



Hummersea Primary School

# **Safeguarding and Child Protection** **Policy**

September 2026

## **Purpose and Aim**

Hummersea Primary School's whole-school Safeguarding Policy provides clear expectations for all staff and others when responding to safeguarding and child welfare concerns. It sets out the school's commitment to good safeguarding practice, effective procedures and a strong culture of vigilance to ensure that all children are kept safe and supported to achieve the best possible outcomes.

Hummersea Primary School recognises that abuse, neglect and exploitation can occur in all communities and contexts. All staff have a responsibility to be alert to concerns, listen to children and take appropriate action when a child shares a worry or when concerns arise about their welfare or safety.

Our whole-school culture of vigilance aims to create an environment where children:

- are supported, listened to and responded to effectively;
- feel valued and taken seriously when they share their views or concerns; and
- are protected through timely and appropriate action by staff when safeguarding concerns arise.

The welfare of our children is of paramount importance. The school is committed to identifying needs at the earliest opportunity, providing appropriate early help and additional support where required, preventing concerns from escalating, and ensuring that safeguarding concerns are responded to sensitively, professionally and in a way that promotes the individual child's safety, wellbeing and best interests.

Governors and staff at Hummersea Primary School are committed to safeguarding and promoting the welfare of all children through effective policies, procedures and everyday practice. We expect parents, carers, visitors, volunteers, contractors and all other members of the school community to share this commitment.

## **Introduction**

Hummersea Primary School fully recognises the important role that schools play in safeguarding children and promoting their welfare. Safeguarding is the responsibility of everyone within our school community. Our approach is based on four key principles:

**Prevention:** We promote a positive, safe and inclusive school environment through effective teaching, pastoral support, positive role models and preventative education. We work to identify and reduce risks to children, including bullying and harassment, sexual violence and sexual harassment, exploitation, serious violence, radicalisation, online harm and other forms of abuse.

**Protection:** We follow clear safeguarding and child protection procedures and ensure that all staff receive appropriate training and regular updates. Staff are expected to report concerns promptly to the Designated Safeguarding Lead (DSL), a Deputy Designated Safeguarding Lead (DDSL), or, where appropriate, directly to relevant external agencies. The DSL is Miss C Moonie and the DDSLs are Mrs C Grainger, Mrs S Debnath and Mrs M Marshall (who is also the schools SENCO).

**Monitoring and professional challenge:** We monitor the progress and outcomes of safeguarding concerns, referrals and support arrangements. Where a child's circumstances do not improve, or where concerns remain, the school will review the situation, challenge appropriately and escalate concerns where necessary.

**Support:** We recognise that children and families may require support at different levels of need. The School will work with local safeguarding partners and relevant services to provide or facilitate help, support and protection including universal support, Family Help and statutory safeguarding intervention, according to the child's assessed needs.

All staff have a responsibility to recognise and respond to concerns relating to child abuse, neglect, exploitation and child-on-child abuse in all its forms. Staff are expected to maintain an attitude of professional curiosity and an 'it could happen here' approach, recognising that children may communicate concerns in different ways and may not always feel able to disclose that they are experiencing harm.

Hummersea Primary School does not tolerate abusive, harmful or discriminatory behaviour, including behaviour that may be dismissed as 'banter'. All concerns will be taken seriously, challenged appropriately and responded to promptly. Staff will work proactively to prevent harm, promote positive and respectful relationships, and ensure that children feel safe, listened to and confident that their concerns will be acted upon.

Staff should also be aware that changes in a child's behaviour, presentation, attendance, emotional wellbeing or mental health may, in some circumstances, indicate that they are experiencing or are at risk of experiencing abuse, neglect or exploitation. Such indicators should always be considered in the context of the individual child and should not be dismissed without further consideration.

Where a safeguarding concern is identified, staff must report it immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL). Concerns will be recorded, assessed and responded to appropriately, including the provision of support within school and, where necessary, referral or information sharing with relevant external agencies. Where there is an immediate risk of harm, staff must take immediate action to ensure the child's safety and follow the school's safeguarding procedures.

