

## SAFEGUARDING POLICY

<b>Process Area</b>	<b>Student Services</b>
<b>Reference Number</b>	<b>STS/015 (SECTOR POLICY)</b>
<b>Directorate</b>	<b>Client Services</b>

<b>Issue No</b>	<b>Date</b>	<b>Details</b>	<b>Author</b>	<b>Approved</b>
001	Dec 2012	First issue Replaces STS/002 PCYPVA	GH, JMCK, RS	BD
002	Oct 2014	Reviewed – no changes	JMCK	BD
003	Nov 2014	Contact details for College Safeguarding Officers included	JMCK	Governing Body
004	Nov 2017	Annual review with changes to Section 1, 3 and 4	RS	Governing Body
005	April 2019	Revised in line with legislation and the development of a procedural note	RS	Governing Body
006	Dec 2019	This is a revised policy developed in conjunction with Colleges and DfE	RS	Governing Body
007	Apr 2021	Policy has been updated with addition of a Covid-19 addendum	RS	Governing Body
008	Nov 2021	Reviewed with changes to Section 4, 5, 7 and 13. Appendices amended and rearranged in line with ETI proforma	RS	Governing Body

**If requested, the College will make the policy available in alternative formats to accommodate visual or hearing impairments. The policy can also be downloaded from the College website and made available in alternative languages upon request.**



# Northern Ireland Further Education Colleges

## Safeguarding, Care & Welfare Policy

Approved by

Date

30/11/21

\_\_\_\_\_  
Signature of Principal and Chief Executive

**BRIAN DORAN**

Name of Principal and Chief Executive

**SOUTHERN REGIONAL COLLEGE**

Name of College

## **SAFEGUARDING, CARE & WELFARE POLICY**

### **EQUALITY SCREENING & RURAL PROOFING**

<b>Details</b>	<b>Date Approved</b>
Equality Screening (sectoral screening only) and rural proofing	03/03/2021
Education Committee	30/11/2021
Governing Body	07/12/2021

### **SAFEGUARDING, CARE & WELFARE POLICY FRAMEWORK**

The Framework from which this Policy is derived has been developed by the Further Education (FE) Colleges Safeguarding Working Group established in April 2019. The framework contains the minimum standard of information for any Safeguarding Policy in a FE College in Northern Ireland.

The FE Colleges Safeguarding Working Group has agreed that the Framework may be added to by a College, but content cannot be withdrawn otherwise the organisation may fail to meet its legal and moral duty, put learners / participants at risk and may be vulnerable to potential legal challenge and / or reputational damage.

The FE Colleges Safeguarding Working Group is committed, at the very least, to an annual review of the framework and revision if required at regional and College level dependent on current legislation and organisation structures.

Membership of the FE Colleges Safeguarding Working Group is listed in Appendix 6.

# SAFEGUARDING, CARE & WELFARE POLICY

## CONTENTS

<b>SAFEGUARDING, CARE &amp; WELFARE POLICY</b> .....	5
<b>1. PURPOSE</b> .....	5
<b>2. CONTEXT</b> .....	5
<b>3. SCOPE</b> .....	6
<b>4. GENERAL PRINCIPLES</b> .....	6
<b>5. KEY DEFINITIONS</b> .....	6
<b>6. PROMOTING DIGITAL SAFETY</b> .....	8
<b>7. RESPONSIBILITY</b> .....	8
<b>8. CONFIDENTIALITY</b> .....	10
<b>9. WORK PLACEMENTS OR EXCHANGE VISITS</b> .....	11
<b>10. RESPONDING TO A DISCLOSURE</b> .....	11
<b>11. DEALING WITH COMPLAINTS</b> .....	122
<b>12. EQUALITY</b> .....	12
<b>13. MONITORING</b> .....	12
<b>APPENDIX 1</b> .....	13
<b>DEPARTMENT OF EDUCATION CIRCULARS</b> .....	13
<b>APPENDIX 2</b> .....	13
<b>LEGISLATION:</b> .....	18
<b>APPENDIX 3</b> .....	19
<b>REFERENCES &amp; RESOURCES</b> .....	21
<b>APPENDIX 4</b> .....	Error! Bookmark not defined.
<b>TYPES OF ABUSE</b> .....	22
<b>APPENDIX 5</b> .....	22
<b>MEMBERSHIP OF THE FE COLLEGES SAFEGUARDING WORKING GROUP</b> .....	26
<b>APPENDIX 6</b> .....	27
<b>SAFEGUARDING TEAM MEMBERS</b> .....	27
<b>APPENDIX 7</b> .....	28
<b>SAFEGUARDING, CARE &amp; WELFARE REPORTING OF CONCERN</b> .....	28
<b>APPENDIX 8</b> .....	29
<b>COMPLAINTS AND COMPLIMENTS POLICY</b> .....	29

# SAFEGUARDING, CARE & WELFARE POLICY

## SAFEGUARDING, CARE & WELFARE POLICY

### 1. PURPOSE

Southern Regional College (hereafter referred to as the College) aims to ensure that all students, staff and stakeholders of the College experience an inclusive, enjoyable and safe environment, in which they feel respected and valued. We all share an objective to keep children, young people, adults at risk and adults in need of protection, safe from harm. This College Safeguarding, Care & Welfare Policy is built upon a foundation of ‘zero tolerance’ of harm to all children, young people, adults at risk of harm and adults in need of protection and is aligned to the Northern Ireland Adult Safeguarding Partnership (NIASP) statement “Safeguarding is everyone’s business”.

The purpose of this Policy is to:

- Promote the welfare of children, young people, adults at risk of harm and adults in need of protection to protect them from harm;
- Encourage good practice in all aspects of promotion and protection of children, young people, adults at risk of harm and adults in need of protection;
- Raise awareness of the safeguarding, care and welfare issues that may or have the potential to impact upon children, young people and adults at risk of harm and adults in need of protection;
- Prevent and reduce the risk and potential risk of harm to children, young people, adults at risk of harm and adults in need of protection, whilst providing an inclusive non-stigmatised learning environment for all;
- Empower children, young people, adults at risk of harm and adults in need of protection to make informed decisions about their education, life experiences and wellbeing which will allow them to live life free from coercion and have freedom of expression;
- Provide and implement clear, accessible and consistent guidance in relation to the procedures for reporting concerns;
- Advocate for children, young people, adults at risk of harm and adults in need of protection in their right to fair justice as a result of abuse, exploitation or neglect;
- Encourage and promote continuous professional development in the approach to safeguarding, care and welfare practices.

### 2. CONTEXT

The College will carry out its responsibilities under all relevant legislation, regulations and professional guidelines, which are listed in Appendices 1, 2 & 3.

### 3. SCOPE

This policy applies to all staff, students, the Governing Body, volunteers and third parties and should be read in conjunction with relevant standard operating procedures and any other relevant organisation procedures.

