



## **Holy Trinity CE Primary School CPOMS Policy**

Holy Trinity CE Primary School is striving to be a fully inclusive school that serves our local community. Through the love of Jesus Christ, we are preparing our children to be future caring, responsible citizens in a diverse society. Our children will be given every opportunity to grow spiritually, academically, socially and to achieve their full potential within a safe, happy Christian school family.

'Life in all is fullness' - John 10:10

### **Why is good record keeping important?**

Keeping Children Safe in Education 2023 states:

- 'All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).'
- It also highlights that examples of poor safeguarding practice includes 'poor record keeping'
- Primary School safeguarding records transfer with a child to any new schools they attend. Safeguarding records should be kept until the child's 26th birthday and GDPR legislation grants pupils, and those with parental responsibility for a pupil, right of access.
- Records can become part of a statutory assessments by children's social care and/or the police, and can be requested by legal teams in court procedures.

### **What is CPOMS?**

CPOMS is a secure online system which allows staff to report information or concerns about a child. This information can then be shared with the people who need to know allowing the appropriate action to be taken. The system means that all the information logged by a variety of staff about a particular child is kept together.

Chronologies can be produced quickly allowing patterns to be spotted and support to be put in place. Documents such as: minutes of meetings; Child Protection plans; Education Health and Care Plans; Annual reviews and reports from outside agencies can also be uploaded into the child's online document vault. This allows those with access to find information concerning the children in school and senior leaders to access information on any child in the school. It also makes it easy to electronically transfer information securely between schools at transition points.

### **1. Information Sharing**

Under Data Protection Legislation, all personal information kept in school must be treated sensitively, in a lawful, fair and transparent manner, should only be kept for as long as is absolutely necessary, should be accurate and should be stored in a confidential, secure manner. There must be a lawful reason to share information. Section 5.4 of the IPMAT Data Protection Policy states

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address
- Contacting the DPO (Data Protection Officer – HT) in the following circumstances:



## CPOMS Policy September 2023

- With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
- If they have any concerns that this policy is not being followed
- If they are unsure whether or not they have a lawful basis to use personal data in a particular way
- If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
- If there has been a data breach
- Whenever they are engaging in a new activity that may affect the privacy rights of individuals
- If they need help with any contracts or sharing personal data with third parties

However, with regard to safeguarding children from harm, we recognise the key messages given in Keeping Children Safe in Education 2021. We know that information sharing is vital in identifying and tackling all forms of abuse and neglect and recognise that Data Protection Legislation does not prevent us from recording and sharing information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. We recognise that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information.

This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. When children leave school, safeguarding and serious behaviours data will be transferred to the new school, or home school, along with other information we are obliged to pass on to comply with the DFE, and information necessary to protect the vital interests of an individual.

All information shared with a child's new school will be sent securely and a receipt will be required which will be kept in both the sending and receiving school. Safeguarding records are retained for a child until their 25th birthday. (It is recommended that in the situation of electronic transfer, an email is sent to the receiver asking for confirmation that the number of files sent have been received. The receipt will then be the reply by return of email and should be stored securely).

CPOMS may be used for:

- Reporting a safeguarding concern (all staff)
- Reporting a breach of the behaviour policy with the sanction alongside (all staff) as this can often build into a bigger picture around the pupil.
- Reporting incidents of aggressive, destructive or verbally abusive behaviour. (The member of staff who dealt with the incident or initially witnessed it)
- Reporting incidents of bullying (this must be followed up as part of your Behaviour and Bullying policies and procedures and reported to a member of the SLT)
- Reporting racial incidents (this must be passed onto a member of the SLT)
- Peer on Peer incidents (This must be passed onto a member of SLT)
- Parental reported incidents action (the person who spoke to the parent)
- Summarising the key points of meetings with outside agencies or other professionals (SLT, SENDCo, Learning Mentor or the person who represented the school at the meeting)
- Recording the follow up actions for any incidents that have been dealt with as an 'action taken'.
- Recording visits from outside agencies (SLT, SENDCo or DSL)
- Uploading minutes from Child protection or Child in Need meetings (SLT or DSL)
- Uploading CYPs (Child and Young Person's police report) (DSL)