### **Framework and Legislation**

No school operates in isolation. Safeguarding and promoting the welfare of children is the responsibility of everyone who works with or comes into contact with children. Hummersea Primary School works within the local multi-agency safeguarding arrangements established by the South Tees Safeguarding Children Partnership and works with partner agencies to ensure that concerns about children are identified, responded to and escalated appropriately.

Hummersea Primary School is committed to safeguarding and promoting the welfare of all children in accordance with national legislation and statutory guidance, and with the local safeguarding arrangements and procedures of the South Tees Safeguarding Children Partnership.

Where there are concerns that a child is suffering, or is likely to suffer, significant harm, the school will follow the appropriate safeguarding and child protection procedures and make referrals to children's social care and/or the police where required.

The Children Act 1989 provides the principal legal framework for safeguarding children. Section 31 sets out the threshold of significant harm in relation to care and supervision orders. The concept of harm includes ill-treatment and the impairment of a child's health or development, including physical, intellectual, emotional, social or behavioural development. The Adoption and Children Act 2002 also amended the Children Act 1989 to clarify that harm may include the impairment of a child's health or development as a result of witnessing the ill-treatment of another person.

Under section 47 of the Children Act 1989, the local authority has a duty to make enquiries where there is reasonable cause to suspect that a child who is in their area is suffering, or is likely to suffer, significant harm. The Multi Agency Children's Hub (MACH) undertakes the local arrangements for receiving and responding to safeguarding referrals on behalf of the local authority.

This policy should be read alongside the statutory guidance and legislation that underpin safeguarding practice, including;

- Keeping Children Safe in Education (KCSIE) 2026, which sets out the statutory duties and safeguarding expectations for schools and colleges.
- Working Together to Safeguard Children 2026, which sets out the statutory framework for inter-agency working to safeguard and promote the welfare of children.
- The Children Act 1989, which provides the principal legal framework for safeguarding and promoting the welfare of children.
- The local safeguarding procedures and guidance issued by the South Tees Safeguarding Children Partnership.
- The Education (Independent School Standards) Regulations 2014, where applicable
- The Counter-Terrorism and Security Act 2015 and the Prevent duty
- The Equality Act 2010
- The Children and Social Work Act 2017

Hummersea Primary School will ensure that its safeguarding policies, procedures and practice remain consistent with current legislation, statutory guidance and local safeguarding arrangements and will review this policy whenever relevant.

### **Key Safeguarding Contacts**

**Designated Safeguarding Lead; Miss C Moonie**

**Deputy DSL; Mrs C Grainger**

**Deputy DSL; Mrs S Debnath**

**Deputy DSL & SENCO; Mrs M Marshall**

**Redcar and Cleveland MACH; 01642 130700**

**MACH out of hours; 01642 524552**

**LADO; 01642 130700**

**Police (emergency); 999**

**Police (Non-Emergency); 101**

During the school day, staff should report safeguarding concerns immediately to the DSL or a DDSL.

If a DSL/DDSL is unavailable and a child is at risk of harm, staff must not delay taking appropriate action. Concerns can be referred directly to children's social care/MACH or the police where necessary. The DSL should be informed as soon as possible afterwards.

## **Roles and Responsibilities for Staff**

### **All Staff**

Everyone who comes into contact with children and their families has a role to play in safeguarding and promoting the welfare of children. Due to the regular contact they have with pupils, all staff at Hummersea Primary School are particularly well placed to identify concerns at an early stage, provide appropriate support and help prevent concerns from escalating.

Children may disclose concerns, present with indicators of abuse or neglect, or demonstrate changes in their behaviour or presentation at any time and to any member of staff. Safeguarding concerns may also arise within or outside the school environment. All staff must therefore understand their individual responsibilities and the school's safeguarding procedures.