# SAFEGUARDING, CARE & WELFARE POLICY

## 4. GENERAL PRINCIPLES

The Policy is based on the following principles:

- The College seeks to provide and promote a safe learning environment for all users;
- The College is committed to the challenging and reporting of harmful behaviour and, recognising that anyone can be the subject of abuse, will seek to develop a culture of healthy and respectful relationships wherein all allegations of abuse will be taken seriously and treated in accordance with the College's procedures;
- The College will use best practice in its safe recruitment of staff by undertaking the appropriate checks;
- The College must follow risk assessment procedures, before enrolling any person who has a conviction for the abuse of a child, young person, an adult at risk of harm or an adult in need of protection;
- The College will comply with regional policies and procedures in full partnership with other local agencies including the Health and Social Care Trust Gateway Team and Police Service of Northern Ireland (PSNI);
- The College staff will listen to, record and report all concerns, disclosures and allegations of abuse in accordance with current procedures in an empathetic, prompt and secure manner;
- The College will not investigate instances of abuse as this is the role of other statutory agencies e.g. social services, PSNI;
- The College is obligated to supporting, resourcing and training, in line with current legislation, those who work with, or come in contact with children, young people, adults at risk of harm and adults in need of protection and to provide appropriate supervision for them.
- The College is committed to developing knowledge and understanding of Trauma-Informed Practice and the impact of Adverse Childhood Experiences (ACEs)<sup>1</sup> to help staff better understand those in their care. This commitment aims to enhance and work alongside existing safeguarding protections, policies and measures for children, young people, adults at risk of harm or adults in need of protection.

## 5. KEY DEFINITIONS

- a) The definition of a 'child' is any person that is under the age of 18, as defined in the Children (NI) Order 1995, the principal statute governing care, upbringing and protection of children in Northern Ireland.
- b) The definition of an 'adult at risk of harm' is a person aged 18 years and over, whose exposure to harm through abuse, exploitation or neglect may be increased by their personal characteristics and/or life circumstances;

---

<sup>1</sup> ACES: Adverse Childhood Experiences. Ensuring a better deal for children in Wales. Professor Mark A. Bellis.

## **SAFEGUARDING, CARE & WELFARE POLICY**

- Personal characteristics may include but are not limited to: age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain;
  - Life circumstances may include but are not limited to: isolation, socio economic factors and environmental living conditions.
- c) The definition of an 'adult in need of protection' is a person aged 18 years and over, who may be at a greater risk of exposure to harm through abuse, exploitation or neglect may be increased by their:
- a) personal characteristics and / or;
  - b) life circumstances; and
  - c) who is unable to protect their own well-being, rights, or other interests; and
  - d) where the action or inaction of another person or persons is causing, or is likely to cause him / her to be harmed.

The College's safeguarding, care and welfare service understand that in order for our students, as defined above, who are an 'adult in need of protection' either (a) or (b) must be present, in addition to both elements (c) and (d).

The consideration of mental capacity is crucial at all stages of safeguarding adult's procedures as it provides a framework for decision making to balance independence and protection.

### **Types of Child Abuse (NSPCC, 2020) (ref Appendix 4)**

The College recognises that harm from abuse is not always straightforward to identify and a child may all too often experience more than one type of harm or significant harm. Harm can be caused by:

- Emotional abuse
- Sexual abuse
- Physical abuse
- Neglect
- Exploitation
- Harmful Sexual Behaviour
- Domestic Abuse
- Bullying & Cyber Bullying

### **Types of Adult Abuse (DHSSPS, 2015) (ref Appendix 4)**

- Physical abuse
- Sexual abuse
- Psychological / emotional abuse
- Financial abuse
- Institutional abuse
- Neglect
- Exploitation

## **SAFEGUARDING, CARE & WELFARE POLICY**

### **6. PROMOTING DIGITAL SAFETY**

Digital Safety is becoming an increasingly significant issue to consider when it comes to safeguarding children, young people, adults at risk and adults in need of protection.

All staff, students, the Governing Body, volunteers and third parties who wish to use the College's IT systems are required to agree to the College's Acceptable Use Policy and comply with any other relevant digital policies as directed.

The relevant policies are available for all users to access from <https://www.src.ac.uk/the-college/policies>

Staff, students, the Governing Body and volunteers are directed to this Safeguarding, Care and Welfare Policy and procedures during induction and via active promotion of "keeping safe" messages through other activities e.g. internet usage and social networking.

### **7. RESPONSIBILITY**

- a) Governance of safeguarding, care and welfare in the College is overseen by a member of the Governing Body.

The Chief Executive has strategic safeguarding, care and welfare responsibility in the College.

The Designated Safeguarding Officer reports regularly to the Chief Executive.

The Designated Safeguarding Team, comprised of the Assistant Director of Student Services & Marketing and the Learning Support Manager oversee and co-ordinate operational College safeguarding matters.

To further support safeguarding, care and welfare, the College also has a number of nominated Safeguarding Officers across College sites who support and advise staff to ensure a link with the Designated Safeguarding Officer and / or the Deputy Designated Safeguarding Officer who can then manage the child, young person, adult at risk of harm or adult in need of protection.

Posters are displayed throughout the College to identify those whom staff, students, volunteers and any third party can engage with on safeguarding, care and welfare matters.

The names of the individuals employed by the College in safeguarding roles are listed in Appendix 6. However it is the responsibility of all staff working in the College to report abuse and incidents of concern in line with this Safeguarding, Care and Welfare Policy and procedures. This responsibility extends to all staff, not just those specifically working with children, young people, adults at risk of harm and adults in need of protection.

## **SAFEGUARDING, CARE & WELFARE POLICY**

Report of concern(s) should be made a member of the Safeguarding Team in line with this Safeguarding, Care and Welfare Policy and procedures (Ref Section 10 and Appendix 6 & 7).

All employees and volunteers of the College are required to abide by the Employee Standards policy which articulates the College values and sets clear expectations of behaviour for all staff.

b) The Role of the Designated Safeguarding Officer and Deputy Designated Safeguarding Officer is to:

- Liaise with relevant College management and staff regarding this Safeguarding, Care and Welfare Policy, procedures and any reported incidents of concern and report to College management and Governing Body as required;
- Liaise with the local Gateway Team regarding safeguarding, care and welfare procedures and any reported incidents of concern;
- Liaise with and understand the roles and responsibilities of all the appropriate investigating agencies;
- Assist with the review of this Policy and related procedures annually;
- Maintain routine record keeping required (which will also identify patterns and enable early intervention) and the security thereof in relation to safeguarding, care and welfare matters;
- Ensure that the Safeguarding, Care and Welfare Policy and procedures are implemented at all College events that may involve children, young people, adults at risk of harm or adults in need of protection;
- Support children and young people from care backgrounds and who are on the Child Protection Register by attending case conferences, Looked-after children (LAC) reviews and working in partnership with social services;
- Support all Safeguarding Officers;
- Ensure all students are aware of the Safeguarding, Care and Welfare Policy during induction.

