



**OFG**  
Education

# SAFEGUARDING POLICY



Designated Safeguarding Lead: Alison Goodmanvaughan

Safeguarding & Governance Lead: Toni Woods

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## 1.0 Policy statement and Scottish statutory framework

Safeguarding is everyone's responsibility. HCCE is committed to ensuring that every child and young person educated at Closeburn House School and Maben House School is safe, heard, respected and supported. Safeguarding and child protection are central to all decisions, planning, policies and day-to-day practice, including learning on site, off-site activities, transport, work experience, alternative provision, home visits and online or remote activity.

In carrying out its responsibilities to safeguard and promote the wellbeing of children and young people, HCCE will act in accordance with the National Guidance for Child Protection in Scotland 2021, updated 2023; Getting it right for every child (GIRFEC); Dumfries and Galloway multi-agency child protection guidance; relevant Scottish legislation and statutory guidance; and the requirements applying to independent schools in Scotland.

HCCE will have regard to children's rights under the United Nations Convention on the Rights of the Child (UNCRC) and the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024. Practice will also reflect the Human Rights Act 1998 and Equality Act 2010.

Where a child or young person is placed by another local authority, HCCE will work with both the host authority and the placing authority. The school remains responsible for ensuring that safeguarding arrangements are effective when a learner attends alternative provision or work experience.

Maben House School operates alongside a separately registered residential care service. This education policy applies to the school. Where an incident also engages the responsibilities of the registered care service, the relevant care policy, statutory notification and Care Inspectorate requirements must be followed in parallel. School safeguarding action must never be delayed by organisational notification processes.

## Terminology

- "Team member" includes employees, agency staff, contractors, consultants, trainees and any other adult working on behalf of HCCE.
- "Child" means a person under 18 for child-protection purposes. Where HCCE supports a learner aged 18 or over, adult support and protection arrangements may apply.
- "Young person" and "learner" are used inclusively for children and young people educated by HCCE.
- "Additional support needs (ASN)" is used where the Scottish legal meaning is intended.
- For learners aged 16 or over receiving qualifying care, support or welfare services, protected-adult / adult-support-and-protection duties may also be relevant. The DSL will seek advice where the correct framework is unclear.

## 2.0 Local safeguarding arrangements

HCCE covers Closeburn House School and Maben House School. Both schools are located in Dumfries and Galloway and will follow the local multi-agency child protection arrangements of the Dumfries and Galloway Public Protection Partnership, alongside the procedures of any placing authority.

The local strategic public protection arrangements bring together Dumfries and Galloway Council, NHS Dumfries and Galloway, Police Scotland, the Scottish Children's Reporter Administration, Care Inspectorate and other relevant agencies.

### 2.1 Key HCCE roles

- Designated Safeguarding Lead (DSL): Alison Goodmanvaughan
- Deputy Designated Safeguarding Lead: Grace Little
- Headteacher: Alison Goodmanvaughan
- Regional Director / Safeguarding & Governance Lead: Toni Woods

### 2.2 Reporting a child protection concern

- Dumfries and Galloway Social Work Access Team: 030 33 33 3001 (including out-of-hours calls).
- Email: [accessteam@dumgal.gov.uk](mailto:accessteam@dumgal.gov.uk).
- Immediate danger: Police Scotland 999.
- Police Scotland non-emergency: 101.

A concern that a child or young person may be at risk of harm must be referred without delay. HCCE will follow the Dumfries and Galloway child protection referral process. Where required by local procedure, the initial telephone referral will be followed by written information. The DSL will also notify the placing authority where relevant.

Where the concern relates to a learner aged 16 or over and adult support and protection may apply, the DSL will contact the Dumfries and Galloway Social Work Access Team and follow Adult Support and Protection (Scotland) Act 2007 procedures as appropriate.

## 2.3 Professional disagreement and escalation

Where professionals disagree about thresholds, risk, service provision or the Child's Plan, HCCE will first seek resolution through direct professional discussion and management oversight. Where this does not resolve the issue, the Dumfries and Galloway Children's Services Resolution and Escalation Protocol will be used. Escalation must not delay immediate protective action.

## 2.4 Prevent referrals

Concerns about potential radicalisation will be reported to the DSL. The DSL will apply the Scottish 'notice, check, share' approach and, where a referral is indicated, use the current Prevent National Referral Form for Scotland and the Police Scotland Prevent referral route. Immediate risks or suspected offences will be reported to Police Scotland without delay.