Through induction, training and regular updates, all staff, including teaching and non-teaching staff, supply staff, volunteers, students and contractors where appropriate, must:

- **Understand the school's safeguarding procedures** and know how and when to report concerns about a child's welfare or safety.
- **Listen to children and take their views seriously.** Staff should listen carefully, remain calm and reassure children that they have done the right thing by speaking to an adult. Staff should take account of the child's wishes and feelings, while recognising that safeguarding decisions must always be made in the child's best interests.
- **Report safeguarding concerns immediately.** Any concern that a child may be suffering, or may be at risk of suffering, harm, abuse, neglect or exploitation must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, a Deputy Designated Safeguarding Lead (DDSL).
- **Act without delay where there is an immediate risk of harm.** Staff must take appropriate immediate action to protect a child where necessary. Staff should not wait for the DSL or DDSL to become available if doing so would place a child at further risk. Concerns may be reported directly to the Multi Agency Children's Hub (MACH), the police or another appropriate agency where necessary. The DSL should be informed as soon as possible.
- **Record concerns accurately and promptly.** Staff must record concerns, disclosures or observations as soon as possible, using the school's agreed recording system. Records should be factual, clear and objective and should distinguish between fact, observation, information provided by others and professional opinion. Staff should record the child's own words where possible and avoid leading questions or speculation.
- **Share information appropriately.** Staff must understand that safeguarding information should be shared with those who need to know in order to protect a child. Concerns about confidentiality or information sharing must not prevent appropriate action being taken to safeguard a child.
- **Exercise professional curiosity.** Staff must remain alert to the possibility that a child may be experiencing abuse, neglect or exploitation, even where there has been no direct disclosure. Children may not recognise their experiences as harmful, may be unable to communicate what is happening to them, or may feel unable or unwilling to

Speak about their experiences. Staff should follow up concerns rather than making assumptions or dismissing changes in behaviour or presentation.

- **Maintain an ‘it could happen here’ approach.** Staff must remain professionally curious and vigilant about safeguarding risks within the school, at home, online and in the wider community. Concerns must be considered in the context of the individual child and their circumstances.
- **Recognise different forms of harm.** Staff must be able to recognise indicators of abuse, neglect, exploitation and child-on-child abuse, including physical, emotional and sexual abuse, neglect, bullying, discriminatory behaviour, sexual harassment and sexual violence, criminal exploitation, sexual exploitation, county lines, domestic abuse, honour-based abuse, FGM, forced marriage, radicalisation and other forms of extra-familial harm.
- **Recognise that behaviour and wellbeing can be indicators of safeguarding concerns.** Changes in behaviour, emotional wellbeing, mental health, attendance, appearance, relationships, presentation or educational engagement may indicate that a child is experiencing or is at risk of experiencing harm. Such indicators must be considered carefully and should not automatically be attributed to a child’s age, disability, SEND, medical condition or other individual characteristic.
- **Recognise additional safeguarding vulnerabilities.** Staff should be particularly alert to the additional barriers that some children may face when communicating concerns, including children with SEND, disabilities, medical conditions, communication difficulties or other vulnerabilities. Staff must ensure that appropriate adjustments are made so that every child has an opportunity to communicate their wishes, feelings and concerns.
- **Respond appropriately to child-on-child abuse.** Staff must recognise that children can harm other children and that such behaviour must never be dismissed as ‘banter’, ‘part of growing up’ or simply ‘children being children’. All concerns relating to child-on-child abuse must be taken seriously, reported and responded to in accordance with the school’s Child-on-Child Abuse Policy.
- **Promote respectful behaviour and challenge unacceptable conduct.** Hummersea Primary School does not tolerate abuse, harassment, discrimination or other harmful behaviour. Staff must challenge inappropriate behaviour, including behaviour described as ‘banter’, and ensure that concerns are taken seriously and responded to appropriately.
- **Understand online safeguarding risks.** Staff must recognise that technology and online activity are significant components of many safeguarding and wellbeing concerns. Staff should be aware of risks relating to online content, contact, conduct and commerce and must follow the school’s Online Safety and Social Media Policies. Staff must also understand their responsibilities in relation to the school’s filtering and monitoring arrangements.
- **Understand their responsibilities under the Prevent duty.** Staff must understand the school’s responsibilities under the Counter-Terrorism and Security Act 2015 and the Prevent duty. They should remain alert to indicators that a child may be vulnerable to radicalisation, extremism or terrorist influence and report concerns in accordance with the school’s safeguarding procedures.
- **Understand mandatory reporting requirements relating to FGM.** Teachers and specified regulated health and social care professionals are subject to a statutory duty to report known cases of FGM in under-18s to the police where the case is identified in the course of their professional duties. Staff must follow the school’s safeguarding procedures and seek advice from the DSL where appropriate. Other staff who become

concerned that a child may be at risk of FGM must report the concern immediately in accordance with the school's safeguarding procedures.

