

# Safeguarding Children Policy and Procedure



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## 1. Scope and Aims

The Churn Project works with the communities of Cirencester and the outlying villages supporting those who are lonely or marginalised, disadvantaged or at a point of transition or crisis in their lives, including families, unemployed and older people. We may be in contact with children and young people through our day-to-day activities.

### Policy Statement

The Churn Project is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and is committed to ensuring that all those involved with The Churn feel safe and be treated with respect.

If anyone witnesses, discloses or experiences abuse, it will be dealt with in a timely and effective manner and in ways which are proportionate to the issues.

*Everyone who comes into contact with children and families has a role to play. Safeguarding is everyone's responsibility.*

### The purpose of this document is:

- To set out The Churn Projects approach towards safeguarding children.
- To protect children and young people who receive The Churn Project services from harm, which includes children of the adults who use our services.
- To explain the responsibilities the staff, volunteers and trustees have in respect of safeguarding children.
- To provide a clear procedure which will be followed by trustees, staff and volunteers, when reporting and dealing with safeguarding concerns and incidents.

Where a third party is running a service from The Churn's premises, they must have their own Safeguarding policies in place or must sign up to this policy.

## 2. Safeguarding adults and safeguarding children policies

We have separate policies for Safeguarding Adults at Risk and Safeguarding Children. One of the key differences is that adults have their own rights and responsibilities and can make their own decisions and live independent lives. This means that they have a legal right of consent and participation in progressing safeguarding concerns. Exceptions to this are

- if they do not have the mental capacity to make informed decisions about their safety.
- there is a significant risk of harm to the individual or others.
- a crime has taken place or could be prevented.
- or a member of staff is the alleged abuser.

Adult safeguarding concerns may also involve children and vice versa.

For children, due consideration must be given to the wishes and feelings of a child as far as reasonable before deciding on what services to provide or action to take. However, we have a duty to act in the best interests of the child, which may mean contradicting their wishes.

**We will seek to keep children and young people safe by.**

- Valuing listening to and respecting them
- Appointing a nominated child protection lead (DSL)
- Adopting child protection and safeguarding best practice through our policies, procedures, and code of conduct for staff and volunteers
- Providing effective management for staff and volunteers through supervision, support and training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing information professionally and securely, in line with data protection legislation
- Sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions
- Making sure that children, young people and their families know where to go for help if they have a concern
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families, and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing their concerns

### 3. Context

We believe children and young people should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

The welfare of children is paramount in all the work we do and in all the decisions we take. All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation have equal right to protection from all types of harm or abuse.

Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

Legislation provides the framework for safeguarding and child protection in England. It makes clear the expectations and requirements around duties of care to children and creates accountability for these. The main legislation in England is the Children Act 1989, the Children Act 2004 and the Children and Social Work Act 2017.

In England, the Department for Education (DfE) provides the key statutory guidance for anyone working with children and young people: **Working together to safeguard children** (DfE, 2023). This sets out how organisations should work together to keep children safe. Chapter 4: Organisational responsibilities sets out the requirements for voluntary, charity, social enterprise, faith-based organisations and private sectors

#### Who is responsible for safeguarding and child protection

Local safeguarding partners are responsible for child protection policy, procedure and guidance at a local level.

The local safeguarding arrangements are led by three statutory safeguarding partners:

- the local authority
- the integrated care board (ICB, previously clinical commissioning group or 'CCG')
- the police.

Working together with other relevant agencies, they must co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children, including making arrangements to identify and support children at risk of harm.

Gloucestershire Safeguarding Children Partnership [www.gloucestershire.gov.uk/gscp/](http://www.gloucestershire.gov.uk/gscp/)

Gloucestershire Multi Agency Safeguarding HUB (MASH) **01452 426565**

Gloucestershire Safeguarding Children email [childrenhelpdesk@gloucestershire.gov.uk](mailto:childrenhelpdesk@gloucestershire.gov.uk)

## Definitions

**Children** A child is anyone who has not yet reached their 18th birthday and includes unborn children. Due to immaturity and dependency on others, all children are at risk of abuse.

