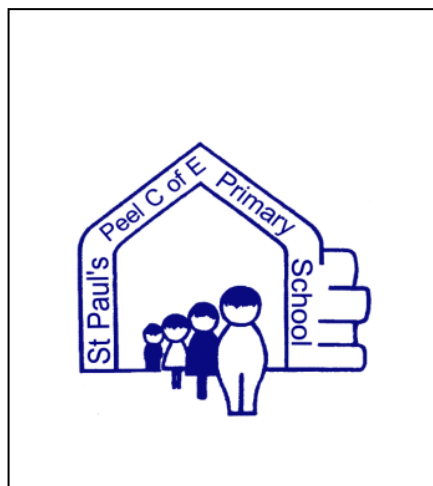


Safeguarding and Child Protection Policy Annex

Coronavirus (COVID-19): Safeguarding in Schools



School Name: St. Paul's Peel C.E. Primary School

Policy owner: St. Paul's Peel C.E. Primary School

Date: 08/04/2020

Date shared with staff: 15/04/2020

Policy Content

This addendum of St. Paul's Peel C.E. Primary School's Safeguarding and Child Protection policy contains details of our school's individual safeguarding arrangements in the following areas:

1. **Context**
2. **Vulnerable Children**
3. **Attendance Monitoring**
4. **Designated Safeguarding Lead**
5. **Reporting a Concern**
6. **Safeguarding Training and Induction**
7. **Safer Recruitment/Volunteers and Movement of Staff**
8. **Online Safety in School**
9. **Children and Online Safety away from School**
10. **Supporting Children not in School**
11. **Supporting Children in School**
12. **Peer on Peer Abuse**
13. **Children's Mental Health**
14. **Children Moving School**
15. **School as a Safeguarding Hub**

1. **Context**

In response to the coronavirus (COVID-19) outbreak, from 20th March 2020 parents were asked to keep their children at home, wherever possible. Schools were asked to remain open only for those children who are vulnerable and the children whose parents are critical to the COVID-19 response and cannot make alternative arrangements to have their child cared for at home. <https://www.gov.uk/government/publications/covid-19-school-closures>

The interim policy will be kept under review and updated with further guidance and updates released from:

- The Government <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>



Government
Guidance (COVID19)

- Salford Safeguarding Children Partnership (SSCP)
<https://safeguardingchildren.salford.gov.uk/>
- Salford City Council
<https://www.salford.gov.uk/cvschools>
<https://www.salford.gov.uk/people-communities-and-local-information/coronavirus/>
- Salford Children's Service regarding children with education, health and care (EHC) plans or on a plan under social care, the local authority designated officer, and, any

arrangements to support children the school are concerned about who do not meet the 'vulnerable' definition.

St. Paul's Peel C.E. Primary School will complete the Interim Safeguarding Guidance Action Plan Checklist to help monitor the progress of the implementation of the COVID-19 Safeguarding Policy Annex



Interim
Safeguarding Guida

2. Vulnerable Children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with Education, Health and Care Plans (EHC).

Those who have a social worker include children who have a Child Protection Plan, those who are looked after by the Local Authority and those recently leaving the care system. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

[\(Coronavirus \(COVID-19\): guidance on vulnerable children and young people\)](#)

Those with a social worker will be risk-assessed by the social worker in consultation with the school, to ascertain whether school or home is the safest place to be during this time. Each child will have a different set of circumstances and these must be taken into account, whilst understanding that a place must be offered for all children with a social worker.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and Deputies) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support. St. Paul's Peel C.E. Primary School will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the Local Authority Virtual School Head (VSH) for looked-after and previously looked-after children.

Children defined as Vulnerable including children working with the Early Help Service and, vulnerable children without a Statutory Plan will receive regular Welfare Checks by St. Paul's Peel C.E. Primary School.

Children with a Statutory Plan and/or an EHC Plan will be contacted at home at least twice a week. St. Paul's Peel C.E. Primary School will contact the child's Social Worker on the day if the child has not arrived at School/ unable to make contact/the welfare check causes concerns.