- **Remain vigilant regarding visitors and contractors.** Staff must follow the school's arrangements for visitors, volunteers and contractors and report any concerns about an individual's behaviour or conduct towards children to the DSL or Headteacher immediately. Staff should also support the school's expectations regarding the use of personal mobile phones and other devices on school premises.
- **Report concerns about adults.** Any safeguarding concern about the behaviour of a member of staff, volunteer, supply staff member, contractor or other adult working with children must be reported in accordance with the school's procedures for allegations against adults. Concerns about the Headteacher must be reported to the Chair of Governors.
- **Raise concerns about unsafe practice.** Staff must feel able to challenge poor or unsafe practice and raise concerns about potential failures in the school's safeguarding arrangements. Staff should use the school's Whistleblowing Policy and Staff Behaviour/Code of Conduct, including the Low-Level Concerns procedures, where appropriate.
- **Complete safeguarding training.** All staff must complete safeguarding and child protection training as part of their induction and receive regular updates, at least annually and whenever required. This includes training relating to online safety, including the expectations, roles and responsibilities associated with filtering and monitoring.
- **Know when and how to seek advice.** Staff should seek advice from the DSL or DDSL whenever they are unsure about a safeguarding concern or the appropriate course of action. Staff should not assume that another member of staff will report a concern or take action.
- **Work in partnership with other agencies.** Hummersea Primary School will work with children's social care, the police, health services, education services and other relevant agencies to safeguard and promote the welfare of children. Staff should contribute to multi-agency safeguarding work when required and provide relevant information to support effective assessment and intervention.

## **Responding to a Disclosure;**

Where a child discloses information that may indicate abuse, neglect, exploitation or another safeguarding concern, staff should:

- listen carefully and remain calm;
- allow the child to speak freely and avoid interrupting unnecessarily;
- reassure the child that they have done the right thing by speaking to an adult;
- explain that the information cannot be kept secret and will need to be shared with people who can help keep them safe;
- avoid asking leading or investigative questions;
- avoid promising confidentiality;
- avoid expressing disbelief, shock or judgement;
- establish only the minimum information necessary to understand the immediate safeguarding concern;
- record the disclosure as soon as possible, using the child's own words where appropriate; and
- report the concern immediately to the DSL or DDSL.

Staff must not investigate safeguarding concerns themselves. Responsibility for assessing the concern, determining the appropriate response and making referrals to external agencies rests with the DSL or, where appropriate, the relevant safeguarding agency.

### **Professional Responsibility**

Safeguarding is everyone's responsibility. No member of staff should assume that someone else will notice, report or act on a concern.

Where a staff member remains concerned after reporting an issue to the DSL or believes that appropriate action has not been taken, they should escalate their concern in accordance with the school's safeguarding procedures and, where necessary, contact the appropriate external safeguarding agency directly.

The school expects all staff to contribute actively to a culture of vigilance in which concerns are identified early, shared appropriately and acted upon promptly, with the welfare and best interests of the child at the centre of all safeguarding decisions.

## **The Designated Safeguarding Lead**

Hummersea Primary School has appointed **Miss C. Moonie** as the school's Designated Safeguarding Lead (DSL). The DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place within the school.

The DSL has the appropriate status and authority within the school to carry out the duties of the role and is provided with the additional time, funding, training, resources and support required to carry out the role effectively.

The DSL provides advice and support to all staff on child welfare, safeguarding and child protection matters. The DSL also takes part in strategy discussions and inter-agency meetings, supports other staff to do so where appropriate, and contributes to the assessment of children.

The DSL, together with the Deputy Designated Safeguarding Leads (DDSLs), is most likely to have a complete safeguarding picture within the school and is the most appropriate person to advise on the response to safeguarding concerns.

