

GLOUCESTERSHIRE SAFEGUARDING CHILDREN PARTNERSHIP WORKING TOGETHER

This document sets out the arrangements put in place to enable local partner agencies in Gloucestershire to meet the requirements of Working Together to Safeguard Children 2018

*Gloucestershire's
multi-agency
arrangements to
safeguard children
2021*

Foreword

Working Together 2018 represents a significant milestone in the development of our collective arrangements to safeguard children and young people in Gloucestershire. It places a 'shared and equal duty' on NHS Gloucestershire Clinical Commissioning Group, Gloucestershire Constabulary and Gloucestershire County Council for local arrangements. We embrace those responsibilities and view this as a real opportunity to further embed child safeguarding considerations across our own agencies and the wider local partnership under the banner of the "Gloucestershire Safeguarding Children Partnership" (GSCP).

The arrangements set out in this document allow us to both build on past practice but also to develop our own local approach. Learning from past incidents and embedding that learning within our organisations are matters that can now develop along local lines reflecting Gloucestershire's collective commitment towards a trauma informed and restorative approach to practice, informed by the learning from ACEs. Our arrangements will continue to develop as confidence increases. We welcome the contribution of our partners and stakeholders and community to what we would hope is an ongoing and rich conversation.

We all share the same aim; namely, that the safety, health, welfare and wellbeing of our children and young people is secured and that we remain open to learning and improving in order to deal with the many challenges and opportunities presented by a rapidly changing world.

Safeguarding though remains 'everybody's business' and we thank you for your continued support, hard work and commitment.'



Marion Andrews Evans
Chair GSCP Executive
Executive Nurse
Gloucestershire Clinical
Commissioning Group



Craig Holden
Assistant Chief Constable
Gloucestershire
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Working Together 2018 Local arrangements for child safeguarding in Gloucestershire

1. Background

- 1.1. The document sets out the arrangements to enable the local partner agencies in Gloucestershire to meet the requirements of Working Together to Safeguard Children 2018 collectively as the Gloucestershire Safeguarding Children Partnership (GSCP). This includes the most recent amendments to Working Together 2018 published in December 2020.
- 1.2. Working Together 2018 represents a significant milestone in the development of our collective arrangements to safeguard children and young people in Gloucestershire. It places a 'shared and equal duty' on NHS Gloucestershire Clinical Commissioning Group, Gloucestershire Constabulary and Gloucestershire County Council for the safeguarding of Gloucestershire's Children
- 1.3. Gloucestershire County Council, working with local partners, set out its vision for Gloucestershire in its 'Looking to the Future 2019-22' document. This identifies key priorities for children and young people; including securing their health and wellbeing and ensuring they have access to a good quality school or early years setting. The arrangements set out in this document will contribute to the achievement of those priorities.

2. Scope of arrangements

- 2.1. The scope of this document encompasses:

- Terms of Reference for the Gloucestershire Safeguarding Children Partnership (GSCP) Executive Group
- Terms of Reference for Gloucestershire Safeguarding Children Partnership (GSCP) Management Group.
- Terms of reference and membership for GSCP Subgroups and Task and Finish Groups
- Key links between child safeguarding arrangements and the wider governance network for Gloucestershire, including the Health and Well Being Board, Safer Gloucestershire and Children's Wellbeing Coalition.
- The role and scope of the Independent Scrutiny Function
- The role and function of the Safeguarding Support Unit in facilitating partnership business.
- Key partnership review processes including rapid reviews, child death reviews, domestic homicide reviews, child safeguarding practice reviews and serious incident notifications to the Youth Justice Board
- Multi-agency Levels of Intervention and Child Safeguarding Threshold Arrangements
- Dispute resolution and escalation processes
- Business planning, annual reporting and performance management
- Multi-agency child safeguarding training and audit processes

Links with multi-agency risk management process as they relate to the safeguarding of children – Missing and Child Exploitation (MACE), Multi-agency Public Protection Arrangements (MAPPA), Multi-agency Safeguarding Hub (MASH), Channel Panel & Integrated Offender Management (IOM)

3. Context

3.1. The revised statutory guidance Working Together to Safeguard Children 2018 (as amended Dec 2020) is the key statutory guidance for local partner agencies to ensure children are kept safe from harm and that the welfare of all children is promoted. Within the guidance, safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

3.2 The amendments to the Children Act 2004 introduced by the Children and Social Work Act 2017, establish three safeguarding partners with a 'shared and equal duty' to make arrangements to work together, and with other partners locally, to safeguard and promote the welfare of all children in their area. A safeguarding partner in relation to a local authority area is defined as:

- The local authority
- A clinical commissioning group for an area any part of which falls within the local authority area
- The Chief Officer of Police for an area any part of which falls within the local authority area

3.3 The arrangements set out in these proposals will apply to the County of Gloucestershire, with the safeguarding partners (as defined above) being:

- Gloucestershire County Council
- Gloucestershire Constabulary
- NHS Gloucestershire Clinical Commissioning Group

3.4 The Child Death Review partners for Gloucestershire are:

- Gloucestershire County Council
- NHS Gloucestershire Clinical Commissioning Group

3.5 A particular consideration in Gloucestershire is that around 8 -10,000 citizens are registered with NHS Wales and, as such, key services for children and young people such as midwifery, health visiting and GPs will be provided by services outside of Gloucestershire. In the event of a safeguarding concern, involving a child or young person within that cohort, NHS Gloucestershire CCG will liaise with the relevant NHS Wales agency on behalf of the Safeguarding Partners. It is acknowledged that this does not affect the accountability for child safeguarding arrangements, which remains with the Gloucestershire Safeguarding Partners.

3.6 The three safeguarding partners, working through the safeguarding structure established under these arrangements, will co-ordinate their safeguarding services and engage the wider range of partners with continuing Section 11 duties, including:

- local authority - children's and adult social care services, public health, housing, sport, culture and leisure services, licensing authorities and youth services
- NHS organisations and agencies and the independent sector, including NHS England and clinical commissioning groups, NHS Trusts, NHS Foundation Trusts and General Practitioners
- Police, including police and crime commissioners and the chief officer of each police force in England and the Mayor's Office for Policing and Crime in London
- British Transport Police
- National Probation Service and Community Rehabilitation Companies
- Governors/Directors of Prisons and Young Offender Institutions (YOIs)
- Directors of Secure Training Centres (STCs)
- Principals of Secure Colleges
- Youth Offending Teams/Services (YOTs)

3.7 Within these arrangements, the wider safeguarding partnership comprises:

- Gloucester City Council
- Cheltenham Borough Council
- Stroud District Council
- Tewkesbury Borough Council
- Forest of Dean District Council
- Cotswold District Council
- District Safeguarding Subgroup
- HM Court Services
- Crown Prosecution Service
- National Probation Service
- Bristol, Gloucestershire, Somerset and Wiltshire Community Rehabilitation Company
- CAF/CASS
- Gloucestershire Health & Care Services
- General Practitioners Representative
- Gloucestershire Hospitals NHS Foundation Trust
- South West Ambulance Service Trust
- Gloucestershire Association of Special School Heads
- Gloucestershire Association of Primary School Heads
- Gloucestershire Association of Secondary School Heads
- Further Education Representative
- Gloucestershire Fire & Rescue Service
- Gloucestershire Diocese
- Lay Person
- Voluntary Sector

3.8 The guidance includes a requirement for the independent scrutiny of any local arrangements established under Working Together 2018. The guidance is not prescriptive around the form these should take and the GSCP will deliver its independent scrutiny function through a range of means.