## 2.5 Allegations about adults

Scotland does not use the English Local Authority Designated Officer (LADO) model. Allegations about adults working with children must be reported immediately through HCCE/OFG allegation-management procedures and to the DSL and Regional Director. The DSL/Regional Director will seek advice from Dumfries and Galloway Social Work where child protection concerns arise, involve Police Scotland where criminal conduct or significant harm may be involved, and consider Disclosure Scotland, GTCS, SSSC, Care Inspectorate and other professional-regulator notifications or referrals as applicable.

## 2.6 Contextual safeguarding profile

The DSL will complete and review an annual safeguarding contextual profile by the end of the autumn term, drawing on local and school data. It will consider exploitation, domestic abuse, serious violence, missing episodes, online harms, weapon-related concerns, radicalisation, local transport/community risks, attendance, child-on-child abuse, bullying, prejudice-based harm and emerging safeguarding themes. Findings will inform training, curriculum, supervision, risk assessment and governance assurance.

# 3.0 What safeguarding and child protection mean in Scotland

Safeguarding is the wider activity of promoting children's welfare, rights and wellbeing and protecting them from harm. Child protection is part of safeguarding and concerns the processes undertaken when there are concerns that a child may be at risk of significant harm.

HCCE applies the GIRFEC approach. Wellbeing is considered through the SHANARRI indicators: Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible and Included. A wellbeing concern does not need to reach a child-protection threshold before support is offered. Equally, early support must never delay a child-protection referral where risk of significant harm is suspected.

Harm may arise from abuse, neglect, exploitation or other adverse experiences and can occur within families, institutions, peer groups, intimate relationships, communities or online. It may be caused by an adult or another child or young person and can involve a single incident or a pattern of behaviour.

## 3.1 Forms of abuse and harm

- Physical abuse - physical injury or harm, including fabricated or induced illness.
- Emotional abuse - persistent emotional ill-treatment that has a harmful effect on a child's emotional development and wellbeing.
- Sexual abuse - involving or coercing a child in sexual activity, contact or non-contact, online or offline.
- Neglect - persistent failure to meet a child's basic physical, emotional, health, supervision or developmental needs.
- Exploitation - including child sexual exploitation, child criminal exploitation, trafficking, modern slavery and financial exploitation.

- Domestic abuse - including the impact on children who see, hear or experience the effects of abuse in the home or in their own relationships.
- Online abuse and technology-facilitated harm - including grooming, coercion, sexual extortion, harmful content, manipulation and AI-generated or altered content.
- Child-on-child abuse - including bullying, harassment, violence, coercive control, harmful sexual behaviour and abuse in intimate relationships.

### 3.2 Contextual safeguarding

HCCE will consider risks beyond the family home, including peer groups, transport, neighbourhoods, community locations, education placements and online environments. Assessment and planning will consider how these contexts interact with the child's strengths, vulnerabilities, relationships and support network.

## 4.0 Role of the proprietor, governance lead and senior leaders

The proprietor, Regional Director/Safeguarding & Governance Lead and senior leaders have strategic responsibility for ensuring that HCCE complies with Scottish safeguarding duties and that safeguarding arrangements are effective in practice.

- ensure an appropriate senior leader is appointed as DSL and there is trained deputy cover;
- receive safeguarding and child-protection training sufficient to provide informed challenge and assurance;
- ensure safer recruitment, PVG and professional-registration arrangements are implemented and audited;
- monitor safeguarding culture through audits, pupil voice, staff feedback, data analysis and annual self-evaluation;
- ensure children's views and lived experiences inform safeguarding improvement;
- ensure appropriate filtering and monitoring arrangements are in place and reviewed at least annually as an OFG safeguarding control;
- ensure safeguarding requirements are considered when premises are used by third parties and when learners attend off-site provision;
- ensure equality, human rights, UNCRC and reasonable-adjustment duties are considered in safeguarding decisions;
- ensure local and placing-authority multi-agency procedures are understood and followed.

Safeguarding & Governance Lead: Toni Woods.

## 5.0 Designated Safeguarding Lead (DSL)

DSL: Alison Goodmanvaughan. Deputy DSL: Grace Little.

