for them. Where NCS has concerns about the impact of staff absence – such as our DSLs or nursing staff - the school will discuss them immediately with the governors, and the Warden as Chair of Governors. The following protocol has also been issued to staff working on site:

- As much as is practicable with young children, the government’s guidance on social distancing should be followed: <https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-and-for-vulnerable-people>
- The existing hand washing regime should be followed, with soap and warm water being used in addition to, and instead of hand sanitizer should that provision disappear due to high demand
- The government’s guidance for educational settings should continue to be used: <https://www.gov.uk/government/publications/guidance-to-educational-settings-about-covid-19>; our isolation room remains the same (the school counsellor’s room)
- Where it is safe to do so, internal doors, with the exception of fire doors, should be kept open to reduce handle-touching. Please ensure these doors are kept open safely with appropriate wedges, rather than propped open with items that would cause a trip hazard
- We will aim for the minimum necessary number of staff to be on site, but please bear in mind that the number of children needing care is likely to fluctuate over time and there are certain minimum requirements we need to fulfil, e.g. for first aid provision
- Registration will take place at the start of the morning and afternoon sessions, with the teacher on duty providing the office with a list of children in attendance
- Please note that, due to the nature of the situation, staffing requirements are very likely to change at short notice. Your flexibility, mutual support and calm positive professionalism are much appreciated in this scenario
- If there are any concerns about staffing they should be addressed to [matthew.jenkinson@newcollegeschool.org](mailto:matthew.jenkinson@newcollegeschool.org) and [Yvonne.goodgame@new.ox.ac.uk](mailto:Yvonne.goodgame@new.ox.ac.uk)
- Meetings should be carried out online or via phone where possible. In rare instances when this is not possible, the above social distancing guidance should be followed
- Drop off and pick up should happen in the playground at the end nearest the gate
- The sharing of facilities like iPads should be minimized: boys should be allocated a device that is ‘theirs’ for this period (for use in school) and screens should be cleaned regularly as a matter of course. They should also use the same desk each day if at all possible and windows should be opened for ventilation
- The cleaning regime will continue to focus on potential areas of cross-infection like door handles and keyboards
- Boys (and members of their households) must not be questioned about critical worker status and their home arrangements. If any enquiries need to be made, they will be done through the HM and/or school office
- Please keep an eye out for stigmatization (and consequent unkindness/bullying) especially of those boys whose parents are in the medical profession
- In term time we will provide warm lunches (prepared following 5-star-rated council hygiene standards) while staffing is available. In the event that staffing is unavailable, packed lunches will need to be brought in

## **12. Peer on Peer Abuse**

Where NCS receives a report of peer on peer abuse, we will follow the principles as set out in part 5 of KCSIE and of those outlined within the Safeguarding and Child Protection Policy. The school will listen and work with the young person, parents/carers and any multi- agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded as usual and appropriate referrals made.