

Whole-School Policy on Safeguarding and Child Protection

SCHOOL: Hillside Specialist School and College

A. Named staff/personnel with specific responsibility for Safeguarding and Child Protection

Academic Year	Designated Safeguarding Lead & 'Back-Up' or Deputy DSL	Nominated Governor
2017- 2018	Paul Leaper Emily Roberts	Steve Warren

B. Training for Designated Staff in School (DSLs should refresh their training every 2 years KCSIE 2016)

Name of Staff Member / Governor	Date when last attended Safeguarding Training	Provided by Whom (e.g. LCC, Governor Services)
Paul Leaper	October 2017	LCC
Emily Roberts	December 2016	LCC

C. Whole School Safeguarding Training (all staff members should receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members should receive safeguarding and child protection updates...as required, but at least annually..." KCSIE 2016)

Who attended (e.g. all teaching and welfare / support staff, Governors, volunteers)	Date	Training delivered by
Contest (counter terrorist strategy) WRAP (Workshop to Raise Awareness of Prevent) safeguarding training. All Staff	5/01/16 Inset Day	Lancashire Constabulary
Safeguarding Training All Teaching and Support Staff including none classroom based staff, employed at the time	6/06/16 and Inset Day	Paul Leaper

Keeping Children Safe in Education part 1 Staff Briefing All Staff	25/01/17	Paul Leaper
Safeguarding Training All Teaching and Support Staff including none classroom based staff, employed at the time.	5/06/17	Paul Leaper

D. Safer Recruitment Training in line with KCSiE 2016 and The School Staffing (England) Regulations 2009 require governing bodies of maintained schools to ensure that at least one person on any appointment panel has undertaken safer recruitment training. (LCC recommends this is updated every 5 years)

Name of Staff Member / Governor	Date when attended	Provided by Whom (e.g. LCC, Governor Services, on line training)
Liz Ascroft	15/12/15	LCC
Paul Leaper	30/03/16	LCC
Emily Roberts	31/01/17	LCC
Claire Iddon	31/01/17	LCC
Carol Griffin	22/03/17	LCC
Emma Cookson	22/03/17	LCC
Helen Grice	22/03/17	LCC
Lisa Rowlinson	3/05/17	LCC
Julie Greenall	3/05/17	LCC
Sharon Taylor - Governor	21/06/17	LCC
Lyn Preston - Governor	21/06/17	LCC

E. Review dates for this policy (annual review required KCSiE 2016)

Review Date	Changes made	By whom
Autumn 17 SEC	Updated in line with new guidance and format. Dates of DSL training and whole staff training updated. Safe Recruitment Training updated	Paul Leaper and approval from Governing Body SEC committee members

1. PURPOSE OF A SAFEGUARDING AND CHILD PROTECTION POLICY

An effective whole school child protection policy is one which provides clear direction to staff and others about expected codes of behaviour in dealing with child protection issues. An effective policy also makes explicit the school's commitment to the development of good practice and sound procedures. This ensures that child protection concerns and referrals may be handled sensitively, professionally and in ways which prioritise the needs of the child.

2. INTRODUCTION

This policy was written by Mary Aurens, previous Schools Safeguarding Officer, Lancashire County Council, based on the previous template which originated in the Child Protection Information Pack 2004 and has been updated on an as and when required basis and acknowledges that it did and does include information from the CAPE sample school policy.

All schools are expected to play their part in keeping children safe. These responsibilities for maintained and independent schools (including academies) are set out in section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 (made under section 94 of the Education and Skills Act 2008). These require Governing Bodies and Proprietors to ensure that arrangements are made to safeguard and promote the welfare of children at the school.

This policy updates the LA sample template policy issued last in April 2014 and is in response to Section 175 of the Education Act 2002 and Section 94 of the Education and Skills Act 2008 and:

- Lancashire Safeguarding Children Board 'Safeguarding Children Procedures' (May 2015) - <http://panlancashirescb.proceduresonline.com/index.htm>
- Keeping Children Safe in Education (KCSIE) (DfE 2016)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> (NOT YET UPDATED WITH SEPT 2016 UPDATE)
- Working Together To Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (DfE 2015);
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- What To Do If You're Worried A Child Is Being Abused (DfE 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416455/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- [Disqualification under the Childcare Act 2006](https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006)
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

- The Childcare Act 2006 – Disqualification Requirements.
- The Early Years Foundation Stage Framework section 3 – the Safeguarding and Welfare Requirements, September 2014.

(Where the school's Early Years Provision is registered with Ofsted, they must comply with section 3).

Our school fully recognises the contribution it can make to protect children and support pupils in school'.

There are three main elements to our Safeguarding and Child Protection Policy.

- (a) **Prevention:**
Creating a positive school atmosphere, teaching and pastoral support to pupils where children have opportunities to have a voice and that their wishes and feelings are listened to and taken into account.
- (b) **Protection:**
By following agreed procedures, ensuring staff are trained to recognise possible signs and symptoms of abuse and are trained and supported to respond appropriately and sensitively to child protection concerns.
- (c) **Support:**
To pupils and school staff and to children who may have been abused.

This policy applies to all adults, including volunteers, working in or on behalf of the school.

3. SCHOOL COMMITMENT

We recognise that high self-esteem, confidence, peer support and clear lines of communication with trusted adults helps all children, and especially those at risk of, or suffering abuse.

Our school will therefore:

- (a) Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to. That they have opportunities to talk and their wishes and feeling are sort, listened to and taken into account.
- (b) Ensure that children know that there are adults in the school who they can approach if they are worried or are in difficulty.
- (c) Include in the curriculum activities and opportunities for PSHE which equip children with the skills they need to stay safe and / or communicate their fears or concerns about abuse.
- (d) Include in the curriculum material which will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to

- childcare and parenting skills. To enable them to develop to their full potential and enter adulthood successfully.
- (e) Ensure that every effort will be made to establish effective working relationships with parents and colleagues from other agencies.