c) The Role of the Adult Safeguarding Champion (ASC) is to:

- Provide strategic and operational leadership and oversight in relation to Adult Safeguarding;
- Manage the Deputy Designated Safeguarding Officer and Safeguarding Officers;
- Ensure full implementation of the College Safeguarding, Care and Welfare Policy and procedures;
- Oversee the security of record keeping in relation to safeguarding, care and welfare matters;
- Compile and analyse records of reported concerns to determine whether a number of low-level concerns are accumulating to become significant, and make records available for inspection;
- Review the Safeguarding, Care and Welfare Policy and related procedures annually;

## SAFEGUARDING, CARE & WELFARE POLICY

- Provide information and support for staff on adult safeguarding within the organisation;
- Advise within the organisation regarding adult safeguarding training needs in line with current legislation;
- Provide advice to staff or volunteers who have concerns about the signs of harm, and ensure a report is made to Health and Social Care (HSC) Trusts where there is a safeguarding concern;
- Support staff to ensure that any actions take account of what the adult wishes to achieve – this should not prevent information about any risk of serious harm being passed to the relevant HSC Trust Adult Protection Gateway Service for assessment and decision making;
- Establish contact with the HSC Trust Designated Adult Protection Officer (DAPO), PSNI and other agencies as appropriate.

The ASC should ensure that, at a minimum, the organisation safeguards adults at risk by:

- Recognising that adult harm is wrong and that it should not be tolerated;
- Being aware of the signs of harm from abuse, exploitation and neglect;
- Reducing opportunities for harm from abuse, exploitation and neglect to occur; and
- Knowing how and when to report safeguarding concerns to HSC Trusts or the PSNI.

d) The role of the Human Resources and Development Department overseen by the Assistant Director for Human Resources and Development is to:

- Ensure the safe recruitment and induction of all staff and volunteers ensuring all are appropriately vetted in compliance with relevant DfE Circulars, Operational Requirements and Guidelines in accordance with the Safeguarding Vulnerable Groups (NI) Order (2007);
- Ensure implementation of staff disciplinary investigations if any concerns, disclosures or allegations of abuse by a staff member are made;
- Plan, deliver and monitor in partnership with other College departments the appropriate level of training required by all staff, in line with current legislation;
- Annually review and update Human Resources policies and procedures to reflect safeguarding, care and welfare arrangements in the College.

## 8. CONFIDENTIALITY

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety and welfare of the person is the overriding concern. The degree of confidentiality will be governed by the need to protect the individual and therefore complete confidentiality cannot be guaranteed. It is therefore *crucial* that staff understand and implement the guidelines for Data Protection and information sharing.

## **SAFEGUARDING, CARE & WELFARE POLICY**

### **9. WORK PLACEMENTS OR EXCHANGE VISITS**

Staff organising any work placements or exchange visits should take the safeguarding, care and welfare of children, young people, adults at risk and adults in need of protection into account when assessing the suitability of the work placement or exchange visit arrangements. Students are more vulnerable to harm or abuse when in long-term placement in the workplace or when outside their normal environment. The College has a duty to put in place additional safeguards as required.

All students on work placement or exchange visits should have a regular point of contact with a member of College staff and be advised that they can discuss with that person any concerns about their work placement or exchange visit. Any concerns raised or any suspicions of abuse must be reported to a member of the Safeguarding Team by staff immediately in line with safeguarding, care and welfare procedures as outlined in this document.

### **10. RESPONDING TO A DISCLOSURE**

The College is committed to dealing with any concern(s) that a child, young person, adult at risk of harm or an adult in need of protection in line with Safeguarding, Care and Welfare Policy and procedures.

Anyone with knowledge of or a suspicion that, a child, young person, adult at risk of harm or an adult in need of protection has been suffering abuse must refer their concern to a member of the Safeguarding Team as soon as possible.

All allegations or suspicions must be taken seriously. The child, young person, adult at risk of harm or adult in need of protection must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in College in the first instance. No promise of confidentiality can or should ever be made to a student or anyone else giving information about possible abuse.

The person disclosing the information should be advised as soon as possible by the Designated Safeguarding Officer what action will be taken as a result of the disclosure. They should also be made aware of the counselling service available to the College.

The College procedure for reporting and dealing with concerns can be found in Appendix 7 of this document.

All written records must be passed to the Designated Safeguarding Officer. Records will be uploaded to the secure safeguarding database managed by the Designated Safeguarding Officer (Assistant Director for Student Services & Marketing) and maintained for a period of five years. Records are strictly confidential. They may be accessed by the subject of the record but not by any third party other than the aforementioned or the Deputy Designated Safeguarding Officer.

## **SAFEGUARDING, CARE & WELFARE POLICY**

In the event that a disclosure is made concerning the activities of a member of staff towards a student, the matter must be referred directly to the Assistant Director for Human Resources and Development.

If any staff member feels unsure about what to do if they have concerns about a child, young person, an adult at risk of harm or an adult in need of protection or if they are unsure about being able to recognise the signs or symptoms of possible abuse, they should speak directly to a member of the Safeguarding Team.

### **11. DEALING WITH COMPLAINTS**

The Corporate Compliance Manager and Data Protection Officer is responsible for dealing with all complaints and compliments for the College. The College Complaints Policy is referenced in Appendix 8.

### **12. EQUALITY**

Screening is one of the key tools to enable the College to fulfil its statutory obligations and mainstream the Section 75 equality and good relations duties into policy development. Screening will help to identify policies that are likely to have an impact on equality of opportunity and help to draw considerations of equality of opportunity into the policy making process. The Human Resources and Development Department commits to screening this Safeguarding, Care and Welfare Policy in line with these statutory obligations.

### **13. MONITORING**

This Safeguarding, Care and Welfare Policy will be refreshed as required in line with organisational changes in the College and will be reviewed, at the very least annually, in line with the overarching framework, reflective of current legislation, as agreed by the FE Colleges Safeguarding Working Group.

Date for review: November 2021.

