Lingham Primary School

Safeguarding Policy and Procedure

This policy was adopted by the Governing Body on 02/10/2018

This policy is due for review on 02/10/2019

Key Contacts:

Role:	Name/ Details:	Contact:
Designated Safeguarding Lead	Philippa Malcolm	0151 677 5381
Deputy Designated Safeguarding Lead	Lucy Doyle	0151 677 5381
Nominated governor for Safeguarding and C P	Ceri Jones	0151 677 5381
Chair of Governors	Ceri Jones	0151 677 5381
Local Authority Designated Officer (LADO)	Suzanne Cottrell	0151 666 4582 07780 508 919
Head of Safeguarding Children	Kerry Mehta	0151 666 5575
Prevent Team Merseyside Police	Prevent Team	0151 777 8560 or email msoc.prevent@merseyside.police.uk
Director of Children's Services	Paul Boyce	0151 606 2000
Integrated Front Door	Mon-Fri, 9:00am – 5.00pm Outside of these hours	Tel: 0151 606 2008 Tel: 0151 677 6557
Police	In an emergency For non-emergency but possible crime	999 101

School Record of Safeguarding Training:

Type of Training:	Date completed:	Next due date:
Whole School Safeguarding Training (Due every three years)	11/01/2017	11/01/2020
Senior Designated Safeguarding Lead (DSL) (Due every 2 years)	PMalcolm 26/05/2017	26/05/2019
Deputy Senior Designated Safeguarding Lead (DSL)(Due every 2 years)	LDoyle/ JHutchinson ASmith All 20/05/2017	All 26/05/2019
Whole School Staff Refresher/updates (Annual)	Hays Online (Annual) Prevent (Annual	September every year and on Induction
Safer Recruitment Training Name & Date of training (Due every 5 years)	PMalcolm 22/09/2017 LDoyle 01/07/2014 SWafer 11/12/2015	22/09/2022 01/07/2019 11/12/2020
Governor Training	Ceri Jones Safer Recruitment 08/01/2016 Paul Rolfe Safer Recruitment 08/01/2016 All Governors trained annually: HAYs online and Prevent	08/01/2021 08/01/2021 September every year

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Safeguarding Policy:

INTRODUCTION

1.1.   Safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play ensuring children and young people are safe from abuse, exploitation and harm. Our school is committed to safeguarding children and aims to create a culture of vigilance.

1.2.   Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

1.3.   Our school is a community and all those directly connected, staff members, governors, parents, families and pupils, have an essential role to play in making it safe and secure.

1.4.   This procedure document provides the basis for good practice within the school for Safeguarding work. It should be read in conjunction with the Wirral Safeguarding Board Safeguarding Policies and Procedures. These are in keeping with relevant national procedures and reflect what the Board considers to be safe and professional practice in this context.

2   OUR ETHOS

2.1   We believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical, spiritual and moral development of the individual child.

2.2   We recognise the importance of providing an environment within our school that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and to feel confident that they will be listened to.

2.3   We recognise that all adults within the school, including permanent and temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm.

2.4   We will work with parents to build an understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

3   SCOPE

3.1   In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEN it is up to 25 years of age.

3.2   This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

3.3   This policy applies to all learners in this school.

4   THE LEGAL FRAMEWORK

4.1   Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

4.2   Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to co-operate with the local authority to improve the well-being of children in the local authority area.

4.3   Under section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school or further education institution to supply information in order to perform its functions. This must be complied with.

4.4   This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, July 2018:

https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2018

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

All procedures can be found on the WSCB website:

https://www.wirralsafeguarding.co.uk/procedures/

5   ROLES AND RESPONSIBILITIES

5.1   The school's lead person with overall designated responsibility for safeguarding is Philippa Malcolm. We have a deputy safeguarding lead, Lucy Doyle to ensure there is appropriate cover for this role at all times. **The responsibilities of the Designated Safeguarding Lead are described in Appendix A.**

The Designated Safeguarding Lead will be on our school's leadership team and their role of Designated Safeguarding Lead will be **explicit in their job description**. This person should have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and Safeguarding matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

5.2   The school has a **nominated governor** Ceri Jones responsible for safeguarding to champion good practice, to liaise with the head teacher and to provide information and reports to the governing body.