3.9 The GSCP is a signatory to the South West Child Protection Procedures and, in addition, have a library of established local multi-agency safeguarding arrangements. These arrangements are captured in **Appendix 10**

3.10 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Gloucestershire's Information Sharing Partnership Arrangements (GISPA) v4.1 provides the framework for effective and lawful sharing of information across the partnership and has been agreed by all parties. It is acknowledged that further work is needed to improve information sharing at the operations level. In order to address this we will be publishing a GSCP statement of expectations to promote and ensure effective facilitative systems and a culture that promotes information sharing for the safeguarding of children. **Appendix 10**

3.11 The GSCP identifies its priorities through a cycle of needs assessment, planning, delivery and review. The priorities (below) comprise of a range of capacity building measures aimed to enhance collective arrangements alongside specific areas of concern or risk, as evidenced through our quality assurance, data and needs assessment activity. These include:

Capacity building:

- Ongoing development of Child Safeguarding Performance Dashboard and quality assurance arrangements.
- Ensuring the consistent application of Thresholds across all safeguarding partners
- Evaluating the impact of training and learning from child safeguarding practice reviews, serious incidents and rapid reviews etc.
- Development of an exploitation/vulnerability Profile/Strategy
- Ensuring compliance with safeguarding procedures, protocols and tools
- Exploring the conduct and effectiveness of Strategy Discussions
- Information Sharing for the Safeguarding of Children

Key safeguarding themes:

- Children of Concern – developing a multi-agency response before children are in crisis
- Assurance on Early Help – including issues of consent
- Impact of Exploitation and Missing Strategy and Action Plan
- Inclusion - including missing education, exclusions and Elective Home Education
- Improving the multi-agency response to Neglect including use of the Neglect Toolkit
- Pre-birth and reducing injuries in non-mobile babies.

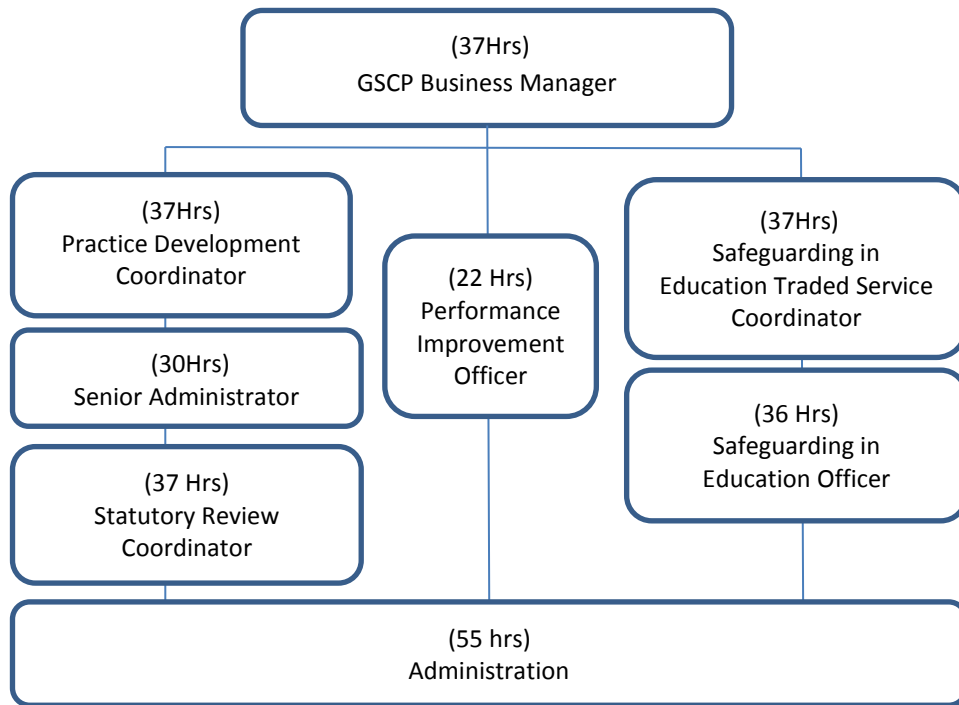
3.11 The multi-agency Safeguarding Hub (MASH) is subject to collective oversight by a MASH Delivery Board which comprises of senior representatives from local partner agencies and is, in turn, accountable to the GSCP. There is a consensus amongst the Safeguarding Partners that the Gloucestershire MASH is the key interface for operational activity to safeguard children. Gloucestershire MASH is underpinned by a multi-agency threshold document to ensure a consistent approach amongst partners towards referrals for children's social care and intervention.

4.0 Key Groups

4.1 The essential architecture of Gloucestershire's arrangements to deliver the requirements of Working Together 2018 will comprise:

- A Gloucestershire Safeguarding Children Partnership (Executive Group) – comprising of the three principal Safeguarding Partner Strategic Leads, their respective Lead Officers, Safeguarding Business Manager and Chair of the GSCP Management Group. The GSCP sets the strategic direction for the partnership and is the key decision-making group for policy, procedural and process changes. Terms of Reference for the Executive are attached at **Appendix 1**.
- A GSCP Management Group chaired by a senior officer from one of the safeguarding partners and comprising of representatives of the local partner agencies set out in paragraph 3.3. The Chair will be appointed and mandated by the Executive. The Management Group provides direction and support for the GSCP Subgroups who are the engine room for the development of local child safeguarding and welfare arrangements as mandated by the GSCP Executive. Its membership is drawn from the Chairs of the formal GSCP Subgroups, the Safeguarding Support Unit Manager and Lay Member. Terms of Reference for the GSCP Management Group are attached at **Appendix 2**.
- GSCP Subgroups are in place to drive and deliver the work of the partnership and are as follows: **(Terms of Reference are attached Appendix 3 to Appendix 7)**
 1. Quality and Improvement in Practice Subgroup (QiiP)
 2. Child Death Overview Panel
 3. Education and Early Years Subgroup
 4. Child Missing and Exploitation Subgroup
 5. Districts Safeguarding Subgroup
 6. Policies and Procedures Subgroup
- A Scheme of Delegation has been developed setting out the responsibilities and accountabilities for the Executive, Management Group and Subgroups to ensure decisions are taken at the most appropriate level and subject to effective oversight. On occasion an issue may arise which requires partner agencies to work together through a Task and Finish Group in order to complete a discrete, time banded piece of work on behalf of the GSCP.
- Independent Scrutiny of these arrangements is provided by a range of means and processes. The role of independent scrutiny is to provide assurance around the effectiveness of multi-agency arrangements to safeguard and promote the welfare of all children in a local area, including arrangements to identify and review serious child safeguarding incidents. Independent scrutiny forms part of a wider assurance system which includes) independent inspectorates' (Ofsted, CQC) s individual safeguarding partners internal assurance processes, Section 11/175 audits and Joint Targeted Area Inspections. Whilst the decision on how best to implement a robust system of independent scrutiny is to be made locally, our commitment is towards scrutiny that is robust, objective, acting as a constructive critical friend and promotes reflection and learning in order to drive continuous improvement.