# SAFEGUARDING, CARE & WELFARE POLICY

## APPENDIX 1

### DEPARTMENT OF EDUCATION CIRCULARS

**Note that DE Circulars apply directly to schools, but provide advice on good practice relevant to all organisations.**

1. FE Circular 11/13 Disclosure and Barring Arrangements: Vetting Requirements for (i) The Recruitment of Staff to Further Education Colleges (ii) Existing Staff and (iii) Students  
<https://www.economy-ni.gov.uk/sites/default/files/publications/del/FE11-13%20Disclosure%20and%20Barring%20Arrangements-Vetting%20requirements%20for%20the%20recruitment%20of%20staff%20to%20FE%20Colleges.pdf>
2. Circular 2007/01 Acceptable Use of the Internet and Digital Technologies in Schools  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/2007.01%20-%20Amended%282%29.pdf>
3. Circular 2019/14 Attendance Guidance and Absence Recording By Schools (2019/14 supercedes 2018/12)  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/DE%20Circular%202019%2014%20-%20Attendance%20Guidance%20and%20Absence%20Recording%20-%20updated%20-%20Feb%202020.pdf>
4. Circular 2006/09 Child Protection: Criminal Background Checking of Staff in Schools – Programme to Extend Coverage  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/Criminal-background-checking-of-staff-in-schools-programme-to-extend-coverage.pdf>
5. Circular 2006/09 Child Protection: Criminal Background Checking of Staff in Schools – Appendix A  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2006-09-appendix-a.pdf>
6. Circular 2006/07 Child Protection: Employment of Substitute Teachers  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2006-07.pdf>
7. Circular 2008/03 Child Protection: Pre-employment Checking of Persons To Work in Schools – New Arrangements  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/Circular-2008-03-pre-employment-checks-new-arrangements.pdf>
8. Circular 2020/07 Child Protection: Record Keeping in Schools

## SAFEGUARDING, CARE & WELFARE POLICY

(2020/07 supercedes 2016/03)

<https://www.education-ni.gov.uk/sites/default/files/publications/education/Circular%20202007%20Child%20Protection%20Record%20Keeping%20in%20Schools.PDF>

9. Circular 2006/06 Child Protection: Recruitment of People to Work With Children and Young People in Educational Settings  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/Circular-2006-06.pdf>
10. Circular 2006/06 Child Protection: Recruitment of People to Work With Children and Young People in Educational Settings – Appendix A  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2006-06-appendix-a-checks-on-applicants-from-abroad.pdf>
11. Circular 2006/06 Child Protection: Recruitment of People to Work With Children and Young People in Educational Settings – Form DOR O2  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2006-06-form-dor-02.pdf>
12. Circular 2006/08 Child Protection: Training Requirement for School Governors on Staff Recruitment and Selection Panels  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2006-08-child-protection-staff-recruitment.pdf>
13. Circular 2006/25 Child Protection: Vetting of School Governors  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/vetting-of-school-governors.pdf>
14. Circular 2016/05 Children Who Display Harmful Sexualised Behaviour  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/Circular%202016\\_05-Children-who-display-harmful-sexualised-behaviour.pdf](https://www.education-ni.gov.uk/sites/default/files/publications/education/Circular%202016_05-Children-who-display-harmful-sexualised-behaviour.pdf)
15. Circular 2016/11 Class Sizes In Post-Primary Schools – Practical Subjects (as well as other subjects that include a practical activity)  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/Class%20Sizes%20in%20Post-Primary%20Schools%20-%20Practical%20Subjects%20-%20Circular%202016....pdf>
16. Circular 2015/13 Dealing With Allegations of Abuse Against A Member of Staff  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/2015-13-dealing-with-allegations-of-abuse-against-a-member-of-staff.pdf>
17. Circular 2012/19 Disclosure and Barring Arrangements: Changes To Pre-employment Vetting Checks For Volunteers Working In Schools From 10/09/12

## SAFEGUARDING, CARE & WELFARE POLICY

– Guidance For Schools and Employing Authorities On Changes To Pre-employment Checking and Safer Recruitment Practices

<https://www.education-ni.gov.uk/sites/default/files/publications/de/Disclosure-and-barring-arrangements-guidance-for-schools-and-employing-authorities-volunteers.pdf>

18. Circular 2013/01 Disclosure and Barring Arrangements: Vetting Requirements for Paid Staff Working In Or Providing A Service For Schools – Guidance For Schools and Employing Authorities On Pre-employment Vetting Checking and Safer Recruitment Practices

<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2013-01-updated-september-2015.pdf>

19. Circular 2015/23 Drugs Guidance

<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-2015-23.pdf>

20. Circular 2014/24 Education Otherwise Than At School (EOTAS) Guidance

<https://www.education-ni.gov.uk/sites/default/files/publications/education/2014-24-eotas-guidance.pdf>

21. Circular 2016/26 Effective Educational Uses of Mobile Digital Devices

<https://www.education-ni.gov.uk/sites/default/files/publications/education/DE%20circular%202016.26%20Effective%20Educational%20Uses%20of%20Mobile%20Digital%20Devices.pdf>

22. Circular 2008/10 Employment of Substitute Teachers – NI Substitute Teachers Register (NISTR)

<https://www.education-ni.gov.uk/sites/default/files/publications/de/circular-number-2008-10-employment-of-substitute-teachers.pdf>

23. Circular 2010/18 Every School A Good School – The Governors' role

<https://www.education-ni.gov.uk/sites/default/files/publications/education/circular-2010-18-governors-guide.pdf>

24. Circular 2013/25 e-Safety Guidance

<https://www.education-ni.gov.uk/sites/default/files/publications/de/2013%2025%20-%20Amended.pdf>

25. Circular 2010/01 Guidance on Relationships and Sexuality Education

<https://www.education-ni.gov.uk/sites/default/files/publications/education/2010%2001%20-%20Amended.pdf>

## SAFEGUARDING, CARE & WELFARE POLICY

26. Circular 2020/05 Guidance for Schools on Supporting Remote Learning to Provide Educational Continuity  
[Circular 2020/05 Guidance for schools on supporting remote learning to provide educational continuity](#)
  
27. Circular 2011/22 Internet Safety  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/2011%2022%20-%20Amended.pdf](#)
  
28. Circular 2014/27 Managing Information On Persons Who Pose A Risk To Pupils  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/Circular%202014-27%20Managing%20information%20on%20persons%20who%20pose%20a%20risk%20to%20pupils%20-%20November%202014.pdf](#)
  
29. Circular 2016/27 Online Safety  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/DE%20Circular%202016.27%20Online%20Safety.pdf](#)
  
30. Circular 2014/14 Pupil Participation  
[https://www.education-ni.gov.uk/sites/default/files/publications/de/2014-14-pupil-participation.pdf](#)
  
31. Circular 2015/22 Relationship and Sexuality Education (RSE) Guidance  
[https://www.education-ni.gov.uk/sites/default/files/publications/de/2015%2022%20-%20Amended.pdf](#)
  
32. Circular 2013/16 Relationships and Sexuality Education Policy In Schools  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/2013%2016%20-%20Amended.pdf](#)
  
33. Circular 2017/04 Safeguarding and Child Protection – A Guide for Schools - Update  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/circular-201704-safeguarding-and-child-protection-in-schools-a-guide-for-schools-%28updated-september-2019%29.pdf](#)
  
34. Circular 2018/07 Self-Assessment Audit Tools for Schools  
[https://www.education-ni.gov.uk/sites/default/files/publications/education/DE%20Circular%20201807%20Self-Assessment%20Audit%20Tool%20for%20Schools\\_1.PDF](#)