5.3 The **case manager for dealing with allegations** of abuse made against school staff members is the head teacher. The case manager for dealing with allegations against the head teacher is the chair of governors Ceri Jones. **The procedure for managing allegations is detailed in Appendix C.**

5.4 The **head teacher** will ensure that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

5.5 The **governing body** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

5.6 **All staff members, governors, volunteers and external providers** know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child. They are aware that behaviours and physical signs linked to behaviours that put children in danger. Safeguarding issues can manifest themselves via peer on peer abuse. This may include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults, harmful sexual behaviour and sexting. Staff should recognise that children are capable of abusing their peers.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing Recent DfE guidance situates sexual violence and sexual harassment in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND.

It is important that schools record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it.

https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges *(May 2018)*

Concerns should be referred to senior staff who may need to consult with the Designated Safeguarding Lead. Victims of peer on peer harm should be supported by the school's pastoral system.

5.7 There is a policy regarding the use of mobile phones, cameras and other digital recording devices e.g. i-Pads. For online safety, there is within the policy support about children accessing the internet whilst they're at school using data on their phones (3G or 4G networks). The IT policy is located the School Office.

6 SUPPORTING CHILDREN

6.1 We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. Our school may be the only stable, secure and predictable element in their lives.

6.2 We accept that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

6.3   Our school will support all pupils by:

➢ ensuring the content of the curriculum includes social and emotional aspects of learning; Through PSHE and other curriculum contexts, pupils are encouraged to talk about feelings and deal assertively with pressures, are listened to, and know to whom they can turn to for help and advice;

➢ providing pupils with a range of appropriate adults to approach if they are in difficulties; and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it' (KCSIE 2018)

➢ supporting the child's development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness while not condoning aggression or bullying; (The anti-bullying policy is located in the School Office)

➢ ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly;

➢ liaising and working together with other support services and those agencies involved in safeguarding children;

➢ ensuring that the curriculum will help children stay safe, recognise when they do not feel safe and identify who they might or can talk to and will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including 'sexting' and 'Harmful Sexualised Behaviour';

➢ having a behaviour policy that is aimed at supporting vulnerable pupils in the school. The school will ensure that each pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;

➢ ensuring repeated hate incidents, e.g. racist, homophobic or gender- or disability-based bullying, are considered under Safeguarding procedures and monitoring children who have been identified as having welfare or protection concerns and providing appropriate support;

➢ acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a pupils life that may be a threat to their safety and/or welfare (working together 2018) and KCSIE 2018

➢ liaising with a range of agencies that support the pupil such as Health Services, Wirral Social Care, Child and Adolescent Mental Health Services, Education Welfare Services, Special Educational Support Services, Youth Offending Service and the Educational Psychology Service.

➢ ensuring that, when a pupil who is the subject of a Child Protection Plan leaves, their information is transferred to the new school within 2 weeks and that the child's Social Worker is informed that the child has moved;

➢ After 20 days absence if a child has moved and the new school is unknown the school will post details on the 'Pupil to Pupil' register;

➢ alert the authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, the school will be vigilant in identifying any private fostering arrangement. (See Appendix C)

➢ acknowledging that a child that is looked after (CLA) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep CLA and previously looked after children safe. It is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group;

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- applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, by considering the risks carefully, given the additional vulnerability of the group;

- recognising that to safeguard a pupil, it may be necessary to use restraint and yet restraint is likely to impact on the well-being of the child. By planning positive and proactive behaviour support, schools and colleges can reduce the occurrence of risky behaviour and the need to use restraint. Guidance is available here:

https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

7 SAFEGUARDING PROCEDURE

7.1 We have developed a structured procedure in line with *Wirral Safeguarding Children Board* which will be followed by all members of the school community in cases of suspected abuse. This is detailed in Appendix B.

7.2 In line with the procedures, the Integrated Front Door will be contacted as soon as there is a significant concern.

7.3 The name of the Designated Safeguarding Lead will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

7.4 We will ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children by publishing the policy and procedures on our website and by referring to them in our introductory school materials.

8 DEALING WITH A DISCLOSURE MADE BY A CHILD – ADVICE FOR ALL MEMBERS OF STAFF

8.1 *If a child discloses that he or she has been abused in some way, the member of staff or volunteer should follow this guidance:*

Receive - Listen actively, open body language, accept, non-judgmental. Use TED (tell, explain, describe)

Reassure - 'You've done the right thing by coming to me', re-assure child that you have listened and hear what they are saying; don't promise what can't be delivered

Respond - Tell what you are going to do and do it. Ensure child is ok before leaving

Report - As soon as possible, to the Designated Senior Lead (DSL) in school

Record – Is Vital – facts, no opinions – When? Where? Who? What?