The DSL is the lead professional within HCCE for safeguarding and child protection. The DSL and Deputy DSL must have appropriate role-specific training and regular updates. The Headteacher will ensure robust cover arrangements so that safeguarding concerns can be received, monitored and acted on without delay whenever the DSL is unavailable.

- provide advice and support to team members and ensure children are immediately safeguarded from harm;
- make or coordinate referrals to Social Work, Police Scotland, placing authorities, the Children's Reporter and Prevent as appropriate;
- liaise with other professionals and contribute to inter-agency referral discussions, assessments and planning;
- ensure children's views, communication needs and rights are considered;
- oversee safeguarding records and ensure decisions, rationale and outcomes are clear and timely;

- analyse safeguarding, attendance, behaviour, bullying, child-on-child abuse, online-safety and restrictive-practice data for patterns and emerging risks;
- lead on safeguarding concerns identified through web filtering and monitoring;
- ensure safeguarding information is transferred securely when a learner moves, with a clear contextual summary of current risks and support needs;
- ensure safeguarding training, induction and local procedure updates are delivered;
- keep senior leaders and the Safeguarding & Governance Lead appropriately informed.

Safeguarding records must be secure, accurate, chronological and sufficiently detailed to show the concern, action taken, decision-making, rationale and outcome. Records should distinguish fact, observation, professional opinion and information provided by others.

## 6.0 Safeguarding training and updates

All team members must receive safeguarding and child-protection training at induction and regular updates thereafter. Training must reflect Scottish legislation, National Child Protection Guidance, GIRFEC, local Dumfries and Galloway procedures and HCCE/OFG policies.

Training and updates will include, as relevant: recognising abuse and neglect; exploitation; child-on-child abuse and harmful sexual behaviour; domestic abuse; online safety and AI-related risks; information sharing; ASN and communication needs; medical and complex health vulnerabilities; attendance and missing education; prejudice-based harm; serious violence; Prevent; mental health; restrictive practice; allegations about adults; and local reporting arrangements.

OFG mandatory safeguarding learning and competency checks remain organisational requirements. Any England-specific elements within Group learning must be interpreted through the Scottish legal and procedural framework.

DSLs and deputies will refresh advanced safeguarding training at least every two years and receive updates more frequently when guidance, local procedures or risks change.

## 7.0 Roles and responsibilities of team members

Every team member has a personal responsibility to safeguard children and young people. Concerns must be reported; team members must never assume that someone else will act.

- know the DSL, Deputy DSL and safeguarding cover arrangements;
- understand local referral routes and how to escalate a concern;
- listen to children and take disclosures seriously;
- maintain professional curiosity and be alert to subtle changes in presentation, behaviour, attendance, communication, health or relationships;
- recognise that ASN, disability, trauma, communication differences and complex health needs can increase barriers to disclosure and can also make signs of harm harder to identify;
- report concerns verbally to the DSL/deputy immediately and record them on the school's safeguarding recording system on the same working day;
- follow up if they believe appropriate action has not been taken and escalate when necessary;
- maintain confidentiality while sharing relevant safeguarding information with those who need it;
- model safe, respectful professional behaviour and maintain appropriate boundaries.

### 7.1 Gender, identity and additional vulnerability

A child or young person questioning or expressing their gender or sexual orientation is not, in itself, a safeguarding concern. HCCE will remain alert to additional vulnerabilities such as bullying, discrimination, family conflict, exploitation, online harm, mental-health concerns or barriers to seeking help. Support decisions will be individualised, rights-respecting and informed by safeguarding, equality, privacy, the child's views, parental involvement where appropriate, and relevant professional advice.

## 7.2 Medical and complex health needs

Changes in attendance, presentation, communication, medication, care routines or engagement may indicate safeguarding concerns. Relevant healthcare plans, Child's Plans, co-ordinated support plans and professional information should inform assessment. A safeguarding referral must be considered where an incident or pattern suggests increased risk of abuse, neglect or exploitation.

## 7.3 Care-experienced children and children living away from home

Care-experienced children and young people may have additional vulnerabilities. HCCE will work closely with the placing authority, social worker and other relevant professionals. Where a child is living with relatives, family friends, foster carers or another arrangement away from their parents, the DSL will seek local authority advice where the arrangement raises child-protection, kinship-care, private-fostering or regulatory questions.