4. FRAMEWORK

Effective safeguarding systems are those where:

- The child's needs are paramount, and the needs and wishes of the child, be they be a baby or infant, or an older child, should be put first, so that every child receives the support they need before a problem escalates;
- All professionals who come into contact with children and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to those children;
- All professionals share appropriate information in a timely way and can discuss concerns about an individual child with the Designated Safeguarding Lead (DSL) and recognise their responsibilities in sharing information with the local authority children's social care where they feel that appropriate action has not been taken by the DSL or their concerns have not been taken seriously.
- High quality professionals are able to use their expert judgement to put the child's needs at the heart of the safeguarding system so that the right solutions can be found for each individual child;
- All professionals contribute to whatever actions are needed to safeguard and promote the child's welfare and take part in regularly reviewing the outcomes for the child against specific and outcomes.

Safeguarding is the responsibility of *all* adults and especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of the Lancashire Safeguarding Children Board (LSCB).

5. ROLES AND RESPONSIBILITIES

The Governing Body/proprietor must ensure that:

- they comply with their duties under legislation. They must have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times.
- Schools and colleges should have a senior board level (or equivalent) lead to take **leadership** responsibility for the organisation's safeguarding arrangements.
- there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

- the above policies and procedures, adopted by governing bodies and proprietors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- there are appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection. This should be explicit in the role-holder's job description.
- during term time the designated safeguarding lead and or a deputy should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
- the designated safeguarding lead and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.
- the school or college contributes to inter-agency working in line with statutory guidance [Working together to safeguard children](#).
- their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB.
- they recognise the importance of information sharing between professionals and local agencies.
- all staff members undergo safeguarding and child protection training at induction. The training should be regularly updated. Induction and training should be in line with advice from the LSCB.
- In addition all staff members should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- they recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- appropriate filters and appropriate monitoring systems are in place.

- children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. The school or college should have written recruitment and selection policies and procedures in place.
- at least one person on any appointment panel has undertaken safer recruitment training.
- there are procedures in place to handle allegations against teachers, headteachers, principals, volunteers and other staff.
- There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**
- their child protection policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with. The policy should reflect the different forms peer on peer abuse can take, make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. It should be clear as to how victims of peer on peer abuse will be supported.
- Governors and proprietors should ensure sexting and the school or colleges approach to it is reflected in the child protection policy.
- the child protection policy reflects the different gender issues that can be prevalent when dealing with peer on peer abuse.
- where there is a safeguarding concern the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately any systems and processes should operate with the **best** interests of the child at their heart.
- staff have the skills, knowledge and understanding necessary to keep looked after children safe. In particular, they should ensure that appropriate staff have the information they need in relation to a child’s looked after legal status
- they appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training.

- their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect of children with special educational needs (SEN) and disabilities

The Headteacher should ensure that:

- the policies and procedures adopted by the Governing Body or Proprietor, particularly concerning referrals of cases of suspected abuse and neglect, are fully implemented and followed by all staff;
- s/he will be the case manager and liaises with the LA designated officer (LADO) in the event of allegations of abuse being made against a member of staff or volunteer
- s/he receives appropriate child protection training which is regularly updated
- s/he will ensure that sufficient resources and time are allocated to enable the staff to discharge their responsibilities, will help to create an environment where all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children and will address any concerns sensitively and effectively in a timely manner in accordance with the agreed whistle blowing policies.

The Designated Safeguarding Lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- undertake Prevent awareness training

- refresh their knowledge and skills at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;¹
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- ensure the school or college's child protection policies are known, understood and used appropriately;
- Ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns and arrange

¹ Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

adequate and appropriate cover arrangements for any out of hours/out of term activities.

Who is available within the Local Authority to offer advice and support to the school?

Andrea Glynn	School Safeguarding Officer	01772 531196
Tim Booth	LADO	01772 536694

It is recognised that child protection is an emotive area of work and staff will be made aware that there are support networks available to them outside to school:- LCC Employee Welfare and Counselling Service 08000 214 154 www.youreap.co.uk

6. PROCEDURES

'Where it is believed that a child is suffering from, or is at risk of significant harm, we will follow the procedures set out in the document produced by Lancashire Safeguarding Children Board (2015) and follow the action chart in the appendices within this policy.

All staff will have access to the Safeguarding and Child Protection policy and will work within it.

A copy of the policy will be made publicly available via the schools website or by other means

All parents/carers will be made aware of the schools responsibilities in relation to safeguarding and that the school will refer all cases of suspected abuse to Children's Social Care via a statement in the prospectus.

All staff will received induction on day one including a copy of relevant policies.

All staff via staff meetings will be advised of changes to policy and procedures including when the Safeguarding and Child Protection Policy has been updated.

7. CONFIDENTIALITY

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of child protection.

The basic principles of information sharing are the 7 Golden Rules of Information sharing (Data Protection Act 1998 (2008))

Staff will be reminded on a regular basis of the 7 Golden Rules and within Safeguarding training will be informed that they must never promise to keep secrets, that if a child ask them to keep a secret they will tell them that them that cannot keep secrets and that any information that indicates that they or

another child or adult is being harmed or is at risk of being harmed will be shared with DSLs/backup DSLs named within this policy.

See appendix 2 of the attached Procedures template

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. Any disclosure of personal information to others, [including Children's Social Care Services], must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (*Data Protection Act 1998, European Convention on Human Rights, Article 8*). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, consent may not be possible or desirable but the safety and welfare of a child dictate that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

9. RECORDS AND MONITORING

Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concerns held about a child or children within our school, the status of such records and when these records, or parts thereof, should be shared with other agencies.

All concerns regarding children and any disclosures made will be recorded on the school's agreed proforma. This will be done as soon as possible and within 24 hours of the disclosure and then given to the DSL or if not available will be given to the backup DSL. . It is recognised that in some cases the initial reporting to the DSL will be verbal to enable a timely response to the concerns raised.

The DSL will then make a decision regarding any further action in accordance with the LSCB Continuum of Need and thresholds guidance.