- Inform the Designated Safeguarding Lead without delay.
- Complete the Safeguarding incident/welfare concern form and pass it to the DSL.

Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL.

Further information about what to do if you are worried that a child is being abused is available here in advice for practitioners:

https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

RECORD KEEPING

8.2   All concerns, discussions and decisions made and the reasons for those decisions **must** be recorded in writing (signed and dated). SFEF model to be used to capture the child's voice (appendix C)

8.3   We will continue to support any pupil leaving the school about whom there have been concerns by ensuring that all appropriate information, including Safeguarding and welfare concerns, is forwarded under confidential cover to the pupil's new school as a matter of priority.

8.4   Schools should have <u>at least two</u> emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home in order to reduce the risk of (Keeping Children Safe in Education 2018)

DISCUSSING CONCERNS WITH THE FAMILY AND THE CHILD – ADVICE   FOR   THE   DESIGNATED SAFEGUARDING LEAD (DSL)

9.1   In general, you should always discuss any concerns the school may have with the child's parents. They need to know that you are worried about their child. However,   you   should not discuss your concerns if you believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.

9.2   If you make a decision not to discuss your concerns with the child's parents or   carers,   this must be recorded in the child's Safeguarding file with a full explanation for your decision.

9.3   It is important to record and consider the child's wishes and feelings, as part of planning what action to take in relation to concerns about their welfare. Capturing the lived experience of the child is paramount to ensure that actions remain child-centred (See Appendix C (Supporting Families Enhancing Futures (SFEF) model to capture the child's lived experience.

9.4   When talking to children, you should take account of their age, understanding and preferred language, which may not be English. It is also important to consider how an SEND child may need support in communicating.

9.5   How you talk to a child will also depend on the substance and seriousness of the concerns. You may need to seek advice from the Integrated Front Door or the police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised.

9.6   If concerns have arisen as a result of information given by a child, it is important to reassure the child but not to promise confidentiality.

9.7   It is expected that you discuss your concerns with the parents and seek their agreement to making a referral to the Integrated Front Door, unless you consider that this would place the child at increased risk of significant harm.

9.8   You do not need the parents' consent to make a referral if you consider the child is in need of protection, although parents will ultimately be made aware of which organisation made the referral. If parents refuse to give consent to a referral but you decide to continue, you need to make this clear to the Integrated Front Door.

9.9   If you decide to refer the child without the parents' consent, make sure to record this with a full explanation of your decision.

9.10   When you make your referral, you should agree with the Integrated Front Door what the child and parents will be told, by whom and when.

MAKING A REFERRAL

If a child or young person is at risk of harm, abuse or neglect please report it to the **Integrated Front Door**

Mon-Fri, 9:00am – 5.00pm Tel: 0151 606 2008

Outside of these hours Tel: 0151 677 6557

In an emergency always call the police on 999.
If you think there has been a crime but it is not an emergency call 101.

The Request for Services referral form that can be found here:

https://www.wirralsafeguarding.co.uk/public/concerned-about-a-child/

E-mail it to: *cadtsocialcare@wirral.gcsx.gov.uk*

10   SAFER WORKFORCE AND MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS (This procedure is detailed in Appendix C, Section 4)

10.1   We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with ***Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2018***. In addition to obtaining the DBS certificate described, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. See Appendix C.

A check of any prohibition can be carried out using the Teacher Services' system that may be found here: *https://teacherservices.education.gov.uk/* *(January 2018)*

Prohibition orders are described in the National College for Teaching and Leadership's (NCTL) publication Teacher misconduct: the prohibition of teachers. It can be found here:

https://www.gov.uk/government/publications/teacher-misconduct-the-prohibition-of-teachers--3

10.2   We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. See Appendix C, for information on Single Central Record (SCR). The Single Central Record is located in the School Office.

10.3   Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

10.4   We will ensure that at least one member of every interview panel has completed safer recruitment training within the last 5 years.

10.5   We have a procedure in place to manage allegations against members of staff and volunteers in line with *WSCB procedures.*

10.6   There is an agreed staff behaviour policy (sometimes called the code of conduct) which is compliant with 'Safer Working Practices', and includes - acceptable use of technologies, staff/pupil relationships and communications including the use of social media.