- The GSCP have set out its arrangements for independent scrutiny and the reporting process for feeding back on the effectiveness of local arrangements, a link to these arrangements is available in **Appendix 10**.
- 4.2 Although the primary focus of these arrangements will be the efficacy and development of local safeguarding arrangements, they will also participate in the development of children’s services across Gloucestershire. As such they will have strong links with the Health and Well Being Board and Safer Gloucestershire that focus respectively on the health and wellbeing, and safety, of the whole population. **Appendix 9** outlines how the work of the Safeguarding Partners established under Working Together 2018 will integrate within the strategic governance arrangements for Gloucestershire. In order to promote equity and challenge, the Chair of the Executive will rotate on a bi-annual basis with the Chair of the GSCP Management Group being appointed by the Executive.
- 5.0 **Safeguarding Support Unit**
- 5.1 The child safeguarding arrangements set out in this document are supported by the Safeguarding Support Unit, managed by the Business Manager and reporting directly to the GSCP Executive Chair. Its unique role representing the partnership affords it the opportunity to provide the GSCP with a management hub for independent scrutiny activity.
- 5.2 The Safeguarding Support Unit is responsible for delivering the secretariat function for the GSCP. In addition to the oversight and delivery of the following on behalf of the Executive:
- Multi-agency Safeguarding Arrangements
 - Management and deployment of the Independent Scrutiny function
 - Section 11 and S175 Audit processes
 - GSCP Budget Management
 - Commissioning Annual Report writing and publication
 - Administration for the GSCP Safeguarding Structure
 - Improving Child Protection and Safeguarding Practice
 - Serious Child Safeguarding Case Reviews (incorporating Rapid Reviews and Local Child Safeguarding Practice Reviews) Process
 - Child Death & Acute Life-Threatening Event (ALTE) Review Process
 - Multi-agency Audits
 - Safeguarding Data Reporting as directed by the GSCP Executive via QiiP
 - Multi-agency Safeguarding Training
- 5.3 Working Together 2018 requires that Safeguarding Partners agree a fair and equitable approach to the funding of any local arrangements. The GSCP agreed an equitable funding model for the year 2019/2020 and has sustained funding for 2020-21. The Local Authority, who have historically been the largest contributor, retain that position but with increased contributions from both the Clinical Commissioning Group and the Constabulary providing growth in the partnership’s ability to meet its statutory duties.



6.0 Annual Reporting, Business Planning, Performance Management and Quality Assurance

6.1 The development of Gloucestershire’s safeguarding children arrangements will continue to be informed by a range of comprehensive needs assessments and surveys including:

- Children and Young Peoples’ Needs Assessment (2018)
- Safer Gloucestershire Needs Assessment (2018)
- Online Pupil Survey
- Serious Safeguarding Case review findings
- Multi and single agency audits
- Other partnership review such as Children of Concern task and finish activity
- Data Exception Reporting to the Executive

6.2 GSCP has an approved a child safeguarding data dashboard drawn from an appropriate range of national indicators, the QiiP has been developing the arrangements for data collection and reporting through 2020. A commitment for a contracted Performance Improvement Officer as part of the Safeguarding Support Unit will improve the unit’s ability to collect and collate data into 2021 and beyond.

6.3 Reporting on the dashboard traditionally is on a quarterly, retrospective, basis and led by the QiiP. The aim is to provide the GSCP with a ‘narrative’ of performance, highlighting areas of effectiveness and of concern, as the basis for collective action, mandated/directed by the Executive and with a direct focus on the most vulnerable cohorts of children. The child safeguarding dashboard will be subject to annual review via the QiiP Subgroup for subsequent approval by the Executive.

6.4 The GSCP currently uses a variety of approaches to test the effectiveness of safeguarding arrangements across agencies including the use of an annual safeguarding audit – Section 11 Audit (for agencies) and a Section 175 Audit (for schools and colleges). Section 11 responsibilities are reinforced within Working Together to Safeguard Children 2018; the GSCP has recently taken the opportunity to explore new models for Section 11 audits and the

potential for shorter thematic audits where a clear links to serious safeguarding case review and other review findings dictate the need for assurances in the following S11 Standards:

- Leadership and Accountability
- Staff Safe Recruitment, Induction, Training and Development
- Safeguarding Policies and Procedures
- Listening to Children and Young People

6.5 In due course the GSCP will also explore, within their report, the level and effectiveness of the local response from the partnership in meeting their collective obligations under Section 10 of the Children Act 2004 to improve the wellbeing of children.

7.0 Multi-agency Threshold Arrangements

7.1 GSCP regularly revises their collective approach toward the provision of support for children and families. They set out Gloucestershire's Levels of Intervention Guidance – Working Together to Provide Early Help, Targeted and Specialist Support for Children and Families in Gloucestershire. A link can be found in **Appendix 10** to the most current version including a schedule of revisions table summarising how this has developed.

7.2 It is acknowledged that the levels of contact and referral activity being experienced in Gloucester MASH and within that the considerable the proportion that do not progress, suggest that further work is needed to ensure the consistent application of threshold across the partnership.

7.3 Regular review and collective exploration of the effectiveness of threshold application will remain a priority within Gloucestershire's child safeguarding arrangements, with a particular emphasis on workflow through MASH and the impact of early help arrangements.

8.0 Links with Schools, Educational settings and Early Years Providers

8.1 Schools, education settings and early year's providers have a pivotal role to play in promoting the safeguarding and welfare of children and young people. It is important to note that the guidance provided by Working Together to Safeguard Children 2018 applies in its entirety to all education and early years settings, as 'Relevant Agencies'. The GSCP seeks assurance about the effectiveness of safeguarding arrangements within these sectors through its annual Section 175 audit process.

8.2 The GSCP Education and Early Years Subgroup provides a robust link with the sector, including the Further Education, Independent schools and other independent Training Providers, of which there are a number in Gloucestershire. The education sector is engaged at all levels of the GSCP including at the GSCP Executive and relationships are robust and well developed. Engagement with early years' settings is via an active 'Early Years Forum' with representation drawn from across the sector. This will continue to form part of these arrangements.

8.3 There is a Traded Service for Education & Early Years Settings in place under the GSCP, delivered through its Safeguarding Support Unit. It offers bespoke training, information advice and guidance, regular updates and brief guides around thematic issues. The team currently serves around 80% of settings in Gloucestershire. The Traded Service supports participating settings with regards to their legal duties and responsibilities under primary safeguarding legislation, including Keeping Children Safe in Education 2020 and Working Together to

Safeguard Children 2018. The legal duties under this legislation and the duty to respond to local arrangements remains that of the educational setting itself.