## SAFEGUARDING, CARE & WELFARE POLICY

35. Circular 2010/22 - School development planning - Regulations and guidance  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/sdp-circular-2010-22-sdp-regulations-and-guidance-english-version%20%281%29.pdf>
36. DE Guidance - School Development Planning 2020/21 – COVID 19  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/Guidance%20on%20School%20Development%20Planning%20for%202021.pdf>
37. Circular 2020/08 Amended draft Attendance Guidance and Absence Recording by schools  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/ED1%2020%20331281%20%20AMENDED%20Draft%20Circular%20-%20Attendance%20Guidance%20and%20absence%20recording%20from%200January%202021%282%29.pdf>
38. Circular 2021/12 Addressing Bullying In Schools Act (NI) 2016 - Statutory Guidance for Schools and Boards of Governors  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/Addressing%20Bullying%20in%20Schools%20Act%20%28NI%29%202016.pdf>
39. Circular 2021/13 Interim Guidance on the use of Restraint and Seclusion in Educational Settings  
<https://www.education-ni.gov.uk/sites/default/files/publications/education/DE%20Circular%2013%20of%202021%20-%20Restraint%20and%20Seclusion.pdf>
40. Circular 2003/13 Welfare and Protection of Pupils Education and Libraries NI Order 2003  
[https://www.eani.org.uk/sites/default/files/2018-10/cpsss\\_circular\\_2003\\_13.pdf](https://www.eani.org.uk/sites/default/files/2018-10/cpsss_circular_2003_13.pdf)

# SAFEGUARDING, CARE & WELFARE POLICY

## APPENDIX 2

### LEGISLATION:

- Addressing Bullying in Schools Act (Northern Ireland) 2016
- Children (Leaving Care) Act (NI) 2002
- Children (Public Performances) Regulations (Northern Ireland) 1996
- Children and Young Persons Act (Northern Ireland) 1968
- Children's Services Co-operation Act (NI) 2015
- Criminal Justice and Courts Act 2015 section 33
- Criminal Law Act (NI) 1967
- Education (NI) Order 1998
- Female Genital Mutilation Act 2003
- Forced Marriage (Civil Protection) Act 2007
- Health & Personal Social Services (NI) Order
- Health & Personal Social Services Act (NI) 2001
- Health & Social Care (Reform) Act (NI) 2009
- Human Rights Act 1998
- Prohibition from Teaching and Working with Children Regulations (NI) 2006
- Protection of Children (NI) Order 1978
- Protection of Children (Northern Ireland) Order 1978 article 3
- Safeguarding Board Act (NI) 2011
- Sexual Offences Act 2003
- The Children (NI) Order 1995
- The Criminal Evidence (NI) Order 1999
- The Criminal Justice Act 1988 (Reviews of Sentencing) Order (NI) 2019
- The Data Protection Act (1998)
- The Disability Discrimination Act 1995
- The Education and Libraries (NI) Order 2003; Articles 17 and 18
- The Family Homes & Domestic Violence (NI) Order 1998
- Mental Capacity Act (Northern Ireland) 2016
- The Mental Health (NI) Order 1986
- The Northern Ireland Act 1998, Section 75
- The Police & Criminal Evidence (NI) Order 1989
- The Public Interest Disclosure (NI) Order 1998
- The Race Relations (NI) Order 1997
- The Safeguarding Vulnerable Groups (NI) Order 2007 (amended 2012)
- The Sexual offences (NI) Order 2008
- The Special Educational Needs and Disability Order (NI) 2005 (SEND0)

## SAFEGUARDING, CARE & WELFARE POLICY

### APPENDIX 3

#### REFERENCES & RESOURCES

While issued mainly for schools note that the Department of Education (DE) and Education Authority (EA) publications and circulars referenced below contain guidance which is regarded as good practice for other organisations, where appropriate. Please refer to these and apply only as appropriate to the context of an FE College.

The Department of Education's publications and guidance on child protection issues for schools are available at: <https://www.education-ni.gov.uk/articles/publications-and-guidance-child-protection-issues-schools>

Further detailed information is available at: <http://www.eani.org.uk/schools/safeguarding-and-child-protection/>

1. Adult Safeguarding Champion Frequently Asked Questions (FAQs)  
<http://www.hscboard.hscni.net/download/PUBLICATIONS/safeguard-vulnerable-adults/niasp-publications/Adult-Safeguarding-Champion-FAQs.pdf>
2. Adult Safeguarding: Prevention and Protection in Partnership  
<https://www.health-ni.gov.uk/articles/adult-safeguarding-prevention-and-protection-partnership>
3. Adversity and Trauma-Informed Practice –Young Minds 2019  
<https://youngminds.org.uk/media/3091/adversity-and-trauma-informed-practice-guide-for-professionals.pdf>
4. Adverse Childhood Experiences. Ensuring a better deal for children in Wales. Professor Mark A. Bellis  
[https://healthandcareresearchwales.org/sites/default/files/2021-05/Prof\\_Mark\\_Bellis\\_ACEs\\_Adverse\\_Childhood\\_Experiences%E2%80%93Ensuring\\_better\\_deal\\_for\\_children\\_in\\_Wales.pdf](https://healthandcareresearchwales.org/sites/default/files/2021-05/Prof_Mark_Bellis_ACEs_Adverse_Childhood_Experiences%E2%80%93Ensuring_better_deal_for_children_in_Wales.pdf)
5. Adverse Childhood Experiences Factsheet  
<https://www.volunteernow.co.uk/app/uploads/2019/05/Adverse-Childhood-Experiences-Factsheet-April-2019.pdf>
6. Apprentice NI Guidelines  
[Apprenticeship guidelines and operational requirements | Department for the Economy \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/apprenticeship-guidelines-and-operational-requirements)
7. Attendance  
<https://www.education-ni.gov.uk/publications/miss-school-miss-out-improving-pupil-attendance-strategy>  
<https://www.etini.gov.uk/news/attendance-schools-eti-good-practice-report-and-case-studies>
8. Code of Good Governance

## SAFEGUARDING, CARE & WELFARE POLICY

<https://www.volunteernow.co.uk/app/uploads/2019/03/Code-of-Good-Governance-Health-Check.pdf>