Where a referral to Children's Social Care and/or the police is required, it will normally be the DSL that undertakes this action, but recognising that anyone can make a referral to CSC and/or the police.

The child protection files will be stored under lock and key in a central place and only those who are DSL trained will have open access to them. The DSL/backup DSL will share information on a need to know basis.

Where children leave the school/college will ensure their child protection file is transferred to the new school or college as soon as possible and in accordance with LSCB best practice guidance, this will be within 15 working days of the

child going off roll. It is recognised that best practice is that there will be a verbal handover between the DSL and the DSL at the receiving school/college prior to the file transfer happening. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

10. SUPPORTING PUPILS AT RISK

Our school recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This school may be the only stable, secure and predictable element in the lives of children at risk. Whilst at school, their behaviour may still be challenging and defiant and there may even be moves to consider suspension or exclusion from school.

It is also recognised that some children who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the child can receive appropriate help and support².

This school will endeavour to support pupils through:

- (a) The curriculum, to encourage self-esteem and self-motivation;
- (b) The school ethos, which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued;
- (c) The implementation of school behaviour management policies (required under the Code of Practice, 1993 Education Act)³;
- (d) A consistent approach, which recognises and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within the school setting;
- (e) Regular liaison with other professionals and agencies who support the pupils and their families, in-line with appropriate confidentiality parameters;
- (f) A commitment to develop productive, supportive relationships with parents, whenever possible and so long as it is in the child's best interests to do so;
- (g) The development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations.

This policy should be considered alongside other related policies in school.
See Section 14

We recognise that, statistically, children with behavioural difficulties and disabilities are particularly vulnerable to abuse. School staff who work, in any capacity, with children with Special Educational Needs and disabilities, and/or emotional and behaviour problems will need to be particularly sensitive to signs of abuse and be aware that additional barriers can exist

² Guidance for schools on the management and support of young people who display problematic or sexually harmful behaviour, for example is available via andrea.glynn@lancashire.gov.uk

when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

Definitions

As in the Children Acts 1989 and 2004, a **child** is anyone who has not yet reached his/her 18th birthday.

Abuse and neglect are forms 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.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say and how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve

physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

11. TAKING ACTION TO ENSURE THAT CHILDREN ARE SAFE.

All staff and volunteers follow the LSCB Child Protection Procedures

<http://panlancashirescb.proceduresonline.com/index.htm>

It is **not** the responsibility of the school staff to investigate or determine the truth of any disclosure or allegation of abuse or neglect. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly all concerns indicating possible abuse or neglect will be recorded and discussed with the DSL or backup DSL prior to any discussion with parents.

It must also be stressed that children can be exposed to a range of issues, whether that be in their home environment or communities, examples of these would be where there is domestic abuse, drug or alcohol misuse, parental mental ill health issues, children vulnerable to violent extremism (radicalisation), female genital mutilation, honour based violence, child sexual exploitation and gang activity, then children may also be particularly vulnerable and in need of support or protection. The procedures relating to these issues and others are detailed in the LSCB procedures.

Bruising to Non-Mobile Children (LSCB Procedures 1.3 points 24 – 26)

All non-mobile children who are observed with injuries / bruises must be considered as possible subjects of non-accidental injury and referred for immediate paediatric

assessment (non-mobile children include very young children or children of any age with motor development delays or physical disabilities that restrict mobility);

In addition:

When there is no explanation or there is cause for concern about the explanation that is offered for the injury the child must be referred to children's social care to consider the need for a S.47 enquiry, as per current procedures;

Even if the explanation appears satisfactory children's social care (CSC) should still be informed of the referral for paediatric assessment (as per current procedures). In these circumstances CSC will review its records and any relevant information will be shared with the examining paediatrician. CSC will also assist with further information gathering at the request of the examining paediatrician should this be required

Go to Flowchart in Appendix 3 for procedure

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the [TES](#), [MindEd](#) and the [NSPCC](#) websites.

Keeping Children Safe in Education 2016, lists a range of specific safeguarding issues, these are encompassed in Lancashire Safeguarding Children Board Procedures, within section 5 (Children in Specific Circumstances)

Go to <http://panlancashirescb.proceduresonline.com/index.htm> click on contents and go to CHILDREN IN SPECIFIC CIRCUMSTANCES

There is also further information regarding some of these issues:

Radicalisation:

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff will use their professional judgement in identifying children who might be at risk of radicalisation and act

proportionately following section 5.32 of the LSCB procedures.
<http://panlancashirescb.proceduresonline.com/index.htm>. This will include making referrals to the Channel programme as appropriate.

Prevent Duty Guidance:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Paragraphs 57-76 of the Prevent guidance relates to schools

Female Genital Mutilation:

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Indicators:

FGM: multi agency practice guidelines:

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Pages 16 -17 - indicators

Pages 42 - the role of schools and colleges.

Also s5.19 <http://panlancashirescb.proceduresonline.com/index.htm>

From, October 2015, all teachers who discover (either by disclosure by the victim or visual evidence) that FGM appears to have been carried out on a child under the age of 18 must immediately report this themselves to the police and involve CSC as appropriate. (Statutory duty to report from October 2015 – section 5B of the FGM Act 2003 (s74 as inserted – Serious Crime Act 2015).

Child Sexual Exploitation:

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive „something“ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, attention, gifts, money) as a result of them performing, or others performing on them, sexual act or activities. Child sexual exploitation grooming can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability”

Via the curriculum this staff will raise awareness around positive healthy relationships and where appropriate specifically raise awareness of CSE and the grooming process. Any concerns re CSE will be reported to the DSL who will follow the LSCB procedures as defined in s5.22.

<http://panlancashirescb.proceduresonline.com/index.htm>

Children missing from education (CME):

A child going missing from education is a potential indicator of abuse or neglect. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

The Local Authority's procedures for CME are currently being updated in line with national guidance. Contact Lancashire CME for further advice on

<http://www.lancashire.gov.uk/practitioners/supporting-children-and-families/education/children-missing-education.aspx>

(The government recently consulted on plans to amend regulations from September 2016, to improve information sharing between schools and LAs to help identify children missing education and help protect children from potential harm. This section will be updated to reflect any changes that are made before September 5 2016.)