## 8.0 Safer recruitment and PVG arrangements

HCCE will follow the Group Safer Recruitment and Selection Policy together with Scottish legal requirements. England-specific DBS and barred-list provisions do not apply to HCCE as the legal basis for Scottish recruitment.

- the Protecting Vulnerable Groups (PVG) Scheme and Disclosure Scotland;
- assessment of whether a post is a regulated role with children under current Scottish legislation;
- the legal prohibition on allowing a barred person to carry out a regulated role;
- appropriate PVG membership/disclosure checks before regulated-role duties commence;
- GTCS registration for teachers where required;
- SSSC registration where applicable;
- identity, right-to-work, qualification, employment-history and reference checks;
- proportionate suitability checks for agency workers, contractors, placement personnel and others according to their duties;
- a clear Scottish record of pre-employment and safeguarding checks, maintained securely and audited regularly.

The English 1 September 2026 volunteer-supervision rule and DBS Single Central Record requirements are not adopted as Scottish legal requirements. HCCE will maintain auditable recruitment records that evidence compliance with Scottish independent-school registration, Disclosure Scotland and professional-registration requirements.

## 9.0 GIRFEC, early support and multi-agency planning

HCCE will use GIRFEC to identify wellbeing needs early and coordinate proportionate support. Support may include universal services, targeted support, a Child's Plan, Team Around the Child or other local multi-agency planning.

A wellbeing pathway must not delay child-protection action. Where there is reason to believe a child may be at risk of significant harm, the DSL will make an immediate referral to Social Work and involve Police Scotland where appropriate.

The DSL will consider referral to the Children's Reporter where compulsory measures may be required and will work with Social Work and the placing authority in determining the appropriate route.

Particular attention will be given to children and young people who are disabled or have ASN, are care experienced, have medical or mental-health needs, are young carers, are pregnant or parents, are frequently absent, are at risk of exclusion, display harmful behaviour, are at risk of exploitation or trafficking, are affected by family substance use/domestic abuse/offending, or may be at risk of FGM, forced marriage or radicalisation.

## 10.0 Reporting concerns and responding to disclosures

All safeguarding concerns must be reported to the DSL or Deputy DSL immediately and recorded on the HCCE safeguarding recording system as soon as practicable on the same working day. Organisational reporting must never delay a referral needed to protect a child.

### 10.1 If a child or young person discloses

- listen calmly and take the child seriously;
- reassure them that they have done the right thing by speaking;
- do not promise confidentiality or secrecy;
- do not ask leading questions or investigate;
- record the child's words as accurately as possible, distinguishing direct quotation from observation;
- report immediately to the DSL/deputy;
- preserve relevant evidence where appropriate and avoid unnecessary handling of digital material.

If neither the DSL nor Deputy DSL is available, the concern must be reported to the Headteacher or Toni Woods, Regional Director/Safeguarding & Governance Lead. If a child is in immediate danger, any team member may contact Social Work or Police Scotland directly and must inform the DSL as soon as possible.

Team members must follow up where they are not satisfied that appropriate action has been taken. Professional disagreement should be escalated rather than allowed to delay safeguarding.

## 11.0 Referrals to Disclosure Scotland and professional/regulatory bodies

Employment decisions, child-protection referrals, barring referrals, professional-regulator referrals and care-service notifications are separate processes and each must be considered on its own legal test.

- Disclosure Scotland - where the statutory referral criteria are met in relation to a regulated role;
- GTCS - where concerns relate to the fitness to teach of a registered teacher;
- SSSC - where concerns relate to a worker registered with SSSC;
- Care Inspectorate - where the matter relates to a registered care service and notification criteria are met;
- HCPC or another relevant regulator - where applicable to the professional involved.

The Headteacher/Regional Director will liaise with OFG Safeguarding and People/HR to ensure required referrals and notifications are made at the appropriate time. England-only referrals to the Teaching Regulation Agency do not apply to HCCE.

## 12.0 Partnership working and information sharing

Effective safeguarding depends on timely, proportionate and purposeful information sharing. UK GDPR and the Data Protection Act 2018 do not prevent sharing information where it is necessary and lawful to safeguard a child.

- share information with the right people at the right time where necessary to protect or promote welfare;
- consider relevance, necessity, proportionality and accuracy;
- record the rationale for decisions to share or not share;
- seek advice where needed, but do not allow uncertainty about data protection to delay necessary protective action;
- normally be open with the child and family about information sharing unless doing so would increase risk, prejudice an investigation or otherwise be inappropriate.

