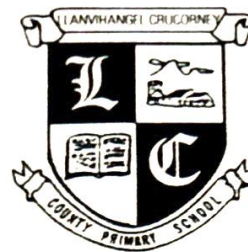
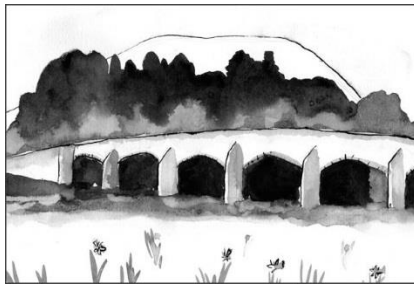


The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools



Safeguarding Policy & Procedures

Agreed October 2022 to be reviewed October 2023

Signed.....S Davies..... Headteacher

Signed.....R Corken..... Chair of Governors

Part 1 MCC Corporate Safeguarding Policy

**Part 2 The Federation of Llanfoist Fawr and Llanvihangel
Crucorney Primary Schools Safeguarding Procedures
Policy**

**Part 3 The Federation of Llanfoist Fawr and Llanvihangel
Crucorney Primary Schools Safeguarding Statement**



Part 1: CORPORATE SAFEGUARDING POLICY

JULY 2017

MARCHANT, CLAIRE L.

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1. INTRODUCTION

Safeguarding children and adults at risk from abuse is everybody's responsibility.

Monmouthshire County Council (the Council) is committed to ensuring that people living in the County are safe and protected and that its statutory duties to safeguard and protect children, young people and adults at risk are discharged.

For the purposes of this policy, children and young people are defined as anyone who has not yet reached their 18th birthday. This does not exclude a young person who is 16 years of age in Further Education, or a member of the Armed Forces, in hospital, in a young offender's institution, or in prison.

An adult at risk is defined as an adult who is experiencing, or who is at risk of, abuse or neglect, has needs for care and support (whether or not the Council is meeting any of those needs), and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The Council's workforce shares a responsibility, both collectively and individually, to ensure that children and adults at risk are protected from harm. Council employees, Councillors, volunteers and contractors who come into contact with children or adults at risk in the course of their duties are expected to understand their responsibility and where necessary take action to safeguard and promote the welfare of vulnerable people.

2. SCOPE

For the purposes of this policy 'workforce' is defined as those engaged by the Council, including permanent and temporary employees, students, volunteers, workers employed by employment agencies, contractors and consultants.

The policy covers the whole workforce and Councillors, and whilst all have varied levels of contact with children, young people and adults at risk everybody should be aware of potential indicators of neglect and abuse and be clear about what to do if they have concerns.

This policy makes explicit the expectation that all settings providing services for children and adults in Monmouthshire will have their own safeguarding policies and procedures which are in keeping with this document and other local, regional and national procedures and guidance.

3. OBJECTIVES

The policy provides a framework which ensures that policies and practices within the Council are consistent and in line with stated values, which must underpin all work with children, young people and adults at risk.

The intention of this policy is to support quality service delivery, promote good practice and ensure services are delivered in a way that children, young people and adults at risk are safe from harm and are allowed to fulfil their potential and live the lives they want to live.

This policy is intended to be enabling; to ensure that all parts of the Council understand how to put effective safeguards in place. This is a policy for a positive, preventative and proactive approach to safeguarding. The policy must be owned and implemented across the Council and promoted in wider communities. The policy is intended as an enabler of

a positive culture of proactively identifying, managing and removing risks to safety, whilst ensuring decisive and timely action to address serious concerns.

4. PRINCIPLES OF THE POLICY

This policy is underpinned by the Council's vision to build sustainable and resilient communities and the 4 wellbeing objectives:

- To develop opportunities for communities and businesses to ensure a well-connected and thriving county
- Maximise the benefits of the natural and built environment for the well-being of current and future generations
- Maximise the potential in our communities to improve wellbeing for people throughout the course of their life
- Provide children and young people with the best possible start in life to help them achieve better outcomes.

There is an expectation that all of the workforce, Councillors and partners share an objective to help keep children, young people and adults at risk safe by contributing to:

- Creating and maintaining a safe environment
- Identifying where there are concerns and taking action to address them in partnership with other agencies
- Prevent unsuitable people from working with children, young people and adults at risk
- Ensure the whole workforce understands safeguarding and their accountabilities and responsibilities
- Promote safe practice and challenge poor and unsafe practice.

The policy sets out a preventive approach which ensures safeguards are proactively put in place to prevent abuse and neglect occurring

The Council requires a competent workforce of individuals who are able to identify instances in which there are grounds for concern about the welfare of a child or adult and initiate or take appropriate action to keep them safe.

The policy requires effective partnership working between all those involved with providing services for children, young people and adults at risk.

5. LEGISLATIVE CONTEXT

The Council remains committed to the 1945 Declaration of Human Rights, the UN Convention on the Rights of a Child, as well as the United Nation's Principles for Older People.

The Care Quality Commission 2014 defined Safeguarding as "protecting individual's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect."

The Social Services and Well-being (Wales) Act (2014) (SSWBA) aims to strengthen and build on existing safeguarding practice in Wales to ensure that people are able to live their lives to the full. There is a new overarching duty to promote the well-being of people

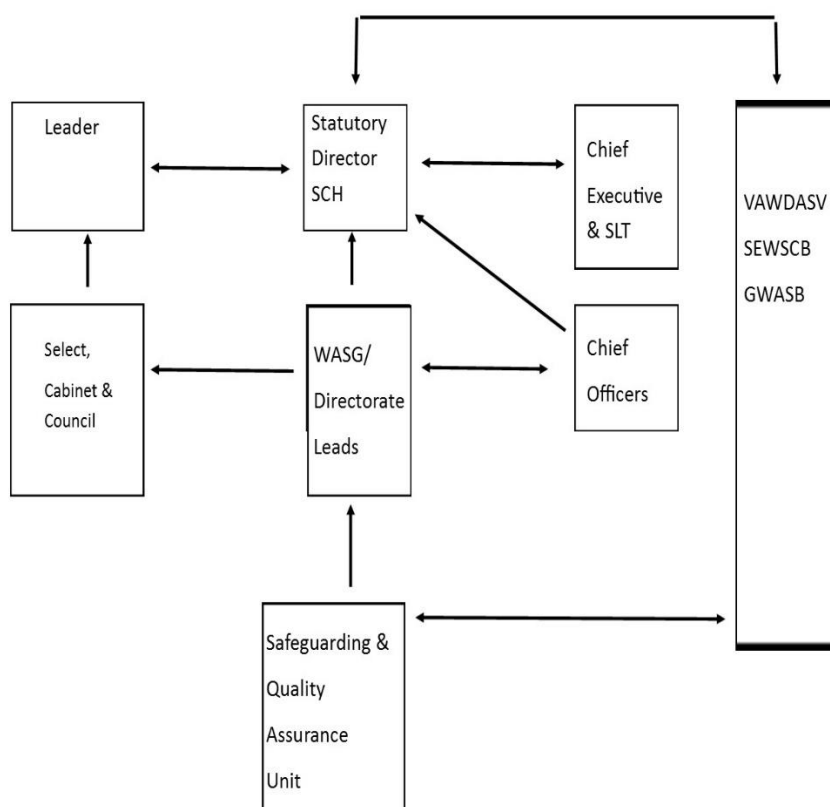
who need care and support together with an emphasis on shared responsibility and partnership working.

“Whilst the Council is the organisation in making enquiries to identify whether an individual is at risk of harm, or abuse, and co-ordinating a response it should be clear that Safeguarding is everyone’s business and to this end this responsibility cannot be achieved in isolation and without clear and accountable leadership.” Social Services and Wellbeing Act (Wales) 2014 (SSWA)

In the Social Services and Wellbeing Act, well-being is defined through eight aspects, one of which is protection from abuse and neglect. In relation to a child, well-being also includes their physical, intellectual, emotional, social and behavioural development; and their welfare (ensuring they are kept safe from harm).

Appendix 1 gives further related legislation, policy and guidance and key contacts within the Council.

6. Governance Arrangements



(a) Role of the Regional Boards

The **Gwent Wide Adult Safeguarding Board (GWASB)** has the statutory responsibility to provide the strategic lead in the region in relation to safeguarding citizens and the promotion of their well-being, as enshrined in the Social Services and Well-being Act 2014 and accompanying guidance, 'Working Together to Safeguard People Volume 1'. The GwASB's purpose is to lead, co-ordinate and ensure the effectiveness of multi-agency safeguarding adult practice in the region. Monmouthshire Council is accountable to the GwASB as a key statutory partner and as such must contribute fully to the work streams of the Board, and ensure good alignment with the Council's work programmes.

The **South East Wales Safeguarding Children Board (SEWSCB)** has the statutory responsibility to provide the strategic lead in the region in relation to the safeguarding of children and promotion of their welfare, as enshrined in the Children Act 2004 and The Social Services and Well-being Act 2014 and accompanying guidance, 'Working Together to Safeguard People Volume 1'. The SEWSCB's purpose is to lead, co-ordinate and ensure the effectiveness of multi-agency safeguarding children practice in the region. Monmouthshire Council is accountable to the SEWSCB as a key statutory partner and as such must contribute fully to the work streams of the Board, and ensure good alignment with the Council's work programmes.

The **Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Regional Board** was established as a statutory requirement within the VAWDASV Act 2015 in order to strategically lead the implementation of the Act in the region. Monmouthshire Council is a key statutory partner on the Board and contributes fully to its work streams and ensures good alignment between the Board and the Council's work programmes.

(b) Chief Officer Social Care and Health (SCH)

The Chief Officer SCH fulfils the role of Statutory Director of Social Services and has legal accountability for ensuring the Council has appropriate safeguarding measures in place to protect children, young people and adults at risk. The Chief Officer is responsible for reporting the effectiveness of these arrangements on a corporate level to the Chief Executive, Senior Leadership Team and Cabinet and Council.

The Chief Officer SCH is the point of contact for all other Chief Officers to report serious safeguarding concerns which may occur in their service area. The Chief Officer is responsible for ensuring appropriate action is taken including reporting to the Chief Executive and Lead Cabinet Member as necessary.

(c) The Chief Executive

The Chief Executive has overall responsibility for ensuring arrangements for safeguarding of children and adults at risk are effective across the Council. The Chief Executive is responsible for developing effective governance arrangements and ensuring there is a safeguarding policy in place.

Through one to one meetings with the Chief Officer for Social Care and Health (SCH), the Chief Executive is kept informed of relevant safeguarding issues.