Vulnerable children without a Statutory Plan:

Welfare checks will still be made for children who are on St. Paul's Peel C.E. Primary School's school based vulnerable list. St. Paul's Peel C.E. Primary School will contact these children at least once per week.

St. Paul's Peel C.E. Primary School will follow the recommended process detailed in the embedded:

- Guide to Welfare Checks during School Closures
- Flow chart for concerns raised or unable to contact a family whilst contacting families for welfare check during the Covid-19 (coronavirus) closures.



SchoolsWelfareCheckGuide_April2020.c School and EYs Flow Chart if conce

The lead persons responsible for the checks will be Miss Joanne Barker/Mrs Sarah Ward/ Mrs Janet Williams/ Mrs Annette Barker/ Mrs Gail Birch/ Mrs Sam Hackey (on a rota system)

3. Attendance Monitoring

Under this interim safeguarding guidance Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance. Daily attendance of children of the critical workers and vulnerable children who are attending school will be completed on the DFE's [daily online attendance form](#).

There is an expectation that vulnerable children who have a social worker will attend the school, so long as they do not have underlying health conditions that put them at increased risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and St. Paul's Peel C.E. Primary School will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID-19, St. Paul's Peel C.E. Primary School or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

St. Paul's Peel C.E. Primary School will encourage our vulnerable children and young people to attend a school, including remotely if needed. St. Paul's Peel C.E. Primary School will follow up on any child that is expecting to attend school but does not, and in all circumstances where a vulnerable child does not take up their place at school, or discontinues, St. Paul's Peel C.E. Primary School will notify their social worker. St. Paul's Peel C.E. Primary School will also notify the Virtual School (for all children on all social care plans) at virtualschoolteam@salford.gov.uk; and the general admin teams at CPCINAD@salford.gov.uk for Children at CIN/CP and LookedAfterChildren.Admin@salford.gov.uk for children who are looked after by Salford.

St. Paul's Peel C.E. Primary School will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

If St. Paul's Peel C.E. Primary School has any children in attendance (e.g. because they are vulnerable or their parent(s) / carers are critical workers) we will submit the daily attendance sheet to the DfE by 12 noon - <https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings>

If the school has closed, we will complete the return once as requested by the DfE. St. Paul's Peel C.E. Primary School and social workers will agree with parents/carers whether children in need should be attending school

To support the above, St. Paul's Peel C.E. Primary School will, when communicating with parents/carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

4. Designated Safeguarding Lead

The Designated Safeguarding Lead for St. Paul's Peel C.E. Primary School is:
Miss Joanne Barker

The Deputy Designated Safeguarding Lead(s) are:
Mrs Sarah Ward and Mrs Gail Birch

In accordance with Keeping Children Safe in Education the optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection files and recording systems and liaising with the offsite DSL (or deputy). This may require liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

It is important that all St. Paul's Peel C.E. Primary School's staff and volunteers have access to the school's DSL (or deputy). Each day, the staff on site will be made aware of who that person is and how to contact them which is stated on the weekly rota timetable.

The DSL/Deputy DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

5. Reporting a Concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding and Child Protection Policy, this includes making a careful report of their concerns or what was said using the school's recording system and informing the DSL.

Where a member of staff cannot access the reporting system to complete a report in the normal way, the Designated Safeguarding Lead, and Headteacher should be informed.

Staff are reminded that in accordance with Keeping Children Safe in Education (paragraph 36), if they have any concerns about a child's welfare, they should act on them immediately and without delay.

Where staff are concerned about an adult working with children in the school, they should follow the school's procedure of informing the Headteacher to report the concern to. If there is a requirement to make a notification to the Headteacher whilst away from school, this should be done verbally and followed up as soon as possible with an email to the Headteacher.

Concerns related to the Headteacher should be directed to the Chair of Governors:

Staff are reminded that if they have concerns about the way a Safeguarding concern is being handled they can follow the school's Whistleblowing procedures, Contact details for the Local Authority Designated Officer (LADO) are: 0161 603 4350 / 4445.