HCCE will work with host and placing authorities, Social Work, Police Scotland, NHS services, SCRA, care services and other relevant agencies. Emergency contact information will be kept up to date, with more than one contact where reasonably possible.

## 13.0 Child-on-child abuse, harmful sexual behaviour, harassment and violence

HCCE recognises that children and young people can harm other children and that abuse can occur inside or outside school, in transport, residential/community contexts and online. All reports will be taken seriously. The absence of reports does not mean abuse is not occurring.

- bullying, including prejudice-based and discriminatory bullying;
- physical assault, threats and weapon-related harm;
- abuse in intimate or peer relationships, including coercive control and financial exploitation;
- harmful sexual behaviour, sexual harassment and sexual violence;
- non-consensual or harmful sharing of intimate images, including AI-generated or altered images;
- upskirting and technology-facilitated sexual abuse;
- initiation or hazing-type violence and humiliation;
- racism, faith-targeted abuse, misogyny, misandry, homophobia, biphobia, transphobia and other discriminatory harm.

The DSL will lead a child-centred, trauma-informed and contextual response. Immediate safety, risk assessment, support for all children involved, communication with parents/carers where appropriate, evidence preservation and referral to Social Work/Police Scotland will be considered. Where sexual violence or another potentially criminal offence is alleged, Police Scotland and Social Work will be consulted without delay as appropriate.

Risk and needs assessments will consider the child harmed, the child alleged to have caused harm, witnesses, wider peer dynamics, transport, online risks, location, supervision and any need for separation or protective arrangements. Such arrangements are safeguarding measures and must not be presented as a finding of guilt.

Records will be reviewed for patterns, repeat behaviours, unsafe locations, online trends, peer-group dynamics and cultural issues. Learning from incidents will inform curriculum, supervision, training and environmental changes.

## 14.0 Bullying and prejudice-based harm

Bullying can cause significant harm and may be a safeguarding matter. HCCE will take reports of bullying, cyberbullying, racism, faith-based prejudice, homophobia, biphobia, transphobia, sexism, misogyny, misandry and other discriminatory behaviour seriously.

Practice will align with Scotland's anti-bullying framework and HCCE's Anti-Bullying and Relational and Inclusive Behaviour policies. Children who experience harm will be supported, and children displaying harmful behaviour will be helped to understand impact, develop safer behaviour and repair relationships where appropriate.

## 15.0 Preventative safeguarding education

Safeguarding education will be embedded through Curriculum for Excellence, particularly Health and Wellbeing, Relationships, Sexual Health and Parenthood (RSHP), literacy/digital learning, pastoral support and wider opportunities.

Learning will be age, stage, communication and developmentally appropriate and will cover healthy relationships, consent, boundaries, equality, prejudice, online safety, grooming, exploitation, harmful sexual behaviour, sexual harassment and violence, AI/deepfakes, coercion, reporting concerns and accessing support.

For learners with limited verbal communication or complex needs, HCCE will use accessible communication, observation, modelling, visuals and individualised teaching so that safeguarding education is meaningful and not reliant on spoken disclosure.

## 16.0 Online safety, filtering and monitoring

Online safety is an integral part of safeguarding. HCCE will help learners build digital resilience and recognise content, contact, conduct and commerce risks, including grooming, sexual extortion, harmful online challenges, scams, misinformation, gambling, misogynistic content, intimate-image abuse and AI-generated or manipulated content.

HCCE will maintain appropriate filtering and monitoring systems on school networks and devices. Responsibilities will be assigned clearly and effectiveness will be reviewed at least annually, together with an online-safety risk assessment. For HCCE this is an organisational safeguarding control; English DfE filtering standards are not treated as binding Scottish statutory requirements.

Online safeguarding concerns must be reported through the same safeguarding route as offline concerns. Criminal or child-protection concerns will be referred to Police Scotland and/or Social Work as appropriate.

Relevant related policies include Staying Safe Online, Web Filtering & Monitoring, Mobile & Smart Technology and AI policies.

## 17.0 Children and young people absent from education

Absence can be an important safeguarding indicator. HCCE will follow the Education (Scotland) Act 1980, Scottish attendance guidance and the school's Attendance Policy, including the principles of Included, Engaged and Involved Part 1: Improving Attendance in Scotland's Schools (2026).

