



Safeguarding and Child Protection Policy - Scotland

Authorisation Date: 09/2025

OSG Document Code: POL_UK_ED_Safeguarding and Child Protection -
Scotland_V4.1

Region: UK - Scotland

Safeguarding and Child Protection Policy

- Scotland

OSG Document Code POL_UK_ED_Safeguarding and Child Protection - Scotland_V4.1	Authorisation date: 09/2025	Next review date: 09/2026
Policy author Tracy Greer, Regional Director of Safeguarding	Reviewed by: Tracy Greer, Regional Director of Safeguarding	Approved by: OneSchool Global UK Board on 06/02/2025
Enquiries contact: support@uk.oneschoolglobal.com	Associated documents • Anti-Bullying Policy • Attendance Policy • Student Discipline Policy • ICT and E-Safety Policy • Complaints Policy • Curriculum Policy documents and schemes of work for PSHE • Data Protection Policy • Disciplinary Procedure • Health & Safety Policy including the following procedures: • Educational Visits • First Aid including arrangements for meeting the medical needs of children • Induction of new staff and volunteers • Learning Support (SEND) Policy • (The) Prevent Duty Guidance • Safer Recruitment Policy • Security & Visitors Policy • Staff Code of Conduct	

1. POLICY STATEMENT AND PURPOSE

At OSGUK Caledonia South Campus (hereafter ‘the Campus’), we will provide a safe and welcoming environment where every child and young person is respected and valued. It is the responsibility of everyone to be alert to the signs of abuse and harm in all its forms and to follow the procedures to ensure that children receive timely and effective support, protection and justice.

This policy sets out the Campus’ commitment to safeguarding, promoting the welfare of children and is set in the framework of Scottish Government’s Getting it Right for Every Child (GIRFEC), National Guidance for Child Protection in Scotland 2021 and The Children and Young People (Scotland) Act 2014.

In Scotland, the Scottish Council of independent Schools (SCIS) Child Protection guidance aims to supports teachers and others working in independent schools in Scotland in their task of safeguarding and promoting the welfare of the children in their care.

The purpose of this policy is to provide a framework setting out how we safeguard and promote students' welfare in accordance with our moral duty and statutory guidance. The policy also informs parents and carers about how we will safeguard their children while they are in our care.

The SCIS Child Protection Guidance sets out:

- What constitutes a Safe Child Centred School?
- The rights of children and young people to be protected
- The need to have a robust recruitment and selection procedures including managing allegations of abuse against staff
- What constitutes child abuse and neglect, including definitions and signs of child abuse
- The responsibilities of those working in the campus
- Information on curricular to support young people in their understanding of healthy relationships and consent
- Updated research of the impact of social media on young people, mental health
- Advice on child protection in specific circumstances including sexual violence and harassment

2. SCOPE

This policy and the associated statutory procedures apply to all staff, Trustees, volunteers, visitors and parents of both current and prospective students in the Campus.

The policy and procedures are consistent with the local authority's child protection committees inter-agency guidance.

The policy is available on the Campus website and is made available to all staff, Trustees, volunteers, parents, both current and prospective, and visitors to the Campus.

3. DEFINITIONS

Term	Definition
CCTV	Close circuit television
Child	Anyone who has not yet reached their 18th birthday. For the purpose of the policy this means all students in the Campus and also extends to visiting students from another OSGUK Campus.
Child Protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. SCIS and The National Guidance for Child Protection in Scotland defines four categories of abuse: emotional, physical, sexual and neglect.
Child in Need	A child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.
Children's Hearing System	Lay tribunal that decides on the best course of action for a child
CPC	Child Protection Committee
CPOMS	Child Protection On-line Management System
Designated Child protection Officer	The lead on Campus for Child Protection.
GIRFEC	Getting it Right For Every Child
SHANARRI	Is the acronym set for the 8 indicators for every child in Scotland. Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included.
Social Work Services	The term used for local authority children and family social work services

4. CONTACT DETAILS

SCHOOL CONTACT INFORMATION		
Child Protection Coordinator:		
Shannon Hunter	01259 303030	Shannon.Hunter@uk.oneschoolglobal.com
Deputy Child Protection Coordinators:		
Catriona Wardell	01259 303030	Catriona.Wardell@uk.oneschoolglobal.com
Christopher Walker		Christopher.Walker@uk.oneschoolglobal.com
Campus Principal		
Ross Queenan	01259 303030	Ross.Queenan@uk.oneschoolglobal.com
Regional Team Leader (where the concern is about the Head Teacher):		
Neville Smerdon	07848 453564	Neville.Smerdon@uk.oneschoolglobal.com
Regional Safeguarding Lead:		
Tracy Greer	0330 055 5600	tracy.greer@uk.oneschoolglobal.com
National Leadership Team Member for Safeguarding Governance:		
Ross Robertson		ross.robertson@uk.oneschoolglobal.com
Local Contact Numbers		
Perth and Kinross Child Protection and Duty Team	01738 476768	ChildProtection@pkc.gov.uk
East Ayrshire Social Services	01563 554200	social.work@east-ayrshire.gov.uk

Fife Council Social Work	03451 551503	sw.enquiries@fife.gov.uk
Edinburgh Social Care	01312 002327	You can complete an online referral form Ask Social Care Direct for advice – The City of Edinburgh Council
Falkirk Council Child Protection	01324 506070	childrenandfamilies.swk@falkirk.gov.uk
South Lanarkshire Child Protection	03031 231008	esws@southlanarkshire.gov.uk
East Renfrewshire Social Work	01415 778300	customerservices@eastrenfrewshire.gov.uk

5. POLICY STATEMENT

5.1 Introduction

5.1.1 Where a child is thought to be at risk of significant harm, the primary concern will be for their safety and staff should contact the Child Protection Coordinator (CPC) Shannon Hunter or Deputy Child Protection Officers (DCPO) Catriona Wardell and Christopher Walker in the first instance.

5.1.2 The Child Protection Coordinator must consider the immediate needs of a child once a concern about their possible safety is raised, considering the following questions:

- a. Is the child at immediate risk?
- b. What is placing this child at immediate risk?
- c. What needs to happen to remove this risk now?

5.1.3 The Board of Trustees takes seriously its responsibility to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our Campus to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

6. POLICY PRINCIPLES

6.1 Child protection is everyone's responsibility.

6.2 Staff should work in partnership with parents / carers to promote the wellbeing, health and development of children and young people.

6.3 Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

6.4 All professionals should make sure their approach is child centred. This means they should consider at all times what is in the best interests of the child.

6.5 Children and young people should be listened to, respected and where there are concerns, staff must take the matter seriously and report the concern on the day.

6.6 Children have a right to express views on all matters which affect them should they wish to do so.

6.7 Campuses should work with social work (Children and family) services, the Police, Health Services and other services to promote the wellbeing and protection of children and protect them from harm. This includes early intervention when additional needs of children are identified and supporting inter agency plans for children subject to child protection plans.

7. TYPES OF ABUSE

What is child abuse and child neglect?

7.1 Definition of abuse

7.1.1 Abuse and neglect are forms of maltreatment of a child. somebody may abuse or neglect a child by inflicting, or by failing to act to prevent, significant harm to the child. children may be abused in a family or in an institutional setting, by those known to them or, more rarely, by a stranger. assessments will need to consider whether abuse has occurred or is likely to occur.

7.1.2 the following definitions show some of the ways in which abuse may be experienced by a child but are not exhaustive, as the individual circumstances of abuse will vary from child to child.

7.2 Physical abuse

7.2.1 Physical abuse is the causing of physical harm to a child or young person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child they are looking after.

7.2.2 The Children (Equal Protection from Assault) (Scotland) Act 2019 removed the “reasonable chastisement” defence. This means that all forms of physical punishment of children will be against the law in Scotland and children will have the same legal protection from assault as adults.

7.3 Emotional abuse

7.3.1 Emotional abuse is persistent emotional neglect or ill treatment that has severe and persistent adverse effects on a child’s emotional development. it may involve conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

7.3.2 It may involve the imposition of age or developmentally inappropriate expectations on a child.

7.3.3 It may involve causing children to feel frightened or in danger or exploiting or corrupting children.

7.3.4 Some level of emotional abuse is present in all types of ill-treatment of a child; it can also occur independently of other forms of abuse.

7.4 Child Sexual Abuse (CSA)

7.4.1 Sexual abuse is any act that involves the child in any activity for the sexual gratification of another person, whether or not it is claimed that the child consented.

7.4.2 Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening.

7.4.3 The activities may involve physical contact, including penetrative or nonpenetrative acts. they may include non-contact activities, such as involving children in looking at, or

in the production of, pornographic material or in watching sexual activities, using sexual language towards a child or encouraging children to behave in sexually inappropriate ways.