The DSL will communicate to staff any new, or change in, local arrangements, This will ensure they know what to do if they are worried about a child or have a safeguarding concern regarding an adult through Salford Email.

6. Safeguarding and Child Protection Training and Induction

As DSL training is very unlikely to take place whilst there remains a threat of the COVID 19 virus. 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.

All existing school staff have had safeguarding training and have read Part One of Keeping Children Safe in Education (KCSIE) (2019).

Where new staff are recruited, or new volunteers enter St. Paul's Peel C.E. Primary School, they will continue to be provided with a safeguarding induction which will include providing the new staff with all the relevant policies as listed in the school's Safeguarding and Child Protection Policy and Part One of KCSIE).

If staff are deployed from another education or children's workforce setting to St. Paul's Peel C.E. Primary School upon arrival, they will be given a copy of the receiving setting's Child Protection Policy, confirmation of local processes and confirmation of DSL arrangements

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. When recruiting new staff, St. Paul's Peel C.E. Primary School will continue to follow the school's relevant Safer Recruitment processes, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2019) (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. In urgent cases where it is not possible to follow the normal identity checking guidelines of the ID checker being face to face and in physical possession of the original documents so they can be checked for indicators of fraud, to ensure that the necessary DBS

checks can still be carried out, the DBS ID checking guidance will be changed for a temporary period.

The change will enable:

- ID documents to be viewed over video link
- scanned images to be used in advance of the DBS check being submitted

The new member of staff will then need to present the original versions of these documents when they first attend their employment or volunteering role.

<https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines>

If staff are deployed from another education or children's workforce setting to St. Paul's Peel C.E. Primary School, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Where St. Paul's Peel C.E. Primary School are utilising 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 will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

St. Paul's Peel C.E. Primary School will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

(Paragraph 163 of KCSIE 2019).

St. Paul's Peel C.E. Primary School will 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

Whilst acknowledging the challenge of the current National Emergency, it is essential from a safeguarding perspective that the school is aware, on any given day, which staff/volunteers will be in the school, and that appropriate checks have been carried out. This is especially important for anyone engaging in regulated activity. As such, St. Paul's Peel C.E. Primary School will continue to keep the Single Central Record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

By adding a COVID-19 sheet/section/page to the SCR the SCR will be used to record everyone that will be working or volunteering in the school or college on any given day, including any staff who may be on loan from other institutions. The SCR will be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

8. Online Safety in School

St. Paul's Peel C.E. Primary School will continue to provide a safe environment, including online. This includes continuing to ensure that appropriate filters and monitoring systems are in place to protect children when they are online in the school

Where students are using computers in school, appropriate supervision will be in place.

Safe IT arrangements will be maintained in the school by Mrs Janet Allen.

If Mrs Janet Allen is not available Safe IT arrangements will be maintained by Miss Joanne Barker

9. Children and Online Safety away from School

It is important that all staff when interacting with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with in line with the Safeguarding and 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 same principles as set out in the schools Staff Code of Conduct.

St. Paul's Peel C.E. Primary School 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:

- No 'one to ones' - groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any Computer/Tablet/Telephone used by staff to communicate with pupils, must be school or Local Authority equipment. **Under no circumstances** should staff use their personal equipment for communication with pupils.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms specified by the school's senior managers and approved by our IT network manager / provider to communicate with pupils
- Staff should record, the length, time, date and attendance of any sessions held.

The DfE will be 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. The School's Safeguarding and Child Protection Policies will be updated to reflect the departments advice and guidance

10. Supporting Children not in School

St. Paul's Peel C.E. Primary School 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 will ensure that a robust communication plan is in place for that child or young person.

Details of this plan will be recorded in the electronic safeguarding folder as will a record of any contact having been made.

The communication plans can include;

- remote contact details
- phone contacts
- email contact details
- door-step visits.

Where appropriate other individualised contact methods should be considered and recorded.

