

The irtual School

Child Protection and Safeguarding Policy



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Section 1: Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 and in line with statutory guidance: 'Working together to safeguard children' (DfE 2026) and 'Keeping children safe in education' (DfE guidance commencing 1st September 2026).

This policy also takes into account the procedures and guidance set out by Gloucestershire Safeguarding Children Partnership (GSCP).

Safeguarding (KCSIE 2026) is defined as providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment whether that is within or outside the home, including online, preventing impairment of mental and physical health and development, ensuring that children grow up in the provision of safe and effective care and taking action to enable all children to have the best outcomes.

The Virtual School follows the procedures established by the Gloucestershire Safeguarding Children Partnership (GSCP) www.gloucestershire.gov.uk/gscp/. All staff are signed up to receive regular email alerts from the GSCP by signing up here: [GSCP newsletter](#). All staff are encouraged to visit this website regularly, as this is updated on the 'live' system, which guides and informs the Virtual School. All staff are trained on a 3 yearly basis in Safeguarding Children-Level 2.

The Virtual School ensures they have suitable staff by adhering stringently to safer recruitment processes and ensuring any unsuitable behaviour is reported and managed quickly using the Allegations Management procedures.

We ensure that within the Virtual School there is an understanding that safeguarding is the responsibility of EVERYONE. If at any point, there is immediate risk of serious harm to a child a referral must be made to social care immediately or dial 999. Anybody can make a referral.

To safeguard and promote the welfare of children, The Virtual School will act in accordance with the following legislation and guidance:

- ✓ The Children Act 1989
- ✓ The Children Act 2004
- ✓ Education Act 2002 (Section 175)
- ✓ The Equality Act 2010
- ✓ Gloucestershire Safeguarding Children Partnership (Inter-agency Child Protection and Safeguarding Children Procedures) (Electronic – live online – www.gloucestershire.gov.uk/gscp/)

- ✓ Keeping Children Safe in Education: statutory guidance for schools and colleges (DFE guidance commencing 1st September 2026)
- ✓ Working Together to Safeguard Children (DfE 2026)
- ✓ Paragraph 7(b) of the Schedule to the Education (Independent School Standards) Regulations 2014, made under sections 94(1) and (2) of the Education and Skills Act 2008,
- ✓ Child sexual exploitation (Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (February 2017)

Furthermore, Keeping Children Safe in Education (DfE September 2026) states that all staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- ✓ child protection and safeguarding policy
- ✓ behaviour policy (not applicable for virtual school).
- ✓ staff behaviour policy (known as code of conduct in GCC) should amongst other things, include low-level concerns, allegations against staff and whistleblowing <https://gloucestershirecc.sharepoint.com/sites/StaffNet/SitePages/Code-of-conduct-for-employees.aspx>
- ✓ safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- ✓ role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

Overall responsibility for safeguarding and child protection matters rest with the Designated Senior Person (referred to in 'Keeping Children Safe in Education (DFE, September 2026) as Designated Safeguarding Lead'). This responsibility cannot be delegated. Staff with the designated safeguarding lead responsibility will undertake Child Protection Inter Agency training every 2 years.

The Virtual School staff are aware of and follow the procedures established by the Gloucestershire Safeguarding Children Partnership (GSCP).

All staff should be alerted to signs of abuse and know to whom they should report any concerns or suspicions.

If staff have **any concerns** about a child's welfare, they should act on them **immediately**. They should follow their own organisation's child protection/safeguarding policy and speak to the designated safeguarding lead.

All concerns or discussions, decisions made and reasons for those decisions must be recorded by staff using agreed virtual school procedures.

See Section 13 of this policy for details of Virtual School designated safeguarding leads.

Section 2: The Role of the Designated Safeguarding Lead at the Virtual School

The broad areas of responsibility for the designated safeguarding leads and deputy safeguarding leads are:

- ✓ act as a source of support, advice and expertise for all staff
- ✓ act as a point of contact with the safeguarding partners
- ✓ liaise with the Virtual School Head to inform her of issues
- ✓ as required, liaise with the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- ✓ liaise with staff on matters of safety and safeguarding and welfare including online safety
- ✓ work with the school staff and relevant strategic leads, promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that vulnerable children are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.

Section 3: Raising Awareness and Encouraging Ongoing Vigilance

All members of the Virtual School must be familiar with, and constantly mindful of, the content of the following documents:

- Virtual School Child Protection Policy and procedures (this document)
- 'Keeping Children Safe in Education: information for all school and college staff' (DfE September 2026)
- Working Together to Safeguard Children (DfE 2026)

Other useful information, can be found online at Gloucestershire Safeguarding children Partnership (GSCP) www.gloucestershire.gov.uk/gscp/

At the Virtual School, it is recognised that it is EVERYONE's responsibility for safeguarding.

All staff are also expected to:

- ✓ Undertake and engage with regular training on Child Protection and safeguarding through the GSCP child protection training offer every three years,
- ✓ Be able to identify signs and symptoms of abuse.
- ✓ Understand the role of the DSL.
- ✓ Be able to identify children in need of extra help or at risk of significant harm including online harm.
- ✓ Be able to support social workers in making decisions.
- ✓ Report concerns (including concerns about other staff/professionals) to the Designated Safeguarding Lead or other senior staff members as appropriate.
- ✓ Know how to make referrals to the children's helpdesk (if/when appropriate)
- ✓ Be aware of procedures and guidelines for safeguarding.
- ✓ Monitor and report as required on the welfare, attendance and progress of all pupils.
- ✓ Keep clear, dated, factual and confidential records of any child protection concerns and share these with the DSL/Senior SLT staff and Social Care.
- ✓ Respond appropriately to disclosures from children and young people (stay calm, reassure without making unrealistic promises, listen, avoid leading questions, avoid being judgmental and keep records).
- ✓ The Virtual School staff are required to attend CP/safeguarding updates every 3 years as well as participate in any GSCP updates.