7.4.4 Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

7.5 Neglect

7.5.1 Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

7.5.2 It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or to ensure access to appropriate medical care or treatment.

7.5.3 It may also include neglect of, or failure to respond to, a child's basic emotional needs.

7.5.4 Neglect may also result in the child being diagnosed as suffering from non-organic failure to thrive where they have significantly failed to reach normal weight and growth or development milestones, and where physical and genetic reasons have been medically eliminated. I

7.5.5 In its extreme form, children can be at serious risk from the effects of malnutrition, lack of nurturing and stimulation.

7.5.6 This can lead to serious long-term effects such as greater susceptibility to serious childhood illnesses and reduction in potential stature.

7.5.7 With young children in particular, the consequences may be life-threatening within a relatively short period of time.

7.6 Children with Additional Support Needs including Disabilities

7.6.1 Children with Additional Support Needs can be especially vulnerable.

7.6.2 Disabled and deaf children are three times more likely to be abused than their peers.

7.6.3 These children can face additional barriers when recognising abuse and neglect including:

- a. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- b. being more prone to peer group isolation than other children
- c. the potential for being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

7.7 Disability

7.7.1 The definition of 'children with a disability' includes children and young people with a comprehensive range of physical, emotional, developmental, learning, communication and health care needs.

- 7.7.2 'Children with a disability' are defined as children in need under section 93(4) of the Children (Scotland) Act 1995.
- 7.7.3 Children with a disability are not only vulnerable to the same types of abuse as their able-bodied peers, but they are also more vulnerable to that abuse.
- 7.7.4 Children with behavioural disorders, learning disabilities and/or sensory impairments are particularly at risk.
- 7.7.5 Neglect is the most frequently reported form of abuse, followed by emotional abuse.
- 7.7.6 Abuse of children with a disability is significantly under-reported.
- 7.7.7 Children with a disability are more likely to be dependent on support for communication, mobility, manual handling, intimate care, feeding and/or invasive procedures.
- 7.7.8 There may be increased parental stress, multiple carers and care in different settings (including residential); there may also be reluctance among adults, including practitioners, to believe that children with a disability are abused.
- 7.7.9 Children with a disability are likely to be less able to protect themselves from abuse.
- 7.7.10 Limited mobility can add to their vulnerability.
- 7.7.11 In addition, the network of carers around the child is likely to be larger than for a non-disabled child, which can be a risk factor in itself.
- 7.7.12 While the majority of parents or carers provide the highest standard of care for their child, it must be acknowledged that in some cases they themselves will be perpetrators of abuse.
- 7.7.13 Children with a disability can progress into adult protection. The Protection of Vulnerable Groups (Scotland) Act 2007 recognises the vulnerability of disabled adults.
- 7.7.14 Transition to adult services can be a traumatic time for children with a disability and their families. Local child protection committees should have protocols in place that reflect the complexity of transition from child to adult services.
- 7.7.15 Children can also be affected by the disability of those caring for them.
- 7.7.16 Parents/carers/siblings may have additional support needs relating to physical and or sensory impairments, mental illness, learning disabilities, serious or terminal illness, or degenerative conditions.
- 7.7.17 These may impact on the safety and wellbeing of their children, affecting their education, physical and emotional development.
- 7.7.18 A full assessment of parents' needs, and of the support they need in order to fulfil their parenting responsibilities, should be carried out as well as an assessment of the needs of the child. Joint working between specialist disability and child protection services will be needed. For more information, see the Safeguarding Children with a Disability: Practice Guidance.

7.8 What is Harm and Significant Harm in a Child Protection Context?

- 7.8.1 'Harm' means the ill treatment or the impairment of the health or development of the child, including impairment suffered as a result of seeing or hearing the ill treatment of another.
- 7.8.2 In this context, 'development' can mean physical, intellectual, emotional, social or behavioural development and 'health' can mean physical or mental health. Whether the harm suffered, or likely to be suffered, by a child or young person is 'significant' is determined by comparing the child's health and development with what might be reasonably expected of a similar child.
- 7.8.3 Child protection is closely linked to the risk of significant harm.
- 7.8.4 'Significant harm' is a complex matter and subject to professional judgement based on a multi-agency assessment of the circumstances of the child and their family.
- 7.8.5 Where there are concerns about harm, abuse or neglect, these must be shared with the relevant agencies so that they can decide together whether the harm is, or is likely to be, significant.
- 7.8.6 Significant harm can result from a specific incident, a series of incidents or an accumulation of concerns over a period of time.
- 7.8.7 It is essential that when considering the presence or likelihood of significant harm that the impact (or potential impact) on the child takes priority and not simply the alleged abusive behaviour.
- 7.8.8 There are no absolute criteria for judging what constitutes significant harm.
- 7.8.9 Sometimes, a single traumatic event may constitute significant harm; more often, significant harm results from an accumulation of significant events, both acute and long standing that interrupt, change or damage the child's physical and psychological development.
- 7.8.10 To understand and identify significant harm, it is necessary to consider:
- a. the nature of harm, either through an act of commission or omission
 - b. the impact on the child's health and development, taking into account their age and stage of development
 - c. the child's development within the context of their family and wider environment
 - d. the context in which a harmful incident or behaviour occurred
 - e. any particular needs, such as a medical condition, communication impairment or disability, that may affect the child's development, make them more vulnerable to harm or influence the level and type of care provided by the family
 - f. the capacity of parents or carers to meet adequately the child's needs, and
 - g. the wider and environmental family context.

- 7.8.11 The reactions, perceptions, wishes and feelings of the child must also be considered, with account taken of their age and level of understanding.
- 7.8.12 This will depend on effective communication, including with those children who find communication difficult because of their age, impairment or particular psychological or social situation.
- 7.8.13 It is important to observe what children say as well as to bear in mind that children may have a strong desire to be loyal to their parents or carers who may also hold some power over the child. Steps should be taken to ensure that any accounts of adverse experiences given by children are accurate and complete, and that they are recorded fully.
- 7.8.14 Where a child is thought to be at risk of significant harm, the primary concern will be for their safety.

8. RESPONDING TO SAFEGUARDING ISSUES

8.1 How Concerns May Arise

8.1.1 Concerns about child abuse may arise in the following circumstances:

- a. A member of staff has concerns arising from observation of the child's behaviour or appearance, or comments the child has made, or a child tells a member of staff they have been abused or feel unsafe
- b. A third party expresses concerns to a member of staff: this could be another pupil, a parent/carer or member of the public
- c. An anonymous allegation is received
- d. Non-recent child abuse (previously known as 'Historical Abuse').

8.1.2 Questioning and testing of evidence is not a matter for school staff; this is the responsibility of the Police and Social Work. Such an approach by staff could prejudice later investigations.

8.1.3 The responsibilities of Campus staff for child protection are to Recognise, Respond, Report and Record (the 4 Rs):

8.1.3.1 Recognise when the child's behaviour and demeanour is a cause for concern or the child has told you something that suggest that they may be at risk of harm.

8.1.3.2 Respond without showing signs of disquiet, anxiety or shock.

8.1.3.3 Report the concerns as quickly as possible and on the same working day to the CPC.

8.1.3.4 Record in detail on CPOMS what you have seen and/or heard and when. And then report to the CPC. Signs of physical injury should be described in detail.

8.1.4 Any comment by the child concerned, or by an adult who might be the alleged perpetrator, about how the injury occurred should be recorded, preferably quoting

words actually used, as soon as possible after the comment has been made, and sign and date the report on the day.

8.1.5 Stay calm, spend time with the child and use your skill in communicating with children to understand what has gone on. Some key things to consider:

- a. observe any injuries but should not ask a child to remove or adjust their clothing to observe them.
- b. allow the child to lead the discussion. Do take it seriously even if you find it shocking or unlikely.
- c. ask open questions. You need to ask enough information to know that it is a disclosure that needs to be addressed and the immediacy of any danger or significance of harm to the individual. It is not your role to get a detailed account, and the individual may have to tell their story several more times.
- d. accept what the student says without challenge – reassure them that they are doing the right thing and that you recognise how hard it is for them.
- e. do not lay blame or criticise either the child or the perpetrator.
- f. do not make promises on about what will happen next nor that information provided will not be shared – reassure and explain that they have done the right thing and who needs to be told but do not promise confidentiality.
- g. Is the disclosure from an individual alleging abuse to themselves or another? Is this person reporting a concern or suspicion? Does it involve another child, a teacher/volunteer or friends/family away from school?
- h. Is the response what you would expect? I.e. has medical attention been sought promptly? Are parents being protective?
- i. Is it something that needs addressing right now? Is it something that requires some planning before the end of the school day?