(This section will be amended once update is received)

For all Safeguarding issues:

a) Staff must immediately report:

- any suspicion that a child is injured, marked, or bruised in a way
 - which is not readily attributable to the normal knocks or scrapes
 - received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, including nonattendance
- any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people
- any concerns regarding person(s) who may pose a risk to children (e.g. staff in school or person living in a household with children present) including inappropriate behaviour e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

b) Responding to Disclosure

Disclosures or information may be received from pupils, parents or other

members of the public. School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity. Any child who has communication difficulties will be given access to express themselves to a member of staff with the appropriate skills. Such information cannot remain confidential and staff will immediately communicate what they have been told to the DSL and make a contemporaneous record using the school pro forma.

12. SAFER SCHOOLS, SAFER STAFF

The School Staffing Regulations require governing bodies of maintained schools to ensure that at least one person on any appointment panel has undertaken safer recruitment training.

In line with part three of KCSiE 2016, governing bodies and proprietors will take steps to prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. The school or college should have written recruitment and selection policies and procedures in place. See flow chart in Appendix 5

A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. A check of any prohibition can be carried out using the [Teacher Services' system](#).

A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. The grounds on which a section 128 direction may be made by the Secretary of State are found in the relevant regulations.

Governors in maintained schools are required to have an enhanced criminal records certificate from the DBS.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

In line with part four of KCSiE 2016, governing bodies and proprietors will ensure there are procedures in place to handle allegations against members of staff and volunteers. Such allegations should be referred to the LADO at the local authority. There must also be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.

If the allegation is against a member of staff/volunteer then the Head Teacher is the Case Manager who deals with this and liaises with the Local Authority. If the allegation is against the Head Teacher then the Case Manager who deals with this is the Chair of Governors.

In all instances, the Case Manager has no role of investigation at the onset of the allegation and advice should be sought from the LADO (Local Authority Designated Officer for Allegations) 01772 536694 or Safeguarding in Education Team 01772 531196.

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know. However, there will be some cases that require a strategy discussion with CSC and/or the police and it will be within the strategy discussion that decisions are made as to what information can be disclosed to parents or carers. (KCSIE 2015 para122, p39)

Confidentiality in relation to allegations.

In the event of an allegation being made, our school/college will make every effort to maintain confidentiality and guard against unwanted publicity. Parents and carers will be made aware that under s141F of the Education Act 2011, there is a prohibition on reporting or publishing allegations about teachers, this includes via social media eg Facebook, Twitter etc and if breached this could lead to prosecution. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be advised to seek legal advice.

Go to: <http://panlancashirescb.proceduresonline.com/index.htm> **and click on contents and go to Chapter 6 – Safer Workforce**

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school or college, as outlined in this guidance. It is recognised that for most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity (as defined in KCSiE 2016)

All relevant staff who work within early years or provide child care to children in extended years will be checked in accordance with the requirements of the statutory guidance Disqualification under the Childcare Act 2006 (February 2015). These checks will be conducted annually for existing staff and at the point of conditional job offer for new staff. A record of all checks will be entered onto the Single Central Record and disclosure forms will be held on staff personnel files.

On induction, all staff and volunteers, will be given the LCC Induction Pack and included in this is the Guidance for Safer Working Practice for Staff who work in Education Settings March 2009. They will sign to say that they have had this document and will work within it.

13. USE OF MOBILE PHONES AND CAMERAS

Children have their photographs taken to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2014).

Staff, visitors, volunteers and students are not permitted to use their own mobile phones to take or record any images of children for their own records during session times.

Procedures

Under the Data Protection Act 1998, the school must seek parental consent to take photographs and use video recorders. Photographs will be stored only on school hardware drives that do not leave the premises and are protected by a secure server.

The schools digital camera/s or memory cards must not leave the school setting unless on an official school trip. Photos are printed/uploaded in the setting by staff and once done images are then immediately removed from the cameras memory.

The schools digital camera/s or memory cards must not leave the school setting unless on an official school trip. Photos are printed/uploaded in the setting by staff and once done images are then immediately removed from the cameras memory.

It is acknowledged that often photographs may contain other children in the background.

You will also need to consider the schools position on parents recording/photographing events such as sports day, outings/trips, and Christmas and fundraising events. As well as parents – what is the schools position on staff photographing and/or recording such events on schools equipment – will it be a number of staff or will only certain named staff be asked to undertake this.

On admission, parents will be asked to sign the consent for photographs to be taken in school or by the media for use in relation to promoting/publishing the school. This consent will last for a maximum of 5 years only. This does not cover any other agency and if any other agency requests to take photographs of any child then separate consent before photographs are taken will be sought.

Cameras and mobile phones are prohibited in school. This procedure is covered under the ICT Security Framework Policy.

The 'School's photographic Images Policy' is agreed by the Governing Body and signed off by the Chair of Governors

14. RELATED SCHOOL SAFEGUARDING POLICIES

Safeguarding is not just about protecting children from deliberate harm (child protection). It includes:

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

and relates to:

- pupils' health and safety
- the use of reasonable force
- meeting the needs of pupils with medical conditions
- providing first aid
- educational visits and work experience
- intimate care
- internet or online safety
- appropriate arrangements to ensure school security, taking into account the local context.
- rigour with which absence is followed up
- decision-making process involved in taking pupils off roll
- care taken to ensure that pupils placed in alternative provision are safe at all times

Safeguarding can involve a range of potential issues such as:

- Child sexual exploitation
- Bullying including online bullying (cyberbullying)
- Domestic abuse
- Drugs and/or alcohol
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation
- Forced marriage and honour based violence
- Gangs and youth violence
- Gender based violence/violence against women and girls
- Mental health
- Private fostering
- preventing radicalisation (Children who may be vulnerable to violent extremism)
- Sexting
- Teenage relationship abuse
- Trafficking.