9. Co-operating to Safeguard Children & Young People in NI (2017) DoH  
<https://www.health-ni.gov.uk/publications/co-operating-safeguard-children-and-young-people-northern-ireland>
10. Department of Health, Social Services and Public Safety (DHSSPS) Adult Safeguarding (2015) Prevention and Protection in Partnership  
<https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/adult-safeguarding-policy.pdf>
11. First-aid and administration of medicines  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/supporting-pupils-with-medical-needs.pdf>
12. Health and Safety  
<https://www.hseni.gov.uk/articles/education>
13. Managing Critical Incidents Guidance  
<https://www.education-ni.gov.uk/sites/default/files/publications/de/guide-to-managing-critical-incidents-in-schools.pdf>
14. Mental Capacity Factsheet  
<https://www.volunteernow.co.uk/app/uploads/2019/01/Mental-Capacity-Factsheet.pdf>
15. National Society for the Prevention of Cruelty to Children (NSPCC) (2017) Child Abuse and Neglect  
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>
16. Publications and guidance on child protection issues for schools  
<https://www.education-ni.gov.uk/articles/publications-and-guidance-child-protection-issues-schools>
17. Safeguarding Children and Adults at Risk, Policy Standards  
<https://www.volunteernow.co.uk/app/uploads/2019/10/safeguarding-children-and-adults-at-risk-policy-standards2019.pdf>
18. Safeguarding and Child Protection - Information and resources for school Governors, Principals, Designated Teachers/Deputy Designated Teachers and for all EA staff  
<https://www.eani.org.uk/school-management/safeguarding-and-child-protection>
19. Safeguarding Board for Northern Ireland (SBNI) Procedures Manual (May 2018)  
<https://www.proceduresonline.com/sbni/>

## **SAFEGUARDING, CARE & WELFARE POLICY**

20. Safeguarding Board NI Strategic Plan 2018-2022  
[Strategic Plan 2018 - 22 \(safeguardingni.org\)](#)
21. The United Nations Convention on the Rights of the Child  
<https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>
22. Training for Success (TfS) Operational Requirements and Guidelines  
<https://www.economy-ni.gov.uk/publications/training-success-operational-requirements-and-guidelines>
23. UK Council for Child Internet Safety (2016) Sexting in schools and colleges  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759007/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759007/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

# SAFEGUARDING, CARE & WELFARE POLICY

## APPENDIX 4

### TYPES OF ABUSE

#### Types of Child Abuse (NSPCC, 2020)

- General signs of abuse -Children experiencing abuse often experience more than one type of abuse over a period of time. Children who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Many of the signs that a child is being abused are the same regardless of the type of abuse.
- Physical abuse - when a child is deliberately hurt, causing physical harm. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating. It's also physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they don't need, making them unwell. This is known as fabricated or induced illness (FII).
- Neglect - is not meeting a child's basic physical and/or psychological needs. This can result in serious damage to their health and development. Neglect may involve a parent or carer not:
  - providing adequate food, clothing or shelter
  - supervising a child or keeping them safe from harm or danger (including leaving them with unsuitable carers)
  - making sure the child receives appropriate health and/or dental care
  - making sure the child receives a suitable education
  - meeting the child's basic emotional needs – this is known as emotional neglect.Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.
- Sexual abuse- is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and non-contact abuse.
- Child sexual exploitation (CSE) - is a type of sexual abuse. Young people may be coerced or groomed into exploitative situations and relationships. They may be given things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities.
- Harmful sexual behaviour (HSB) - is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour.
- Emotional abuse – this may involve:
  - humiliating, putting down or regularly criticising a child
  - shouting at or threatening a child or calling them names

## **SAFEGUARDING, CARE & WELFARE POLICY**

- mocking a child or making them perform degrading acts
  - constantly blaming or scapegoating a child for things which are not their fault
  - trying to control a child's life and not recognizing their individuality
  - not allowing a child to have friends or develop socially
  - pushing a child too hard or not recognising their limitations
  - manipulating a child
  - exposing a child to distressing events or interactions
  - persistently ignoring a child
  - being cold and emotionally unavailable during interactions with a child
  - not being positive or encouraging to a child or praising their achievements and successes.
- 
- Domestic abuse - is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can include physical, sexual, psychological, emotional or financial abuse. Exposure to domestic abuse is child abuse.
  
  - Bullying and cyberbullying - is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable.

## **SAFEGUARDING, CARE & WELFARE POLICY**

### **Types of Adult Abuse (DHSSPS, 2015)**

- Physical abuse - This is the use of physical force or mistreatment of one person by another, which may or may not result in actual physical injury. This may include hitting, pushing, rough handling, exposure to heat or cold, force-feeding, improper administration of medication, denial of treatment, misuse or illegal use of restraint and deprivation of liberty.
- Sexual abuse - This is any behaviour perceived to be of a sexual nature, which is unwanted or takes place without consent or understanding. Sexual violence and abuse can take many forms and may include non-contact sexual activities, such as indecent exposure, stalking, grooming, being made to look at or be involved in the production of sexually abusive material or being made to watch sexual activities. It may involve physical contact, including but not limited to non-consensual penetrative sexual activities or non-penetrative sexual activities, such as intentional touching (known as groping).
- Psychological / emotional abuse - This is behaviour that is psychologically harmful or inflicts mental distress by threat, humiliation or other verbal/non-verbal conduct. This may include threats, humiliation or ridicule, provoking fear of violence, shouting, yelling and swearing, blaming, controlling, intimidation and coercion.
- Financial abuse - This is actual or attempted theft, fraud or burglary. It is the misappropriation or misuse of money, property, benefits, material goods or other asset transactions which the person did not or could not consent to, or which were invalidated by intimidation, coercion or deception. This may include exploitation, embezzlement, withholding pension or benefits or pressure exerted around wills, property or inheritance.
- Institutional abuse - This is the mistreatment or neglect of an adult by a regime or individuals in settings, which adults who may be at risk, reside in or use. This can occur in any organisation, within and outside the HSC sector. Institutional abuse may occur when the routines, systems and regimes result in poor standards of care, poor practice and behaviours, inflexible regimes and rigid routines, which violate the dignity and human rights of the adults and place them at risk of harm. Institutional abuse may occur within a culture that denies, restricts or curtails privacy, dignity, choice and independence. It involves the collective failure of a service provider or an organisation to provide safe and appropriate services and includes a failure to ensure that the necessary preventative and/or protective measures are in place.
- Neglect - Neglect occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support which is required by another adult. It may be through a lack of knowledge or awareness, or through a failure to take reasonable action given the information and facts available to them at the time. It may include physical neglect to the extent that health or well-being is impaired, administering too much or too little medication, failure to provide access to appropriate health or social care, withholding the necessities of life, such as adequate nutrition, heating or clothing, or failure to intervene in situations that are dangerous to the person concerned or to others particularly when the person lacks the capacity to assess risk.

## **SAFEGUARDING, CARE & WELFARE POLICY**

- Exploitation - This is the deliberate maltreatment, manipulation or abuse of power and control over another person; to take advantage of another person or situation usually, but not always, for personal gain from using them as a commodity. It may manifest itself in many forms including slavery, servitude, forced or compulsory labour, domestic violence and abuse, sexual violence and abuse, or human trafficking.