8.2 Concerns about a child

8.2.1 If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

- a. Make an initial record of the information related to the concern on CPOMS
- b. Alert the CPC via CPOMS
- c. Where there is an immediate concern for a child's safety, the member of staff must alert the CPC as the first port of call and log on CPOMS as soon as they can
- d. The CPC will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the CPC is not immediately available.

8.2.2 Make an accurate record on CPOMS (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:

- a. Dates and times of their observations
- b. Dates and times of any discussions in which they were involved.
- c. Any injuries
- d. Explanations given by the child / adult
- e. Rationale for decision making and action taken
- f. Any actual words or phrases used by the child
- g. In the absence of the CPC or a DCPC, staff must be prepared to refer directly to the relevant authorities

8.2.3 NB: A referral regarding significant harm must be made immediately or at least within 24 hours.

8.3 Information Sharing

8.3.1 Information sharing appropriate information is essential to safeguarding children and young people.

8.3.2 To secure the best outcomes for them, staff need to understand when it is appropriate to share information, how much information to share and what to do with that information.

8.3.3 Staff also need to consider, from and with who, information can, and should, be sought and/or shared. This applies not only between different agencies, but also within schools.

8.3.4 All staff will report concerns directly to the Designated Safeguarding Lead on school site via CPOMS.

8.3.5 Any information shared will be logged on CPOMS, recording who it was shared with, when and for what purpose.

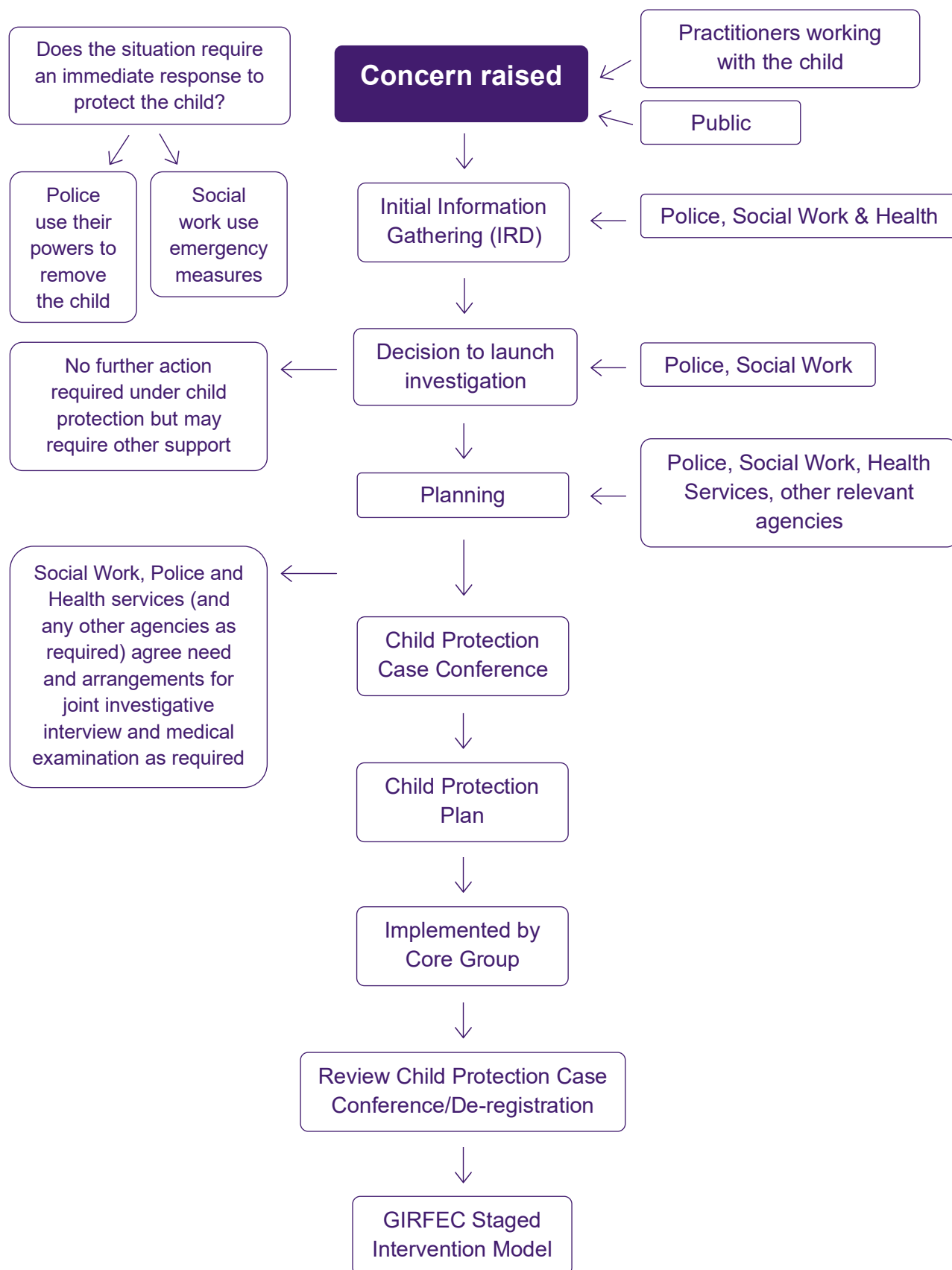
8.4 Action by the Child Protection Co-ordinator

8.4.1 All cases of alleged or suspected abuse must be treated seriously. Some may require an urgent response.

8.4.2 If the CPC is certain or has very good reason to suspect or believe that a child has been abused or requires protection or is at risk of significant harm, he/she should contact the local Social Work (Children and Families) Department Office. The Senior Social Worker will, if necessary, inform Police and Reporter to the Children's Hearing. Decisions concerning when parents are informed will be made by the Social Work Department.

- 8.4.3 It should always be borne in mind that it is not the school's role to investigate the allegations or suspicions, but to gather together what information it has about a child and pass it to the Social Work (Children and Family Services) Department or Police.
- 8.4.4 Children should not be subject to questioning by a variety of school staff. It is the responsibility of the CPC to ensure that the child is reassured and supported at all stages and that all concerned parties are informed of subsequent decisions and actions.
- 8.4.5 It would be against good investigative procedures and best evidence for children to be subject to internal investigations and thereafter re-interviewed by Social Work (Children and Family Services) and Police authorities.
- 8.4.6 Schools, and in particular the CPC are urged to establish relationships with Social Work (Children and Family Services) which will give them the confidence to seek guidance and advice when concerns arise.
- 8.4.7 The CPC should collate all relevant information held by the school on the child and complete share this with the relevant agency, sign and date it and include the reasons for the decision to make or not make a formal child protection referral to the statutory agencies.
- 8.4.8 Referrals should be made in every case where there is any substantial suspicion.
- 8.4.9 Proof is not required at this stage.
- 8.4.10 If there is doubt about whether to refer, Social Work (Children and Family) Services should still be advised of the circumstances of the allegation and the school's doubts about it.
- 8.4.11 Consideration should be given to the provision of support for the child and for the member of staff who made the report.
- 8.4.12 The Campus Principal should send a brief report of the incident in confidence to the Associate Principal for Safeguarding. The names of the people involved should not be disclosed in this report unless there are exceptional reasons for doing so.

8.5 Child Protection Process Flowchart



8.6 Principles of Information Sharing Scotland

- 8.6.1 As a general principle, children and their families have a right to know when information about them is being shared.
- 8.6.2 However, where agencies are acting in fulfillment of their statutory duties, it is not necessary or appropriate to seek consent – e.g. where a referral is made to the Scottish Children's Reporter Administration (SCRA) under the Children's Hearings (Scotland) Act 2011, the consent of a child and/or parents or carers should not need to be sought prior to the submission of a report.
- 8.6.3 There is an important distinction between making the child aware that information will/may be shared and seeking their consent for that sharing.
- 8.6.4 It is perfectly acceptable and lawful for services to share information, where there is an indication that a child is at risk of significant harm or abuse, relevant information must always be shared. Under such circumstances consent is not required.
- 8.6.5 The best interests of the child are of central importance when making decisions to lawfully share information with, or about, them.
- 8.6.6 Children have a right to express their views and have them taken into account.
- 8.6.7 At all times, information shared should be relevant, necessary and proportionate to the circumstances of the child, and limited to those who need to know.
- 8.6.8 When information is shared, a record should be made of when it was shared, with whom, for what purpose, in what form and whether it was disclosed with, or without, informed consent. Similarly, any decision not to share information and the rationale must also be recorded. This must be recorded on CPOMS.