### **Deputy Designated Safeguarding Leads**

Hummersea Primary School has appointed three Deputy Designated Safeguarding Leads who form part of the school's safeguarding team:

- **Mrs C. Grainger**
- **Mrs S. Debnath**
- **Mrs M. Marshall**

The Deputy Designated Safeguarding Leads are trained to the same standard as the DSL. Whilst activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

### **Availability**

During term time, the DSL or a Deputy Designated Safeguarding Lead is always available during school hours for staff to discuss safeguarding concerns.

Hummersea Primary School has appropriate arrangements in place to ensure that safeguarding responsibilities remain covered when the DSL is unavailable due to illness, leave or other circumstances. Staff will be made aware of who they should contact if the DSL is unavailable so that concerns can be raised and acted upon without delay.

If there is an immediate safeguarding concern and the DSL or Deputy Designated Safeguarding Leads are unavailable, immediate support can be obtained from the **Multi Agency Children's Hub (MACH) on 01642 130 700**.

### **Manage Referrals**

The DSL is expected to refer cases:

- Of suspected abuse and neglect to the Multi Agency Children's Hub and support staff who make referrals to the Multi Agency Children's Hub.

- To the Channel programme where there is a concern about radicalisation, as required, and support staff who make referrals to the Channel programme.
- To the Disclosure and Barring Service where a person is dismissed or leaves due to risk of harm to a child, as required.
- To the Police where a crime may have been committed, as required.

### Working with Others

The DSL is expected to:

- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners, including the **South Tees Safeguarding Children Partnership**.
- Liaise with the Headteacher to inform them of safeguarding issues, particularly ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the case manager and the Local Authority Designated Officer (LADO) in relation to child protection concerns involving a member of staff.
- Liaise with staff, particularly teachers, pastoral support staff, school nurses, IT technicians, the SENCO and the Senior Mental Health Lead, on matters relating to safety, safeguarding and welfare, including online and digital safety.
- Liaise with relevant agencies when deciding whether to make a referral, ensuring that children's needs are considered holistically.
- Liaise with the Senior Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be experiencing challenging circumstances.
- Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by understanding the welfare, safeguarding and child protection issues experienced by children in need, and identifying the impact these issues may have on attendance, engagement and achievement.
- Ensure that the school knows which children have or have had a social worker, understands their academic progress and attainment, and maintains a culture of high aspirations for this cohort.
- Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there may still be a lasting impact on educational outcomes.

### Information Sharing and Managing the Child Protection File

The DSL is responsible for ensuring that child protection files are kept up to date.

Hummersea Primary School records safeguarding concerns and referrals on **CPOMS**.

Safeguarding information is kept confidential, stored securely and accessed only by those who need to see it.

Safeguarding records should be clear, factual and distinguish between observed concerns, professional opinion and historic information.

Records should include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A record of any action taken, decisions reached and the outcome.
- Where appropriate, the rationale for decisions made, including decisions about whether or not to make a referral.

The DSL will ensure that safeguarding information is shared appropriately and in accordance with information-sharing guidance and data protection legislation.

Where children leave the school, including through an in-year transfer, the DSL should ensure that their child protection file is transferred to the new school or college as soon as possible and:

- Within **5 days** for an in-year transfer; or
- Within the first **5 days of the start of a new term** for a child transferring at the beginning of a new term.

The child protection file should be transferred separately from the main pupil file, using secure transit arrangements, and confirmation of receipt should be obtained.

Where child protection files are transferred, Hummersea Primary School will provide a clear and structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs. Appropriate care will be taken to distinguish current safeguarding concerns from historic information.

The receiving school should ensure that safeguarding information is reviewed by an appropriately trained member of staff so that key risks and needs are clearly understood. Safeguarding information should be used to support, and not disadvantage, the child.

In addition to the child protection file, the DSL will consider whether any additional information should be shared with the new school or college in advance of a child leaving, particularly where this information would support effective safeguarding or allow appropriate support to be put in place when the child arrives.

Where there are significant safeguarding issues or concerns, it is good practice for the DSL at Hummersea Primary School to communicate directly with the DSL at the receiving school so that information is actively considered and acted upon.