HCCE will monitor repeated, prolonged, unexplained and partial-day absence, including adapted or part-time timetables. The school will seek to understand barriers to attendance through a relational, trauma-informed and GIRFEC approach while maintaining appropriate safeguarding vigilance.

- make prompt contact with parents/carers when absence is unexplained;
- make reasonable enquiries to establish the child's whereabouts and safety;
- record actions and outcomes;
- inform the placing authority where relevant;
- refer to Social Work where absence gives rise to safeguarding concerns;
- follow local procedures for children missing from education;
- escalate serious missing-person or immediate-risk concerns to Police Scotland.

## 18.0 Child sexual and criminal exploitation

Child sexual exploitation (CSE) and child criminal exploitation (CCE) are forms of child abuse involving an imbalance of power and coercion, manipulation or deception. Exploitation can occur online or offline and may involve trafficking, organised networks, gangs, financial exploitation or modern slavery.

All team members must know the signs and indicators of exploitation and report concerns immediately to the DSL. Where there is immediate concern for safety, the DSL will make a same-day referral to Social Work and contact Police Scotland. HCCE will also consider wider contextual risks and support through relevant local services.

HCCE will maintain a local exploitation procedure aligned with Dumfries and Galloway multi-agency child protection guidance and the Child Exploitation Policy.

## 19.0 Serious violence and weapon-related concerns

Team members must be alert to indicators of serious violence, including changes in peer groups, unexplained injuries or possessions, increased absence, exploitation, threats, weapon access and escalating conflict.

Any concern that a learner is carrying, has access to, has used or intends to use a weapon must be reported to the DSL immediately. The DSL will assess immediate risk, take steps to protect learners and staff, and involve Police Scotland/Social Work where necessary. HCCE will use de-escalation and targeted multi-agency support wherever safe and appropriate.

## **20.0 Honour-based abuse, FGM and forced marriage**

Honour-based abuse can include coercive control, threats, physical or sexual abuse, forced marriage, female genital mutilation (FGM), virginity testing and other harmful practices. It is a child-protection concern and may involve multiple perpetrators.

In Scotland, concerns about FGM will be managed under the National Guidance for Child Protection in Scotland and relevant Scottish legislation, including the Female Genital Mutilation (Protection and Guidance) (Scotland) Act 2020. The England-and-Wales mandatory teacher-reporting provision is not applied as a Scottish legal duty. Any concern that a child has undergone, or may be at risk of, FGM must nevertheless be reported immediately to the DSL and referred through local child-protection procedures, with Police Scotland involvement where appropriate.

Forced marriage will be managed in accordance with the Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011 and current Scottish statutory guidance. A forced marriage is one without full and free consent. Family mediation must not be attempted where it may increase risk. The Forced Marriage Unit may be contacted for specialist advice.

Immediate concerns must be shared with Toni Woods, Regional Director/Safeguarding & Governance Lead, and external safeguarding agencies as required.

## **21.0 Preventing radicalisation and the Prevent Duty**

HCCE recognises its responsibilities under the Counter-Terrorism and Security Act 2015 and the Prevent Duty as it applies in Scotland. Prevent is a safeguarding responsibility focused on preventing people from being drawn into terrorism.

Team members will report concerns to the DSL. The DSL will consider the concern in the context of the child's wellbeing, vulnerabilities and wider influences, use the Scottish notice-check-share approach, and make a Prevent referral to Police Scotland where indicated. Prevent action does not replace child-protection or criminal-justice action where those are also required.

HCCE will use Scottish Prevent guidance and Education Scotland resources rather than England-only DfE self-assessment requirements.

## **22.0 Mental health and safeguarding**

Mental-health difficulties can be associated with safeguarding concerns and can also be indicators of abuse, neglect, exploitation, bullying, discrimination or trauma. Team members should not assume concerning presentation is explained solely by a diagnosis or known condition.

Concerns about self-harm, suicidal ideation, suicide risk or significant deterioration must be reported to the DSL without delay. Where there is immediate danger or a medical emergency, 999 must be called or urgent emergency care sought. HCCE will work with families, health services, Social Work and the clinical team as appropriate.

Early wellbeing support will be considered through GIRFEC, but this must not delay child-protection action.

## **23.0 Physical intervention, restraint and restrictive practice**

HCCE will follow Scottish guidance, including Included, Engaged and Involved Part 3: A Relationships and Rights Based Approach to Physical Intervention in Schools, alongside the organisation's Scottish restrictive-practice procedures.