9.0 Child Death, Rapid Review and Serious Incident Notifications (Ofsted and Youth Justice Board)

9.1 Ofsted has published guidance on how local authorities should report a serious incident of child abuse or neglect, or the death of a child who is looked after. Since 29 June 2018, local authorities in England have been required to notify the national Child Safeguarding Practice Review Panel within 5 working days of becoming aware of a serious incident. Notifications must be made using the online form for notifications of serious incidents for local authorities.

9.2 In order to ensure Gloucestershire safeguarding partners and local agencies can comply with these changes, a multi-agency process guide has been developed. A link to this is available in **Appendix 10**. It is important to note that its aim is to ensure a timely and appropriate response by local agencies when they become aware of a child death, acute life-threatening event or serious safeguarding incidents.

Once notification has commenced, this will then flow into a Child Death Review or Rapid Review leading to a possible child safeguarding practice review at local or national level, the latter informed by the views of the Child Safeguarding Practice Review Panel.

This will also encompass safeguarding incidents previously notified to the Youth Justice Board under their safeguarding and public protection notification arrangements.

9.3 Responsibility for learning the lessons from serious child safeguarding incidents lies at a national level with the Child Safeguarding Practice Review Panel and at local level with the GSCP. The QiiP Subgroup will provide the link between the national and local response to incidents.

9.4 The GSCP has overall responsibility for ensuring that all incidents are notified in accordance with local guidance to ensure that the reporting requirements are met and the criteria for a local review. A rapid review will be initiated by the Safeguarding Support Unit, to be completed within 15 days of the notification and sent to the National Child Safeguarding Practice Review Panel.

9.5 Any decision to commence a local child safeguarding review (or not to do so) will be for the GSCP Executive, as informed by the findings of the Rapid Review and overseen by the QiiP Subgroup. The Chair of the Executive shall consult with the Business Manager on any occasion in which there is a lack of agreement between the Safeguarding Partners setting out an independent oversight solution on a case by case basis.

9.6 Any local child safeguarding practice reviews initiated under these arrangements shall be scoped and commissioned in accordance with paragraphs 30-42 of Working Together 2018. The GSCP, via the work of the QiiP Subgroup, will agree the terms of reference and methodology for any review and appoint the reviewer, having regard to the circumstances of each case and the particular knowledge and expertise this will require of the reviewer. The GSCP Executive will have the final decision on publishing arrangements and ensure a copy is provided to the National Panel and DfE no less than 7 working days ahead of publication. The presumption is that a report will be published unless the Safeguarding Partners consider it

inappropriate to do so. The rationale for not publishing a local review will also be provided within the same timescales.

10.0 Escalation of Professional Concerns – Dispute Resolution

10.1 The GSCP has a robust escalation and dispute resolution guidance policy document and process in light of the publication of Working Together (July 2018 – page 82). A link to the escalation guidance is available in **Appendix 10**

10.2 A central feature of our arrangements is a commitment to ongoing inter-agency communication based on openness; transparency and mutual respect in order to resolve concerns by informal means, with the use of formal processes kept to a minimum. Dispute resolution will also be child-centred, with clarity on the impact/change for the child the escalation is seeking to achieve.

10.2 The Chair of the GSCP Executive supported by the Safeguarding Support Unit Business Manager will be the final stage of local resolution, where necessary commissioning independent scrutiny either through the partnership or externally. It is acknowledged that Safeguarding Partners are able in extremis to escalate concerns to the Secretary of State if local resolution is not achieved.

11.0 The Views of Children and Families

11.1 Obtaining the views of children, young people and families is essential in ensuring that local agencies and services are well positioned to meet their needs and particularly so in ensuring that the most vulnerable children are effectively safeguarded.

11.2 A key element within the Independent Scrutiny function will be to commission and report on suitable consultation with the Ambassadors, Children in Care and Care Leavers Groups to ensure their views are contributing towards the development and efficacy of child safeguarding arrangements.

11.3 Over the longer term there is a commitment by the Safeguarding Partners to explore the potential for a 'shadow' child GSCP comprising of young people, supported by the Ambassadors and Children's Engagement Team. The effectiveness of advocacy, return interview and support services for children and young people is a further area for development as part of these arrangements.

12.0 Domestic Homicide Review Protocol

12.1 Safer Gloucestershire, which is the county wide partnership for safer community activity in Gloucestershire, has a published protocol for Domestic Homicide Reviews (DHR) in order to ensure a consistent approach to the completion and dissemination of multi-agency learning across the county. A link to the DHR Protocol (2018) is available in **Appendix 10**.

12.2 There is recognition within the protocol that a domestic homicide may trigger a requirement for other reviews, such as a local or national child safeguarding practice review. In these circumstances the DHR protocol provides for a joint review process in order to avoid duplication and maximise learning, whilst ensuring the requirements of each review process are satisfied.

13.0 Child Death Overview Panel

- 13.1 Gloucestershire has a well-established Child Death Overview Panel (CDOP) that facilitates comprehensive multi-agency reviews of child deaths and Acute Life-Threatening Events, in order to better understand how and why children die. Terms of Reference for the Child Death Overview Panel and the outline arrangements for the conduct of a child death review are available through the link in **Appendix 1**.
- 13.2 The child death review partners with the responsibility for Child Death Reviews are the Local Authority and the clinical Commissioning Group. They have committed to the ongoing purchase of eCDOP. This provides a secure, flexible web-based solution to facilitate the CDR processes whilst ensuring seamless transition of data from Gloucestershire to the National Child Mortality Data Base Service.

14.0 Channel Panel

- 14.1 Gloucestershire has a well-established Channel Panel that operates alongside our multi-agency child safeguarding arrangements, acknowledging that the radicalisation of children and young people involves the potential for safeguarding harm. The involvement of children's social care practitioners within both our Channel and Safeguarding Partnership ensures that where vulnerabilities are identified that require intervention from social services or the individual is known to social services the appropriate support is provided.
- 14.2 Where a Rapid Review, Domestic Homicide Review or Child Safeguarding Practice Review is commenced due to a serious incident or death including a child or young person, the views of the Channel Panel will be sought as part of the review process in order to support the identification of practice improvements and shared learning.

15.0 People in Positions of Trust: Allegations Management Arrangements

- 15.1 Local authorities should put in place arrangements to provide advice and guidance to employers and voluntary organisations and agencies on how to deal with allegations against people who work with children. Local authorities should also ensure that there are appropriate arrangements in place to liaise effectively with the police and other organisations and agencies to monitor the progress of cases and ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.
- 15.2 In Gloucestershire the Local Authority has an appointed Local Authority Designated Officer (LADO) to manage allegations against people in a position of trust. The Allegations Management process can be found via the link in **Appendix 10**.