(d) The Leader

The Leader of the Council is responsible overall for providing political leadership to ensure the Council fulfils its duties and responsibilities for safeguarding.

(e) Lead Cabinet Member for Safeguarding

The Lead Cabinet Member for Safeguarding will have regular one to one meetings, monthly as a minimum, with the Chief Officer SCH and be kept informed and updated on relevant safeguarding matters.

The Lead Member will be briefed on any sensitive cases that may be considered for Child or Adult Practice Reviews or may otherwise become a matter of public interest.

(f) Executive Members

All Cabinet members have a responsibility to support and challenge their Chief Officers on the effectiveness of safeguarding within their area.

(g) Chief Officers

Chief Officers are responsible for reporting any serious safeguarding concerns that may arise in their service area to the Chief Officer SCH. Chief Officers will brief their respective Cabinet Members on any safeguarding issues and on the general effectiveness of safeguarding arrangements.

Chief Officers are responsible for ensuring the workforce within their Directorates are appropriately trained to identify and respond to safeguarding concerns.

Chief Officers are responsible for ensuring that they have safeguarding operational procedures in place and Safeguarding Audit Framework for Evaluation (SAFE) audits are undertaken for the relevant service areas within their Directorate.

Chief Officers will ensure that Directorate Safeguarding Leads (DSLs) are nominated for any service areas where there is direct contact with the public and the DSL has a direct link to them to ensure that a robust reporting mechanism is in place for reporting any safeguarding concerns.

(h) Head of Children's Services and Head of Adult Services

The Heads of Service ensure the Chief Officer SCH is informed of any safeguarding issues in their one to one meetings and ensure that any serious concerns are raised without delay.

The Heads of Service represent the Council on the South East Wales Safeguarding Children's Board (SEWSCB) and the Gwent Wide Adult Safeguarding Board (GwASB) and are responsible for ensuring appropriate representation on any respective Sub Groups. The Heads of Service will brief the Chief Officer SCH, the Senior Leadership Team, Select Committees, Cabinet and Council on any issues arising from Child or Adult Practice Reviews and the resultant action plans.

The Head of Children's Service has operational and strategic management responsibility for the Safeguarding and Quality Assurance Unit which works across the Council to

provide assurance and support to safeguarding and operationally leads Child Protection and Protection of Vulnerable Adult processes.

7 ROLES AND RESPONSIBILITIES

(a) Councillors

All Councillors must familiarise themselves with this Policy and seek advice from the Chief Officer SCH if they are unclear about their responsibility for safeguarding. The Corporate Safeguarding Policy will be communicated as part of the mandatory induction programme for all new Councillors.

All Councillors will be expected to undertake safeguarding training combined Level 1 as a minimum.

(b) Select Committee

The role of the Select Committee is to review and scrutinise decisions and make reports or recommendations in connection with the discharge of any of the Council's functions whether by the Cabinet or another part of the Council. The role is to provide constructive challenge to the Council about its safeguarding activity in an impartial and independent manner.

(c) All Staff

Every service area of the Council has a role to play and must take full ownership of their safeguarding responsibilities. The Council expects every member of the workforce to take all reasonable steps to ensure the safety of any child or adult at risk involved in Council activity.

Managers must proactively analyse where risks to safeguarding are most likely to arise in their particular service(s) and ensure they have appropriate operational procedures and supporting systems in place to manage these well. They are accountable for understanding the training needs of their workforce and ensuring there are appropriate operational arrangements for people to access the right training.

Any person responsible for, or working with, children or adults at risk in any capacity, whether paid or unpaid, is considered to have a duty of care towards them both legally and contractually and as a responsible moral citizen. This includes a duty to behave in a manner that does not threaten, harm or put people at risk of harm from others.

All parts of the workforce have a responsibility to conduct themselves in their private lives in a manner that does not compromise their position in the workplace or call into question their suitability to work with children or adults at risk.

All members of the workforce should:

- Be alert to the possibility of harm, abuse and neglect
- Participate in relevant safeguarding training and multi-agency working to safeguard children and adults at risk
- Be familiar with local procedures and protocols for safeguarding and follow the Council's Code of Conduct and other professional codes
- Report any concerns about the safety or welfare of a child or adult at risk.

Everybody working for or on behalf of the Council has a duty to report any concerns they may have for the welfare and/or protection of children and adults at risk. The duty to report is a legal requirement and failure to report appropriately will be considered a serious matter under the Council's personnel policies. (See Appendix 2 and 8 for how to make a referral and Appendix 1 for contact information).

Each Directorate where there is direct contact with the public, will have a Directorate Safeguarding Lead (DSL) responsible for safeguarding. See Appendix 4 for roles and responsibilities. The DSL will work and liaise with the Safeguarding and Quality Assurance Unit to deal with any safeguarding concerns about a child or adult at risk including allegations against members of staff.

(d) Safeguarding and Quality Assurance Unit

The Council's Safeguarding and Quality Assurance Unit provides safeguarding support to all service areas and settings in the County covered by this policy. This is alongside of the unit's operational / statutory role in respect of adult and child protection.

The Unit will support, challenge and hold to account all directorates, schools, service areas and partner agencies in respect of their safeguarding practices in the following ways:

- Facilitate directorates, service areas, schools and partner agencies to undertake a bi-annual audit of safeguarding arrangements using the SAFE framework
- Undertake regular review meetings / visits to Council departments and other settings to discuss safeguarding procedures and practices
- Provide support and challenge to directorates regarding their safeguarding arrangements
- Provide professional advice and consultation regarding safeguarding or child / adult protection issues
- Support the Whole Authority Safeguarding Group in delivering its activity programme
- Support the Whole Authority Safeguarding Group in implementing a quality assurance framework for safeguarding
- Work with People Services in relation to safe recruitment and HR Practices and the development of a training plan
- Provide safeguarding training across the Council to support services in meeting their training requirements
- Follow up any allegations against professionals in partnership with others.

(e) Directorate Heads of Service

All Heads of Service are responsible, through their Departmental Management Teams (DMTs) for ensuring that the workforce is aware of the Corporate Safeguarding Policy and service operational procedures and that people receive training at a level appropriate to their role and responsibility

All Heads of Service must ensure that safe recruitment practices are adopted particularly in relation to reference checks and where relevant, checks through the Disclosure and Barring Service (DBS).

All Heads of Service must report any safeguarding concerns to their responsible Chief Officer or DSL.

(f) Line Managers and Supervisors

Every line manager / supervisor is responsible for ensuring that the workforce for whom they are responsible (including agency, consultants and volunteers) receive the training they need, proportionate to their role and responsibilities.

(g) Contractors, Sub Contractors or organisations funded by the Council

All contractors, sub-contractors or other organisations funded by the Council are responsible for arranging checks through the safe recruitment process and for ensuring that staff comply with regulatory and contractual arrangements relating to their safeguarding responsibilities. All contractors, sub-contractors and other organisations are responsible for informing relevant Managers within the Council of any safeguarding concerns they may have.

(h) Agency Workers

The Council requires all Employment Agencies to undertake the relevant safe recruitment checks and references on any staff members offered employment / placements within the Council. However, it is the responsibility of the Directorate/ Service Manager to draw the Agency Workers attention to the Corporate Safeguarding Policy.

(8) Quality Assurance

(a) Reporting and Monitoring

The Council has comprehensive mechanisms in place for Officers and Councillors which provide a robust governance framework supported by a performance reporting system that is transparent, on line and capable of providing information for challenging scrutiny by Officers, Councillors and Regulators.

At a corporate level, the responsibility for monitoring the effectiveness of safeguarding arrangements across the Council is delegated to the Whole Authority Safeguarding Group. Terms of Reference for the Whole Authority Safeguarding Group can be found at Appendix 6

The Whole Authority Safeguarding Group will produce a report at least annually for Senior Leadership Team (SLT), Cabinet and Scrutiny. This report will provide an overview of the Council's safeguarding performance. This will provide an opportunity for councillors to scrutinise and challenge the Council's safeguarding activity

A clear line of sight on reporting of safeguarding performance is also available through Service Improvement Plans (SIPs) which are subject to scrutiny by the Leader of the Council, Cabinet Member, Chief Executive, SLT and Policy and Performance Unit. Safeguarding information pertinent to the service area must be included in all SIPs.

Observations of Cabinet, Scrutiny, Internal Audit and external regulators will steer and influence the priorities of the Whole Authority Safeguarding Group.

All reports prepared for Members will include a section and explanation to any safeguarding implications in the same way as Finance and Legal.

The Head of Adults and Head of Children's Services will ensure the activities of the regional boards will be reported to Council on a formal, regular basis

The SLT will have safeguarding as part of its work programme and regular agenda item at its meetings.

The Senior Management Team (SMT) Meetings will have safeguarding as a regular agenda item and will be a forum to raise awareness about safeguarding and to cascade information.

Departmental Management Team meetings (DMT) will have safeguarding as a regular item on their agenda and will escalate risks, issues and training needs to the relevant DSLs.

Every Service in the Council will report on their safeguarding performance to the Whole Authority Safeguarding Group through their DSL.

(b) Safeguarding Audit Framework for Evaluation - SAFE

The SAFE audit tool (See Appendix 6) will be used to monitor and gather information and monitor compliance of the Safeguarding Policy by all DMTs, schools and other settings working with children, young people and adults at risk. The audit will be undertaken on a bi-annual basis and information gathered will be used to improve safeguarding for children, young people and adults at risk.

The audit tool is based on legislation and is set out in sections which require service areas to critically consider their own practice, procedures, systems and culture. The SAFE includes a safeguarding action plan which enables the service area to establish a programme of activity to address any improvements indicated through the SAFE. The Safeguarding and Quality Assurance Unit will provide support to services in completing and delivering their SAFEs.

The SAFE is an important mechanism in the safeguarding of children, young people and adults at risk in the care of the Council, at school or in other services provided or commissioned by the Council.

(c) Internal Audit / External Regulators

Internal Audit will review safeguarding on a cyclical basis in accordance with their normal planning and risk assessment process along with all other services of the Council which could be subject to an audit review. This will be done on an annual basis.

Where there are matters of concern in service provision, allegation of fraud, theft or corruption or significant non-compliance with Council policy, discussions will take place with Internal Audit to assess whether they are the appropriate mechanism to investigate the matter further. If both parties confirm that this is appropriate Internal Audit will undertake a special investigation and report back any outcomes to the respective Head of Service / Chief Officer.

The Council will address any issues identified by respective external regulators and it is incumbent on all Chief Officers and Senior Managers to ensure that coherent and comprehensive self-evaluation and consequential action is taken where required to oversee improvements.