8.7 Recording Information

- 8.7.1 Decision-making depends on having sufficient, succinct, accurate and accessible records.
- 8.7.2 A distinction should always be made between facts, hearsay and opinion.
- 8.7.3 Child Protection files should be kept separate from a Pupil's Educational Record, clearly labelled on the front as 'Confidential - Child Protection' where it is a paper copy.
- 8.7.4 A chronology should be at the front of the file and separate sections should be kept to make for easy access to relevant forms/reports e.g. Child Protection Referral Forms, Child Protection Case Conferences (CPCC) and Minutes, Children's Panel Reports and correspondence including the decisions of Children's Hearings.
- 8.7.5 Records of incidents must be logged on CPOMS and should include a note of:
 - 8.7.5.1 the child's name and any other name the child has been, or is known by
 - 8.7.5.2 the child's date of birth
 - 8.7.5.3 the pupil's Scottish Candidate Number (SCN).

8.7.5.4 a chronology of significant events (e.g. dates of staff contacts with children and their parents; actions and decisions and the rationale behind them; outcomes of interventions including positive outcomes.

8.7.5.5 all contacts with the child and their family/carers including whom information was shared with. It should be reviewed and monitored by the CPC. Access to these files should be restricted to the CPC, the Head of School and any member of staff delegated by the Head of School.

9. ROLES AND RESPONSIBILITIES

9.1 The Board of Trustees will:

9.1.1 Provide guidance in line with their responsibility as the proprietor to ensure policy, practice and training is in place in line statutory obligations. The National Board of Trustees will appoint a Regional Team Leader to oversee this.

9.1.2 Safeguard and promote the welfare of children to protect them from maltreatment, to prevent impairment of children's health or development ensuring that children grow in circumstances consistent with the provision of safe and effective care and taking action to enable children to have the best outcomes. This is a strategic role, and the CA team would not ordinarily be involved in the day-to-day response to operational safeguarding matters except where the CA is a member of the Campus Safeguarding Committee.

9.1.3 Ensure that there is a mechanism in place to assist all staff, including CAs and volunteers understand and discharge their role and responsibilities to safeguarding in line with the statutory guidance.

9.2 The National Board of Trustees will:

Appoint a Safeguarding CA (Governor) to:

9.2.1 take a lead in monitoring that the statutory requirements and procedures set out in this policy are adhered to.

9.2.2 Be responsible for undertaking annual reviews on behalf of the National Board of Trustees and evaluation at the Campus of the Safeguarding & Child Protection Policy and procedures in conjunction with the Designated Safeguarding Lead.

9.2.3 Provide an annual report to the National Board of Trustees on the safeguarding provision

9.2.4 Meet regularly (at least termly) with the CPC to discuss updates, reviews and evaluation of the Safeguarding and child protection policies and procedures.

9.2.5 Be trained in child protection and inter-agency working. This training will be updated every two years or in line with the statutory requirements

9.2.6 Ensure that a comprehensive annual safeguarding audit is undertaken and that all action points are recorded on the School Improvement Plan and remedied.

9.2.7 Ensure that the safeguarding performance reports are completed as required, their outcomes discussed, and any learning actioned on the School Improvement Plan.

9.2.8 Have procedures in place to handle allegations against other children (peer on peer); youth produced sexual imagery and how to handle allegations about staff members, including allegations against the Campus principal and CAs, volunteers or visitors to the school.

9.2.9 Ensure the Campus' Safeguarding and Child Protection Policy is available publicly and on the Campus website.

9.2.10 Ensure that the CPC and DCPO have time, funding, training, support and resources to undertake their role and to support other staff within the Campus.

9.2.11 Ensure that appropriate child protection training is in place (current and up to date) for the CPC and DCPO

9.2.12 Ensure that new staff members taking on a CPC role are appropriately trained

9.2.13 Ensure that appropriate child protection training is in place as part of the induction for all staff including temporary and voluntary staff and that it is updated annually or in line with the statutory requirements and that there is no lapse in training dates. Safeguarding training must always include an element of face to face, interactive training.

9.2.14 Ensure that the children are aware of who the CPC and the pastoral team are and who is responsible for their wellbeing; how they will respond to a safeguarding concern and what the procedure involves.

9.2.15 Ensure that the children are aware of the ICT Policy and that they are taught about keeping safe online, including cyber bullying and youth produced sexual imagery.

9.3 The Child Protection Co-ordinator (CPC)

9.3.1 The Campus Principal should ensure an appropriate senior member of staff is appointed to the role of the CPC.

9.3.2 This person should take lead responsibility for safeguarding and child protection.

9.3.3 This should be explicit in the role holder's job description, and he/she should have the appropriate status and authority within the school to carry out the duties of the post.

9.3.4 They should be given the time, funding, training, resources and support to provide advice and support other staff on child protection matters, to take part in discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

9.3.5 The wellbeing and protection of children and the efficient operation of the school's Child Protection Procedures will be facilitated by the CPC.

9.3.6 Assigning the role of CPC to a member of staff who is not the Campus Principal does not preclude the involvement of the Campus principal in discussions about child protection concerns.

9.3.7 The CPC has both general, and particular, responsibilities with regard to child protection.

9.3.8 The key responsibilities are:

9.3.8.1 staff induction - supplying new members of staff with a written copy of the procedures e.g. induction card/leaflet/summary chart of the Child Protection Procedures, as well as the Code of Conduct and emphasising their importance and maintaining a record of these

9.3.8.2 ensuring that all staff are aware of the school's Child Protection procedures and any amendments to them

9.3.8.3 organising staff briefings and training on child protection: new staff should receive a briefing and undergo a Child Protection Course for the 'Specific Contact Workforce'

9.3.9 Other staff should receive an updated briefing annually from the CPC with whole staff training from an external Child Protection Consultant every 2-3 years:

9.3.9.1 overseeing the planning of any curricular provision designed to give children the knowledge and skills to keep themselves safe from all forms of abuse including online safety

9.3.9.2 understanding the specific needs of children in need, those with special educational needs and young carers

9.3.9.3 be able to keep detailed, accurate, secure written records of concerns and referrals

9.3.9.4 referring cases of suspected abuse to the statutory agencies

9.3.9.5 supporting staff who raise a concern

9.3.9.6 liaising with other agencies, e.g. Police, Social Work (Children and Family Services), Health, the SCRA in matters relating to child protection

a. listening and responding to general concerns raised by staff, pupils and parents/carers in relation to child protection

9.3.9.7 co-ordinating action within the school in relation to specific children about whom concerns have been raised

9.3.9.8 delegating responsibilities to the most appropriate person, e.g. in situations where the CPC may not be the most appropriate person to support a particular child when an allegation has been made

9.3.9.9 having knowledge of how local authorities conduct a Child Protection Case Conference and Review Conference and be able to attend and contribute to these effectively

9.3.9.10 ensuring they receive updated training for the 'Intensive Contact Workforce' on a regular basis (the Head of School should also receive training at this level).

9.3.10 CPCs must ensure their professional knowledge and skills are as up to date as possible in a changing landscape.

9.3.11 The line manager of the CPC together with the CPC should assess the professional learning requirements of their CPCs to determine if more frequent, annual training is necessary e.g. new or inexperienced staff appointed as CPCs may benefit from more frequent training in order to build their own knowledge and skills and confidence in managing child protection:

- a. review the school's procedures annually
- b. audit child protection at regular intervals
- c. maintain a record of all Child Protection Referrals.

9.4 The Campus Principal will:

9.4.1 Ensure that the Safeguarding Policy and its procedures are implemented and followed by all staff

9.4.2 Undertake the CPC Training as per the statutory requirements

9.4.3 Ensure that safeguarding, including helping to protect students from a range of risks, including e-safety, is fully explored in teaching and learning opportunities within the curriculum

9.4.4 Ensure that students are able to identify a trusted adult to listen to their concerns

9.4.5 Ensure that there is a Safeguarding Notice Board in the Staff Room demonstrating how the Campus keeps children safe, to include e-safety. It will include how to report a concern, training dates, policies, posters, roles and responsibilities of safeguarding personnel, safeguarding up-dates, the statutory guidance and other publications and communications with regard to safeguarding

9.4.6 Ensure Safeguarding Notices are displayed around the school, at reception and in all communal areas.

9.4.7 Meet with the CPC to be kept informed of on-going situations.

9.4.8 Be the appointed member of staff to promote the achievement of looked after children.

9.4.9 Be alert to children who go missing in education and put in place the appropriate safeguarding response.

9.5 Campus staff will:

9.5.1 Know who holds the CPC and Deputy CPC roles within the Campus.

9.5.2 Receive annual training and regular updates in safeguarding and child protection, (e.g. minuted staff meetings, e-bulletins etc.). Prevent awareness training, recognising the signs of Mental Health issues and on-line safety will be part of this.