## CPOMS Policy September 2023

- Uploading letters and reports from outside agencies (e.g. Educational Psychologists, Speech and Language Therapist, Occupational Therapist, Child and Adolescent Mental Health Service etc.) (SLT, SENDCo or DSL)
- Uploading copies of plans (e.g. Education Health and Care Plans, Annual reviews, Care Plans, Behaviour plans, Individual Education Plan, risk assessments, PEEPs, PEPs, Individual Health Care Plans) (SENDCo, DSL)

Records must be:

- ✓ Completed as soon as possible...is this different for different concerns?
- ✓ Accurate and factual...factual details about child are correct, accurate language used.
- ✓ Specific...refrain from using generic terms such as always, constantly, never, inappropriate...
- ✓ Non-judgemental...it is not about what WE think!
- ✓ Completed in the correct format...verbally, electronic, using correct categories, written in the first person.
- ✓ Child centred...what is the impact of the concern on the child?
- ✓ Defensible...is it clear what happened, what was done about it and why?

## **2. Who can view and input information on CPOMS?**

Information will always be shared on a need to know basis. This may mean there will be times when you have submitted information, but are not made aware of any further information or the details of any outcome.

- The HT and DSL Team should be able to view all information and input information for all sections.
- Teacher
- Teaching Assistant
- Support staff (administration)
- SENDCos are likely to have access to all sections apart from child protection, (unless they are also the DSL; in many instances it is good practice for the SENDCo to be a DSL as well to ensure the specific and unique safeguarding SEND issues are addressed appropriately).
- All staff should have their own login for CPOMS: this includes LTS, Cleaning Staff and Administrative Staff; this is to ensure that all records written have been shared directly by the individual.

## **3. How do I log in to CPOMS?**

- Initially every member of staff will receive an email invitation to log in to CPOMS and create an individual password. The Administrator (Lead DSL) will add staff emails onto the system and this will generate the invitation. If your email is not recognised it is because it has not been set up on the system, see a DSL.
  - Save the link to CPOMS for your school on your device to allow for swift logging to take place.
  - If you are a new user and don't have a password, then click straight on the 'forgotten your password.....' message and set up a new password. After that you will be able to log in directly from this screen.

Access should be restricted for those individuals not working within a SLT or DSL capacity in school. Staff at all levels must be able to add incidents to CPOMS, however will be unable to search for a pupil through elevated access.

## **4. How do I log an incident?**

- a) Click on Add Incident in the purple banner at the top of the initial screen.



CPOMS Policy September 2023

- b) Enter the Student's name in the student box. PLEASE ENSURE YOU SELECT THE CORRECT NAME
- c) Enter your concern in the Incident box.

### Guidelines for recording an incident on CPOMS

- ✓ Write a succinct and factual account of the incident/observation
- ✓ Remember, anything you write on CPOMS could be subject to freedom of information and could, therefore, be seen by parents, courts or serious case reviews
- ✓ DO NOT express your opinion as these records could be used as evidence. Do not add multiple exclamation marks or write in capital letters when making your entry even though you may feel frustrated. Below are examples of your opinion rather than facts:

- \* Really angry
- \* Threatening
- \* Rude
- \* Stormed off
- \* Aggressive
- \* As per usual,....
- \* Surprisingly ... (avoid adverbs such as this)
- \* The repetition of such incidents is becoming frustrating for staff and other children ... (be careful not to express your own emotions regarding the situation. If CPOMS is called as official evidence, it will be very unhelpful.)

- ✓ Aim to remain factual

- The parent spoke loudly in close proximity to my face (approx. 15cm)
- The parent paced the room. Her fists were clenched. She would not respond to the invitation to sit down.
- The child was tearful. They struggled to speak whilst crying. They repeatedly asked if I could not tell anyone (approx. 6 times). Their emotions and language suggested to me they were distressed.
- Ensure that you use the language used in the incident – from both children and/or adults and where appropriate use speech marks.