16.0 Appendices

- Appendix 1 Terms of Reference for Gloucestershire Safeguarding Children’s Executive
- Appendix 2 Terms of Reference for Gloucestershire Safeguarding Children’s Delivery Board
- Appendix 3 Quality and Improvement in Practice (QiiP) Subgroup Terms of Reference
- Appendix 4 Child Death Overview Panel (CDOP) Terms of Reference
- Appendix 5 Missing Child and Exploitation Subgroup Terms of Reference
- Appendix 6 Education and Early Years Subgroup Terms of Reference
- Appendix 7 Districts Safeguarding Subgroup Terms of Reference
- Appendix 8 Policies and Procedures Subgroup Terms of Reference
- Appendix 9 Links with existing governance and delivery
- Appendix 10 Links to GSCP Processes

Appendix 1

Terms of Reference Gloucestershire Safeguarding Children's Executive (GSCP)

1. Purpose

To provide effective leadership for the work of local partners and agencies in safeguarding and promoting the welfare of children and young people in Gloucestershire.

To ensure the effectiveness of local safeguarding arrangements and place the welfare and protection of children and young people at the heart of the local vision for Gloucestershire.

2. Membership

- Assistant Chief Constable: Gloucestershire Constabulary
- Head of Public Protection Unit: Gloucestershire Constabulary
- Director of Children's Services
- Director of Children's Safeguarding and Care
- Chief Nurse: Gloucestershire Clinical Commissioning Group (Chair 2020 – 2021)
- Designated Nurse Safeguarding Children – Gloucestershire Clinical Commissioning Group
- Independent Scrutineer
- Safeguarding Business Manager (GSCP Support Officer)
- Chair of Safeguarding Management Group

3. Key Objectives

The key objectives for Gloucestershire Safeguarding Children's Executive are to ensure:

- children are safeguarded and their welfare promoted.
- there is an exhaustive appreciation of the effectiveness of local multi-agency safeguarding arrangements through robust quality assurance and performance management arrangements
- there are robust arrangements in place for local rapid reviews, child safeguarding practice reviews and Child Death Reviews
- there is a robust cycle of needs assessment, planning and delivery to support the continuous development of local child safeguarding arrangements
- effective direction is given to the Safeguarding Management Group and Subgroups to ensure they are focussed on established priorities and having a positive impact on child safeguarding arrangements.
- there is early identification and analysis of new and emerging child safeguarding issues
- partner organisations and agencies challenge and hold one another to account for the effectiveness of child safeguarding arrangements through regular and open dialogue with escalation used as a last resort.
- learning and continuous professional development are an integral element within local safeguarding arrangements including the learning from Child Safeguarding Practice Reviews,

Rapid Reviews, Child Death Reviews and other multi-agency learning and quality assurance activity.

- there are effective information sharing arrangements in place to support accurate and timely decision making for children and families
- the development of local child safeguarding arrangements takes place within the context of the local vision for children and young people in Gloucestershire, with ongoing liaison with other key partnerships including Safer Gloucestershire and Gloucestershire's Wellbeing Coalition.

Frequency of meetings: Quarterly

Appendix 2

Terms of Reference Gloucestershire Safeguarding Children Partnership Management Group

The subgroup is accountable to the Gloucestershire Safeguarding Children Partnership Executive (Executive) and supports it to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

To deliver the key local priorities for child safeguarding as directed by Gloucestershire's Safeguarding Children Partnership Executive.

To co-ordinate the work of the multi-agency Safeguarding Subgroups and provide regular updates on progress to Gloucestershire's Safeguarding Children Partnership Executive

To ensure there are robust links with the wider network of safeguarding activity in locality-based partnerships, the education sector and health economy.

2. Membership

Nominated Chair by the GSPC Executive

Chair – Quality and Improvement in Practice Subgroup

Chair – Child Missing and Exploitation Subgroup

Chair – Education and Early Years Subgroup

Chair – Child Death Overview Panel

Chair – Districts Safeguarding Group

Rapid Review – Lead Officer

Safeguarding Unit Manager

GSCP Lay Member

3. Key Objectives

Working on behalf of safeguarding partners, the key objectives of the GSCP Management Group are to ensure:

- there is an effective cycle of needs assessment, planning and delivery in place to deliver the priorities and vision of the GSCP – this will include ensuring each Subgroup has an annual work programme what aligns with GSCP Business Plan
- to ensure the delivery of the vision and priorities established by the GSCP as set out in the annual child safeguarding Business Plan.
- to provide regular updates on the work of the Subgroups against the agreed priorities of the GSCP, highlighting any concerns/blockages.
- local child safeguarding practice reviews, rapid reviews and child death reviews are facilitated in a timely manner working alongside and in partnership with each other in accordance with statutory requirements
- ensure robust arrangements for multi-agency child safeguarding policies and procedures including an appropriate review and updating schedule.

- a programme of multi-agency child safeguarding training and development is in place, based on an assessment of local needs.
- the local multi-agency levels of Intervention and thresholds document is subject to regular review.
- to produce an annual report/assessment of the effectiveness of local safeguarding arrangements, incorporating the views of the independent scrutineer or independent scrutiny function.
- to facilitate periodic audit of agency Section 11 and Section 175 arrangements or their equivalent.
- to scrutinise the effectiveness of key plans and strategies for the safeguarding of children.
- effective performance management and quality assurance arrangements are in place to ensure the GSCP has an exhaustive appreciation of the effectiveness and impact of local child safeguarding arrangements.

4. Frequency of meetings:

Eight times per year to align with quarterly meeting of the GSCP Executive and its subgroups

Appendix 3

Terms of Reference Quality and Improvement in Practice (QiiP) Subgroup

The subgroup is accountable to the Gloucestershire Safeguarding Children Partnership Executive (Executive) and supports it to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

To ensure that the learning from case file auditing, performance data, CSPRs and critical incidents translate into improved safeguarding practice and better outcomes for children and young people

2. Membership

- Clinical Commissioning Group - Chair
- Children's Social Care Head of service - Vice Chair
- Safeguarding Business Manager (GCSE Support Officer)
- Senior Administrator GSCE Safeguarding Support Unit
- Independent Scrutineer
- Education Department – Chair of Education & Learning Subgroup
- Gloucestershire Constabulary – Chair of Rapid Review/CSPR Panel
- GCC Head of Quality
- Gloucestershire NHS Hospitals Trust
- Gloucestershire Health & Care Trust
- GSAB Business Unit Manager
- Youth Offending Service
- Gloucestershire Fire and Rescue Service
- Domestic Abuse Coordinator
- Drug & Alcohol Services
- GCC Early Help
- GSCE Practice Development Manager

It is imperative that the QiiP subgroup has committed and sustained representation from partner agencies and organisations. Members must have appropriate seniority, enabling each a mandate to take decisive actions on matters arising.

3. Key Objectives

- Ensure an effective cycle of quality assurance and practice improvement in place, appropriately planned and focused on the priorities established by the Executive.
- To oversee and quality assure the work of Local Child Safeguarding Practice Reviews and Rapid Reviews in accordance with statutory requirements.
- Maintaining oversight for editing and publication of multi-agency policies and procedures. Predominantly this is through the South West Child Protection Procedures arrangements, but must also be inclusive of bespoke local practice guidance, newsletters and practice briefings.