All internal and external audit reports are scrutinised by the relevant Select Committee and any recommendations, if accepted, from every inspection / audit report are

transferred into the work programme of the Whole Authority Safeguarding Group and relevant Service Plans for action and subjected to the Council's performance measures.

(9) SAFE WORKFORCE

(a) Recruitment, selection and management of the workforce

The Council will implement safe recruitment and employment standards in accordance with the South East Wales Safeguarding Children Board and Gwent Wide Adult Safeguarding Board regional guidance and as set out in the Monmouthshire Recruitment and Selection Policy and Guidance Handbook.

To promote safe recruitment and HR practices the Council will:

- Review its recruitment and selection procedures regularly and will carry out regular auditing on safe recruitment practices for staff
- Ensure that managers responsible for recruitment receive safe recruitment training which is updated on a regular basis
- Ensure that safe recruitment procedures are made accessible to and used by all managers
- Ensure that safe recruitment standards are applied and monitored within the contractual arrangements in services that are commissioned by the Council or supported through grants
- Monitor staff compliance with its policies for safeguarding and promoting the welfare of children, young people and adults at risk through training and auditing of HR processes.

The Council's Disciplinary Procedures set out what action will be taken against any member of the workforce who does not comply with the Council's policies and procedures, including those in place to safeguard and promote the well-being of children and adults at risk.

[Corporate Disciplinary Policy](#)

[School Disciplinary Policy](#)

(b) Whistleblowing

Whistleblowing is defined as:

'The disclosure by a member of staff or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the work place, be it of the employer or his/her fellow employees' (Public Concern at Work Guidelines 1997).

The Council has an agreed [Whistleblowing Policy](#) which refers to the reporting, by any member of the workforce, of suspected misconduct, illegal acts or failure to act within the Council. The whistleblowing policy can be used for confidential reporting of any abusive, inappropriate or unprofessional behaviour against any children, young people or adults at risk, or any conduct that breaches criminal law or statute; compromise health and safety,

breaches accepted professional code of conduct, or otherwise falls below established standards of practice in relation to children, young people or adults at risk.

The Council expects the highest standards of conduct from the workforce, and encourages the workforce and others with serious concerns about any aspect of the Council's work to come forward and voice those concerns in a safe environment. The Whistleblowing policy enables members of the workforce to raise concerns at an early stage and in the correct way.

The policy is accessible to all staff within the People Services area on the Hub. The Policy explains:

- The types of issues/disclosures that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern
- What the Council will do.

(c) Allegations against Adults who work with Children, Young People or Adults at Risk

Allegations or concerns in regard to adults working with children and/ or adults at risk must be referred and investigated in a fair, timely and consistent manner in order to effectively protect those at risk.

Policy and guidance which clarifies Council staff member's duty to report concerns relating to other staff members, professionals and volunteers, and offers support to this process includes:

- The Social Services and Well-being (Wales) Act 2014
- Wales Interim Policy and Procedures for the Protection of Vulnerable Adults from Abuse
- The Council's Whistle Blowing Policy (See Section 8).

The sharing of information must be sensitively handled and be restricted to those agencies who have a need to know in order to:

- Protect adults and children
- Facilitate enquiries
- Manage HR/ disciplinary processes.

All Professional Strategy Meetings for children and adults at risk will be convened and chaired by the Safeguarding and Quality Assurance Unit in accordance with regional guidance.

On the completion of the investigation, should an individual be dismissed or removed from working with children or adults at risk (in a Regulated Activity) the Council has a duty to refer the individual to the DBS (Safeguarding Vulnerable Groups Act 2006). Equally the Council has an obligation to refer certain information about an employee's conduct and matters relating to safeguarding to professional regulatory bodies.

Any member of the Monmouthshire County Council workforce/ employee of a contractor or sub-contractor who believes that allegations or suspicions are not being investigated

properly has a responsibility to escalate their concern to a higher level within the Council or via the Council Whistleblowing Policy – see above.

Referral forms can be found at

Adults - www.gwasb.org.uk

Children - <http://www.sewsc.org.uk/index.php?id=40>

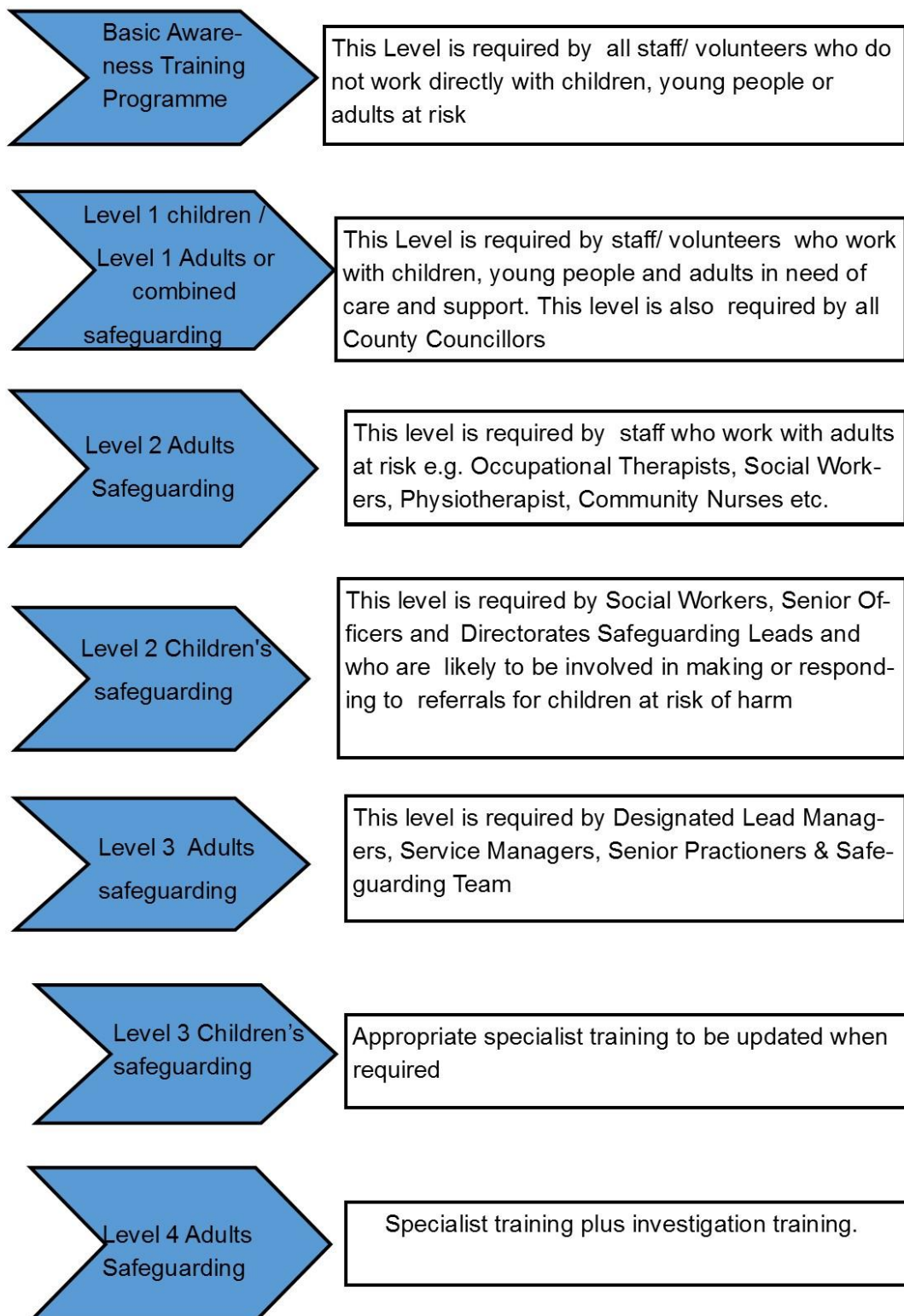
(d) Training

All members of the workforce, whether permanent or temporary, Councillors and volunteers who work with children and adults at risk in Monmouthshire will be given access to this policy and the name and contact details of the DSL as part of their induction when they commence work.

All of the workforce will be expected to undertake training relevant to the position that they hold and to renew their qualifications to the highest level.

All members of the workforce are responsible for their own Continuous Professional Development and to ensure that their safeguarding training is current and up to date. Each Directorate is required to keep a record of workforce safeguarding training using the template at Appendix 7 .

The Council's Safeguarding and Quality Assurance Unit will be responsible for informing Directorates of the Training Programme. Attendance at training courses will be monitored through SAFE audits and reported back by each Directorate to the WASG.



(e) Volunteering

This Policy applies to all volunteers who engage with adults at risk, children and young people in their volunteering role.

Volunteers working for the Council, including within schools, will be subject to the same recruitment processes as the paid workforce and according to the nature of the activity being undertaken.

Safeguarding will be covered within the initial induction. Volunteers must subsequently attend the level of safeguarding training relevant to the nature of the voluntary activity being undertaken

10. PREVENTATIVE APPROACH

One of the Council's corporate priorities is to support Monmouthshire residents to be safe, stay well and to live independently within their community. With regard to this the Council is committed to the development and commissioning of services and the implementation of community and individual well-being approaches to help meet this aim.

Services operating within the Council will be expected to respond to the needs of children and adults at risk, understand how to establish a positive culture of safeguarding and adhere to the principles of partnership working in promoting prevention and early intervention.

(a) Counter Terrorism and the Risk of Radicalisation

The PREVENT Public Sector Duty came into place in July 2015. The Counter Terrorism and Securities Act 2015 places an expectation on the Council when exercising its functions, to have due regard to the need to prevent people from being drawn into terrorism. PREVENT covers all forms of extremism including Islamist extremism, Extreme Far-Right, militant, animal rights etc. The aim of PREVENT is to safeguard those who may be vulnerable to extremist influence and provide support to those who are at risk. If anybody has PREVENT concerns, they should raise with the PREVENT Lead for the Council (See Appendix 1).

Initial referrals are made via the Multi Agency Referral Process (MARF) before a PREVENT referral is submitted. Once it is ascertained that the referral is not subject to any other police investigations, a multi-agency panel known as the Channel Panel is held and a support plan is developed for the individual.

(b) Child Sexual Exploitation

Child sexual exploitation is the coercion or manipulation of children and young people into taking part in sexual activities. It is a form of sexual abuse involving an exchange of some form of payment which can include money, mobile phones and other items, drugs, alcohol, a place to stay, 'protection' or affection. The vulnerability of the young person and grooming process employed by perpetrators renders them powerless to recognise the exploitative nature of relationships and unable to give informed consent.