- ✓ Ensure you link any students into your incident log by typing their name in the 'linked students' text box.
- ✓ Do not use initials when recording logs if you are including other pupils into your logs, but ensure that you are linking these students (this will enable children's names to be redacted if preparing a report for court or a third person). ENSURE NAMES ARE SPELT ACCURATELY.
- ✓ Be careful to be accurate and specific as once you submit the incident you cannot delete it. Whilst the incident can be edited, this is time-stamped and shows as an edit on the system.
- ✓ Incidents should be added as soon as possible after the event – this must be the same day – as close to immediately as you can. Schools should aim to have a device available at all times which may be allocated for CPOMS reporting.

**IF YOU ARE CONCERNED ABOUT A CHILD'S IMMEDIATE SAFETY, HAVE A SAFEGUARDING CONCERN (INCLUDING DISCLOSURES) OR NEED SOME ADVICE PLEASE SEEK OUT ONE OF THE DSLs TO PASS ON YOUR CONCERN WITHOUT DELAY**

- ✓ Most incidents will require an action. If you have already taken action, make sure you record this as part of the incident. If there are any additional actions following senior leader input these must also be recorded as part of the log and notify you for additional detail. When you are recording an action, ensure it is on the record of the pupil who relates to the action (where multiple children are linked to an incident, this will



## CPOMS Policy September 2023

require an individual action on each child's name). If the action is necessary and appropriate for all, click on 'linked students.)

✓ The person who has the concern or observation must be the person who records the incident; it cannot be passed on to another person.

✓ If part of your log is that you will make contact with someone, please ensure you follow this up as part of the incident – or if this is complete, as an action.

✓ Where no further action is required, ensure you have selected 'Closed' in the Status.

d) Categories: Every incident must be linked to a category. Select a category that you feel best describes your concern.

e) Linked Student(s): This is likely to be used if a breach of the behaviour policy has been identified and multiple children are involved. It is also useful to note linked students as siblings, (Only link siblings if it is relevant to the incident)

f) Body Map – Please complete if applicable. This is important if a child has an injury.

g) Date/Time: Record the date and time of the incident itself. Remember, your incidents should be logged in a timely manner – the incident must be an accurate recording of the timely action taken

h) **Alert** Staff Members: Each staff 'group' is represented by the buttons, clicking a button will mean that everyone in that group will be alerted and be able to read the Incident. To alert specific individuals start to type the name and options will appear.

### Who to Alert / Pre-set Alerts:

✓ The Headteacher / Lead DSL should be alerted to all incident logs

✓ If your concern is safeguarding, click to alert the DSL team

✓ If your concern is a behaviour concern, click (for example) KS2 Behaviour to alert the Headteacher, KS2 Leader, Learning Mentor and Attendance and Behaviour Officer.

✓ You can type individuals to alert (such as class teachers) to behaviour/attendance/lower level logs for their information.

i) File(s): The option to upload documents is available here e.g. previous school notes, letter from social services (generally this will only be used by SLT, SENCO or Class teachers). Before uploading a file, it is important to raise an incident simply stating the name of the file you intend to upload. This will ensure the document is correctly listed in the child's chronology.

j) Agencies: Select from the list of agencies pre-populated in the system if appropriate.

k) Add Incident: Click to submit the incident and alert members of staff - remember **YOU CANNOT EDIT THE INCIDENT ONCE IT IS SUBMITTED**. If you make a significant mistake and realise after it is submitted, take note of the incident ID number (top left corner of the incident) and let your Lead DSL know.

l) Once you have finished adding the incident please remember to log out.

## 5. How will I know if I have an alert?

➤ As soon as somebody alerts you to an incident you will receive an email. If you click on the link in the email it will take you directly to the login screen where you can enter your password and read the alert.

➤ If you have received several alerts you can read all the incidents at the same time. You can do this via the dashboard or use the 'see next' alert button

➤ If the incident does not require an action from you then you can click on the 'mark as read' tab. The incident will then disappear.

➤ If you need to act on the information, e.g. speak to the child or the parent, then don't click on the 'mark as read' tab until you have completed the action and written a summary of the outcome in the 'Action' box.