## SAFEGUARDING, CARE & WELFARE POLICY

### APPENDIX 5

#### MEMBERSHIP OF THE FE COLLEGES SAFEGUARDING WORKING GROUP

College / Organisation	Name of Nominee	Changes to nominee	Changes to nominee	Changes to nominee
BMC	<del>Jim Woods</del>	Gertie Burke (Sept 2019)	Nuala Boyle (Nov 2020)	
NRC	Laura Firth			
NWRC	Gillian Moss			
SERC	Paul Walsh			
SRC	Lorraine McKeown			
SWC	<del>Sharon Pritchard</del>	Deborah Brown (temp for SP Nov 2019)	Sharon Pritchard (Jan 2020)	
DfE rep	Susanne Workman			
DfE rep (Policy Lead)	<del>Shauna Mullan</del>	David Broadhurst (Nov 2019)		

## SAFEGUARDING, CARE & WELFARE POLICY

### APPENDIX 6

#### SAFEGUARDING TEAM MEMBERS

THE INDIVIDUALS WITH RESPONSIBILITY FOR SAFEGUARDING, CARE AND WELFARE AT SOUTHERN REGIONAL COLLEGE ARE:

Role	Name of Individual	Campus if applicable	Contact Details
Governing Body Safeguarding Lead	Gordon Gough	All campuses	<a href="mailto:armstrongl@src.ac.uk">armstrongl@src.ac.uk</a> 07912046243 02830259610
Strategic Safeguarding Lead	Brian Doran	All campuses	<a href="mailto:doranb@src.ac.uk">doranb@src.ac.uk</a> 02830259603
Adult Safeguarding Champion	Lorraine McKeown	All campuses	<a href="mailto:mckeownl@src.ac.uk">mckeownl@src.ac.uk</a> 07841907692 02830259696
Designated Safeguarding Officer	Lorraine McKeown	All campuses	<a href="mailto:mckeownl@src.ac.uk">mckeownl@src.ac.uk</a> 07841907692 02830259696
Deputy Designated Safeguarding Officer	Donna Hughes	All campuses	<a href="mailto:hughesdo@src.ac.uk">hughesdo@src.ac.uk</a> 07767167124 02838397710
Safeguarding Officer  <b>CAMPUS KEY:</b> Armagh Campus = A Banbridge Campus = B Kilkeel Campus = K Lurgan Campus = L Newry Campus = N Portadown Campus = P	Raymond Mallon Jason Moles Paula Shields Caitriona Killoran Laura McNally Lorraine Abbott Patrick Toner Michelle O'Callaghan Sean McNally Majella Kelly Jacqueline Simms LS Co-ordinator CS Co-ordinator ST Co-ordinator Darrelle McSherry Cate McCourt Rosemary Muldrew Jason Brennan Fiona Ferris Grainne O'Dowd Jenni Spice Joseph McCaffrey	N, K N, K N, K N, K N, K A A A A, N L, P A B B, L, N B, L, P L, P L, P A, N A, P, N P N L	07553352370 07767167131 07767167138 07711981741 07760750685 07841970567 07739212956 07587770223 07989102854 03001231223 07733912872 07733912871 07767167127 03001231223 02837512808 07767167121 07872636378 07711981715 03001231223 03001231223 03001231223 03001231223

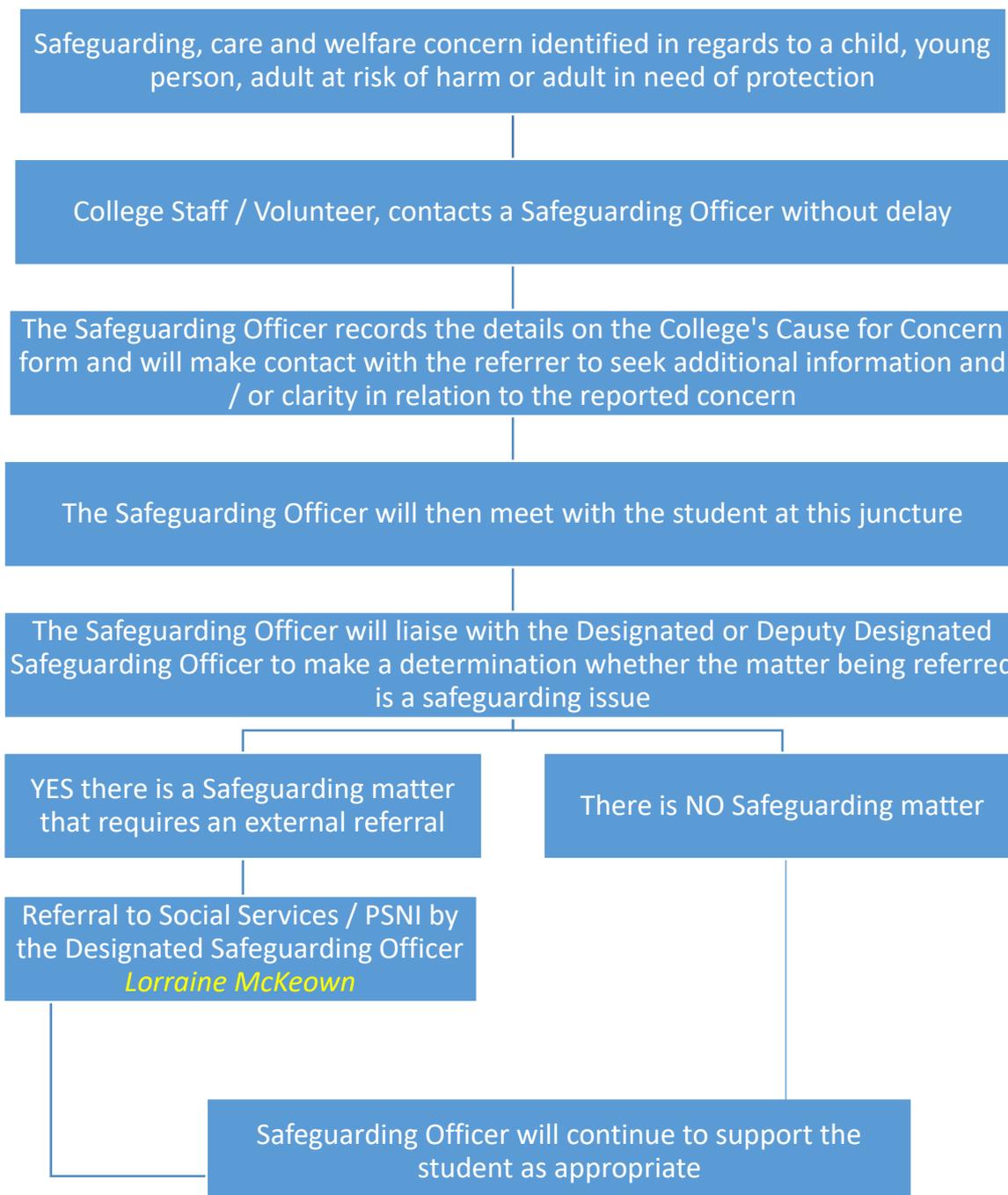
# SAFEGUARDING, CARE & WELFARE POLICY

## APPENDIX 7

### SAFEGUARDING, CARE & WELFARE REPORTING OF CONCERN

#### REPORTING PROCEDURE FLOWCHART (FOR CONCERNS RELATING TO CHILD, YOUNG PERSON, ADULT AT RISK OF HARM OR ADULT IN NEED OF PROTECTION)

The reporting procedure, when a **concern is identified in regard to a child, young person, adult at risk of harm or adult in need of protection**, for Southern Regional College is as follows:



## SAFEGUARDING, CARE & WELFARE POLICY

### REPORTING PROCEDURE RECORD FORM (FOR CONCERNS RELATING TO CHILD, YOUNG PERSON, ADULT AT RISK OF HARM OR ADULT IN NEED OF PROTECTION)

The Cause for Concern Form for Southern Regional College is as follows:

## CAUSE FOR CONCERN FORM

This form is to be completed by the **College Safeguarding Officer** when a member of staff/student raises their concerns regarding a student's welfare.