Parents will receive regular headteacher updates, letters and newsletters and staff have been given the following guidelines on online learning:

1. Pupils have been told in a letter from the school that has been sent to parents and cares that they when working from home as far as possible they should follow their school timetable and work in a routine.
2. As defined in the interim guidance parents and carers will also be informed what their children are being asked to do online, including:
 - the sites they will asked to access
 - who from the school (if anyone) their child is going to be interacting with online
 - 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 - if they choose to supplement support for their children from online companies or individual tutors
 - Support that is available to keep their children safe online including:
 - [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 careers 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
3. Use your staff email /Salford email only for any contact with pupils - never use a personal email

4. Do not interact on social media or add/ accept pupils or students to any social media accounts
5. Do not direct pupils or students to third party websites other than those that are normally used in school for study
6. Maintain professional language and boundaries at all times, particularly with regard to forms of address and sign-off. Staff will not encourage 'banter' – behaviour should replicate the behaviour of the classroom
7. Copy your Headteacher into all correspondence with the pupils. to safeguard yourself.
8. If a pupil or student raises a safeguarding matter or a pastoral concern via email please report to the DSL or senior leader as would normally be done in the school.

Email during normal working hours as parents and pupils have been recommended to follow their timetables as a study routine.

St. Paul's Peel C.E. Primary School and the DSL(s) will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This communication plan will be reviewed regularly 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.

As part of the online learning protocols children who are being asked to work online will be provided with very clear reporting routes, so they can raise any concerns whilst online. In addition to providing the reporting routes back to the school the school will also provide signposting for the children to age appropriate practical support including:

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

11. Supporting Children in School

St. Paul's Peel C.E. Primary School is committed to ensuring the safety and wellbeing of all its students.

St. Paul's Peel C.E. Primary School 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.

St. Paul's Peel C.E. Primary School 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.

St. Paul's Peel C.E. Primary School 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 and recorded daily.

Where St. Paul's Peel C.E. Primary School has concerns about the impact of staff absence – such as the Designated Safeguarding Lead or First Aider's – this will be discussed immediately with the Senior Leadership Team and then the Local Authority.

12. Peer on Peer Abuse

St. Paul's Peel C.E. Primary School recognises that during the closure a revised process may be required for managing any report of peer on peer abuse and supporting victims.

Where a school receives a report of peer on peer abuse, they will follow the principles as set out in Part 5 of KCSIE and of those outlined in the Safeguarding and Child Protection - Peer on Peer Abuse Policy.

The school will listen and work with the young person's, parents/carers and any multi- agency partner required to ensure the safety and security of the young persons. Each individual report will be reviewed to inform of the approach deployed in managing any report of such abuse and supporting the victims

Concerns and actions will be recorded on the school's electronic safeguarding folder and appropriate referrals made.

13. Children's Mental Health

St. Paul's Peel C.E. Primary School recognises that school is a protective factor for children and young people, and the current circumstances, can affect the **mental** health of pupils and their parents/carers. Teachers at St. Paul's Peel C.E. Primary School have been made aware of taking this into account through regular communications from the Headteacher when setting expectations of pupils' work where they are at home.

Appropriate support will be available on site for children of critical workers and vulnerable children which will include existing provision in the school where possible, support over the phone or from specialist staff or support services. Staff will be mindful of the guidance on [mental health and behaviour in schools](#) when providing or sourcing support for children in the current circumstances.

14. Children Moving School

If a child from St. Paul's Peel C.E. Primary School attends another setting, the school will do whatever we reasonably can and is practicably possible to provide the receiving institution with any relevant welfare and child protection information before the child arrives at the receiving institution. St. Paul's Peel C.E. Primary School will endeavour to inform the DSL (or Deputy) and/or the SENCO or if this is not possible a senior leader of the receiving institution as appropriate of:

- the reason the child is vulnerable
- any arrangements in place to support them.
- a vulnerable child's EHC plan,
- child in need plan,
- child protection plan

In addition -for looked-after children:

- their personal education plan
- the child's social worker
- the Virtual School Headteacher (VSH)

For looked-after children, any change in school will be led and managed by the Virtual School Headteacher (VSH) with responsibility for the child.