Go to <http://panlancashirescb.proceduresonline.com/index.htm> and click on contents and go to CHILDREN IN SPECIFIC CIRCUMSTANCES

Related school policies include:

- Attendance, admissions & exclusions
- Anti-bullying
- Behaviour

- Child Protection
- Children Missing Education
- Care and control / positive behavior
- Complaints
- Discipline
- Educational Visits
- Equal opportunities
- Online Safety inc Acceptable Use Policy (AUP)
- Extended Services/ before and after school
- Equality
- First Aid (inc. medicines, intimate personal care etc)
- Health and Safety
- Home School Agreements
- Induction
- Intimate Personal Care
- Managing Allegations
- PSHE inc Sex and Relationships Education
- Restrictive Physical Intervention
- Care and Control
- Recruitment and Selection
- Special Needs
- Staff behaviour/codes of conduct
- Staff Discipline
- Use of photographs / videos / imagery
- Use of Social Networking and media sites
- Use of Mobile Phones in school
- Photographic Images of Children Policy
- Whistle blowing

SCHOOL CHILD PROTECTION PROCEDURES

The Designated Safeguarding Lead will ensure that the school Child Protection policy is made publically available and that parents are aware of the fact that all cases of suspected abuse or neglect will be referred to Children's Social Care and the school/colleges' role within this. That staff know the policy and use it appropriately, it is reviewed and updated regularly along with the governing body/ proprietors/management committee.

What Should Staff/Volunteers Do If They Have Concerns About A Child or Young Person in School?

Education professionals who are concerned about a child's welfare or who believe that a child is or may be at risk of abuse should pass any information to the Designated Safeguarding Lead (**DSL**) in school; this should *always* occur as soon as possible and certainly within 24 hours (see Flowchart at Appendix 1):

The Designated Safeguarding Lead is: Paul Leaper.....

The Back up Designated Safeguarding Lead is: Emily Roberts.....

It is these senior colleagues who are responsible for taking action where the welfare or safety of children or young people is concerned. If staff are uncertain about whether their concerns are indeed 'child protection' then a discussion with their DSL/back up DSL will assist in determining the most appropriate next course of action:

Staff should never:

- Do nothing/assume that another agency or professional will act or is acting.
- Attempt to resolve the matter themselves, the process in our school is that all concerns are reported to the DSL/backup DSL, if no one who is DSL trained is contactable, then the concerns are reported to the next most senior member of staff.

What should the DSL consider right at the outset?

- Am I dealing with 'risk' or 'need'? (By definition, a child at risk is also a child in need. However, what is the *priority / level and immediacy* of risk / need?)
- Can the level of need identified be met in or by the school or by accessing universal services/undertaking a level 2 CAF/TAF without referral to Children's Social Care
- By working with the child, parents and colleagues?
- What resources are available to me / the school and what are their limitations?
- Is the level of need such that a referral needs to be made to Children's Social Care which requests that an assessment of need be undertaken? **(Level 3 on the Continuum of Need (CoN))**
- Is the level and/or likelihood of risk such that a child protection referral needs to be made (i.e. a child is suffering or is likely to suffer significant harm)? **(Level 4 on the CoN)**
- What information is available to me: Child, Parents, Family and Environment?
- What information is inaccessible and, potentially, how significant might this be?
- Who do/don't I need to speak to now and what do they need to know?
- Where can I access appropriate advice and/or support? (Safeguarding in Education Team 01772 531196)
- If I am not going to refer, then what action am I going to take? (e.g. CAF, time-limited monitoring plan, discussion with parents or other professionals, recording etc)

Feedback to Staff Who Report Concerns to the Designated Safeguarding Lead

Rules of confidentiality dictate that it may not always be possible or appropriate for the Designated Safeguarding Lead to feedback to staff who report concerns

to them. Such information will be shared on a 'need to know' basis only and the Designated Safeguarding Lead will decide which information needs to be shared, when and with whom. The primary purpose of confidentiality in this context is to safeguard and promote the child's welfare.

Thresholds for Referral to Children's Social Care (CSC)

Where a Designated Safeguarding Lead or back up considers that a referral to CSC may be required, there are two thresholds for (and their criteria) and types of referral that need to be carefully considered:

(i) Is this a Child In Need?

Under section 17 (s17(10)) of the Children Act 1989, a child is in need if:

- (a) He is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
- (b) His health or development is likely to be impaired, or further impaired, without the provision of such services;
- (c) He is disabled.

(ii) Is this a Child Protection Matter?

Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:

- (a) is the subject of an Emergency Protection Order;
- (b) is in Police Protection; or where they have
- (c) reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

Therefore, it is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm.

The Designated Safeguarding Lead will make judgements around 'significant harm', levels of 'need' and 'risk' when to refer.

Making Referrals to CSC (Guidance for the Designated Safeguarding Lead)

The Lancashire CoN provides 4 levels to described family circumstances

- **LEVEL 1** – needs and risks are met through Universal Services or simple specific agency response
- **LEVEL 2** – evidence of some unmet needs and low risk. Targeted Service Provision via CAF/TAF

- **LEVEL 3** – higher levels of unmet needs and medium risk. Child in Need (CIN)
- **LEVEL 4** – Significant unmet needs and high risk. Child Protection (CP) and Looked After Children.