Section 4: The Child Protection Referral Process

All staff recognise that all matters relating to child protection are confidential.

The DSL or Senior SLT will only disclose information about a child to other members of staff or other professionals directly responsible for the child.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

The Virtual School will co-operate as required with enquiries from relevant agencies regarding child protection.

Section 5: Safer Recruitment

Safer recruitment is a vital aspect of child protection. The Virtual School adheres to Gloucestershire County Council safer recruitment procedures which follows

guidance from The Children's Workforce Development Council (CWDC). References are taken up before interviews and safer recruitment practice is followed in full.

In line with government guidance, at least one person on any appointment panel will have undertaken safer recruitment training and will be involved in the complete selection process. No member of staff or volunteer in a regulated activity will be left alone with children until the DBS check has been completed.

Section 6: Allegations Against Staff (Allegations Management) & Whistle-Blowing

All staff should take care not to place themselves in a vulnerable position with a child. Interviews or work with individual children or parents must be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction. Ongoing training and discussion at team meetings and in supervision meeting with line-managers help to support staff.

We understand that a pupil, carer / parent or other professionals may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head Teacher, who on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO), and the Head of Service within GCC.

Section 7: Lone Working and Transport

The role of the Virtual School is to monitor education for children in care therefore, most discussions regarding children's education will be via a multi-agency approach and there should not be opportunities for lone working with young people. **If transportation for young people is required, it should be commissioned through due processes for educational purposes. If virtual school staff are supporting social care colleagues to help a young person to engage in an event, then transport should be provided. In line with GCC priorities, all staff should be encouraging the use of public transport wherever possible.**

All Virtual School staff are expected to follow GGC Lone Working policy which can be found here:  [lone-working-policy.pdf](#)

Section 8: Child Exploitation and Children Missing from Education

(For a more detailed explanation, please see KCSIE 2026 p16-18)

Child Exploitation (CE)

Child criminal exploitation (CCE) occurs where organised crime groups or individuals exploit an imbalance of power between themselves and a child or young person under the age of 18, to manipulate the young person into carrying out illegal activities on their behalf. This type of exploitation commonly occurs within County Lines and Modern Day

Slavery, both of which interlink with a wide range of recognised vulnerabilities including, but not limited to, child sexual exploitation (CSE), human trafficking, debt bondage, children in care and school exclusion.

Home Office guidance on criminal exploitation of young people can be found here (Oct 2023) <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Child Sexual Exploitation (CSE) is when someone grooms and controls a child for a sexual purpose. It can happen to boys and girls, it can happen in rural and urban areas, it can happen face to face and it can happen online. It is a form of child abuse.

Revised statutory definition of child sexual exploitation (Feb 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

The new working together advice (Feb 2017) from the DfE on CSE and the new definition can be found at

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Further information about CCE and CSE can be found on the Gloucestershire Safeguarding Children Partnership (GSCP) website: www.gloucestershire.gov.uk/gscp/

CE Screening Tool

This should be completed if CE is suspected. The tool and guidance outlining how to complete and submit the tool can be found on the GSCP website: [Child criminal and sexual exploitation | Gloucestershire Safeguarding Children's Partnership](#)

Children who are absent from education or missing education (CME)

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils, and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may

increase known safeguarding risks within the family or in the community.

Where children have unexplained and/or persistent absences from education, Virtual School staff will liaise with school and social care staff to ensure there is an appropriate safeguarding response. <https://www.gov.uk/government/publications/children-missing-education>

Section 9: Online Safety including Filtering and Monitoring

All Virtual School staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). **When Pupil Premium Plus funding is used to purchase IT equipment for pupils, it is on the understanding that school staff have received appropriate online safety training and that appropriate school filtering and monitoring systems are in place and regularly reviewed.**

On the rare occasions where the Virtual School Head has given permission for Pupil Premium Plus funding to be transferred to social care budgets to purchase IT equipment for students, **it is on the understanding that the social worker completes a Virtual School Acceptable User Policy form and takes responsibility for ensuring that appropriate online safeguarding measures are in place.**

Section 10: Child-on-Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. If child-on-child sexual violence and/or sexual harassment is reported to or suspected by Virtual School staff, they will report to the Virtual School DSL or DDSL and liaise with school and social care staff to ensure there is an appropriate safeguarding response.

Section 11: Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism and other forms including online. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of The Virtual School's safeguarding approach. If Virtual School staff suspect that a child may be at risk, they will report to the Virtual School DSL or DDSL and liaise with school and social care staff to ensure there is an appropriate safeguarding response. This may include making a prevent referral.

Section 12: Commissioning of Services from Outside Agencies

The Virtual School will not directly commission services for children in care which are funded by pupil premium plus (PP+). If PP+ funding is agreed by the virtual school to support the education of a child in care, then the funds will be sent to the education setting and they will be responsible for commissioning any services required. The education setting will follow their own safeguarding procedures and ensure that they are happy to proceed with the commissioning of the service. The only exception to this is where a child is not on roll with a school, college or training provider. In this instance, Jane Featherstone (Virtual School Head) will make the relevant checks and agree to commission the service on behalf of the child.

Section 13: Useful Contacts Within the Virtual School

DSL (Designated Safeguarding Lead within The Virtual School)

Karla Broady

Assistant Head for Children in Care

Karla.Broady@gloucestershire.gov.uk

07825974027

DDSL (Deputy Designated Safeguarding Lead within The Virtual School)

Lindsay Evans

Assistant Head for Children with a Social Worker

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VSH (Virtual School Head)

Jane Featherstone

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This policy will be reviewed annually and will next be reviewed in September 2027.