9.5.3 Adhere to the Staff Code of Conduct.

9.6 Campus Safeguarding Committee will:

9.6.1 Meet every fortnight to ensure compliance with the obligations set out below.

9.6.2 Ensure that the Campus complies with its safeguarding obligations set out in relevant legislation, regulations and guidance and any rules issued by OSG UK

9.6.3 review safeguarding practice, in order to ensure the campus' fulfilment of its safeguarding obligations

9.6.4 work in partnership to ensure that the CSC is properly informed by appropriate information sharing and enabled to act effectively in addition to the specific roles of the CPC and DCPO

9.6.5 develop a holistic view of the safeguarding arrangements in place for individual students

9.6.6 identify and reflect on issues and patterns of concerns which may require a revision of safeguarding practice and policy.

9.7 Regional Safeguarding Coordinator will:

9.7.1 Provide guidance to all Campuses on policy and procedures related to Safeguarding.

9.7.2 Provide advice and guidance to Campus Principals and Safeguarding governance team in the implementation of the Safeguarding Policy, procedures and for training of staff, parents, volunteers and students.

9.8 Regional Safeguarding Committee will:

9.8.1 Ensure that Safeguarding has the appropriate importance and organisational priority.

9.8.2 Ensure that OSGUK and all Campuses comply with their safeguarding obligations as set out in relevant legislation, regulations and guidance and any rules issued by OSGUK.

9.8.3 Review national trends in safeguarding and child protection, in order to advise on improvements to policy and procedure for all Campuses; make recommendations on safeguarding strategy, policies and practice, including lessons learnt from ineffective practice, in order to ensure that OSGUK and Campus' fulfilment with their safeguarding obligations.

9.8.4 Identify and assess the safeguarding risks faced by OSGUK and Campuses and to recommend measures to mitigate those risks including the maintenance of a safeguarding risk register.

9.8.5 Hold line management (Regional Principals, Campus Principals and DSLs) to account on implementation of safeguarding policies in schools.

9.8.6 Identify and reflect on issues and patterns of concerns which may require a revision of safeguarding policies or practice.

9.9 Regional Principal will:

9.9.1 regularly audit safeguarding procedures at the Campus and make recommendations, where necessary, for improvement or sharing of good practice and to report on its effectiveness to the Board of Trustees.

- 9.9.2 be aware of the numbers of Safeguarding referrals having been made, including allegations against staff members. Specific details of referrals relating to children do not need to be shared.
- 9.9.3 provide professional support in the event of disciplinary procedures against students or adults at the Campus.
- 9.9.4 Not be expected, unless acting as Campus Principal to advise on specific referrals to external agencies.

10. BULLYING AND CYBERBULLYING

- 10.1 The most recent research findings in the UK found that one in five young people are experiencing some form of bullying.
- 10.2 The impact bullying has on children can be enormous, affecting a child's confidence, self-esteem and their mental health.
- 10.3 The Campus has an anti-bullying policy provides a framework for proactive and reactive strategies and includes cyberbullying and is based on the 'Respect' Guidelines.
- 10.4 Child on Child Abuse (COCA)
 - 10.4.1 COCA abuse is most likely to include, but may not be limited to:
 - 10.4.1.1 bullying (including cyberbullying)
 - 10.4.1.2 physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - 10.4.1.3 sexual violence, such as rape, assault by penetration and sexual assault
 - 10.4.1.4 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
 - 10.4.1.5 upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - 10.4.1.6 sexting (also known as youth produced sexual imagery), and
 - 10.4.1.7 initiation/hazing type violence and rituals.
 - 10.4.2 COCA in any form will not be tolerated and will be taken seriously. It will not be simply seen as banter, 'having a laugh', or 'part of growing up'. The Campus will put the safety, health and well-being of the child at the forefront of any action taken.
 - 10.4.3 The Campus has put in place safeguards to reduce the likelihood of COCA. There is an established ethos of moral integrity, respect, friendship, courtesy and kindness with a clear Behaviour Policy and visible staff presence. We seek to educate all students on healthy relationships through the curriculum by exploring concepts such as consent, gender roles, stereotyping and equality. We recognise that, despite this, we need to be alert to COCA.

10.4.4 Any COCA allegation must be referred to the CPC using CPOMS to record what has happened and any action taken. Where a concern regarding COCA has been disclosed to the CPC advice and guidance may be sought from the local Social Work Department Office.

10.4.5 Where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. If a student's behaviour negatively impacts on the safety and well-being of others, then safeguards will be put in place to promote the welfare of the students affected.

10.4.6 In relation to understanding exactly what has happened and why. the Campus recognises the influences of peers and family beyond the 'school gate'. The extra familial harms aspect is very important in determining the best action to take going forward.

10.4.7 As a Campus, we recognise the research that suggests COCA can be gender based, as COCA manifests differently for boys and girls. Boys are at greater risk of gang violence whereas girls are at greater risk of sexual assault and sexual exploitation.

10.5 Domestic Abuse

10.5.1 Domestic abuse can describe a multitude of behaviours, from physical violence to exercising total control over a partner's everyday life.

10.5.2 Victims who suffer psychological abuse at the hands of a partner previously had no legal avenue to prosecute their behaviour. The Domestic Abuse (Scotland) Act 2018 makes all domestic abuse towards a partner, whether psychological or physical, a criminal offence.

10.5.3 It redefines domestic abuse as a course of behaviour towards a partner intended to cause them harm, or which is reckless as to whether it causes harm.

10.5.4 Behaviour can mean any violent, threatening or intimidating act against a partner.

10.5.5 Importantly, it can also mean acts towards a partner, child or another person which have one of the following effects:

10.5.5.1 Making a partner dependent or subordinate, such as denying them access to money or bank cards.

10.5.5.2 Isolating a partner from friends, family or other support, such as forcing them to cancel plans or make excuses not to attend family events.

10.5.5.3 Controlling, regulating or monitoring a partner's day to day activities, such as accessing their bank statements or calling them excessively to find out where they are and punishing them for not answering.

10.5.5.4 Depriving or restricting a partner's freedom of action, such not allowing them to have keys to the house so they cannot leave or preventing them from having a job.

10.5.5.5 Frightening, humiliating, degrading or punishing a partner, such as insulting them on a regular basis or fabricating stories, such as false illness, to cause them alarm.

10.5.6 This relatively new law also provides an aggravation to the offence where the behaviour is carried out in the presence of a child. Aggravators are characteristics which make an offence worse and can result in a higher sentence.

10.5.7 In domestic abuse cases, it is sufficient that a child is present and witnesses the behaviour. The child does not need to be physically harmed themselves.

10.5.8 Children and young people living with domestic abuse are at increased risk of significant harm, through witnessing the abuse and being abused themselves. Children can also be affected by abuse even when they are not witnessing it or being subjected to abuse themselves. Domestic abuse can profoundly disrupt a child's environment, undermining their stability and damaging their physical, mental and emotional health. Domestic abuse can have a profound impact on children, both in the short and long term.

10.5.9 The best way to keep both children and non-abusive parents or carers safe is to focus on early identification, assessment and intervention through skilled and attentive staff in universal services. Domestic abuse is widely under-reported to the Police. Given the reluctance of victims to come forward, it is crucial that staff are aware of the signs of domestic abuse. All staff will undergo training in Domestic abuse to enable them to recognise the signs of DA.

10.5.10 The Domestic Abuse (Scotland) Act 2018 makes psychological domestic abuse and controlling behaviour a crime.

10.6 Parental Problematic Alcohol and Drug Misuse

10.6.1 Problematic parental substance misuse can involve alcohol and/or drug misuse (including prescription as well as illegal drugs). Alcohol and/or drug misuse during pregnancy can have significant health impacts on the unborn child. The risks to, and impact on, children of alcohol/drug-misusing parents and carers are known and well-researched and can also result in sustained abuse, neglect, maltreatment, behavioural problems, disruption in primary caregiving, social isolation and stigma of children.

10.6.2 Parents/carers with drug or alcohol problems often lack the ability to provide structure or discipline in family life.

10.6.3 Poor parenting can impede child development through poor attachment, and the long-term effects of maltreatment can be complex.

10.6.4 The capability of parents or carers to be consistent, warm and emotionally responsive to their children can be undermined.

10.6.5 It is important that all practitioners working with parents/carers affected by problematic drug and/or alcohol use know the potential impact that this has on children, both in terms of the impact on the care environment through direct exposure to alcohol and/or drug use, and also the potential practical and emotional challenges presented in terms of the recovery process.

10.6.6 The Campus has a substance misuse policy and guidance in place for the identification, assessment and management of children affected by alcohol and/or drug misuse.