Prevention, co-regulation, positive relationships and de-escalation are the primary approach. Restraint or seclusion must not become routine practice. Restrictive intervention may only be used as a last resort to avert an immediate risk of injury where no less restrictive option is viable, for the shortest necessary time and in the safest, least restrictive manner.

- the child's dignity, communication needs, health and rights must be protected;
- intervention must never be punitive or degrading;
- the incident must be recorded promptly and accurately;
- appropriate medical attention and welfare checks must be offered;
- parents/carers and relevant placing professionals must be informed in line with policy;
- post-incident support and a child-centred learning review must take place;
- any allegation or concern arising from the intervention must be reported immediately through safeguarding procedures.

Where the learner is also resident in a registered care service, any additional care-service restrictive-practice and Care Inspectorate requirements must be followed.

## 24.0 Allegations against team members

An allegation or safeguarding concern about an adult must be taken seriously, recorded and acted on without delay. This includes concerns that an adult may have harmed a child, committed a criminal offence involving a child, behaved in a way indicating risk of harm, or otherwise behaved in a way that may make them unsuitable to work with children.

Any allegation must be reported immediately to the DSL and Toni Woods, Regional Director. If the allegation concerns the Headteacher/DSL, it must be reported directly to Toni Woods and OFG Safeguarding/People.

HCCE will not use LADO terminology. The response will follow Scottish local child-protection arrangements and the OFG Managing Allegations Against an Employee procedure. Dumfries and Galloway Social Work will be contacted for child-protection advice/referral; Police Scotland will be involved where criminal conduct or significant harm may be involved; and Disclosure Scotland, GTCS, SSSC, Care Inspectorate or another professional regulator will be considered where applicable.

Allegations involving agency staff or third-party workers must be managed jointly with the employer/agency. HCCE retains responsibility for safeguarding children and must not simply end the placement without ensuring the safeguarding concern is appropriately considered and referred.

## 25.0 Low-level concerns

A low-level concern is any concern, however small, that an adult working in or on behalf of HCCE may have acted in a way inconsistent with expected professional conduct but which does not, on the information available, meet the threshold for a formal safeguarding allegation.

All low-level concerns must be shared with the Headteacher/DSL and managed in accordance with the OFG Low Level Concerns Policy. Records will be maintained and reviewed for patterns. Where concerns indicate possible harm, unsuitability or criminal conduct, the matter must be escalated into the allegations procedure and external referrals considered.

Where the concern relates to the Headteacher/DSL, it must be reported to Toni Woods, Regional Director/Safeguarding & Governance Lead.

## 26.0 Local authority and professional escalation

The DSL is responsible for following up referrals and ensuring a timely response is received. If HCCE believes a response does not adequately address risk or protection needs, the matter will be escalated through line management and the Dumfries and Galloway Children's Services Resolution and Escalation

Protocol. Where a child remains at immediate risk, protective action and Police Scotland involvement must not be delayed.

## 27.0 Whistleblowing

HCCE will maintain a culture in which team members can raise concerns about unsafe practice, safeguarding failures or conduct without fear of reprisal. Concerns should normally be raised through line management, the DSL, Headteacher or Regional Director. The OFG whistleblowing arrangements, including Safecall, are also available.

- Safecall: 0800 915 1571.

A team member's duty to safeguard children takes priority. If internal routes do not result in appropriate action, concerns should be escalated to relevant external safeguarding or regulatory bodies.

## 28.0 Alternative provision and work experience

HCCE remains responsible for safeguarding learners attending alternative provision or work experience. Placements must be appropriate to the learner's needs, risk assessed, monitored and subject to written safeguarding and health-and-safety assurance.

Scottish terminology and requirements apply. HCCE will not rely on England-only DfE alternative-provision guidance or DBS regulated-activity tests. Where placement adults may undertake a regulated role with children, HCCE will consider the current PVG/Disclosure Scotland requirements and obtain proportionate assurances about suitability.

- written safeguarding arrangements and named contacts;
- appropriate recruitment/PVG assurances where relevant;
- health and safety and insurance arrangements;
- learner-specific risk assessment, communication and medical needs;
- travel and supervision arrangements;
- regular contact/check-ins and attendance monitoring;
- clear arrangements for reporting concerns and changes in staffing;
- regular review of placement suitability and outcomes.