The link below enables access to the documents to enable a referral to CSC

<http://www.lancshiresafeguarding.org.uk/>

CAF/TAF forms as well as relevant guidance documents can be found at:

https://schoolsportal.lancsngfl.ac.uk/sp_atoz/service.asp?u_id=3414&strSL=C

CSC Responses to Referrals and Timescales

In response to a referral, Children's Social Care may decide to:

- Provide advice to the referrer and/or child/family;
- Refer on to another agency who can provide services;
- Convene a Strategy Meeting (within five working days);
- Provide support services under Section 17;
- Undertake a Statutory Assessment (completed within 45 working days);
- Convene an Initial Child Protection Conference (within 15 working days of a Strategy Meeting)

- Accommodate the child under Section 20 (with parental consent);
- Make an application to court for an Order
- Take no further action
- Step down to Wellbeing, Prevention and Early Help

Feedback from Children's Social Care

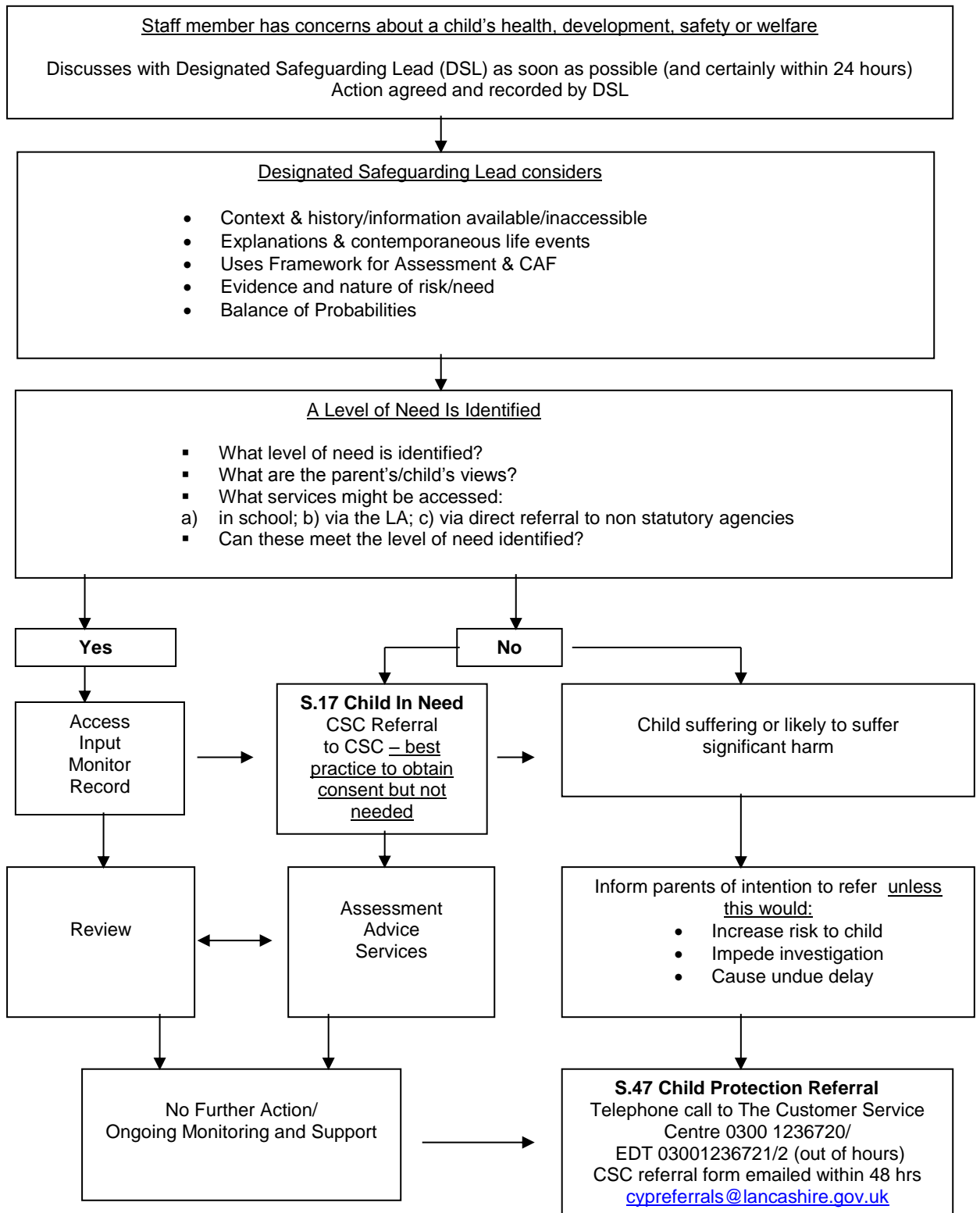
Upon receiving referral, Children's Social Care will decide on a course of action. They should acknowledge receipt of a written referral within **ONE** working day. If the referrer has not received an acknowledgement within **THREE** working days they should make contact with the relevant manager in the Children's Social Care Team. The Children's Social Care manager is responsible for ensuring that the referrer and the family (provided this does not increase any risk to the child) are informed of the outcome of the referral and reasons for supporting the decision. This will be done as soon as possible and, in all cases, within a **maximum of 7 working days**.

Risk Assessment 'Checklist'

- Does/could the suspected harm meet the LSCB definitions of abuse?
- Are there cultural, linguistic or disability issues?
- I am wrongly attributing something to impairment?
- Does the chronology indicate any possible patterns which could/do impact upon the level of risk?
- Are any injuries or incidents acute, cumulative, and/or episodic?
- Did any injuries result from spontaneous action, neglect, or intent?
- Explanations consistent with injuries/behaviour?
- Severity and duration of any harm?
- Effects upon the child's health/development?
- Immediate/longer term effects?
- Likelihood of recurrence?
- Child's reaction?
- Child's perception of the harm?
- Child's needs, wishes and feelings?
- Parent's/carer's attitudes/response to concerns?
- How willing are they to cooperate?
- What does the child mean to the family?
- What role does the child play?

- Possible effects of intervention?
- Protective factors and strengths of/for child (i.e. resilience/vulnerability)
- Familial strengths and weaknesses?
- Possibilities?
- Probabilities?
- When and how is the child at risk?
- How imminent is any likely risk?
- How grave are the possible consequences?
- How safe is this child?
- What are the risk assessment options?
- What are the risk management options?
- What is the interim plan?