10.7 Children and young people experiencing mental health problems

- 10.7.1 The emotional wellbeing of children and young people is just as important as their physical health. Most children grow up mentally healthy, but certain risk factors make some more likely to experience problems than others.
- 10.7.2 Traumatic events in themselves will not usually lead to mental health problems, but they may trigger problems in those children and young people whose mental health is not robust.
- 10.7.3 Changes, such as moving home or changing school or academic pressures, can act as triggers.
- 10.7.4 Teenagers often experience emotional turmoil as their minds and bodies change and develop.
- 10.7.5 For some young people, mental health problems will severely limit their capacity to participate actively in everyday life and will continue to affect them into adulthood.
- 10.7.6 Some may go on to develop severe difficulties and display behaviour that challenges families and services, including personality disorders.
- 10.7.7 A small number of children with mental health problems may pose risks to themselves and others.
- 10.7.8 In the most severe cases this can include self-harm and suicide.
- 10.7.9 For some young people, their vulnerability, suggestibility and risk levels may be heightened as a result of their mental illness.
- 10.7.10 For others, a need to control, coupled with lack of insight into, or regard for, others' feelings and needs, may lead to them preying on the vulnerabilities of other children. It is imperative that the school works closely with services to address these issues and mitigate risks for these children and for others.
- 10.7.11 Certain risk factors make some children and young people more likely to experience mental health problems than others. These include:
 - 10.7.11.1 having a long-term physical illness
 - 10.7.11.2 having a parent or carer who has had mental health problems, problems with alcohol/drugs or a history of offending behaviour
 - 10.7.11.3 experiencing the death of someone close to them
 - 10.7.11.4 having parents who separate or divorce
 - 10.7.11.5 having been severely bullied or physically or sexually abused
 - 10.7.11.6 living in poverty or being homeless
 - 10.7.11.7 having a learning disability
 - 10.7.11.8 experiencing discrimination, perhaps because of their race, nationality, sexuality or religion

10.7.11.9 acting as a carer for a relative,

10.7.11.10 having long-standing educational difficulties; and forming insecure attachments with their primary carer.

10.7.12 Children and young people can experience a range of mental health problems, from depression and anxiety through to psychosis. While most will recover, some are left with unresolved difficulties or undiagnosed illnesses that can follow them into adult life. Child protection is a crucial component of the service response to children and young people experiencing mental health problems. Children and young people experiencing such difficulties must have access to the right support and services and know that their issues are being taken seriously.

10.7.13 The Campus CPC will ensure that all staff have received training in how to recognise mental health issues. The staff must not try to suggest treatment, any concerns must be referred to the CPC, and the CPC will liaise with necessary agencies to engage support for the family and child.

10.8 Female Genital Mutilation (FGM)

10.8.1 FGM is a culture-specific abusive practice affecting some communities. It should always trigger child protection concerns. The legal definition of FGM is 'to excise, infibulate or otherwise mutilate the whole or any part of the labia majora, labia minora, prepuce of the clitoris, clitoris or vagina.'

10.8.2 It includes all procedures which involve the total or partial removal of the external female genital organs for non-medical reasons. There are four types of female FGM ranging from a symbolic jab to the vagina to the partial or total removal of the external female genitalia.

10.8.3 The Prohibition of Female Genital Mutilation (Scotland) Act 2005 makes it illegal to perform or arrange to have FGM carried out in Scotland or abroad. The procedure is usually carried out on children aged between four and ten years. A sentence of 14 years' imprisonment can be imposed.

10.8.4 Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out and discuss such cases with the safeguarding lead (unless they have good reason not to) and Children's Social Care. The duty does not apply in relation to at risk or suspected cases. At risk or suspected cases should follow standard safeguarding arrangements.

10.9 Child Sexual Exploitation (CSE)

10.9.1 The sexual exploitation of children and young people is an often-hidden form of children sexual abuse, with distinctive elements of exploitation and exchange. In practice, the sexual exploitation of children and young people under 18 might involve young people being coerced, manipulated, forced or deceived into performing and/or others performing on them, sexual activities in exchange for receiving some form of material goods or other entity (for example, food, accommodation, drugs, alcohol, cigarettes, gifts, affection).

10.9.2 Sexual exploitation can occur through the use of technology and without the child's immediate recognition.

10.9.3 In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are often common features; involvement in exploitative relationships being characterized in the main by the child/young person's limited availability of choice resulting from their social, economic and/or emotional vulnerability. In some cases, the sexual activity may just take place between one young person and the perpetrator (whether an adult or peer).

10.9.4 In other situations, a young person may be passed for sex between two or more perpetrators, or this may be organised exploitation (often by criminal gangs or organised groups).

10.9.5 Staff have a responsibility to follow local child protection procedures where CSE is suspected.

10.10 Forced Marriage

10.10.1 A forced marriage is one in which one or both parties do not consent to the marriage but are coerced into it (may include the use of violence and threats). This is not the same as an arranged marriage which is common in many cultures.

10.11 Homelessness

10.11.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

10.11.2 The CPC (and deputy) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

10.11.3 Indicators that a family may be at risk of homelessness include household debt and domestic abuse as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

10.11.4 It should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the CPC (or deputy) should ensure appropriate referrals are made based on the child's circumstances.

10.12 Honour-Based Violence (HBV)

10.12.1 HBV is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is a collection of practices which are used to control behaviour in families and other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators believe that a relative has shamed the family or community.

10.12.2 HBV might be committed against individuals who:

10.12.2.1 Become involved with a boyfriend/girlfriend from a different religion or culture

10.12.2.2 Want to get out of an arranged or forced marriage

10.12.2.3 Wear clothes or take part in activities that are not considered 'traditional' within a particular culture

10.13 Young Carers

10.13.1 There are an estimated 93,000 carers aged 4-24 in Scotland according to the most accurate estimate from the Scottish Health Survey (SHS).

10.13.2 It is likely that this is an underestimate as not all young carers will identify as a young carer, either because they do not see themselves in that role or because they are concerned about revealing their caring responsibilities.

10.13.3 Young carers are a diverse group of all ages and backgrounds and live in all areas of Scotland who provide help or support to family members because of either long term physical or mental ill health, (including parents with substance misuse problems) and disability.

10.13.4 In the recent 'Young carers: Review of research and data, the findings show that:

10.13.5 Being a young carer tends to be associated with poorer health and wellbeing. This is true for self-reported health, long term conditions or disabilities and mental health conditions. Although those providing more hours of care appear to have worse health, it is not possible to say the extent to which this is directly related to caring responsibilities. Other factors such as deprivation, gender and support networks are also likely to have an impact.

10.13.6 Young carers may face challenges in participating in social or leisure activities and may feel isolated as a result.

10.13.7 Caring may adversely affect a young person's education but there is inconsistent evidence on the extent of the impact. The issues most commonly found to affect young carers' education were school attendance, tiredness and bullying. Schools therefore have an important role in helping to support young carers.

10.13.8 Caring responsibilities may influence education and employment choices, and flexibility is an important factor in enabling young carers to balance different commitments. The negative impact of combining caring and education may have potentially significant enduring consequences for workforce participation and geographic and social mobility, with the risk of compounding deprivation and inequalities.

10.13.9 The evidence is stronger on the challenges facing young carers than it is on effective support and interventions. However, it does highlight the importance of recognition and an assessment of need and that effective support can be either or both for the young carer or for the cared person.

10.13.10 Evidence suggests that children and young people engaged in young carer support projects feel recognised, supported and valued. Although schools are also seen as a

potentially valuable avenue for support the evidence on effective support and interventions in schools is underdeveloped.

10.13.11 Young carers can be positive about their caring role and feel that it brings benefits. Given the impact of caring on young people, access to an assessment of their needs and support is critically important. Improving access to assessments and support requires awareness of young caring amongst professionals and service providers and ensuring that assessments and support are provided in a way that is sensitive to young people's concerns about being identified as a carer or about requiring help. Young carers can face challenges in balancing their caring responsibilities with education and employment requirements and opportunities. This has potentially profound long-term effects on socio-economic and health outcomes and on inequality. It is possible that young carers may be more likely to experience problems at school and have lower attainment although this will not apply to all young carers.

10.13.12 The CPC will be able to advise on support for a young carer and know how to accurately assess their wellbeing and support.

10.14 Helping Children To Keep Themselves Safe Including Online (Including when they are online at home)

10.14.1 Children at the Campus are taught to recognise, self-reflect and manage risk through the Campus Personal, Social, Health and Economic Education (PSHEE) curriculum, lessons and rehearsed throughout all aspects of Campus life.

10.14.2 This will include covering relevant issues through Relationships Education and Relationships and Sex Education, online safety week, the Campus tutor-time programme.

10.14.3 The Campus approach is designed to help children to think about risks they may encounter and, with staff, work out how to self-manage to reduce those risks. This should include:

10.14.3.1 discussion about risk, promoting sensible behaviour

10.14.3.2 teaching children how to conduct themselves and how to behave in a responsible manner

10.14.3.3 reminding children about e-safety, mobile devices and tackling bullying procedures

10.14.4 The main areas of online risk are:

10.14.4.1 Content - exposure to inappropriate or harmful content

10.14.4.2 Contact - being subjected to harmful online interaction with other users

10.14.4.3 Conduct - personal online behaviour that increases the likelihood of, or causes, harm

10.14.5 We will never achieve risk-aware young people who can keep themselves safe, by over-blocking content.

10.14.6 There will be training for parents in e-safety, delivered by the Campus, overseen by the CPC. Parent engagement will be tracked, to guide intervention and catch-up for any parents/carers unable to engage.