The Council strives to create a hostile environment to child sexual exploitation and actively works with partners to identify children at risk and prevent this form of abuse.

(c) Self-Harm / Suicide

Self-harm is the name given to any deliberate act of self-injury or behaviour intended to cause harm to someone's own body.

The Suicide and Self Harm Prevention Strategy and associated action plan builds on '*Talk to Me*' the 2009 national action plan to reduce suicide and self-harm in Wales. It sets out the strategic aims and objectives to prevent and reduce suicide and self-harm in Wales over the period 2015-2020. It identifies priority care providers to deliver action in certain priority places to the benefit of key priority people, and confirms the national and local action required.

Buddy is a support and advice website for young people living with Self Harm which has been developed by young people and professionals from the Council. Buddy provides confidential support, advice and tools and techniques to help deal with negative thoughts and feelings associated with self-harm. There is specific information for helping people within this site, as well as advice for parents and professionals

www.buddyapp.monmouthshire.gov.uk.

(d) Modern Slavery / Trafficking

Modern Day Slavery encompasses slavery, sexual exploitation, human trafficking, forced labour, and domestic servitude. Traffickers and slave masters use whatever means they have to coerce or force the individual into a life of abuse, servitude and inhumane treatment. The Modern Slavery Act came into law in 2015 and allows the courts to pass down severe sentences on the perpetrators, and to place restrictions on people from harm. The Council has a Duty under S 52 of the Act to advise the Secretary of State of any individual who may be identified as a victim of Slavery, or Trafficking.

The Council acts in accordance with the relevant Modern Slavery and Trafficking legislation and guidance, and promotes practices to identify and safeguard victims of these crimes, and ensure transparency of supply chains.

Training and Victim Support regarding Modern Slavery can be found at BAWSO www.bawso.org.uk.

Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV)

Domestic Abuse is recognised to impact both adults and children and can have life changing effects. The VAWDASV Act (Wales) 2015 aim's to improve arrangements for the prevention of gender based violence, abuse, and sexual violence. The Act requires the Council to train all staff in a principle based approach to targeted enquiry for these issues across the Public Service known as "Ask and Act" in order to signpost victims and potential victims to support services. The regional VAWDSV board has also prioritised a "whole

school approach” to training and support in order to continue a preventative agenda to domestic abuse.

11. ROBUST PROTECTION

(a) Child Protection

Child Protection is an essential part of safeguarding, it refers to the activity which is undertaken to protect children who are suffering, or at risk of suffering significant harm, as a result of abuse or neglect.

The categories of abuse recognised within Child Protection are

- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Neglect

The definitions of categories of abuse are outlined in Appendix 7

The primary legislation and guidance which shape’s Child Protection Practice and Procedures is:

- Children Act 1989
- Children Act 2004
- Social Services and Wellbeing Act (Wales) 2014

Whilst Statutory Children’s Services are the Lead Agency in Child Protection matters, there is a wider duty on all agencies to work together to protect and safeguard children.

(b) Adult Protection

Adult Safeguarding is on a statutory basis from April 2014 when SSWBA which came into force. The drafting and ratification of SSWBA compliant all-Wales policy, procedure and guidance is not yet complete. Adult Safeguarding is shaped, and informed by the “All Wales Interim Policy and Procedures for the Protection of Vulnerable Adult’s”.

The SSWBA refers to an ‘adult at risk from abuse or neglect’ which is defined as an adult who:

- Is experiencing or is at risk of abuse or neglect,
- Has needs for care and support (whether or not the authority is meeting any of those needs), and
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

This applies to all adults within the County boundary whether or not they are ordinarily resident. Adult safeguarding also needs to take into account the capacity of adults to make decisions in accordance with the Mental Capacity Act. If an adult is deemed to have capacity, then consent must be sought for the safeguarding process. The only exception to this is when an alleged abuser is a potential risk to other vulnerable people.

The Act also places a ‘duty to report’ on all staff to report actual or suspected abuse or neglect of both adults and children deemed to be at risk and provides for the use of Adult

Protection Safeguarding Orders (APSO) via a Magistrate to allow Designated Officers to enter a premises where it is suspected an adult is at risk and speak to them alone to establish if they are safe

Appendix 3 sets out a flowchart outlining Adults referral process

(c) Allegations or Concerns against adults who work with children and adults at risk Professional Strategy Meetings

See Section 9c

12. SAFE SERVICES

(a) Commissioning Arrangements

Any new service provider commissioned to support children or adults at risk will be required to undergo an accreditation process. The accreditation process is designed to ensure that the service is fit for purpose and has the necessary arrangements in place to safeguard those it is supporting and deliver a quality service. As part of the accreditation process checks will be made with local hosting authorities, regulating bodies as well as financial enquires. Providers will be required to provide information confirming their safeguarding policy and procedures.

Contractor monitoring activity either planned or unplanned, will include satisfying the Council that the provider is managing their responsibilities in regard to safeguarding and are operating in line with legislation, policy and procedures. Where required confirmation will be sought of the service's performance regarding safe recruitment practices, DBS checking and safeguarding referrals.

(b) Lettings and Hiring

With almost all casual lettings the Council will not be contracting the services of hirers. It is nonetheless allowing its premises to be used for activities that may involve children, young people or adults at risk.

Therefore Managers have a duty to ensure, as far as is reasonable, that these activities also comply with safeguarding requirements. Members of the public may reasonably assume that because an activity is taking place within a Council setting, the Council has had due regard to safeguarding in entering into the arrangement.

In allowing use of council premises, the onus must remain upon the hirer to ensure that safeguarding standards are maintained. This is something that organisations are made aware of under safeguarding legislation and through their own organisational governing body, if applicable.

Managers should request to see and retain copies of relevant safeguarding documentation as proof that hirers and their staff comply with such measures on receipt of applications.

Managers must also consider reporting any concerns about an individual's suitability to work with children, young people and adults at risk to Children's/ Adults Services.

In the case of 'one off' children's events, for example, a private birthday party, safeguarding legislation exempts such uses from the processes mentioned above but

nonetheless this policy requires managers to be able to properly demonstrate due regard to safeguarding risks in agreeing any hiring arrangements.

(c) Monmouthshire Homesearch - Housing Register

The Council's Housing Register, known as Monmouthshire Homesearch, is a partnership between the Council and local housing associations. Monmouthshire Homesearch is a common housing register and a joint allocations policy. The Housing Register, a legal responsibility of the Council, determines the priority and procedure for the allocation of housing accommodation in Monmouthshire. The Housing Register policy supports and contributes to the Council's Safeguarding Policy through the following:

Special Management Lettings - There may be exceptional circumstances where the only way an exceptionally urgent housing need can be resolved is through the use of management discretion. There is the ability in very urgent cases for MHR Operational Sub Group to exercise discretion. In the interests of fairness to all applicants these circumstances are kept to an absolute minimum. Such cases may include the following circumstances: an applicant has an exceptional need that is not covered by the allocation scheme, for example, where Child or Public Protection issues require urgent rehousing.

Serious Offenders – Monmouthshire Homesearch will seek to minimise the risk to the community and the applicant where individuals are considered to pose a risk to themselves and/or others (even where an individual has not been convicted of an offence). Monmouthshire Homesearch (through the Council's Housing Options Team) will work with the Police and Probation Services to assess and manage risk and will apply special arrangements where cases are referred through the Multi-Agency Public Protection panel (MAPPA) or any protocol with Probation Services Officers. This may result in restrictions being placed upon the applicant in their choice of property or area, or a direct offer of suitable accommodation being made.

Information Sharing - Information may be shared about individuals and their history irrespective of whether their consent has been obtained in exceptional circumstances. This will be in accordance with the provisions of the Crime and Disorder Act 1998 (Section 115). This includes where there is a need to safeguard children and address issues regarding child protection or adults at risk.

(d) Licensing

With effect from 1st April 2016 all new and existing Licensed Hackney Carriage, Private Hire Drivers, Proprietors and Operators must undergo Safeguarding of children young people and adults at risk training before obtaining a licence from the Council.

All staff within the Licensing Section should undertake safeguarding training to enable them to work with the taxi trade to gather information to safeguard children young people and adults at risk and be able to share relevant information with Police and Social Services.

Whilst the Council is unable to insist on safeguarding training as part of the condition of a licence with the alcohol and entertainment industry Licensing will continue to work with the Police to provide free training to those working in the industry and continue to improve information sharing.

The Council will continue to work with traders who require licenses e.g. takeaway outlets to provide assistance on how to recognise possible safeguarding issues.

13. Safeguarding in Education

Roles and Responsibilities in Schools

(a) The role of the Governing Body in Maintained Schools in Monmouthshire

Governing bodies of maintained schools, governing bodies (Corporations) of FE institutions, and proprietors of independent schools in Monmouthshire should ensure that their respective organisations

- Have effective child protection policies and procedures in place that are:
 - In accordance with local authority guidance and locally agreed interagency procedures
 - Inclusive of services that extend beyond the school day (e.g. boarding accommodation, community activities on school premises, etc.)
 - Reviewed at least annually
 - Made available to parents or carers on request
 - Provided in a format appropriate to the understanding of children, particularly where schools cater for children with additional needs
- Operate safe recruitment procedures that take account of the need to safeguard children and young people, including arrangements to ensure that all appropriate checks are carried out on new staff and volunteers who will work with children, including relevant DBS checks
- Ensure that the head teacher/principal and all other permanent staff and volunteers who work with children undertake appropriate training to equip them with the knowledge and skills that are necessary to carry out their responsibilities for child protection effectively, which is kept up-to date by refresher training
- Give clear guidance to temporary staff and volunteers providing cover during short-term absences and who will be working with children and young people on the organisation's arrangements for child protection and their responsibilities
- Ensure that the governing body/proprietor remedies without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention
- Ensure that the designated senior person (DSP) for child protection, the designated governor and the chair of governors undertakes training in inter-agency working that is provided by, or to standards agreed by, the Safeguarding Children Board and refresher training to keep their knowledge and skills up to date, in addition to basic child protection training.

(See 'Keeping Learners Safe October 2020 - The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002')

(b) Additional responsibilities of community Focussed Schools, Pre and Post School Learning and Out of Hours Learning Providers in Monmouthshire.

The governing body of a school controls the use of the school premises both during and outside school hours, except where a trust deed allows a person other than the governing body to control the use of the premises, or a transfer of control agreement has been made. Governing bodies can enter into transfer of control agreements in order to share control of the school premises with another body, or transfer control to it. The other body, known as the "controlling body", will control the occupation and use of the premises during the times specified in the agreement.