- To ensure that a robust program of multi-agency training and development is in place, based on an assessment of local needs and GSCE priorities.
- To develop and enable a mechanism by which we know practice is improving, and is providing visibility on the impact of local safeguarding arrangements. This means using a range of performance management measures and quality assurance arrangements, including:
 - Detailed reporting and informed analysis from the GSCE quarterly data scorecard
 - Multi-agency training reports on attendance, evaluation, quality and impact.
 - A range of multi-agency audit planning, including case file audits.
 - The development of a dynamic 'learning hub' model.
 - Oversight on the periodic audit of agency Section 11 and Section 175 arrangements or their equivalent.
 - Mobilising specific 'task and finish' groups as need appropriates.
 - To assure the Levels of Intervention Guidance (local multi-agency thresholds document) is actively promoted and subject to regular update and review.
 - To be inclusive and collaborative within agencies and organisations, recognising and sharing good practice across the partnership.

4. Frequency of meetings:

- four times per year to align with quarterly meeting of the GSCE delivery Board. The subgroup may choose to meet more frequently, up to six times a year, dependent upon current need.
- Meetings will be held in the mornings on the same day of the week (where practicable) and in the same period of the quarter where possible and will be for 3 hours.

Appendix 4

Terms of Reference Child Death Overview Panel

The subgroup is accountable to the Gloucestershire Clinical Commissioning Group and Gloucestershire County Council's Childrens Services and supports the Gloucestershire Safeguarding Children Partnership Executive to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

Through a comprehensive and multidisciplinary review of child deaths, the Gloucestershire Safeguarding Children Board (GSCB) Child Death Overview Panel (CDOP) aims to better understand how and why children in Gloucestershire die and use our findings to take action to prevent other deaths and improve the health and safety of our children.

In carrying out activities to pursue this purpose, the CDOP will meet the functions set out in paragraph 7.4 of Working Together to Safeguard Children in relation to the deaths of any children normally resident in Gloucestershire. Namely collecting and analysing information about each death with a view to identifying –

- (i) any case giving rise to the need for a Serious Case Review
- (ii) any matters of concern affecting the safety and welfare of children in Gloucestershire
- (iii) any wider public health or safety concerns arising from a particular death or from a pattern of deaths in Gloucestershire

2. Objectives

- To ensure, in consultation with the local Coroner, that local procedures and protocols are developed, implemented and monitored, in line with the guidance in Chapter 7 of Working Together on enquiring into unexpected deaths.
- To ensure the accurate identification of and uniform, consistent reporting of the cause and manner of every child death.
- To Collect and collate an agreed minimum data set of information on all child deaths in Gloucestershire and, where relevant, to seek additional information from professionals and family members.
- To evaluate data on the deaths of all children normally resident in Gloucestershire, thereby identifying lessons to be learnt or issues of concern, with a particular focus on effective inter-agency working to safeguard and promote the welfare of children.
- To evaluate specific cases in depth, where necessary to learn lessons or identify issues of concern.
- To identify significant risk factors and trends in individual child deaths and in the overall patterns of deaths in Gloucestershire, including relevant environmental, social, health and cultural aspects of each death, and any systemic or structural factors affecting children's well-being to ensure a thorough consideration of how such deaths might be prevented in the future.
- To identify any public health issues and consider, with the Director of Public Health and other provider services how best to address these and their implications for both the provision of services and for training.

- To identify and advocate for needed changes in legislation, policy and practices to promote child health and safety and to prevent child deaths.
- To increase public awareness and advocacy for the issues that affects the health and safety of children.
- Where concerns of a criminal or child protection nature are identified, to ensure that the police and coroner are aware and to inform them of any specific new information that may influence their inquiries; to notify the Chair of the GSCE of those concerns and advise the chair on the need for further enquiries under section 47 of the Children Act, or of the need for a Serious Case Review.
- To improve agency responses to child deaths through monitoring the appropriateness of the response of professionals to each unexpected death of a child, reviewing the reports produced by the rapid response team and providing the professionals concerned with feedback on their work.
- To provide relevant information to those professionals involved with the child's family so that they, in turn, can convey this information in a sensitive and timely manner to the family.
- To monitor the support and assessment services offered to families of children who have died.
- To monitor and advise the GSCE on the resources and training required locally to ensure an effective inter-agency response to child deaths.
- To co-operate with any regional and national initiatives – e.g. the Confidential Enquiry into Maternal and Child Health (CEMACH). Collation of data with other neighbouring CDOPs across the region – in order to identify lessons on the prevention of child deaths.

3. Scope

The CDOP will gather and assess data on the deaths of all children and young people from birth (excluding those babies who are stillborn) up to the age of 18 years who are normally resident in Gloucestershire. This will include neonatal deaths, expected and unexpected deaths in infants and in older children. Where a child normally resident in another area dies within Gloucestershire, that death shall be notified to the CDOP in the child's area of residence. Similarly, when a child normally resident in Gloucestershire dies outside Gloucestershire the Gloucestershire CDOP should be notified. In both cases an agreement should be made as to which CDOP (normally that of the child's area of residence) will review the child's death and how they will report to the other.

Team Membership

The Child Death Overview Panel will have a permanent core membership drawn from the following key organisations represented on the GSCE and from other relevant organisations:

- Consultant in Public Health – to Chair CDOP
- Designated Consultant Paediatrician
- Designated Nurse
- Coroner's Office
- Midwifery
- Lay representative
- Children's Social Care
- Police Child Protection Unit
- Bereavement Counsellor e.g. Winston's Wish
- University academic
- Administration Support

CDOP core members will nominate a suitable deputy who will attend meetings in the absence of core members. Other members may be co-opted to contribute to the discussion of certain types of death when they occur:

- Emergency Department medical and nursing staff
- Primary Care
- Other paediatric input
- Obstetric staff
- Other police representatives including accident investigators
- Fire Services
- Ambulance/paramedic services
- Education
- Paediatric Pathologist
- Child and Adolescent Mental Health Services (CAMHS)
- Adult mental health
- Voluntary agencies
- Registrar of Births, Deaths, Marriages
- Community Safety
- Others as required

The Chair has the discretion to defer the meeting if the appropriate representatives or deputies, with relevant skill mix are not available for a meeting or there are insufficient numbers for the meeting to be held effectively.

4. Confidentiality and Information Sharing

Information discussed at the CDOP meetings will not be anonymised prior to the meeting, it is therefore essential that all members adhere to strict guidelines on confidentiality and information sharing. Information is being shared in the public interest for the purposes set out in Working Together and is bound by legislation on data protection.

CDOP members will all be required to sign a confidentiality agreement before participating in the CDOP. Any ad-hoc or co-opted members and observers will also be required to sign the confidentiality agreement. At each meeting of the CDOP all participants will be required to sign an attendance sheet, confirming that they have understood and signed the confidentiality agreement.