APPENDIX 1: TAKING ACTION ON CHILD WELFARE/PROTECTION CONCERNS IN SCHOOL



APPENDIX 2: TALKING AND LISTENING TO CHILDREN

If a child wants to confide in you, you **SHOULD**

- Be accessible and receptive;
- Listen carefully and uncritically, at the child's pace;
- Take what is said seriously;
- Reassure children that they are right to tell;
- Tell the child that you must pass this information on;
- Make sure that the child is ok ;
- Make a careful record of what was said (see *Recording*).

You should **NEVER**

- Investigate or seek to prove or disprove possible abuse;
- Make promises about confidentiality or keeping 'secrets' to children;
- Assume that someone else will take the necessary action;
- Jump to conclusions, be dismissive or react with shock, anger, horror etc;
- Speculate or accuse anybody;
- Investigate, suggest or probe for information;
- Confront another person (adult or child) allegedly involved;
- Offer opinions about what is being said or the persons allegedly involved;
- Forget to record what you have been told;
- Fail to pass this information on to the correct person (the Designated Senior Leader).

Children with communication difficulties, or who use alternative/augmentative communication systems

- While extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, any suspicions should be reported in exactly the same manner as for other children;
- Opinion and interpretation will be crucial (be prepared to be asked about the basis for it and to possibly have its validity questioned if the matter goes to court).

Recordings should

- State who was present, time, date and place;
- Be written in ink and be signed by the recorder;
- Be passed to the DSL or backup immediately (certainly within 24 hours);
- Use the child's words wherever possible;
- Be factual/state exactly what was said;
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation.

What information do you need to obtain?

- Schools have **no investigative role** in child protection
- Never prompt or probe for information, your job is to listen, record and pass on;
- Ideally, you should be clear about what is being said in terms of **who, what, where and when**;
- The question which you should be able to answer at the end of the listening process is 'might this be a child protection matter?';

- If the answer is yes, or if you're not sure, record and pass on immediately to the Designated Safeguarding Lead /Head Teacher/line manager.

If you do need to ask questions, what is and isn't OK?

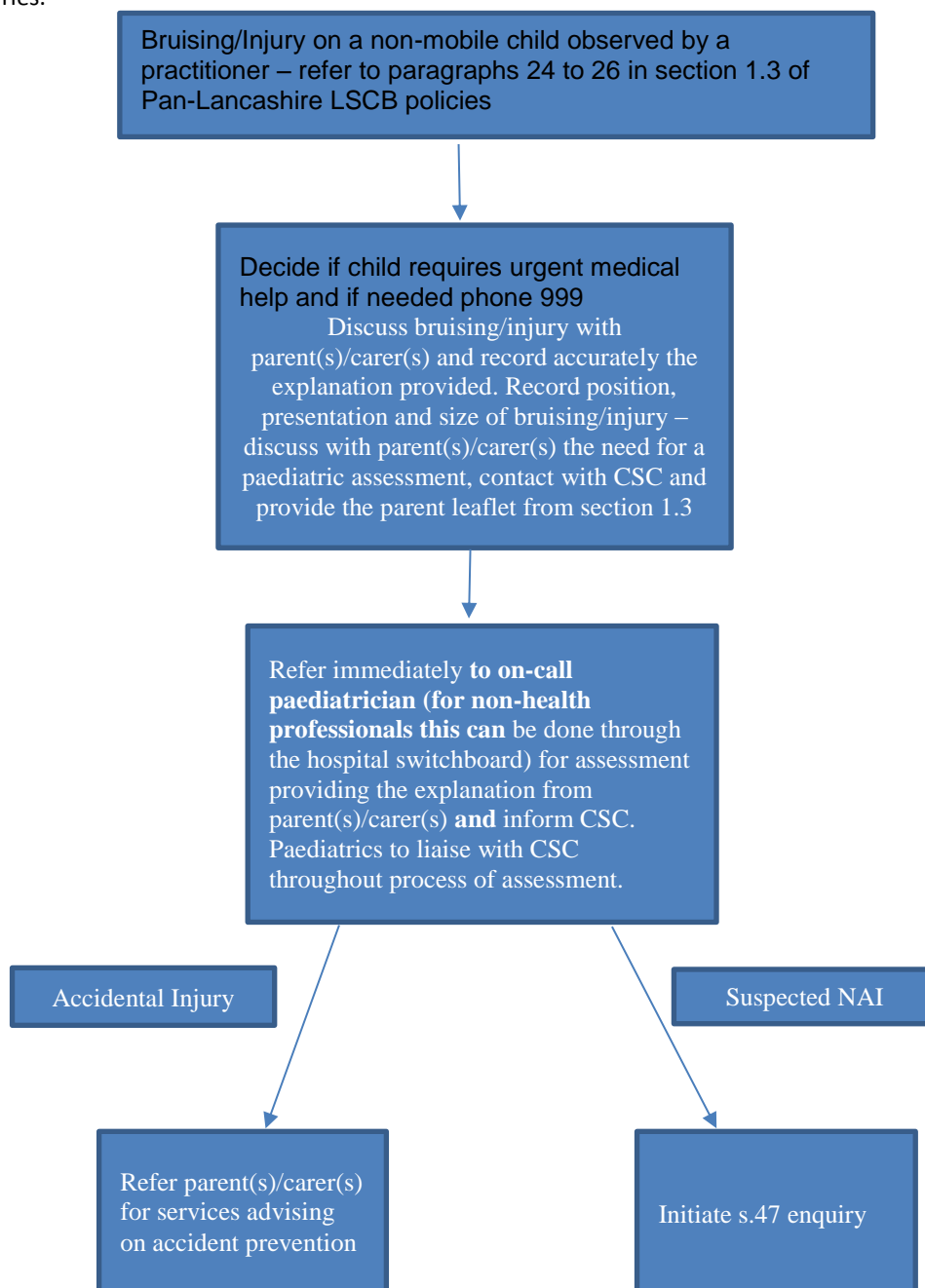
- **Never** asked closed questions i.e. ones which children can answer yes or no to e.g. Did he touch you?
- **Never** make suggestions about who, how or where someone is alleged to have touched, hit etc
- If we must, use only '**minimal prompts**' such as 'go on ... tell me more about that ... tell me everything that you remember about that '
- Timescales are very important: '**When was the last time this happened?**' is an important question.