Transferring control of the premises to local community groups, sports associations and service providers can enable school facilities to be used without needing ongoing management or administrative time from school staff.

Where the governing body provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the governing body must confirm that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate.

(c) Responsibilities of Head teachers

Head teachers and principals of all schools should ensure that all staff (including supply teachers and volunteers):

- Are aware of child protection policies and procedures adopted by the governing body or proprietor are fully implemented and followed by all staff
- Can access sufficient resources and time to enable them to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children
- Understand the procedures for safeguarding children, and feel able to, raise concerns about poor or unsafe practice and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed Welsh Government Procedures for Whistleblowing in Schools and Model Policy
- As part of their induction, are given a written statement about the school's policy and procedures, and the name and contact details of the DSP for child protection when they start work in a new establishment

(d) Role of the Designated Person in Schools

The designated senior person for safeguarding in a school fulfils an essential role in developing and implementing policies that help to safeguard adults and children from all forms of abuse and create a safe environment. Refer to Keeping Learners Safe October 2020

Each setting should identify a Designated Senior Person (DSP) with lead responsibility for managing adult and child protection and safeguarding issues and cases.

The DSP should know how to recognise and identify the signs of abuse and neglect and know when it is appropriate to make a referral to the relevant investigating agencies.

The role involves providing advice and support to other staff, making referrals to and liaising and working with other agencies as necessary. The DSP role is not to investigate allegations, but they must keep the head teacher informed of all adult/child protection issues in the establishment.

The DSP must be a senior officer at the setting or part of the senior leadership team with the status and authority within the organisation to carry out the duties of the post, including committing resources to child protection matters, and where appropriate directing other staff. Dealing with individual cases may be a responsibility of other staff

members, but it is important that a senior member of staff takes responsibility for this area of work.

In many schools and settings a single designated person will be sufficient, but a deputy should be available to act in their absence. In establishments which are organised on different sites or with separate management structures, there should be a designated person for each part or site. In large organisations, or those with a large number of adult/child protection concerns, it may be necessary to have a number of deputies to deal with the responsibilities.

The establishment must also make arrangements to cover the role of the DSP when that person is unavailable. In many cases, there will be a deputy DSP in place and larger schools may have a team of staff working together.

The DSP does not have to be an expert in the area of adult/child protection but will take responsibility for the establishment's adult/child protection practice, policy, procedures and professional development working with other agencies as necessary. The head teacher should ensure that the DSP:

- is given sufficient time and resources to carry out the role effectively, which should be explicitly defined in the post holder's job description
- has access to required levels of training and support to undertake the role, has time to attend and provide reports and advice to case conferences and other interagency meetings as required.

(e) Referrals

The DSP should act as a point of contact and a source of support, advice and expertise within the setting establishment when deciding whether to make a referral by liaising with relevant agencies.

The DSP is responsible for making referrals about allegations of suspected abuse to the relevant investigating agencies. Where these relate to cases of suspected abuse or allegations of abuse against staff or volunteers, the process for referral and enquiries is set out in the relevant procedures

DSPs have a responsibility to ensure that:

- The Duty Officer (children's social care) contact details for the originating authorities of all service users are sourced and displayed in an area which is accessible to all staff;
- In the event of a safeguarding concern a referral is made both to the duty officer in the person's home authority and to the Monmouthshire duty officer.
- In the event of an allegation against a professional the Safeguarding and Quality assurance Unit is informed at the same time as the above referral/s.

(f) Role of Independent Settings and Residential Establishments

Proprietors of residential and/or independent settings should ensure that:

- They comply with the requirements of their regulatory body
- They fulfil all responsibilities for safeguarding adults and children (including those at risk).

(g) The Role of the Manager of Early Years Settings/ Nurseries/ Playgroups/ Before & After School Care Settings

Managers of Early Years Settings and all partner agencies in Monmouthshire providing early years services for children should:

- Act as or appoint a DSP to take the lead role in safeguarding and protecting the children in their care
- Ensure that they have an up to date Safeguarding/child protection policy and procedures which have been adopted by the proprietor/managing body and are fully implemented and followed by all staff
- Ensure that sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children; and
- All staff and volunteers understand the procedures for and are supported in raising concerns with regard to children in their care.

(h.) The Role of Volunteers in Educational Establishments

Volunteers are also seen by children as safe and trustworthy adults, and therefore will be subject to the same recruitment processes as the paid workforce and according to the nature of the activity being undertaken.

However, in other circumstances, e.g. where a volunteer's role will be one-off, such as accompanying teachers and pupils on a day outing or helping at a concert or school fete, such measures would be unnecessary provided that the person is not to be left alone and unsupervised in charge of children.

For the purpose of this policy governors who also volunteer in schools should be treated on the same basis as other volunteers.

The DSP should keep a register of volunteers and record how often they volunteer and the roles that they are undertaking. This will then determine whether they are in regulated activity and the recruitment processes to be followed.

Regulated activity is defined as unsupervised activity in a limited range of establishments with the opportunity for contact with children. The scope of regulated activity includes unsupervised activities such as:

- Teaching
- Training
- Instructing
- Caring for or supervising children
- Providing advice or guidance on wellbeing
- Driving a vehicle only for children

In addition, to be regarded as regulated activity, this unsupervised activity enacted within a specified place must be done regularly. Regularly means carried out by the same person frequently (once a week or more often), or on four or more days in a 30 day period (or in some cases, overnight).

For those people who do not work in regulated activity but nevertheless work, paid or unpaid, with children, their employers may, but will not be required to, obtain relevant checks – but it will be unlawful to check if they are on a barred list.

Record of Appendices

Appendix 1	Relevant Legislation and Council Contacts
Appendix 2	Referral Process – Children
Appendix 3	Flow chart adult referrals
Appendix 4	Roles and Responsibilities Directorate Safeguarding Leads
Appendix 5	Terms of Reference Whole Authority Safeguarding Group
Appendix 6	SAFE Auditing Tool
Appendix 7	Training Record Template
Appendix 8	Categories of abuse - Definition
Appendix 9	Model Template Safeguarding Policy for Operational Settings and Schools

Appendix 1

Relevant Legislation and Contact Details

- Social Services and Wellbeing Act (Wales) 2014
- Children Act 1989, 2004
- Carers Act 2004
- Human Rights Act 1998
- Equalities Act 2010
- Framework for Assessing Children and their Need (2001)
- Stronger Partnership's for Better Outcomes (2006)
- Wales Interim Policy & Procedures for the Protection of Vulnerable Adults from Abuse (2010)
- Mental Capacity Act 2005
- NSF for Children, Young People and Maternity Services
- Direct Payment's Guidance
- Violence against Women, Domestic Abuse and Sexual Violence Act 2015
- Data Protection Act
- United Nations Convention on the Rights of the Child 1989
- VAWDASV Regional Service -
www.gwasb.org.uk/fileadmin/documents/Handout_7_-_Gwent_VAWDASV_services_directory_3_amended_16.12.16_HG.pdf.
- PREVENT
www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf.
- Keeping Learners Safe <https://gov.wales/keeping-learners-safe>

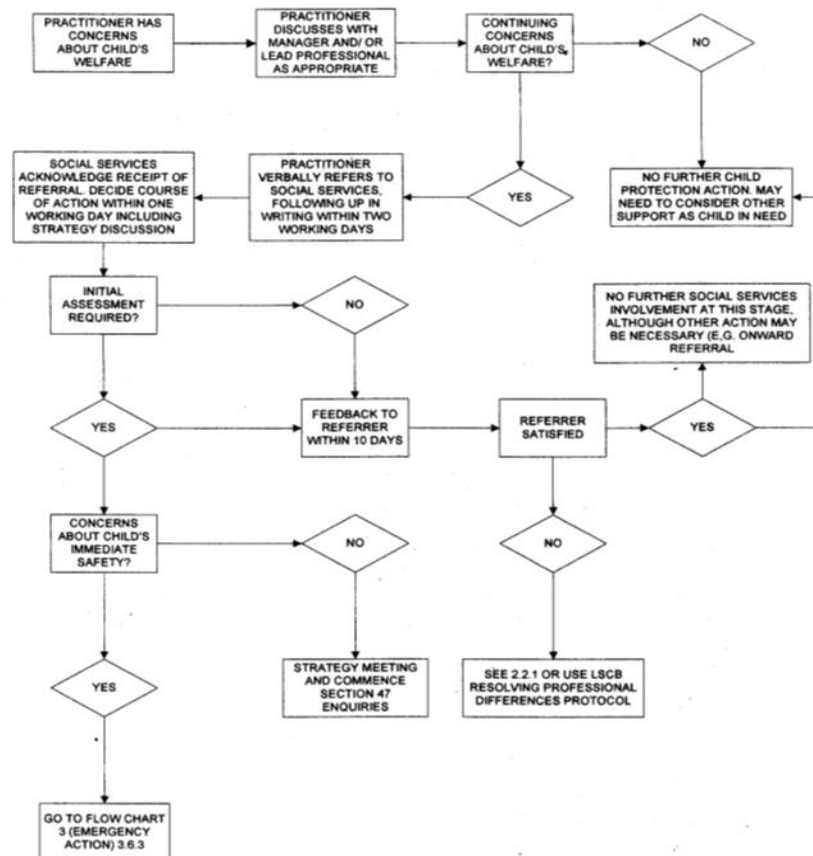
Relevant Contacts

Social Services Duty – Children Services	01291 635669 during office hours 0800 328 4432 out of office hours
Social Services Duty – Adult Services	Monmouth/Usk/Raglan – 01600 773041 Abergavenny – 01873 735885 Chepstow/Caldicot – 01291 635666
PREVENT	heatherpowell@newport.gov.uk
South East Wales Safeguarding Board	www.sewsc.org.uk
Gwent Wide Adult Safeguarding Board	www.gwasb.org.uk
Buddy Support and Advice	www.buddyapp.monmouthshire.gov.uk .
Modern Slavery /Trafficking – Training and Victim Support	BAWSO www.bawso.org.uk .