10.14.7 The Campus promotes an ethos of respect for students, and they must be aware of who to speak to in confidence about any worries they may have, including electronic reporting with the e-safety button.

10.15 ICT & E-Safety Policy

10.15.1 This Campus has a separate ICT & E-Safety policy. It details the roles and responsibilities of the whole school community as well as the method for filtering and monitoring. Breaches are reported in accordance with the ICT & E-Safety policy.

10.15.2 The ICT & E-Safety Policy also covers how to keep students safe whilst learning online at home.

10.15.3 The DSL will take a lead on the monitoring and filtering procedures and system in place in campus, they will ensure they are reviewed and are effective for keeping children safe in school using all IT devices.

10.16 E-safety reporting button

10.16.1 To ensure that students and school family have access to a confidential and direct reporting system, we have an e-safety reporting button on the main page of our Intranet. The button is for reporting concerns about e-safety, bullying, inappropriate use of computers or the internet. It is labelled as such.

10.17 Photographs and Videos of Children and Young People

10.17.1 The Campus will take all reasonable steps to safeguard pupils when they are being photographed and/or videoed.

10.17.2 These provide opportunities to celebrate school activities and pupils' achievements and are invaluable for some specific educational purposes.

10.17.3 Common sense and proportionality are required when implementing this guidance and all decisions should reflect the best interests of the pupil:

10.17.3.1 Only School equipment will be used for taking photographs/filming.

10.17.3.2 No photographs or video footage should ever be permitted in areas of personal privacy by staff or pupils e.g. changing rooms

10.17.3.3 If using an external agency, ensure the photographer has been appropriately checked and is accompanied by a member of school staff at all times.

10.17.3.4 All images and videos of pupils taken for educational purposes belong to the school and should be compatible with GDPR.

10.17.4 Parents and pupils should be informed that pupils may, from time to time, be photographed. This could be for one of the following reasons:

a. Educational purposes.

- b. Video footage for performance development.
- c. Media coverage of an event or achievement.
- d. Promotional purposes e.g. website or publication.

10.18 Physical contact with students

10.18.1 Physical contact with students must be avoided. The Staff Code of Conduct sets out expectations around professional behaviour.

11. ALLEGATIONS AGAINST STAFF

Inappropriate or Abusive Behaviour

11.1 The list below is presented to show some of the ways in which inappropriate behaviour or abuse may be manifested.

11.2 It is important to recognise that this list is neither definitive nor exhaustive, nor is it meant to suggest that all the actions below are in themselves abusive: they must be seen in the context of the interaction with the child and the intention of staff.

11.3 Staff should bear these in mind as a way of minimising risk and encouraging good practice. Staff must always exercise professional judgement in each circumstance.

11.3.1 Physical

11.3.1.1 Hitting/tapping/shaking

11.3.1.2 Pushing/jabbing

11.3.1.3 Throwing 'missiles'

11.3.2 Emotional

11.3.2.1 Inappropriate/systematic sarcasm

11.3.2.2 Isolating e.g. locked room

11.3.2.3 Unfavourable comparisons

11.3.2.4 Threats

11.3.2.5 Intimidation

11.3.2.6 Scapegoating

11.3.2.7 Systematic personal criticism

11.3.3 Sexual

11.3.3.1 Inappropriate contact by E-technology

11.3.3.2 Any sexual activity with a pupil Inappropriate touching/comforting

11.3.3.3 Suggestive remarks or gestures

11.3.3.4 Sexual harassment Indecent materials

11.3.3.5 Grooming a child for abuse

11.3.3.6 Any inappropriate online contact including sending indecent images

11.3.4 The procedures for dealing with allegations of abuse need to be applied with common sense, proportionality and judgement. Employers have a duty of care to their employees. Campuses should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

11.3.5 It is essential that any allegation of abuse is dealt with quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.

11.3.6 Allegations may be genuine, malicious or misplaced.

11.3.7 They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

11.4 Where the Allegation Suggests Possible Child Abuse

11.4.1 Any allegation of child abuse against a member of staff must be taken seriously and acted on.

11.4.2 The Campus Principal and CPC should be informed immediately.

11.4.3 If the person is deemed to be an immediate risk to children or there is evidence of a possible child abuse, advice should be taken by either the CPC or the Head of School from the Police or Social Work (Children & Families), on the day (including when and what the member of staff can be told) before anyone is questioned to ensure best evidence is preserved.

11.4.4 If the Police inform the school that they are proceeding with a criminal investigation, advice should be taken from the Investigating Officer what information (either orally or in writing) can be given, and when, to the member of staff involved in the allegation.

11.4.5 The Board of Trustees should be informed by the Campus Principal as a matter of urgency.

11.4.6 The Scottish Government issued advice on reporting restrictions preventing the publication of any material that may lead to the identification of any member of staff in a school who has been accused by a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence. The reporting restrictions are lifted if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so.

11.4.7 Taking the above into account, the Campus Principal should organise an inter-agency strategy meeting and take advice from Police and Social Work (Children and Family) Services and agree the following:

11.4.7.1 who needs to know and, importantly, exactly what information can be shared

11.4.7.2 how to manage speculation, leaks and gossip

11.4.7.3 what, if anything, can be shared with parents.

11.5 Supporting the Member of Staff

11.5.1 OSGUK has a duty of care to their employees.

11.5.2 They should act to manage and minimise the stress inherent in the allegations process.

11.5.3 Support for the individual is vital to fulfilling this duty.

11.5.4 Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action

11.5.5 The individual should be advised to contact their Professional Association/Trade Union representative, if they have one, or a colleague for support.

11.5.6 They should also be given access to counselling or medical advice where this is provided by the OSG.

11.5.7 Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues.

11.5.8 Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

11.5.9 If so, this should be discussed with the Investigating Officer in the Police.

11.6 Precautionary Suspension

11.6.1 The Campus must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children and young people at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved.

11.6.2 All options to avoid suspension should be considered prior to taking that step.

11.6.3 The school will have to consider the need to ensure that children and young people are protected while an allegation is under investigation.

11.6.4 A precautionary suspension, without prejudice to the member of staff, for the duration of the investigation, should be considered by the Head of School and Chair of Governors in cases where:

11.6.4.1 there is cause to suspect or believe a pupil or pupils are at risk of harm

11.6.4.2 the allegation warrants investigation by the Police

11.6.4.3 the allegation is so serious that it might be grounds for dismissal.

11.6.5 The Police or Social Work (Children and Family) Services cannot require the Campus Principal to suspend a member of staff. The power to suspend is vested in the Trustees. However, where the initial evaluation or an inter-agency discussion concludes that there should be enquiries by Social Work (Children and Family Services) and/or an investigation by the Police, the Campus Principal as part of a risk

assessment should seek the views of the Investigating Officer and Social Worker about whether the member of staff needs to be suspended from contact with children in order to inform consideration of suspension.

- 11.6.6 Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.
- 11.6.7 Where the member of staff concerned has had contact with a number of children, consideration should be given to the possibility that others may also have been affected.
- 11.6.8 If a decision is made to suspend the member of staff, there should be no delay in taking action, including during school holiday periods.
- 11.6.9 The member of staff should be informed immediately and informed that there should be no contact with pupils for the duration of the investigation. In the event of a member of staff being suspended while investigations are taking place, the school should consider whether it may be advisable to inform all parents or carers of children with whom the staff member concerned has had contact.
- 11.6.10 As the matter will be sub judice, advice should be sought from the Investigating Officer in the Police who may need to discuss the matter with the Procurator Fiscal.
- 11.6.11 In the infrequent event of a second allegation being made, the school would have to consider informing all parents.
- 11.6.12 Experience has shown that, once rumours and misinformation start to circulate, a lack of openness can lead to a loss of trust between parents and the school and a breakdown in relationships.
- 11.6.13 If there is enough suspicion of multiple abuse to justify enquiries being made of other children and families by Police and Social Work (Children and Family) Services, the school will wish to ensure that it is seen to be co-operating and responding appropriately to the legitimate concerns of parents or carers. In this situation, legal advice should be taken about the terms of any letter to be sent to all relevant parents or carers, and the terms of response to any enquiries from the press.
- 11.6.14 Where the matter is sub judice, no letter should be sent to the parents or carers without clearing it with the Investigating Officer in the Police who may need to clear it with the Procurator Fiscal.
- 11.6.15 A delicate balance has to be maintained between openness and confidentiality, which respects rules of law about matters which are under investigation.
- 11.6.16 In cases where abuse of a child is suspected, after consulting with Police, Social Work and the Procurator Fiscal about compliance with legal requirements, the campus should, if appropriate, enable parents (with appropriate consents), to seek counselling for individuals affected.
- 11.6.17 Should the allegations be proven, parents or carers should be informed of the facts and of the action taken by the school. If, after Police and Social Work (Children and Family Services) investigation, there is felt to be insufficient evidence for prosecution,

or where a prosecution does not result in a conviction, disciplinary action against the member of staff may still be taken, if the member of staff is considered to represent a risk to a child or children or their behaviour has caused concern. A referral to the Protecting Vulnerable Groups (PVG) Scheme may be appropriate in some circumstances.