**Parent** The term parent includes carers and guardians. It means, in usual circumstances, someone who is legally entitled to take decisions on behalf of the child.

**Abuse or neglect** Defining abuse or neglect is complex and rests on many factors. The term “abuse” can be subject to wide interpretation. We will reference the Working Together definition for abuse

*A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.*

## Child Safeguarding Concern Categories

Adopting a child-centred approach means the welfare of the child is paramount. We will treat as a child safeguarding concern any case where a child is suspected to be involved in any of the following categories:

### Neglect and Acts of Omission:

**Definition:** The persistent failure to meet a child’s basic physical and/or psychological needs, likely resulting in serious impairment of the child’s health or development. Neglect may also occur during pregnancy due to maternal substance abuse.

### Examples:

- Failing to provide adequate food, clothing, and shelter (including exclusion from home and abandonment).
- Failing to protect a child from physical and emotional harm or danger.
- Failing to ensure adequate supervision (including the use of inadequate caregivers).
- Failing to ensure access to appropriate medical treatment or care.
- Neglecting or being unresponsive to a child’s basic emotional needs.

### Physical Abuse:

**Definition:** Physical abuse involves intentionally hurting or harming a child.

### Examples:

- Hitting, slapping, punching, shaking, kicking, poisoning, burning or scalding, breaking bones, biting, and drowning.
- Making up symptoms of an illness or causing a child to become unwell.

**Sexual Abuse:**

**Definition:** Sexual abuse includes both contact and non-contact abuse, in person and online.

**Examples:**

- Contact abuse: Sexual touching of any part of a child's body, forcing a child to take part in sexual activities, making a child undress or touch someone else.
- Non-contact abuse: Flashing or exposing, showing pornography, forcing a child to take part in sexual activities online.

**Emotional or Psychological Abuse:**

**Definition:** Emotional abuse involves the continual emotional mistreatment of a child.

**Examples:**

- Deliberately trying to scare, humiliate, isolate, or ignore a child.
- Threatening, shouting at a child, calling them names.
- Blaming and scapegoating.
- Making the child perform degrading acts.
- Pushing a child too hard or not recognising their limitations.

**Other Specific Acts of Abuse and Neglect**

**Online Abuse:** Abuse that occurs via the internet, including cyberbullying, grooming, and exploitation.

**Child Sexual Exploitation (CSE):** A form of sexual abuse where children are manipulated or coerced into sexual activities, often in exchange for money, gifts, or affection.

**Female Genital Mutilation (FGM):** Any procedure involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

**Bullying and Cyberbullying:** Bullying that occurs in person or through digital platforms, including social media, texts, and emails.

**Domestic Abuse:** Exposure to domestic violence, impacting the child's well-being, even if not directly targeted.

**Child Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of a child for exploitation purposes.

**Grooming and Harmful Sexual Behaviour:** Building a relationship with a child to exploit or abuse them sexually.

**Criminal Exploitation and Gangs:** Coercing or manipulating a child into criminal activities, often associated with gang involvement.

## Principles of the Child-Centred Approach

**Listening to the Child:** Ensuring the child's voice is heard and considered.

**Confidentiality:** Handling information discreetly and sharing it only with those who need to know.

**Safety and Protection:** Prioritising the immediate and long-term safety of the child.

**Intervention and Support:** Providing appropriate interventions and support tailored to the child's needs.

**Partnership with Parents/Guardians:** Engaging with the child's caregivers, unless they are the source of harm.

**Multi-Agency Collaboration:** Working with various agencies and professionals to ensure comprehensive care and protection.

**Respect and Dignity:** Treating the child with respect and maintaining their dignity throughout the process.

By adhering to these principles and recognizing the specific categories of concern, we can better protect and support children, ensuring their well-being is always the foremost consideration.