Appendix 2

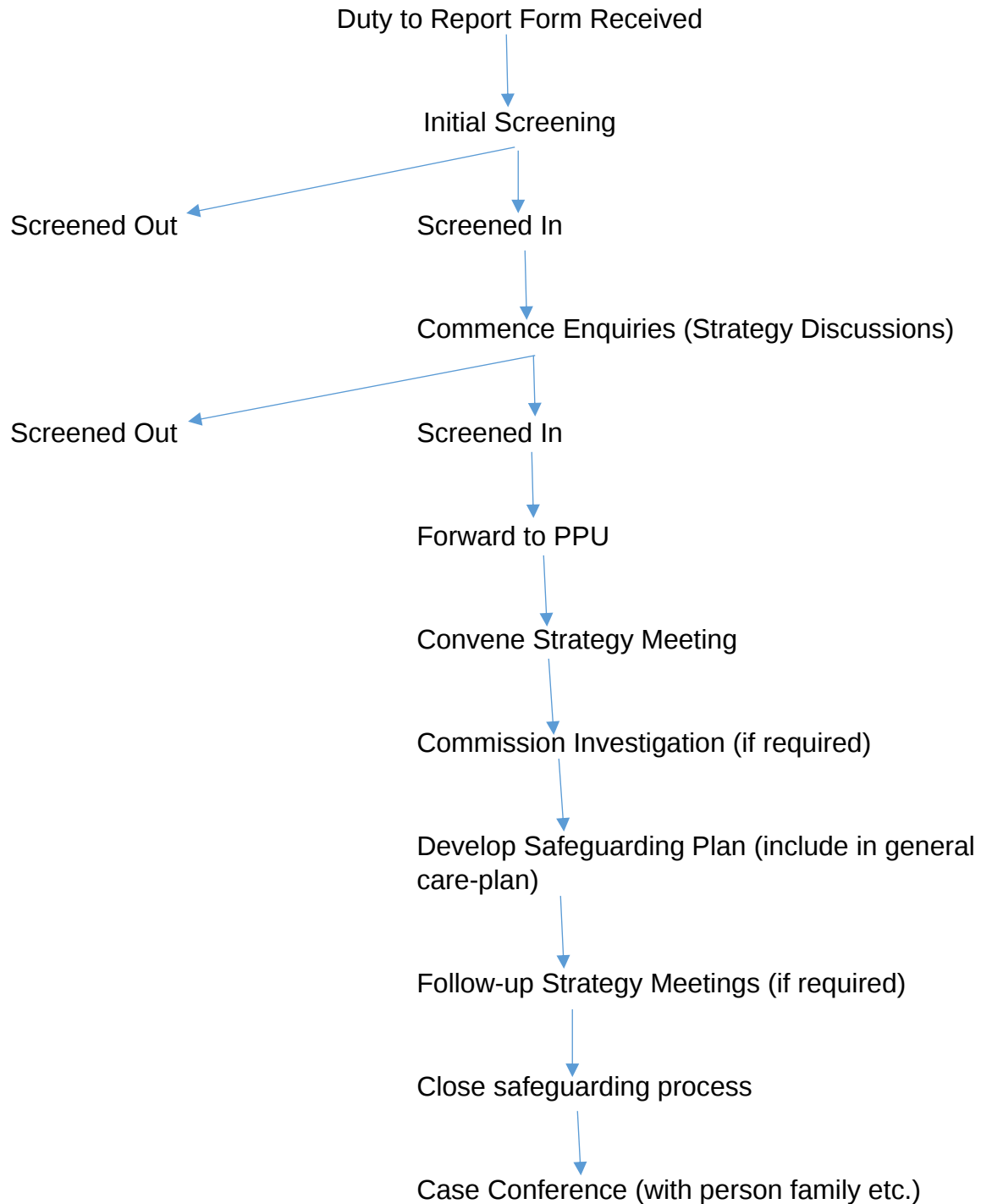
Referral Process - Children

3.2.5 Flowchart 1: referral



Appendix 3

Adult Safeguarding Process



Appendix 4

Role Description for Directorate Safeguarding Lead

Every Directorate within the Council is required to nominate a Directorate Safeguarding Lead (DSL) for dealing with safeguarding children and adult's issues. The DSL is responsible for:

- Acting as an overarching and key source of advice and support for other staff in their Service on all safeguarding issues
- Ensuring robust arrangements are in place for staff to access day to day practice advice and support for safeguarding from their line managers
- Support staff or take the lead in referring safeguarding concerns to Social Care and Health as appropriate
- Being familiar with the Council's Corporate Safeguarding Policy and the All Wales Procedures as they relate to Children's and Adult safeguarding
- Ensuring the Operational Procedures for safeguarding within the directorate are compliant with legislation and statutory guidance and are issued to all staff
- Representing their Directorate on the Whole Authority Safeguarding Group
- Ensuring compliance with policies and guidance within their directorate service areas and reporting this to the Whole Authority Safeguarding Group
- Attending relevant training
- Ensuring members of the workforce within their Services attend training at levels appropriate to their roles and functions and maintain management information in relation to attendance on training
- Ensuring safeguarding responsibilities are highlighted through staff induction processes, team meetings, supervision and staff briefings

Appendix 5

Terms of Reference for Whole Authority Safeguarding Group

The main responsibilities of the Group are to ensure that robust arrangements for safeguarding children and adults are in place within and across the Council

The Whole Authority Safeguarding Group will act on a strategic level to:

- Assure the Council that procedures for managing safeguarding concerns are robust;
- Ensure that all directorates within the council are aware of their contribution to keeping children, young people and adults at risk safe and free from harm or abuse;
- Support the functions and duties of the Chief Officer Social Care and Health;
- Ensure inter departmental working and corporate communication is effective;
- Resolve any potential barriers that could prevent having effective procedures in place;
- Receive and consider recommendations and learning from Child / Adult Practice / Domestic Homicide Reviews;
- Ensure appropriate training is available for the workforce and Elected Members;
- Receive and consider agreed performance information;
- Produce an Annual Report on safeguarding performance within the council for SLT, Cabinet and relevant Scrutiny Committee;
- Review the Corporate Safeguarding Policy as and when required or after 3 years as a minimum.

Appendix 6

MONMOUTHSHIRE SAFEGUARDING AUDIT FRAMEWORK for EVALUATION

In according with Monmouthshire's Safeguarding Policy, all organisations that provide services for or work with adults at risk, children, young people and families are expected to carry out an audit of their safeguarding practices, based on a process of self-evaluation.

The following audit framework is set out in sections related to different standards and requires you to think about your own practices and procedures within your service area/ establishment. It is designed to give you an understanding of safeguarding in your own service area/ establishment and how these might be developed. In addition the audits provide Monmouthshire County Council with an overview of safeguarding practices across the county.

The audit tool is based on Social Services and Wellbeing Act 2014.

Please undertake the following audit and return it to the named officer below for your Directorate:

Bernard Boniface, Adult Safeguarding Manager (Adult Services) bernardboniface@monmouthshire.gov.uk.

Diane Corrister, Safeguarding and Quality Assurance Unit Manager (Operations) dianecorrister@monmouthshire.gov.uk.

Heather Heaney, Designated Lead Officer for Safeguarding in Education (CYP, Schools, Early Years Settings, Flying Start) heatherheaney@monmouthshire.gov.uk

Cath Sheen, Corporate Safeguarding Programme Lead (Resources & Enterprise) cathsheen@monmouthshire.gov.uk

Please think carefully about your own practices and procedures in your setting; complete the audit to the best of your knowledge and think about how you will evidence your responses. Please complete the RAG System (Red, Amber or Green – see below) and produce an action plan with any actions that are required to improve safeguarding in your area.

We review the information you give us and will provide follow up advice and support where appropriate. Our review of the information helps to inform MCC in developing safeguarding practices at a wider level.

We aim to undertake a follow up audit every 2 years. Please try to be as realistic and honest as you can be and use this document to help you to identify your current position regarding safeguarding and set targets/actions to improve.

ORGANISATION / SERVICE AREA / SCHOOL / ESTABLISHMENT NAME.....

PERSON COMPLETING THIS AUDIT..... ROLE/POSITION.....

DATE COMPLETED..... DATE RETURNED TO LA.....

Please list below ALL the individual services / organisations / establishments that you are responsible for and reporting on in this audit. Where relevant be specific in your audit regarding which service is being commented upon. (for e.g. Leisure Centre, Day Service, Care Home, Social Work Team Primary School, Comprehensive School, Nursery, Breakfast Club, After School Club, Sports Activities, etc.)

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STANDARD	EVIDENCE	RAG RATING	FURTHER ACTIONS REQ'D
STANDARD 1. Designated Safeguarding Leads Designated Safeguarding Leads fulfil an essential role in developing and implementing policies that help to protect children and adults at risk from all forms of abuse and create a safe environment. Designated Safeguarding Leads take responsibility in their setting for managing issues and concerns about adults and children at risk.			
1.1 There is a Designated Safeguarding Lead (DSL) for Safeguarding and all staff know who that person is.			

1.2 There is a Deputy Designated Safeguarding Lead (to act when the DSL is off site) and all staff know who that person is.			
1.3 The role of the Designated Safeguarding Lead is clearly defined in a job description which sets out their responsibilities in safeguarding.			
1.4 The DSL and deputy DSL are adequately trained and supported to fulfil their roles.	Provide details of safeguarding courses attended with dates:		
STANDARD 2. Policies and Procedures			
2.1 Your setting has adopted the Monmouthshire Safeguarding Policy (formally via governing body/trustee / management body if appropriate).	Give Date when adopted:		

2.2 The LA policy has been communicated to all staff members and is implemented in your setting/organisation.			
2.3 Your setting has its own written safeguarding policies and procedures which are reviewed regularly (at least every 3 years)	List any relevant policies with dates including date of reviews and of next review:		
2.4 All staff and volunteers are made aware of all safeguarding policies and procedures and how these are applied within the setting			
2.5 Everyone using your service are made aware of all safeguarding policies and procedures and how these are applied within the setting			

2.6 We are confident that every service we commission delivers a safeguarding standard consistent with our service.			
STANDARD 3. Accountability			
3.1 All staff understand to whom they are directly accountable with regards to the well-being of adults at risk and children, and the level of accountability they have.	Is this discussed at team meetings and staff appraisals? How is this recorded?		
3.2 All Job descriptions are explicit and recognise responsibilities regarding safeguarding and promoting the well-being of children and adults at risk.			
STANDARD 4: LISTENING AND RESPONDING			
4.1 Children and adults at risk are			

encouraged to express their wishes and feelings including any concerns they might have over harm and abuse			
4.2 Appropriate decisions are made in order to protect children, young people and adults at risk from harm			
4.3 Children, young people and adults at risk feel safe in your setting and that their well-being is promoted.			
4.4 We reflect on what has gone well and areas for improvement, and ensure that new learning is embedded.	How is this achieved?		