Any reports, minutes and recommendations arising from the CDOP will be fully anonymised and steps taken to ensure that no personal information can be identified.

5. Accountability and Reporting arrangements

The CDOP will be accountable to the chair of the GSCP Executive.

The Child Death Overview Panel is responsible for developing its work plan, which should be approved by the GSCP. It will prepare an annual report for the GSCP.

The GSCP takes responsibility for disseminating the lessons to be learnt to all relevant organisations and acts on any recommendations to improve policy, professional practice and inter-agency working to safeguard and promote the welfare of children.

The GSCP will supply data regularly on every child death as required by the Department for Education and Skills to bodies commissioned by the Department to undertake and publish nationally comparable, anonymised analyses of these deaths.

6. Frequency of Meetings

The CDOP will in general meet at 2 monthly intervals but may hold extra meetings if matters are identified by the Chair of the panel or Chair of the Executive which require an earlier response.

7. Administration

- Meetings will be supported by the Child Death Review CDOP Administrator and minutes will be circulated within 2 weeks of the meeting being held.
- Agenda and supporting papers will be circulated at least one week in advance of the meeting.
- Review
- The Chair of the CDOP will ensure co-ordination with other working groups and will facilitate an annual review of these terms of reference and other associated documentation, amending as necessary.

Appendix 5

Terms of Reference Education and Early Years Subgroup

The subgroup is accountable to the Gloucestershire Safeguarding Children Partnership Executive (Executive) and supports it to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

To ensure children and young people in educational settings are effectively safeguarded and that educational provision in Gloucestershire is an integral element within multi-agency child safeguarding arrangements.

2. Membership:

- Gloucestershire County Council Education Department
- Gloucestershire Childrens Social Care
- Gloucestershire Constabulary
- The Diocese of Gloucester Academies Trust
- Gloucestershire Association of Special School Heads (GASSH)
- Gloucestershire Association of Primary School Heads (GAPH)
- Gloucestershire Association of Secondary Heads (GASH)
- Independent Schools Representation
- Gloucester Diocese
- Fe Colleges
- Alternative Training Providers
- GFRS Skill zone
- GDASS/West Mercia Women's Aid

Quorum

Representation from three-member agencies

3. Objectives:

- Ensuring that all education, childcare and training providers for children and young people aged 0-19 and the education related services that support children outside of these settings have suitable policies and procedures in place to safeguard a child's wellbeing.
- Ensuring good communication and awareness amongst education, child care and training professionals of Gloucestershire's corporate policies and practices as well as the practices and procedures maintained and managed by the Gloucestershire Safeguarding Children Executive on Child Protection and Children in Need.
- Taking forward practices set out by Gloucestershire Safeguarding Children Executive at local level and ensuring that they are being implemented in all relevant settings.
- Publicising National policies and cross agency child protection issues to promote awareness for all professionals in areas represented on the sub-committee.
- Working co-operatively with other agencies to establish and carry forward good practice and identifying areas of commonality to ensure the effective use of resources where possible.

- Overseeing the regular audit and monitoring aspects of safeguarding, to deliver single agency training and advice as appropriate and to keep records of training undertaken.
- Carrying out an annual audit of safeguarding issues within education, child care and learning settings (under Sections 175 and 157 of the Education Act 2002) in order to target provision and policy decisions and ensure settings are aware of changes within safeguarding.
- Acting as a conduit to service providers and the Gloucestershire Safeguarding Children Executive by undertaking work requested by the Gloucestershire Safeguarding Children Executive and Delivery Boards pertaining to safeguarding issues and reporting back progress made and any barriers to progress.
- Implementing our duty under sections 175 and 157 of the Education Act 2002 - 'Duties of LAs and Governing Bodies in relation to welfare of children' by ensuring arrangements are in place to safeguard and promote the welfare of children in educational settings and using these duties as a benchmark for agencies providing education and training for children and which are not covered by the Act.

4. Frequency of meeting

Minimum – every three months

Appendix 6

Terms of Reference Missing & Child Exploitation Subgroup

The subgroup is accountable to the Gloucestershire Safeguarding Children Partnership Executive (Executive) and supports it to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

Set out, review, monitor and evaluate the quality and effectiveness of the county's approach to identifying and tackling child criminal exploitation (CCE), sexual exploitation (CSE) and missing episodes and to raise awareness of child exploitation and missing within agencies and communities and monitor and evaluate the effectiveness of responses for children who are exploited and/or go missing.

2. Membership

Subgroup membership will include appropriate representatives from Social Care, Police, NHS, Prospects, Education Safeguarding and Youth Justice.

3. Objectives:

- Develop and implement the county's strategy to combat child exploitation with consideration to regional and national strategies.
- Agree actions to minimise harm to children and young people and achieve the GSCE objectives.
- Ensure that protocols including information sharing in respect of CSE, CCE and missing children are relevant, up to date, and effective.
- Understand data and identify emerging patterns, threats, risks and opportunities relating to CCE, CSE and missing children so that agencies may target their service delivery activities appropriately.
- Undertake quality assurance audits of CCE, CSE & Missing cases to ensure the effectiveness of safeguarding work and hold agencies to account.
- Promote an understanding of CSE, CCE and missing in Gloucestershire amongst professionals and the public.
- Encourage engagement with young people and the use of their feedback to improve services.
- Consider serious case reviews, operation debrief and other relevant publications, ensuring that best practice is considered, disseminated and implemented.
- Identify training needs in conjunction with the Workforce Development Subgroup.
- Ensure joined up working with other GSCE subgroups and partner groups

4. Frequency of Meetings

The subgroup will meet quarterly or more frequently and the Chair of the subgroup will provide a quarterly update regarding work and activities to the GSCP.

Appendix 7

Terms of Reference Districts Safeguarding Subgroup

The subgroup is accountable to the Gloucestershire Safeguarding Children Partnership Executive (Executive) and supports it to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

To ensure that all Gloucestershire's District Councils are meeting their duties and obligations under the Children Act 2004 and Working Together 2018 and increasing the visibility of the district council functions in the work of the GSCP

2. Membership

- Stroud District Council
- Tewksbury Borough Council
- Forest of Dean District Council
- Cheltenham Borough Council
- Cotswold District Council
- Gloucester City Council
- Safeguarding Business Manager
- GSAB Business Unit Manager

3. Key Objectives

- Oversight on the requirements under the Children Act 2004 Section 11 to report to the GSCP on the collective district arrangements for safeguarding
- Reviewing S3 Licencing Act requirements and making recommendations to the GSCP on its implementation and oversight.
- Mobilising specific 'task and finish' groups as need appropriates.
- To be inclusive and collaborative within agencies and organisations, recognising and sharing good practice across the partnership.

1. Frequency of meetings:

- Four times per year to align with quarterly meeting of the GSCP Management Group. The subgroup may choose to meet more frequently

Appendix 8

Terms of Reference Policies & Procedures Subgroup

The subgroup is accountable to the Gloucestershire Safeguarding Children Partnership Executive (Executive) and supports it to fulfil its statutory responsibility to monitor and evaluate the effectiveness of local arrangements to safeguard and protect children.