## 4. Responsibilities of staff, trustees and volunteers

We expect all staff, volunteers and trustees to

- Be alert to concerns for welfare and indicators of abuse or neglect
- Report all cases of suspected abuse or neglect to the designated safeguarding leads
- Be vigilant about their actions so that they cannot be misinterpreted and are aware of appropriate behaviour when working with service users (for example, appropriate boundaries of personal contact)
- Attend safeguarding training and refresher training where relevant

All line managers are responsible for

- Ensuring safeguarding is a fixed agenda item and regularly discussed in team meetings and 121s
- Ensure staff record and report child safeguarding cases in accordance with procedures

Designated Safeguarding Leads are responsible for

- Ensuring that any changes to legislation or good practice lead to corresponding policy and procedure updates
- Notify the board in the event of a serious safeguarding incident and/or pending safeguarding children review
- Review the children safeguarding policy on a regular basis and ensure that other policies have regard to safeguarding as appropriate
- Ensure systems are in place to accurately and appropriately record and monitor safeguarding cases



- Promotes awareness of safeguarding within the organisation
- Work with external organisations as appropriate in relation to children safeguarding
- Attend external safeguarding meetings representing The Churn
- Provide guidance to colleagues on specific cases and generally liaise with statutory agencies regarding referrals and active cases

## **Whistleblowing**

If a member of staff, trustee or volunteer suspects that a child is being abused by another staff member, trustee or volunteer, they must immediately report their concerns to the Designated Safeguarding Leads or Chief Executive Officer. The whistleblowing policy must be followed.

## **Recruitment**

We are committed to safe recruitment, selection and vetting of all trustees, staff and volunteers. This includes

- All new employees and volunteers will complete an application form
- Before commencing employment or voluntary work, staff and volunteers will be asked to attend an interview with an appropriate manager or representative members from the Board of Trustees. The level and formality of interview will depend on the role and work involved
- New trustees and employees will be required to provide two acceptable references
- All employees, trustees and volunteers will require a DBS disclosure at the appropriate level which will include self-declaration. Which will be renewed every 3 years.

## **Training and Induction**

### **Induction**

All new staff members will receive a comprehensive induction upon commencement of their employment.

- The induction will cover the organisation's policies and procedures.
- An induction checklist will be completed and signed by both the new employee and the supervisor to ensure all topics are covered.
- Volunteers will participate in an induction programme. They will receive a handbook that includes key safeguarding information and other relevant organisational policies.

### **Safeguarding Training:**

#### **Initial Training:**

- The induction for both staff and volunteers will include an appropriate level of safeguarding training tailored to their roles.
- This initial safeguarding training will ensure that all new staff, trustees and volunteers understand their responsibilities and the procedures for reporting concerns.

**Ongoing Training:**

- Safeguarding training will be renewed every two years at the appropriate level for all staff, trustees, and volunteers.
- The training will be conducted by a recognised organisation to ensure it meets current best practices and legal requirements.

**Documentation and Records:****Training Records:**

- Completion certificates for all safeguarding training will be stored in individual staff files.
- Detailed records of all training sessions attended by staff, trustees, and volunteers will be maintained.

**Monitoring and Compliance:**

- Regular audits will be conducted to ensure all staff, trustees, and volunteers have up-to-date safeguarding training.
- Non-compliance with the training requirements will be addressed promptly to maintain high safeguarding standards.

## **Confidentiality**

We will always respect confidentiality and will not share any information given in confidence unless justified by the assessed risk to the child or required by law.

Effective sharing of information is essential for early identification of need, assessment, and service provision to keep children safe. The Data Protection Act 2018 and the General Data Protection Regulations (GDPR) do not prevent sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

## **Diversity and Inclusion**

We will ensure that no person or group of persons will be treated less favourably than another person or group of persons on account of any diversity strand.

## **Complaints**

Service users who do not feel satisfied with our service in relation to Safeguarding may wish to make a complaint. Complaints will be investigated by the safeguarding lead for a resolution. If a resolution is not found or the service user remains dissatisfied, this will be managed in accordance with the Complaints Policy.

## **Support to staff, volunteers and trustees**

Support will be provided to staff, volunteers and trustees dealing with safeguarding cases, including supervisory support from managers and the safeguarding leads. Clear guidance will be given around professional boundaries when working with children.

Where we receive an allegation about a member of staff that constitutes a child safeguarding issue, an investigation will be conducted in accordance with the Disciplinary procedures and LADO will be contacted as appropriate.