Contact details for the VSH are Sue Johnson, sue.johnson@salford.gov.uk or virtualschoolteam@salford.gov.uk

St. Paul's Peel C.E. Primary School will, whilst having appropriate regard to data protection and GDPR, continue sharing information for the purposes of keeping children safe. Further advice about information sharing can be found at paragraphs 76-83 of KCSIE.

15. School as a Safeguarding Hub

Where St. Paul's Peel C.E. Primary School is acting as the hub of a collaboration of schools and children and/or staff from multiple settings are clustered in the school, St. Paul's Peel C.E. Primary School, will continue to apply the principles in the guidance [Keeping children safe in Education \(KCSIE\)](#). St. Paul's Peel C.E. Primary School will continue to provide a safe environment, in which to keep children safe and ensure all staff and volunteers from other settings have been appropriately checked and risk assessments will be carried out as required.

St. Paul's Peel C.E. Primary School when acting as a school hub will ensure:

1. All staff will have access to the school's Safeguarding and Child Protection Policy and Staff Code of Conduct/Behaviour Policy
2. Staff and/ or volunteers from other schools have appropriate checks completed and are recorded on the school's SCR
3. All staff will be notified of the name and contact details of the DSL or Senior Leader on site from the schools using the hub who is responsible for Safeguarding and Child Protection.
4. All schools using the hub school will be provided with the processes and mechanism for informing the schools within the hub of any non-attendance of children identified as vulnerable There will also be clarity on how this will be reported and followed up to ensure the alternative arrangements are both safe and appropriate.
5. All staff who provide online/remote learning MUST, have full regard to the Staff Conduct and On-line Safety Policy and Procedures related to the use of personal technology.
6. Parent's and Carers are provided with details of the hubs, school's safeguarding and policies online information.

The SCR will be used to record everyone that will be working or volunteering in the school or college on any given day, including any staff who may be on loan from other institutions. The SCR will be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere

Additional advice on clusters and safeguarding will be provided in due course once published by the DfE

Where children or staff from St. Paul's Peel C.E. Primary School attend/work at an alternative setting St. Paul's Peel C.E. Primary School will ensure:

- 1.. That the staff/volunteers have appropriate checks completed and recorded on the school SCR and this information will be provided for the host school
3. Staff are aware of the name and contact details of the DSL or Senior Leader on the hub school site who is responsible for Safeguarding and Child Protection.
4. Staff and Senior Leaders are aware of the hub school's processes and mechanism the reporting of any non-attendance of children identified as vulnerable, and how this will be followed up to ensure the alternative arrangements are both safe and appropriate.
5. Their staff, if providing online 'remote learning for the pupils for another school in the hub/cluster, are aware and have full regard to the child's school On-line and Digital Safeguarding policy and Staff Code of Conduct/Behaviour policies and any interim updates.
6. The Parent's and Carers of the children normally attending their school are provided with details to the hub school's online information, safeguarding procedures and their policies.

Children who are being asked to attend a different school will be provided with very clear reporting routes outlined by the Headteacher so that they are aware of where and to whom they can raise any concerns

Consideration must be given to how a member of staff will record their concerns if access to their reporting systems is not available This might require an agreement to temporarily record their concerns in the hosting school system.

This addendum policy was adopted on: Thursday 9th April 2020

It will be reviewed on a regular basis in the light of Government, DfE and Local Authority Advice throughout the COVID-19 outbreak.

The Government Guidance and advice about coronavirus (COVID-19) in educational settings for staff, parents and carers, pupils and students can be found at <https://www.gov.uk/government/collections/coronavirus-covid-19-guidance-for-schools-and-other-educational-settings>

Signed 

Role Headteacher

(In the event of a Cluster/ Hub arrangements, a Lead from each school should also sign the policy or provide a signed copy of their own school's interim policy)