STANDARD 5: Effective inter-agency working to safeguard and promote the welfare of children and adults at risk

5.1 Staff participate in multi-agency meetings and fora to consider the needs of and provide support for individual children and their families and adults at risk.	List the relevant meetings your setting is involved:		
5.2 Staff are able to recognise when children and adults at risk need additional support and are able to make the appropriate referral e.g. referrals to other single agencies, referral to TAF, referral to Adult Services or Children's Services	Provide numbers of referrals made to e.g. adult/children's services		
5.3 Any decisions made or actions taken in relation to the protection or safeguarding of			

individuals are recorded appropriately and maintained confidentially.			
5.4 Arrangements are in place to ensure that personal and confidential information is appropriately shared across settings / services.	Is information securely available across varying levels of need? How do you know this is being complied with?		
STANDARD 6: Staff and Volunteer Training			
6.1. All staff and volunteers receive appropriate training (at the relevant levels) to enable them to discharge their safeguarding duties.	Describe your record keeping arrangements and how this is monitored by your setting. What arrangements are in place for updates and renewals		
6.2 All staff and Volunteers are assessed in relation to	How is this achieved?		

safeguarding training needs.			
6.3 There is a record kept of all adult/child protection and safeguarding training and this is updated as appropriate.	Provide a copy of your training record		
6.4 Arrangements are in place to evaluate the impact and effectiveness of training and the identification of adult/child protection and safeguarding training.			
STANDARD 7: Safe Recruitment			
7.1. All staff and volunteers have DBS checks prior to employment if they are engaged in regulated activity.	Describe how you monitor DBS arrangements:		
7.2. All staff who have contact with children, young people and	Provide information about any DBS		

adults at risk are selected in accordance with the Safe Recruitment Policy and have appropriate checks in line with current legislation and guidance: - References are always taken up prior to appointment. - Identity and qualifications are verified. - Professional registration is in place - Face to face interviews are carried out. - Previous employment history is checked. - Any anomalies or discrepancies are followed up.	risk assessments that you have undertaken since the last audit: how can you be confident that sound decisions are made?		
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- Necessary checks are carried out before the employee takes up the post (e.g. DBS if they are engaged in regulated activity).			
7.3 There is a Safe Recruitment policy in place.			
7.4 Those people involved in recruitment within your setting have undertaken Safe Recruitment Training	Provide details of any training undertaken:		
STANDARD 8: Handling Allegations Against Workers and Volunteers			
8.1 There is a named senior officer with responsibility in respect of allegations against staff and volunteers. All staff			

know who this person is.			
8.2 There is a written procedure for handling allegations against staff and volunteers in place.			
8.3 Incidents and allegations of professional abuse are recorded appropriately and maintained confidentially.	Provide numbers of professional concerns and any issues referred:		
STANDARD 9: Safeguarding in the Building			
9.1 Do you know and monitor public access points in the building(s) so that you know if people are entering or leaving the building?			
9.2 Are Parents / Carers / Visitors monitored whilst they are in the building			

including signing in and out procedures if appropriate? Are badges issued to visitors?			
9.3 Do you have policies and procedures in place to maintain safeguarding when other people/vehicles not involved with your organisation use/visit the premises at the same time as your organisation?			
9.4 Are safeguarding issues reported to the relevant lead officer and the building's management, as appropriate?			
9.5 Do you risk assess for safeguarding and general safety when using premises other than your own and have a reporting system in place for issues identified?			

STANDARD 10: E-Safety			
10.1 Children, young people or adult at risk who have access to the internet via any means in your setting can do so safely.	Provide details of any e-safety awareness activity that is undertaken within your setting:		
10.2 Do you have and implement a policy for the safe use of internet access by service users, staff and volunteers?	Tell us where this policy is available:		

Designated Safeguarding Lead Summary Report

Describe any key challenges and successes that you have experienced over the last year. Relate this both to your individual role and to the wider setting.
Please identify what support might be helpful to you in your role as Designated Safeguarding Lead or to assist with the development of safeguarding within your setting.

RAG RATING

Green

Means everything is in place, up to date, and meets the required minimum standard

Amber

Means that something requires review or improvement

Red

Means something needs to be developed as a matter of urgency

Part 2: Action Plan

INSERT YOUR COMPLETED / UPDATED ACTION PLAN FROM YOUR PREVIOUS AUDIT

Ensure that any actions from your previous action plan that have not been completed are incorporated into your current plan as below.

No	Standard Identified	RAG Rating	Action Needed / Evidence of Completion	Timescale / Date of completion	Lead Officer and Contact Details

Appendix 7

Staff Training Template

Name	Job Title	Base	Level	Provider	Name of Course	Date Completed	Expiry Date
A N Other	Sports Devel. Officer	Usk	2	SEWSCB	Safeguarding and Protecting Children	23/02/2015	23/02/2017

Appendix 8

Definitions of Abuse

Physical abuse

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 caregiver fabricates or induces illness in a child whom they are looking after.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home or being bullied, or, the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

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. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In addition, neglect may occur during pregnancy as a result of maternal substance misuse.

Financial Abuse

Financial or material abuse is any theft or misuse of a person's money, property or resources by a person in a position of, or expectation of, trust to a vulnerable person. Common forms of financial abuse are misuse by others of a vulnerable adult's state benefits or undue pressure to change wills. Financial/material abuse may also be perpetrated by one vulnerable adult upon another.

Part 2

Safeguarding Policy for The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools

Introduction

1.1 The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools fully recognises the contribution it makes to safeguarding adults and children at risk.

There are three main elements to our policy:-

- Prevention;
- Procedures for identifying and reporting cases, or suspected cases of adults and children at risk.
- Support to those who may have experienced abuse or harm.

1.2 This policy applies to all staff and volunteers working in The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools. It is recognised that staff who come into contact with adults and children can often be the first point of disclosure of abuse or harm. This first point of contact is an important part of the protection process and it is essential that all staff are aware of and implement the procedures as noted in this policy.

1.3 The schools fully recognizes the contribution it makes to safeguarding.

There are three main elements to our policy:-

- Prevention through the teaching and pastoral support offered to pupils;
- Procedures for identifying and reporting cases, or suspected cases of abuse. Because of our day to day contact with children school staff are well placed to observe the outward signs of abuse; and
- Support to those pupils who may have been abused.

1.4 This policy applies to all staff and volunteers working in the schools and its governors. It is recognised by these schools that all staff that come in to contact with children can often be the first point of disclosure for a child. This first point of contact is an important part of the safeguarding process, and it is essential that all staffs are aware of and implements the schools procedures as noted in this policy.

Prevention

2.1 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to safeguard adults and children at The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools.

We will therefore:-

- Establish and maintain an ethos where children and adults feel secure, are encouraged to talk and share their concerns and will be listened to;
- Ensure that those attending this setting/using this service know that all staff and volunteers in this setting can be approached if they are worried or concerned about matters that concern them or their family members or friends.
- Include in the ethos of the setting that people have the right to be safe from abuse and to know that they can turn to staff for help;

Procedures

3.1 At The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools we will follow the Wales Safeguarding Procedures 2019 <https://safeguarding.wales/> and also policies, protocols and guidance documents that have been endorsed by Gwent Safeguarding <https://www.gwentsafeguarding.org.uk/en/Children/Protocols-and-Procedures/Protocols-and-Procedures.aspx>.

3.2 The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools will:-

- Ensure it has a named designated senior member of staff (DSL) who has undertaken the appropriate training in line with agreed national and local requirements. This setting/service will also nominate a named deputy who will be the central contact in times when the designated person is absent. In the unlikelyhood that both are absent or unavailable the most senior person will act as a contact point for other staff.
- Recognise the role of designated person and arrange support and training. The setting/service will look to the SEWSCB, GWASB and to the local authority for guidance and support in all safeguarding matters and concerns for adults at risk.
- Ensure that all members of staff, including permanent, part time and adult volunteers, (and school governors/management boards) knows:-
 - The name and contact details of both the designated and deputy person responsible for safeguarding and concerns for adults at risk;
 - That it is the named designated person and/or their deputy who have the responsibility for making referrals for children/adults at risk within timescales, by completing the agreed multi-agency form.

- That the designated person and deputy will seek advice from the Designated Officer and or Social Services Duty Team if necessary when a referral is being considered; if in doubt a referral must be sent.
- Ensure that all members of staff are aware of the need to be alert to signs of abuse and know how to respond to an adult or child who may disclose abuse. That all members of staff will be offered and expected to attend appropriate training and updates as arranged by the setting/service.
- Ensure that adults, children and carers have a clear understanding of the responsibility placed on the setting/service and its staff for safeguarding adults and children by setting out their obligations in relevant service/setting information.
- Provide training for all staff so that they:-
 - i) Understand their personal responsibility;
 - ii) Are cognisant of agreed local procedures
 - iii) Understand the need to be vigilant in identifying suspected cases of abuse;
 - iv) Know how to support an adult or child who discloses abuse, particularly the do's and don'ts.
- Work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding children and adults at risk including attendance at safeguarding/case conferences and subsequent meetings and support these with the submission of written reports.
- Keep written records of concerns about adults and children at risk (noting date, event and action taken), even where there is no need to refer the matter to agencies responsible for formal investigation.
- Ensure that all records and files are kept secure and in locked locations. The designated person is responsible for the security, compilation and storage of all records and should be able to access and produce them in times of need. It is the responsibility of the designated person to ensure that any transfer of records is conducted sensitively and securely.
- Ensure that all recruitment and selection procedures follow all national and local guidance. The setting/service will seek advice and guidance from the appropriate Human Resources on recruitment and selection.
- Seek to designate a governor for safeguarding who will champion and oversee the school's safeguarding policy and practice. This governor will feed back to the Governing body on safeguarding matters as and when required but will be required to write an annual report to the governing body on the school's safeguarding activities.

Supporting children and adults at risk of abuse

4.1 At The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools we recognise that those who are at risk, suffer abuse or witness violence are often affected in adverse ways, some may be deeply troubled by these events.

4.2 At The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools we will endeavour to be patient and supportive to those at risk of harm or abuse.

Prevent Duties

In March 2015, the Counter Terrorism and Security Act received Royal Assent. The Act includes how we need to work together to prevent people from being drawn into terrorism.

Where we become aware of information involving identification of potential instances of extremism and radicalisation we will refer to Adult/Children's Services in the same way as for all safeguarding concerns.

Operation Encompass

Operation Encompass was launched across Monmouthshire schools on 4th March 2019 as part of a Gwent wide initiative to address limitations in the early sharing of information between Police and schools. Its vision is to safeguard children and young people who are affected by domestic abuse, by ensuring that appropriate services are made aware of an incident at the earliest possible opportunity.

This school fully supports Operation Encompass the purpose of which is to safeguard and support those children and young people who have witnessed and/or been present at the time of a domestic abuse incident.