## 5. Procedure when reporting and dealing with safeguarding concerns and incidents

**Emergency:** If someone is in immediate danger, seriously injured or may cause serious harm to others call the emergency services on **999** and inform the safeguarding lead as soon as possible.

**Step 1** - Contact the Designated Safeguarding Lead at The Churn. The designated safeguarding leads for children are

- Sarah Bourne [sarah.bourne@thechurn.org.uk](mailto:sarah.bourne@thechurn.org.uk) 01285 380031
- Rachel Stainton [rachel.stainton@thechurn.org.uk](mailto:rachel.stainton@thechurn.org.uk) 01285 380034 / 07701301122

If they are not available, please speak to trustee safeguarding lead:

**Rosemary Lynn:** [rozlynn54@gmail.com](mailto:rozlynn54@gmail.com) 07527 171490

If they are not available, please speak to another line manager.

**Michelle Bradburn** [michelle.bradburn@thechurn.org.uk](mailto:michelle.bradburn@thechurn.org.uk) 01285 380039

**Step 2** - Having considered all the available information, the safeguarding lead will decide on the next steps which maybe to

- Take no action
- Monitor the situation
- Report the matter to the police
- Contact the Gloucestershire Multi Agency Safeguarding Hub MASH  
**01452 426565** or [childrensheldesk@gloucestershire.gov.uk](mailto:childrensheldesk@gloucestershire.gov.uk)  
or Out of Hours **01452 614194**

Remember it is not the person who first encounters a case of alleged abuse or harm who is responsible for deciding whether abuse has occurred. This is a task for Gloucestershire safeguarding children team.

However, it is important to remember that staff, trustees and volunteers should ensure that concerns are well recorded, physical evidence is preserved, appropriate information is gathered and that responses to concerns are appropriate. (see good practice guidance below) If it is safe to do so, speak to the child concerned to get their views on the concerns or incident and what they would like to happen next.

**If you are unable to contact a safeguarding lead or manager.**

- If someone is at risk, Phone MASH 01452 426565
- If someone is breaking the law, phone the police on 101
- In an emergency phone 999

## **6. Policy Review**

The overall responsibility for this policy lies with the Chief Executive Officer and Board. The policy will be reviewed biennially.

## 7. Contact Information

The Churn Project Designated Children Safeguarding Leads	Sarah Bourne <a href="mailto:sarah.bourne@thechurn.org.uk">sarah.bourne@thechurn.org.uk</a> 01285 380031 or 07701 301092  Rachel Stainton <a href="mailto:rachel.stainton@thechurn.org.uk">rachel.stainton@thechurn.org.uk</a> 01285 380034 or 07701 301122
Gloucestershire Multi Agency Safeguarding HUB (MASH)	<b>01452 426565</b> <a href="mailto:childrenshelpdesk@gloucestershire.gov.uk">childrenshelpdesk@gloucestershire.gov.uk</a> Mon-Fri 9am-5pm  <b>Outside of these hours call</b> <b>01452 614194 Emergency Duty Team</b>
Gloucestershire Safeguarding Children email	<a href="mailto:childrenshelpdesk@gloucestershire.gov.uk">childrenshelpdesk@gloucestershire.gov.uk</a>
To report a concern about a professional working with children (allegations management)	<b>01452 426994</b>  <b>Nigel Hatten LADO</b> (local authority designated officer) <a href="mailto:Nigel.hatten@gloucestershire.gov.uk">Nigel.hatten@gloucestershire.gov.uk</a>  Jenny Kadodia Allegations Management Co-ordinator <b>01452 426320</b>
GSCP Safeguarding Support Unit	<b>01452 583629</b>
GDASS (Gloucestershire Domestic Abuse and Support Service) Inc domestic abuse, coercion, and control, forced marriage	<b>0845 602 9035</b>
Modern slavery reporting	<b>Police 101</b> <b>Crimestoppers 0800 555 111</b>
GRASAC (Glos rape and sexual abuse centre)	<b>01453 526770</b>
The Forced Marriage Unit	<b>020 7008 0151</b>
PREVENT (anti Terrorism)	<b>Police 101</b> <b>Anti-terrorist hotline 0800 789 321</b>
Gloucestershire Fire & Rescue service (Safe and Well Checks)	<b>0800 180 4140</b>
Independent advocacy POhWER	<b>0300 003 1162</b>
Sexual Assessment Referral Centre (SARC) for counselling & support	<b>01452 754390</b>
NSPCC Helpline	<b>0808 800 5000</b>