## 29.0 Digital and remote learning

All safeguarding, professional-boundary, data-protection and online-safety requirements continue to apply during digital or remote learning. HCCE will use approved platforms and accounts and will provide clear expectations to learners, parents/carers and team members.

One-to-one online contact must be risk assessed and authorised in line with HCCE/OFG procedures, with appropriate transparency, recording and safeguarding safeguards. Any concern arising during remote learning must be reported to the DSL immediately.

## 30.0 Home visits

Home visits must be planned in accordance with lone-working and safeguarding procedures. Team members must consider known risks, inform colleagues of their whereabouts and expected return, and where appropriate attend in pairs. Safeguarding concerns identified during a visit must be reported immediately and referred externally where required.

## 31.0 Policy review

This policy will be reviewed at least annually and sooner where there are changes to Scottish legislation, national guidance, Dumfries and Galloway procedures, OFG policy or HCCE safeguarding arrangements.

The DSL will ensure that changes are communicated to team members and reflected in training and practice.

## Appendix 1 - Key local contacts

| Role / service                                     | Contact                                                                       |
|----------------------------------------------------|-------------------------------------------------------------------------------|
| HCCE Headteacher / DSL                             | Alison Goodmanvaughan                                                         |
| HCCE Deputy DSL                                    | Grace Little                                                                  |
| Regional Director / Safeguarding & Governance Lead | Toni Woods                                                                    |
| Dumfries & Galloway Social Work Access Team        | 030 33 33 3001   accessteam@dumgal.gov.uk                                     |
| Police Scotland - emergency                        | 999                                                                           |
| Police Scotland - non-emergency                    | 101                                                                           |
| Dumfries & Galloway Public Protection Partnership  | publicprotection@dumgal.gov.uk                                                |
| OFG Safeguarding                                   | safeguarding@ofgl.co.uk                                                       |
| OFG People Advice                                  | peopleadvice@ofgl.co.uk                                                       |
| Childline                                          | 0800 1111                                                                     |
| Care Inspectorate                                  | 0345 600 9527 (where registered care-service notification/advice is relevant) |

*Local contact details should be checked at each annual review and whenever Dumfries and Galloway procedures change.*

## Appendix 2 - Key Scottish legislation, guidance and related policies

- National Guidance for Child Protection in Scotland 2021 - updated 2023
- Getting it right for every child (GIRFEC) national policy and practice guidance
- Dumfries and Galloway Multi-Agency Child Protection Guidance
- Dumfries and Galloway Children's Services Resolution and Escalation Protocol
- Children (Scotland) Act 1995
- Children and Young People (Scotland) Act 2014
- Education (Scotland) Act 1980
- Education (Additional Support for Learning) (Scotland) Act 2004
- Adult Support and Protection (Scotland) Act 2007
- Protection of Vulnerable Groups (Scotland) Act 2007 and current Disclosure Scotland legislation
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024
- Human Rights Act 1998
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance for Scotland
- Female Genital Mutilation (Protection and Guidance) (Scotland) Act 2020
- Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011 and Scottish statutory guidance
- Included, Engaged and Involved Part 1: Improving Attendance in Scotland's Schools (2026)
- Included, Engaged and Involved Part 3: A Relationships and Rights Based Approach to Physical Intervention in Schools (2024)
- Curriculum for Excellence - Health and Wellbeing and Relationships, Sexual Health and Parenthood education

### Related HCCE/OFG policies

- Child-on-Child Abuse Policy and Harmful Sexual Behaviour Guidance
- Child Exploitation Policy
- Protecting Children & Young People from Radicalisation & Extremism Policy

- Anti-Bullying Policy
- Relational and Inclusive Behaviour Policy
- Pupil Attendance Policy
- Low Level Concerns Policy
- Managing Allegations Against an Employee Procedure
- Safer Recruitment and Selection Policy
- Staying Safe Online Policy
- Web Filtering & Monitoring Policy
- Mobile & Smart Technology Policy
- AI Policy / Acceptable Use Policy
- Alternative Provision Policy
- Work Experience Policy
- Serious Incident Notification Policy
- Restrictive Practice / Physical Intervention Policy applicable in Scotland
- Data Protection Policy
- Whistleblowing Policy

**Safeguarding is everyone's responsibility.**