Guidance can be accessed:

http://www.rrrecruitment.com/wp-content/uploads/2016/04/Guidance-for-Safer-Working-Practice-October-2015.pdf

11   STAFF INDUCTION, TRAINING AND DEVELOPMENT

11.1   All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic safeguarding training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding policy, staff code of conduct, Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, Part One, March 2018 and other related policies. There are mechanisms in place, such as safeguarding updates, to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education. Staff should also read, "Working Together to Safeguard Children."

11.2   The induction will be proportionate to staff members' roles and responsibilities

11.3   All Designated Safeguarding Leads (DSLs) will undergo updated Safeguarding training every two years.

11.4   All staff members of the school will undergo face to face training (whole-school training) which is regularly updated and at least every three years. ***All governors must undergo governor specific awareness training at least every two years – this is to be decided by the school / setting***. All staff will have access to WSCB multi-agency safeguarding training and e-learning.

11.5   Staff members who miss the whole-school training will be required to undertake other relevant training to make up for it, e.g. by joining another school's whole-school training, booking onto whole-school training mop-up sessions.

11.6   The nominated governor for safeguarding will undergo training prior to or soon after appointment to the role; this training will be updated every three years.

11.7   We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.

11.8   The Designated Safeguarding Lead will provide briefings to the school on any changes to safeguarding legislation and procedures and relevant learning from local and national serious case reviews. These will occur annually or more frequently when necessary.

        https://www.wirralsafeguarding.co.uk/professionals/serious-case-reviews/

11.9   The school will maintain accurate records of staff induction and training.

12   CONFIDENTIALITY, CONSENT AND INFORMATION SHARING

12.1   We recognise that all matters relating to Safeguarding are confidential.

12.2   The head teacher or the Designated Safeguarding Lead will disclose any information about a pupil to other members of staff on a need-to-know basis only

12.3   All staff members must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

12.4   All staff members have a professional responsibility to share information with other agencies in order to safeguard children.

12.5   All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

12.6   We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf **(July 2018)**

13   INTER-AGENCY WORKING

13.1   We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

13.2   We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

13.3   We will participate in serious case reviews, other reviews and file audits as and when required to do so by the Wirral Safeguarding Children Board. We will   ensure that we have a clear process for gathering the evidence required for reviews and audits, and embed recommendations into practice and compile required actions within agreed timescales.

14   CONTRACTORS, SERVICE AND ACTIVITY PROVIDERS AND WORK PLACEMENT PROVIDERS

14.1   We will ensure that contractors and providers are aware of our school's safeguarding policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.

14.2   We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding check in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2018.* If assurance is not obtained, permission to work with our children or use our school premises may be refused.

14.3   When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

15   WHISTLE-BLOWING AND COMPLAINTS

15.1   We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so.

The school / college Whistle blowing policy is located in the school office.

Whistleblowing: guidance and code of practice for employers is located: *https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415175/bis-15-200-whistleblowing-guidance-for-employers-and-code-of-practice.pdf (March 2015)*

Whistleblowing Advice Line is available for all worker - 0800 028 0285
- Email *help@nspcc.org.uk*

15.2   We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of Safeguarding, which may include the attitude or actions of colleagues. If necessary, they will speak with the head teacher, the chair of the governing body or with the Local Authority Designated Officer (LADO).

15.3   We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice.

15.4   We will actively seek the views of children, parents and carers and staff members on our Safeguarding arrangements through surveys, questionnaires and other means.

16   SITE SECURITY

16.1   All staff members have a responsibility to ensure our buildings and grounds are secure   and for reporting concerns that may come to light.

16.2   We check the identity of all visitors and volunteers coming into school. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

16.3   The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

17   QUALITY ASSURANCE

17.1   We will ensure that systems are in place to monitor the implementation of and   compliance with this policy and accompanying procedures.

17.2   We will complete an audit of the school's safeguarding arrangements at frequencies specified by the Wirral Safeguarding Children Board and using the Section 175 online audit tool provided by them for this purpose. More information including how to register for the audit can be found below

https://www.wirralsafeguarding.co.uk/professionals/section-11-175-audit/

17.3   The school's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

18   POLICY REVIEW

18.1   This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.

18.2   The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

Updated Policy Date:	Scheduled review
02/10/2018	02/10/2019