## 8. Good practice guides

### Early Help

<https://www.gscb.org.uk/media/2103931/early-help-practice-guide-digital-dev6-v2-070420.pdf>

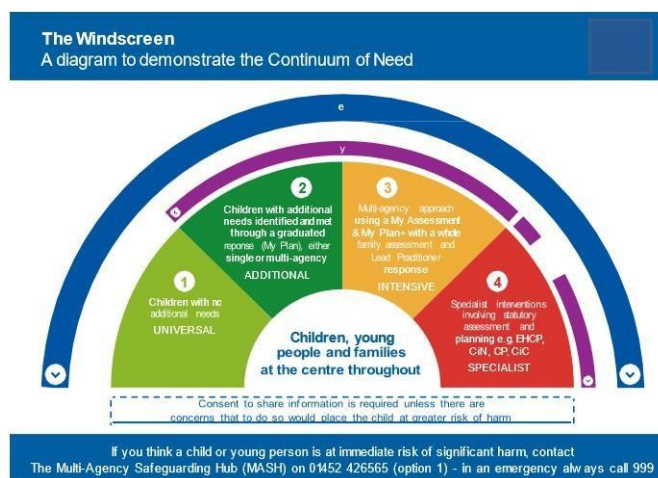
### Thresholds: The 'Windscreen' A diagram to demonstrate the Continuum of Need

#### GSCP Levels of Intervention

The levels of intervention guidance is intended to provide practitioners with guidance about making decisions according to the level of need. It aims to make sure that the appropriate level of support will be put in place to ensure that a child or young person's needs are met in a robust and timely way. Levels of intervention act as a guide to professional decision making and are there to make sure that children, young people and families are able to access the right support to increase life chances and keep children and young people safe.

Children and families have different levels of need at different times across a range of problems. Having a graduated approach ensures that support will be proportionate and at the lowest level of intervention. Children might also have a range of needs across different levels. It is important to take all needs into consideration when determining the type of support that might be required and the professionals who should be involved.

The levels of Intervention Windscreen complements and sits alongside the Early Help Pathway.



### Working Together to Safeguard Children, inter agency.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)

### Procedure for Safeguarding Lead

#### 1. Identification and Documentation of Concern

When a safeguarding concern is identified, a written account is required.

The report can be completed by:

- The person reporting the concern.
- The safeguarding lead if the information comes from a third party, phone call, or other sources.

## 2. Review and Decision-Making

Once the report is completed and information received, the safeguarding lead must decide the necessary action.

Evaluate the concern using the **Graduated Pathway** to determine:

- The child's current level of support.
- The level of support required based on the present concerns.

## 3. Immediate Action for Significant Harm

If a child is at significant harm, immediately contact:

- The **Front Door**.
- The **police**.

In cases of uncertainty or need for advice, the safeguarding lead should:

- Contact the **MASH (Multi-Agency Safeguarding Hub) team** using the professional referral option.
- Follow the advice provided by the MASH team.

## 4. Communication with the Family

The safeguarding lead needs to inform the family about:

- The concern.
- The action that will be taken.

This task can be delegated to a family support worker who has an existing relationship with the family. Ideally, inform the family before completing any referral, unless clear reasons prevent this. Informing the parent(s) is mandatory unless:

- There is a risk of significant harm to the child if the family is made aware.

## 5. Documentation and Referral

- Ensure all actions and decisions are documented.
- Complete any necessary referrals promptly and follow the appropriate procedures as advised by the MASH team or other relevant authorities.

### Note:

Always refer to the accompanying diagram for a visual representation of the process and pathways. This procedure ensures that safeguarding concerns are handled efficiently, with the child's safety as the utmost priority while maintaining transparency with the family whenever possible.