Name of Student & Student ID:	
Name of Staff Member Reporting:	
Name of Safeguarding Officer:	
Course & Campus:	
Address of Student:	
Student's Date of Birth and Age ( ):	
Time and place of disclosure/cause for concern:	
Date of disclosure/cause for concern:	

**Background: Were there any relevant events which sparked off the disclosure/cause for concern?**

**Reporting: Give names of those involved and the nature of the disclosure/cause for concern. Please use the student's actual testimony and do not add your own thoughts to what you are told. Do not tell the student it will be sorted out immediately.**

**Action taken at time of disclosure/cause for concern:**

**Signed by Safeguarding Officer:**

**Date:**

**Date referred to Designated Safeguarding Officer (DSO):**

## SAFEGUARDING, CARE & WELFARE POLICY

### Designated Safeguarding Officer Comment:

--

Signed by Designated Safeguarding Officer (DSO):

Date:

<b>STATUS OF CFC:</b>	<b>Open</b> (awaiting further info)		<b>Closed</b> (for filing)	
-----------------------	-------------------------------------	--	----------------------------	---

Additional Notes/ Email Correspondence with date(s):

--

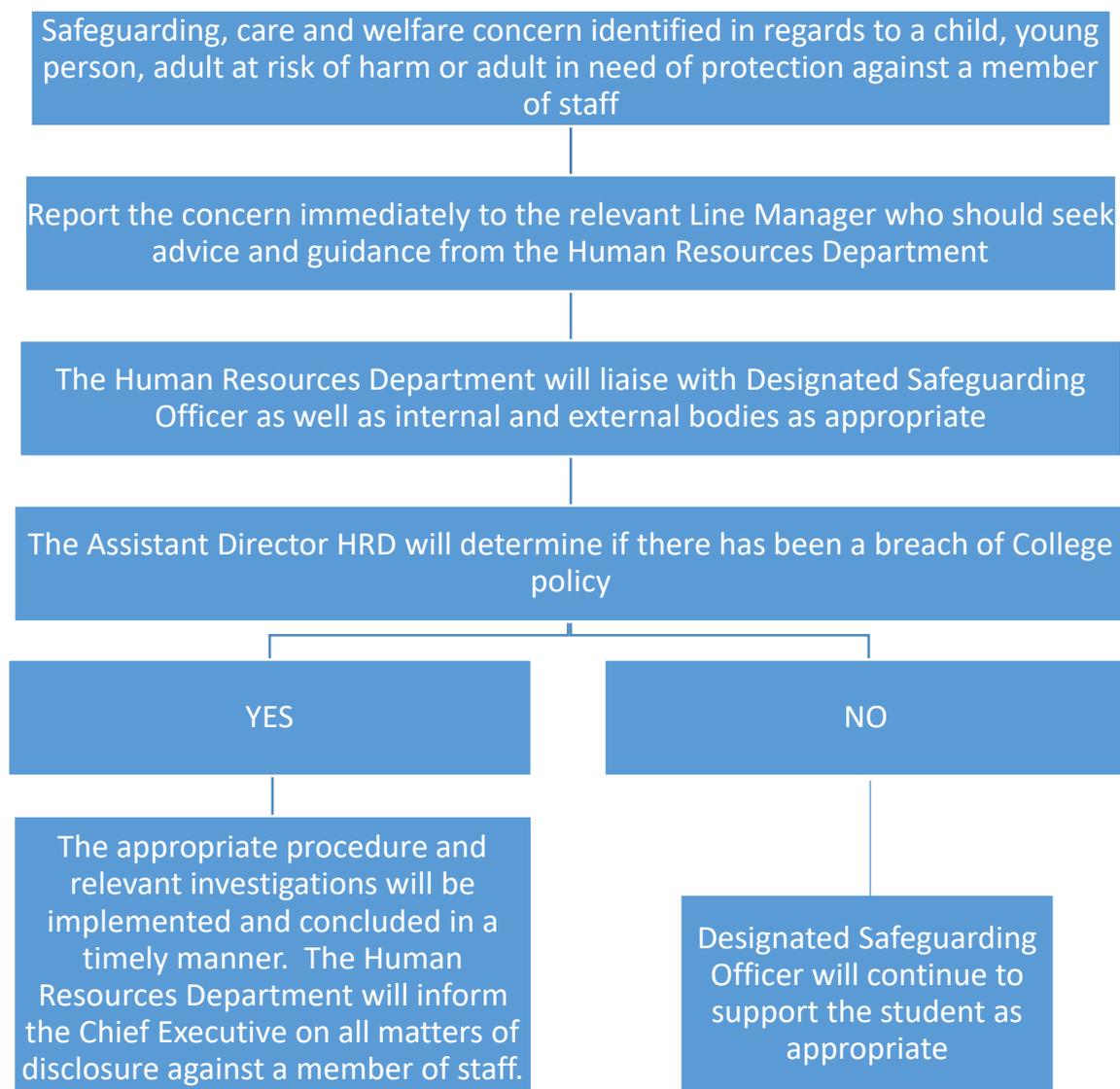
Final Comment/ Outcome:

--

## SAFEGUARDING, CARE & WELFARE POLICY

### REPORTING PROCEDURE FLOWCHART (FOR CONCERNS RELATING TO ACTIVITIES OF A STAFF MEMBER)

The reporting procedure, when a disclosure is made concerning the activities of a staff member towards a student, for Southern Regional College is as follows:



## **SAFEGUARDING, CARE & WELFARE POLICY**

### **APPENDIX 8**

#### **SRC COMPLAINTS AND COMPLIMENTS POLICY**

The College Complaints and Compliments Policy can be found at

[https://www.src.ac.uk/images/files/about\\_us/policies/July19/BUS\\_010 Complaints and Compliments Policy ISSUE 006.pdf](https://www.src.ac.uk/images/files/about_us/policies/July19/BUS_010_Complaints_and_Compliments_Policy_ISSUE_006.pdf)