11.7 Allegations against the Campus Principal

11.7.1 In cases where the member of staff against whom the allegation is made is the Campus Principal, the Regional Team Leader should be informed as a matter of urgency. It will be the responsibility of the Trustees to consider the matter and take appropriate action and follow this Guidance. OSG will seek independent legal advice where there is an allegation against A Campus Principal to ensure a robust approach has been followed in the investigation process.

12. HUMAN TRAFFICKING AND EXPLOITATION

12.1 This act defines a child as a person under the age of 18 years. All staff must notify Police Scotland about possible victims of human trafficking. The sexual abuse of trust offence applies to persons over 18 who are in a defined position of trust (such as teachers, care workers and health professionals) intentionally engaging in sexual activity towards a person under 18 years (Sexual Offences (Scotland) Act 2009, s42). The Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005 also defines a child as a person under 18 years in relation to sexual exploitation of children under the age of 18 through prostitution or pornography.

13. RECORD KEEPING

13.1 Child Protection records should be retained by the last school attended. The long-term security of relevant safeguarding documents and related correspondence is crucial should allegations of abuse arise. All such documents must be securely retained from the date of birth of the student plus 50 years. For further information please refer to the Retention of Records policy.

13.2 Storage provisions for all such documents must be arranged in the event of the School / Education Trust ceasing operations. Storage in these circumstances would be at the office of a solicitor, accountant or at a professional secure storage company.

13.3 The following information should be retained for a minimum of 50 years:

13.3.1 A copy of Safeguarding Policies and revisions thereof

13.3.2 Records of safeguarding training for staff

13.3.3 Records of abuse allegations or incidents including notification to the appropriate authorities

13.3.4 Copies of relevant information and accompanying correspondence relating to abuse of students whilst in our care

13.3.5 Copies of your historical public liability insurance policies

13.4 Transferring Files

13.4.1 The CPC is responsible for ensuring that the Child Protection Files are transferred to each school that a child moves to (e.g. primary to secondary) and the transfer must be conducted securely. It is good practice to request a receipt from the accepting school. The CPC will carefully consider what is transferred but it is important to give the receiving school a good understanding of any issues, a clear narrative and action taken. It may well be appropriate for the current CPC to make contact with the receiving school to assist with understanding. If a child has siblings that are staying in the same Campus, it is important to keep a copy of that child's file to retain context/background.

13.4.2 The CPC will:

13.4.2.1 ensure transfer of Child Protection Files to the new school without delay; within 5 days. Ask for confirmation of receipt from the receiving school

13.4.2.2 send separately from the student's general school file

13.5 Parent Access To Educational Records

13.5.1 Other than in exceptional circumstances, Campuses must make available for inspection or provide a copy of a student's educational record if requested to do so in writing by a parent or student. This must be supplied within 30 days of a request.

14. PREVENT DUTY GUIDANCE: FOR SCOTLAND

14.1 The guidance covers the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

14.2 All schools should undertake Prevent awareness training and would be expected to have robust procedures in place for sharing information about vulnerable individuals in line with Child Protection Procedures.

14.3 Protecting children from the risk of radicalisation is part of schools' wider safeguarding duties.

14.4 During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

14.5 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

14.6 As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences.

15. ONE-TO-ONE TEACHING, EXTENDED SCHOOL AND OFF-SITE-ARRANGEMENTS

15.1 Where staff are engaged in 1:1 teaching or coaching with students, for example, being coached for a presentation in assembly or sports day event, or receiving additional support with their studies, staff should ensure that a senior leader is aware of the 1:1 work and at all times, 1:1 discussions with students should most appropriately take place in rooms which are openly visible to other members of staff.

15.2 If other organisations provide services or activities on the site, the Campus must check that they have appropriate procedures in place, including compliance with safer recruitment procedures. The school should check the appropriateness of any visitor to the school (e.g. by open-source internet searches).

15.3 When students attend off-site activities, including day visits and work-related activities, the Campus will check that effective child protection arrangements are in place. In the case of such alternative provision the Campus should obtain written confirmation that the appropriate safeguarding checks have been conducted.

16. VIDEO CONFERENCING AND OFF-SITE ARRANGEMENTS

16.1 Where students are in Video Conference or other conference links with staff from other OSGUK Campuses there will be written assurance from the teacher's employing Campus that all vetting checks, (including DBS for England, Wales and NI and the PVG Scheme for Scotland, have been carried out and these staff will be added to this school's SCR.

17. VISITORS TO THE CAMPUS

17.1 The Campus will ensure that it complies with the Prevent Duty which requires schools to verify the suitability of all visiting speakers (e.g. internet searches).

18. SITE SECURITY

18.1 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a badge, which confirms they have permission to be on site. Red lanyards denote a lack of security clearance, and those individuals must be accompanied at all times i.e. contractors. Green lanyards denote those who are security cleared such as staff.

18.2 All security cleared OneSchool staff will wear identification badges with lanyards issued from Head Office if on school grounds.

18.3 All visitors are expected to observe the Campus' safeguarding and health and safety requirements to ensure children in Campus are kept safe.

18.4 The Campus Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised whilst on site.

18.5 The Campus will comply with the CCTV Policy.

19. ONLINE DOCUMENTS

19.1 National Guidance for Child protection Scotland 2021 (updated 2023) [National Guidance for Child Protection in Scotland 2021 - updated 2023 - gov.scot](#)

19.2 Getting it Right For Every Child <https://www.gov.scot/policies/girfec/>

19.3 Respect for All: A National Approach to anti bullying
<https://www.gov.scot/publications/respect-national-approach-anti-bullying-scotlands-children-young-people/>

19.4 Getting it Right: Named Person <https://www.gov.scot/policies/girfec/named-person/>

19.5 Getting it Right: Information Sharing <https://www.gov.scot/policies/girfec/information-sharing/>

19.6 How good is our school? [How good is our school? \(4th edition\)](#)

20. LEGISLATION

20.1 Children and Young People (Scotland) Act 2014

20.2 Children (Scotland) Act 1995

20.3 Children's Hearings (Scotland) Act 2011

20.4 Sexual Offences (Scotland) Act 2009

20.5 [Human Trafficking and Exploitation \(Scotland\) Act 2015 \(legislation.gov.uk\)](#)

20.6 [Sexual Offences \(Scotland\) Act 2009 \(legislation.gov.uk\)](#)

20.7 [Protection of Children and Prevention of Sexual Offences \(Scotland\) Act 2005 \(legislation.gov.uk\)](#)

21. ADDITIONAL GUIDANCE AND INFORMATION

21.1 Respect Me: <https://respectme.org.uk/>

21.2 NSPCC Website Link: <http://www.nspcc.org.uk/>

21.3 NSPCC website link to Preventing Abuse: <http://www.nspcc.org.uk/preventing-abuse/>

21.4 CEOPs Thinkuknow programme – Keeping children safe on-line and protecting them from sexual abuse and exploitation. <https://www.thinkuknow.co.uk/Teachers/>

21.5 Safenetwork website jointly managed by the NSPCC and Children England
<http://www.safenetwork.org.uk/Pages/default.aspx>

22. APPENDICES

22.1 Appendix 1: Scottish Council of Independent Schools: Child Protection Guidance 2019

22.2 Appendix 2: Safeguarding Posters

- a. OSG Posters
- b. Who to Contact Poster
- c. Safeguarding Contacts Poster

22.3 Appendix 3: Safeguarding Statement

23. VERSION CONTROL

Document Code	Date	Version No.	Nature of change
POL-GLOBAL-DEP-1.0			
		2.0	Updated link to 2021 Safeguarding Legislation included Updated and added link to HGIOS4 Added section on duties around Human Trafficking and Exploitation
	September 2023	3.0	Reviewed for 2023 as part of annual review. Added guidance around filtering and monitoring. Amended guidance to move from National to Regional
	September 2024	4.0	Policy Reviewed
POL_UK_ED_Safeguarding and Child Protection - Scotland_V4.1	September 2025	4.1	Policy Reviewed and links updated