Following such an incident taking place, children will often arrive at school distressed and unprepared. Operation Encompass aims to ensure that appropriate school staff are made aware at the earliest possible stage in order to provide relevant and tailored support to children and young people in a way that means that they feel safe and included.

All information will be managed sensitively, and only staff who need to be made aware will know about the concern.

Education Welfare Service will continue to forward Operation Encompass notifications to School Designated Safeguarding Leads.

Information for all staff/volunteers

5.1 What to do if a child or adult tells you they have been abused or harmed

A person may confide in any member of staff/volunteer. Staff to whom an allegation is made should remember:-

- Yours is a listening role, do not interrupt the person when they are freely recalling events. Limit any questions to clarifying your understanding of what the person is saying. Any questions should be framed in an open manner so not to lead the person;
- You must report orally to the **Designated Person Safeguarding (DSL) (Stewart Davies Head teacher) or their Deputy (Richard Aylett, Cheryl Evans or Lucy Speake)** in their absence immediately to inform them of what has been disclosed. In the unlikelihood of both being absent seek out the most senior person in the setting/service;
- Make a note of the discussion, as soon as is reasonably practical (but within 24 hours) to pass on to the Designated Safeguarding Lead. The note which should

be clear in its use of terminology should record the time, date, place, and people who were present and should record the person's answers/responses in exactly the way they were said as far as possible. This note will in most cases be the only written record of what has been disclosed and as it records the initial disclosure from the person it is an important one in the safeguarding process.

Remember, your note of the discussion may be used in any subsequent formal investigation and or court proceedings. It is advised that you retain a copy in a safe place;

- Do not give undertakings of absolute confidentiality. (see note following this section for more details) You will need to express this in age/understanding related ways to the person as soon as appropriately possible during the disclosure. This may result in the person 'clamming up' and not completing the disclosure, but you will still be required to share the fact that they have a shared a concern with you to the designated person. Often what is initially shared can be the tip of an iceberg;
- Your responsibility in terms of referring concerns ends at this point, but you may have a future role in terms of supporting the person, contributing to an assessment or supporting safeguarding plans. You can ask the designated person for an update but they are restricted by procedures and confidentiality and may be limited in their response. The level of feedback will be on a need to know basis, but whatever is shared is strictly confidential and not for general discussion with others.

If an allegation of abuse is made against a member of staff/volunteer this must be reported to the Designated Person for Safeguarding (DSL).

Where the allegation is against a member of staff you should refer to Children's/Adult Services in the same way as for all allegations of abuse.

Confidentiality

6.1 A person may only feel confident to confide in a member of staff/volunteer if they feel that the information will not be divulged to anyone else. However we all have a responsibility to share relevant information about the protection of children and adults with the designated statutory agencies when a person is experiencing harm or abuse.

It is important that each member of staff/volunteer deals with this sensitively and explains to the person that they must inform the appropriate people who can help them, but they will only tell those who need to know in order to be able to help. Staff should reassure the person and tell them that their situation will not be common knowledge within the setting/service (i.e. not discussed with other staff) Staff/volunteers need to be aware that it may well have taken significant courage on the part of the person to disclose the information and they may also be experiencing conflicting emotions, involving feelings of guilt, embarrassment, disloyalty (if the abuser is someone close) and hurt.

Training

The setting/service will be cognisant of national and local training requirements and guidance, which will include SEWSCB and GWASB guidance, advice and training opportunities.

7.1 The service/setting will ensure that the Designated Safeguarding Lead (DSL) will have received initial training when starting their role and continued professional updates as required. Specific updates as suggested by national and local

requirements will be central to the DSL's development. The designated deputy will be initially supported by the designated person and consideration for joint opportunities for training with the designated person will be given.

7.2 All staff/ volunteers will be regularly updated during the year as appropriate from the designated lead, but will receive specific awareness raising training within a 2 year period.

7.3 It will be a recommendation that the governing body will also receive awareness raising training and the nominated governor will be offered opportunities for more specific training.

The Designated Safeguarding Lead at this setting is:- Stewart Davies

The Deputy Designated Safeguarding Lead at this setting is:- Richard Aylett/
Cheryl Evans/ Lucy Speake

The nominated governor for safeguarding at these schools are:- Mr Richard Corken
Phone - 07515831106

The Monmouthshire Education Safeguarding Officer is:- Heather Heaney who can be contacted by:- Phone- 01633 644392 Mobile- 07917707343

Email- heather.heaney@monmouthshire.gov.uk

Monmouthshire Children's Services can be contacted as follows:-

Phone: 01291 635669

Out of hours telephone number: 0800 328 4432

Monmouthshire Adult Services can be contacted as follows:-

In an emergency, please call 999 to report a vulnerable adult at risk

- Monday – Friday 9am to 5pm we operate a duty service in each locality.
- If you are reporting an adult at risk who lives in South Monmouthshire, you can speak to someone on telephone number 01291 635666.
- If you are reporting an adult at risk who lives in Abergavenny area, you can speak to someone on telephone number 01873 735885.
- If you are reporting an adult at risk who lives in Monmouth area, you can speak to someone on telephone number 01600 775100.
- Outside of office hours you can contact the Adult Services Emergency Duty Team on 0800 3284432.

Report concerns

NAME OF SCHOOL SAFEGUARDING LEAD Stewart Davies - Headteacher

Duty Social Worker, Monmouthshire County Council: 01291 635669

Out of Hours and Bank Holidays Emergency Duty Team: 0800 328 4432

Gwent police – 101 to report a crime, 999 for urgent response requests only

Advice can also be sought from Local Authority Officers

Heather Heaney HeatherHeaney@monmouthshire.gov.uk

Sharon Randall-Smith SharonRandall-Smith@monmouthshire.gov.uk

Richard Austin RichardAustin@monmouthshire.gov.uk

Police advice re terrorism and radicalisation can be accessed via:-

<https://www.gov.uk/report-terrorism>

<https://www.gwent.police.uk/en/advice/advice/t-z-terrorism-witness-of-crime/terrorism/prevent/>

Other useful resources

www.cyberaware.gov.uk/

www.getsafeonline.org

www.saferinternet.org.uk/

www.childnet.com

APPENDIX 1

INFORMATION FOR PUPILS

If someone is hurting you or your friends, there are people who can help you and stop people from making you feel scared or hurt.

You should tell someone you trust:-

- you can tell a teacher, your parents, carers, grandparents or other members of your family who may be able to help, or can tell a friend; and
- let people help to make things better by stopping the person from hurting you or your friends.

The person in this school who has special responsibility for helping you if someone's hurting you or your friends is Mr Davies or any teacher or adult that you feel happy to talk to.

If you can't talk to any of these, you can talk to one of the following organisations that will have someone who will listen to you:-

Childline

A free 24-hour advice line offering counselling and support to young people suffering from abuse. The call won't show up on your phone bill.

0800 11 11

www.childline.org.uk

NSPCC

A free phone line offering support and advice to young people in abusive or difficult situations. The lines are open 24 hours a day and the calls won't show up on your phone bill.

0808 800 5000

www.nspcc.org.uk

Children's Commissioner for Wales

Children's Champion – Independent human rights institution for children.

0808 801 1000. The lines are open from 9am to 5pm (Monday to Friday).

www.childcom.org.uk

Clic

The National Information and Advice Service for young people in Wales 11 to 25.

www.cliconline.co.uk

Samaritans

Free and confidential advice and support

08457 90 90 90

www.samaritans.org.uk

Barnardo's

Barnardo's works with vulnerable children and young people, helping them and their families to overcome problems like abuse, homelessness and poverty.

020 8550 8822 (national rate, 8am–6pm Mon – Fri)

www.barnardos.org.uk

BBC One Life

This website provides advice on children and young people's rights, what to do if they are being abused and how to get help.

www.bbc.co.uk/surgery

Kidscape

Kidscape works with children and young people under the age of 16, their parents/carers and those who work with them to prevent bullying and child sexual abuse.

08451 205 204

www.kidscape.org.uk

Get Connected

Get Connected provides a free, confidential helpline that gives young people in difficult situations support and information.

0808 808 4994

www.getconnected.org

Bullying Online

Bullying Online is a website that provides information and support for a wide range of parents, pupils, teachers and youth organisations.

www.bullying.co.uk

Wise Kids

Wise Kids is a website that provides information and support on internet literacy, proficiency and knowledge of the intranet and related technologies.

www.wisekids.org.uk

Part 3

The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools Safeguarding Statement

The following statement was agreed by the Head teacher, staff and governors on 19th October 2022.

The Head teacher, staff and Governors of The Federation of Llanfoist Fawr and Llanvihangel Crucorney Primary Schools recognise their responsibility to safeguard all the pupils in our care.

We recognise that we all have a responsibility to help prevent the physical, sexual, emotional abuse and neglect of our pupils and to report any such abuse that we discover or suspect.

- We believe every child should be valued, safe and happy. We want to make sure that children we have contact with know this and are empowered to tell us if they are suffering harm.
- All children and young people have the right to be treated with respect, to be listened to and to be protected from all forms of abuse.
- We recognise the personal dignity and rights of pupils, and staff, and will ensure all our policies and procedures reflect this.
- We undertake to exercise proper care in the appointment and selection of all those who will work with children.

We are committed to:

- Following the guidance in the *Social Services and Well-being (Wales) Act 2014*
- Respecting the rights of children
- Nurturing, protecting and safeguarding all of our pupils
- Implementing the requirements of legislation in regard to people with disabilities.
- Ensuring that workers adhere to the agreed procedures of our safeguarding policy.
- Keeping up to date with national and local developments relating to safeguarding.
- Following any local authority guidelines in relation to safeguarding children and adults in need of protection.
- Supporting parents and families.
- Sharing information with partner agencies where this is necessary to safeguard and promote the well-being of children.

We recognise:

- Monmouthshire Children's Services has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child
- Safeguarding is everyone's responsibility.

We will review this statement and our policy and procedures annually.

If you have any concerns for a child or family then speak to one of the following who are designated to take the lead in safeguarding in this school.

DESIGNATED PERSON FOR SAFEGUARDING - Stewart Davies

DEPUTY DESIGNATED PERSON FOR SAFEGUARDING -Richard Aylett, Cheryl Evans, Lucy Speake

GOVERNOR WITH RESPONSIBILITY FOR SAFEGUARDING Richard Corken

This policy was updated on 2nd September 2022

This policy was presented and accepted by the Governing Body on 19th October 2022

Staffs were made aware of this policy and or updates on September 20th October 2022

This policy is due for review in September 2023