## Action Required for Each Level of Need on the Graduated Pathway

### Level 2: Additional Support

**No immediate safeguarding concern.** Child/family may need additional support to prevent escalation.

#### Actions:

- Contact the family to discuss concerns and potential support.
- With family consent, contact other involved professionals to coordinate support.
- Organise a TAC (Team Around the Child) or TAF (Team Around the Family) meeting with parents and relevant professionals.
- Consider inviting a community social worker or Early Help Coordinator.
- Discuss the option of a My Plan. Register the My Plan with Early Help using the notification form on the Early Help Hub website.
- Allocate a Lead Professional with a positive relationship with the family.
- Consider referrals to other agencies for support/advice, including an Early Help referral to Families Action.

### Level 3: Intensive Support

**More complex needs requiring assessment.**

#### Actions:

- Gain family consent to contact Early Help Advice, Guidance, and Support Teams to check for an existing My Plan or My Plan+.
- If a My Plan or My Plan+ exists, contact the Lead Practitioner to discuss concerns and engage in the TAF.
- If no plan exists, discuss needs with the family and gain consent to complete an early help referral. A My Assessment & My Plan+ is required.
- Consider a TAF meeting to gather information for the My Assessment and to share the assessment and inform the My Plan+.
- Identify a Lead Practitioner and take action to meet the child's needs.
- Regularly review progress through TAF meetings.
- Register the Assessment and My Plan+ with Early Help using the Notification Form.

### Level 4: Specialist Support

**Immediate risk of significant harm.**

#### Actions:

- Contact The Front Door at 01452 426565 (Option 1) or call 999 in an emergency.
- For children needing specialist support from Children's Social Care (including protection and care needs):
- Assess if services under the Children Act 1989 are required.
- Determine potential impacts on the child's health/development without services.
- Consider if multi-agency high-level support or protection is needed.

- Complete the Multi-Agency Service Request Form and email it to the Front Door at [Childrenshelpdesk@gloucestershire.gov.uk](mailto:Childrenshelpdesk@gloucestershire.gov.uk).
- Submit the MARF within 48 hours as written confirmation of any verbal request.
- Contact the MASH team for advice if unsure about the level of need.
- Escalate to line managers if professional disagreements on risk levels arise.

### General Guidance

- **Information Sharing:** Obtain parent/young person consent unless it risks significant harm.
- **MASH Team:** Contact for advice when unsure.
- **Documentation:** Keep clear, factual records. Avoid jargon and generalisations.
- **Professional Disagreements:** Resolve at the lowest level, document actions, and escalate if necessary.

Refer to the respective links and resources for further guidance and necessary forms.

Glofamilies online directory for guidance and information:

<https://www.glofamiliesdirectory.org.uk/>

Multi Agency Request Form (MARF) submit via online portal

<https://children.gloucestershire.gov.uk/web/portal/pages/home>

### Additional Resources for support

[Non-recent abuse | NSPCC](#)

[What is Non-recent and Historical Abuse? | idas.org.uk](#)

### Additional Resources

Gloucestershire Safeguarding Children Partnership

<https://www.gloucestershire.gov.uk/gscp/>

Lead Practitioner Support Page

[https://www.glofamiliesdirectory.org.uk/kb5/gloucs/glofamilies/family.page?familychannel=3\\_2\\_3](https://www.glofamiliesdirectory.org.uk/kb5/gloucs/glofamilies/family.page?familychannel=3_2_3)

Advice, Support and Early Help Services

[https://www.glofamiliesdirectory.org.uk/kb5/gloucs/glofamilies/family.page?familychannel=1\\_1\\_1](https://www.glofamiliesdirectory.org.uk/kb5/gloucs/glofamilies/family.page?familychannel=1_1_1)

Paper MARF

[https://www.gloucestershire.gov.uk/Paper MARF \(DOCX, 52.9 KB\)](https://www.gloucestershire.gov.uk/Paper%20MARF%20(DOCX,%2052.9%20KB))

Sarah Bourne

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