What else should we think about in relation to disclosure?

- Is there a place in school which is particularly suitable for listening to children e.g. not too isolated, easily supervised, quiet etc
- We need to think carefully about our own body language – how we present will dictate how comfortable a child feels in telling us about something which may be extremely frightening, difficult and personal;
- Be prepared to answer the 'what happens next' question;
- We should never make face-value judgements or assumptions about individual children. For example, we 'know that [child.....] tells lies';
- Think about how you might react if a child DID approach you in school. We need to be prepared to offer a child in this position exactly what they need in terms of protection, reassurance, calmness and objectivity;
- Think about what support **you** could access if faced with this kind of situation in school.

APPENDIX 3 Bruises to Non Mobile Children Flow Chart

The flowchart below has been developed to assist health, education, early years and social care practitioners in following the agreed multi-agency procedure where a non-mobile child is observed with bruising and/or injuries.



APPENDIX 4: Children's Social Care**Referrals****Lancashire**

The Customer Service Centre 0300 123 6720
email address for referrals cypreferrals@lancashire.gov.uk
Emergency Duty Team (Out of Hours) 0300 123 6721/3

Customer Service Contact Numbers in neighbouring Local Authorities:-

Blackburn with Darwen 01254 666400 EDT 01254 587547

Blackpool 01254 477299

Cumbria 0333 240 1727

North Yorkshire 01609 536993 EDT 0845 0349417

St Helens 01744 676600 or 0300 6500 148 EDT 0845 0500 148

Wirral 0151 606 2008 EDT 0151 604 63501

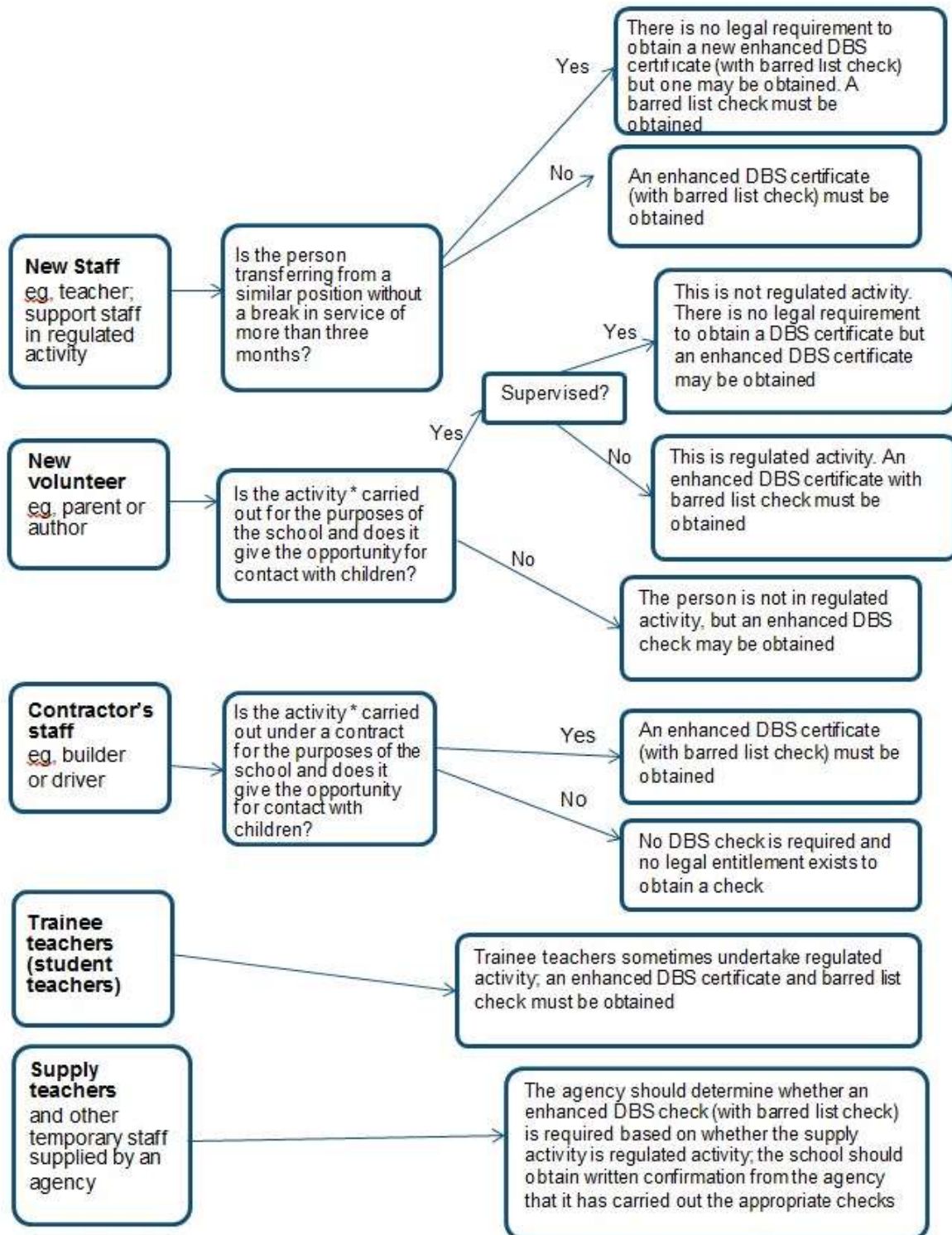
Sefton 0845 140 0845 EDT 0151 9208234

Rochdale 0300 303 0440 EDT 0300 303 8875

Bradford 01274 437500 EDT 01274 431010

Wigan 01942 828300 EDT 0161 834 2436

APPENDIX 5: DBS Check Flowchart



* Activities listed under the guidance's definition of regulated activity and which are carried out frequently