## CPOMS Policy September 2023

This can then be shared with the people who need to know what has happened. You can then click on the 'mark as read' tab.

- Sometimes the school will need to obtain consent from parents to share information. This will need to be recorded in the action box.
- It is better to keep the actions associated with an incident attached to that incident rather than creating a new incident. If you have clicked 'mark as read', a DSL can re-add you to the incident so you are able to add an action.
- It is important that you check all incidents you have been alerted to at the earliest opportunity and action them as soon as possible.

### **Elevated Access**

- Members of the DSL team will receive elevated access – this is primarily for safeguarding purposes / SENCO / Pastoral team purposes.
- Elevated Access allows you to search for a specific child (SLT can see all children, class teachers can see the children in their class). It is possible to access contact information, current attendance figures, review incidents and download documents from the child's vault.
- Further actions can be added to logged incidents if required.

### **6. CONFIDENTIALITY**

- Much of the information shared on CPOMS is extremely confidential. It should only be shared with people who need to know. If you are having a professional discussion about it with a colleague make sure that there are no children or other adults in earshot.
- You must ensure that you don't leave CPOMS open on your desktop particularly if your laptop is connected to an interactive whiteboard.
- Remember to use the lock screen if you walk away and leave your laptop unattended as per your GDPR duties.
- You must never download documents onto a personal device (phone, tablet or computer).
- You must never forward information to a personal email account.
- Any scanned documents to be added must be uploaded to a secure folder. Scans should be immediately deleted from computers once the document is uploaded to CPOMS, including from the recycle bin. The hard document can then be destroyed. If your school is maintaining the use of yellow form files for safeguarding, ensure these are kept securely in a locked cupboard for auditing by the Headteacher / DSL team.

### **7. Transfer:**

CPOMS will be one of the school's key sources for passing information to a new school both in year and at the point of school transfer. When we transfer information it is vital that we follow Data Protection Legislation procedures, remembering that the information passed must only be that required by law (name, DOB, attendance etc), child protection information, or information that will support the child's wellbeing where concerns have been raised about this.

The categories that must be transferred are:

- ✓ Attendance
- ✓ Serious behaviours
- ✓ Bullying
- ✓ Child Protection
- ✓ Racism



## CPOMS Policy September 2023

- ✓ Peer on Peer
- ✓ SEN (if this tab is used by the school)
- ✓ Medical
- ✓ Other transfer

When end of year or mid-year transfers take place, before the electronic transfer is authorised by the departing school, a meeting should take place between the DSLs of both the departing and receiving school with a summary of pupil's needs recorded for any pupils with significant/important background to be shared. If a child is transferring to a school which does not use CPOMS, the chronology should be downloaded as a report with other children's names removed/redacted and transferred with a signed form to confirm the transfer.

### **8. CPOM categories and subcategories:**

#### Attendance

- Leave of Absence request
- Punctuality
- Unauthorised

#### Behaviour incident

- Online
- Physical
- Sexual behaviour
- Verbal

#### CAF/Early Help Plan

- Early Help Assessment
- TAF meeting

#### Family Intensive Support

#### Child Protection Incident

- Disclosure
- Domestic Abuse incident
- Encompass
- Online safety concern

#### Child Protection Plan

- Core Group Meeting
- CP conference

#### CLA and Post CLA

- CLA review
- PEP meeting
- Care Planning



## CPOMS Policy September 2023

### Health

- Care Plan
- COVID
- Medical appointment
- Medication

### Home Communication

- Email from parent
- Formal Meeting
- Legal Proceedings
- Parent App
- Remote Learning
- School Report
- Telephone call with parent

### Mental Well Being

- Direct Work
- ELSA
- EMHP
- Support

### Peer on peer abuse

- Bullying Allegation
- LGBT
- Online Abuse
- Physical Harm
- Racist
- SEND abuse
- Sexual Violence and Harassment

### SEND

- Cause for Concern
- EHCP

### Welfare Concern

- Diet
- General
- Home issues
- Hygiene
- Online safety concern
- Presentation