1. Purpose

To ensure that the GSCP Executive (Executive) has multi-agency policy, protocols, procedures and guidance in place which promote the wellbeing and safeguarding of children and young people in Gloucestershire and to ensure that policies are available that reflect national and local need.

2. Membership

- Gloucestershire Clinical Commissioning Group
- Gloucestershire Childrens Social Care
- Gloucestershire Constabulary
- Safeguarding Business Manager
- Other specialist agency as required to advise and assist in the writing and review of policies and procedures

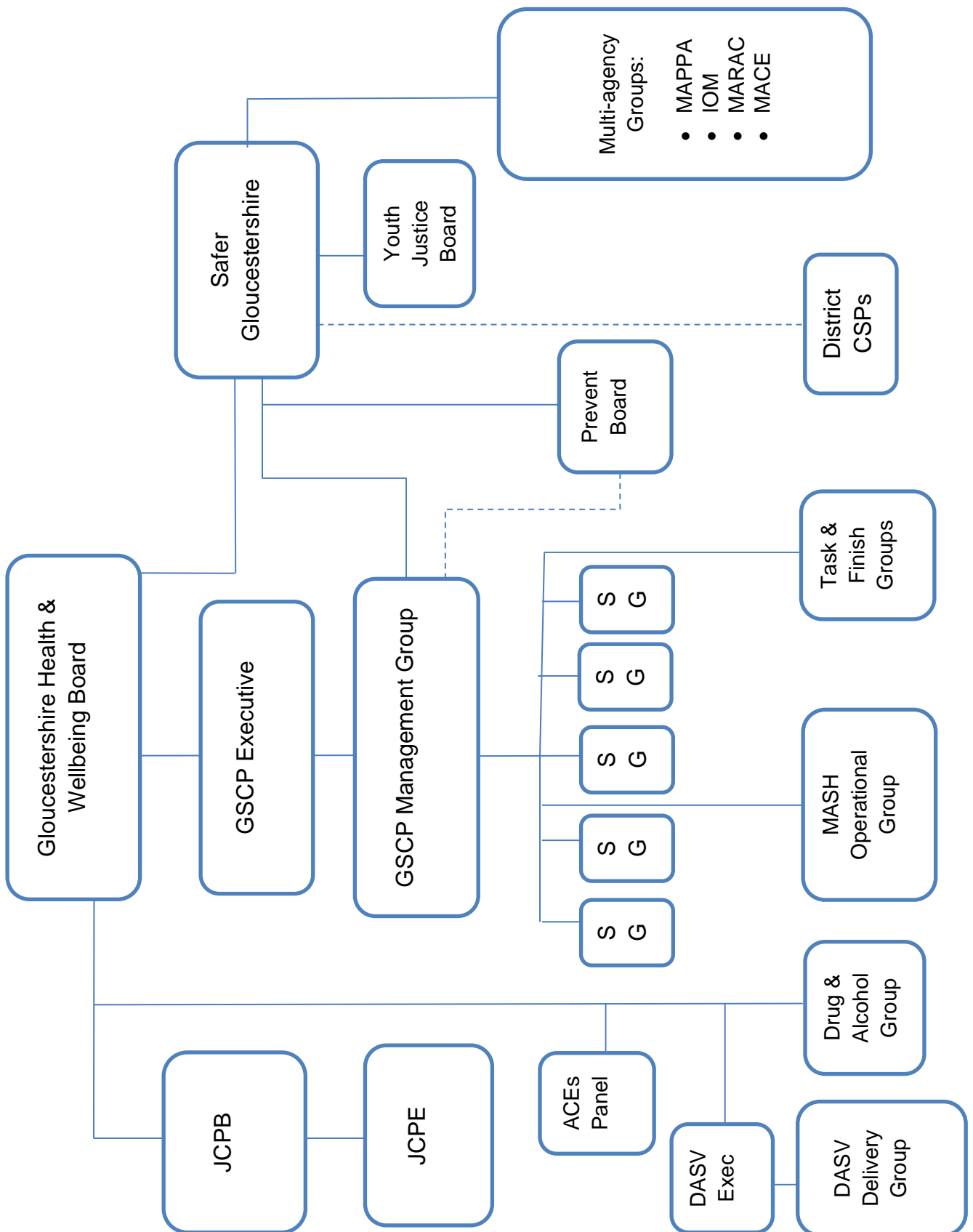
3. Key Objectives

- Develop local protocols on key issues of concern, as agreed/ directed by the Executive
- Oversee and contribute to the development and updating of the South West Child Protection Procedures through the South West Consortium
- Set out, control and oversee a review cycle for all policies, procedures and local arrangements ensuring standardisation of look, quality and version control
- To receive, review, agree, implement and where appropriate develop policies and procedures for safeguarding and promoting the welfare of children and young people in Gloucestershire
- Ensure there is agreement and understanding across agencies about operational practice in relation to each new policy, procedure, guidance or research findings and work with the Quality and Improvement in Practice subgroup (QiiP) to facilitate the translation into practice.
- Agree actions to resolve issues identified by new policies, procedures, guidance or research findings.
- Monitor (and advise the Quality and Improvement in Practice subgroup as required, in line with national guidance) the processes, protocols and procedures in relation to Local Child Safeguarding Practice Reviews, Rapid Reviews and Multi-agency audit processes

4. Frequency of meetings:

- Twice a year to align with the South West Consortium review cycle. The subgroup may choose to meet more frequently or to conduct business virtually between the twice yearly meetings.

Appendix 9 Working Together links to Gloucestershire Governance Network



Appendix 10 Key Hyperlinks

The following links allow access to the GSCP published processes as set out in this document

1. [Gloucestershire's Levels of Intervention Guidance – Working Together to Provide Early Help, Targeted and Specialist Support for Children and Families in Gloucestershire Serious Safeguarding Case Review Process](#)
2. [Section 47 Enquiry Protocol](#)
3. [Serious Incident and Rapid Review Process](#)
4. [Serious Case Review Reports and Practice Briefings](#)
5. [S11 of the Children Act 2004 Process](#)
6. [Gloucestershire's Information Sharing Partnership Arrangements](#)
7. [Independent Scrutiny Function](#)
8. [Escalation of Professional Concerns guidance](#)
9. [Gloucestershire Domestic Homicide \(DHR\) Protocol](#)
10. [Early Help Practice Guidance](#)
11. [Child Death Overview Arrangements including Child Death, Acute Life-Threatening Event,](#)
12. [Multi-agency Learning and Development arrangements](#)
13. [South West Child Protection Procedures](#)
14. [Allegations Management Function and Process](#)
15. [Keeping Children Safe in Education 2020](#)
16. [Working Together to Safeguard Children 2018](#)
17. [GSCP Annual Report](#)

NHS
Gloucestershire
Clinical Commissioning Group



 Gloucestershire
COUNTY COUNCIL