### Raising Awareness

The DSL should:

- Ensure that every member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures, particularly new and part-time staff.
- Ensure that the school's Child Protection and Safeguarding Policy is reviewed annually, as a minimum, and that procedures and implementation are reviewed and updated regularly in consultation with the Governing Body.
- Ensure that the Child Protection and Safeguarding Policy is publicly available and that parents and carers understand that referrals about suspected abuse or neglect may be made and the role of the school in this process.
- Link with the South Tees Safeguarding Children Partnership to ensure that staff are aware of relevant training opportunities and the latest local safeguarding policies and arrangements.

- Help promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues experienced by children who have or have had a social worker with teachers and school leadership staff.

### Training, Knowledge and Skills

The DSL and Deputy Designated Safeguarding Leads should undertake training that provides them with the knowledge and skills required to carry out their roles effectively.

This training should be updated at least every two years. The DSL and Deputy Designated Safeguarding Leads should also undertake Prevent awareness training.

Training should provide the DSL and deputies with a good understanding of:

- Their own safeguarding responsibilities and role.
- How to identify, understand and respond to specific needs that may increase a child's vulnerability.
- Specific harms that may place children at risk.
- The processes, procedures and responsibilities of other agencies, particularly local authority children's social care.
- Local arrangements and criteria for referrals and assessments.
- Child protection conferences and review conferences, including how to contribute effectively when required.
- The lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, and what is required to support positive educational outcomes.
- The specific needs of children in need, children with special educational needs and disabilities (SEND), children with relevant health conditions and young carers.
- The importance of effective information sharing.
- The requirements of the Prevent duty and how to support staff in protecting children from the risk of radicalisation.
- Online safety and the specific risks children may face online.
- The additional online risks faced by children with SEND, including bullying, grooming and radicalisation.

The DSL and deputies should have access to relevant safeguarding resources and refresher training.

In addition to formal training, the DSL and deputies should regularly refresh their knowledge and skills, at least annually, through relevant safeguarding updates, briefings, professional networks, meetings and current guidance.

#### Providing Support to Staff

Training should support the DSL and Deputy Designated Safeguarding Leads in developing the expertise required to support and advise staff and help them feel confident in relation to child welfare, safeguarding and child protection matters.

This includes:

- Ensuring that staff are supported throughout the referral process.
- Supporting staff to understand how safeguarding, welfare and educational outcomes are linked.
- Supporting staff to consider appropriate academic and pastoral support for children affected by safeguarding concerns.

## Understanding the Views of Children

It is important that all children feel heard and understood.

The DSL and Deputy Designated Safeguarding Leads should promote a culture of listening to children and taking account of their wishes and feelings in safeguarding practice and in any measures the school puts in place to protect them.

They should also understand the difficulties that children may experience when approaching staff about their circumstances and consider how trusted relationships can be developed to facilitate communication.

### Holding and Sharing Information

The DSL and Deputy Designated Safeguarding Leads should understand the critical importance of recording, holding, using and sharing safeguarding information effectively. They should:

- Understand the importance of information sharing within the school and with other schools and colleges, including when children transfer between settings.
- Understand the importance of information sharing with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation, including the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.
- Keep detailed, accurate and secure records of safeguarding concerns, discussions and decisions.
- Record the rationale for decisions made, including decisions about whether or not to make referrals to other agencies such as local authority children's social care or the Prevent programme.

The DSL will ensure that safeguarding information is managed securely, appropriately and in accordance with statutory guidance, local safeguarding arrangements and the school's information-sharing procedures.

### **Responsibilities of the Governing Body**

The Governing Body at Hummersea Primary School has strategic leadership responsibility for the school's safeguarding and child protection arrangements. It will ensure that the school complies with its legal and statutory duties, including those arising from the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), applicable data protection legislation, the UK GDPR, and the local safeguarding arrangements.

The Governing Body will ensure that appropriate mechanisms are in place to enable all staff to understand and discharge their safeguarding and child protection roles and responsibilities, as set out in *Keeping Children Safe in Education 2026*. This includes ensuring that all safeguarding and child protection policies and procedures adopted by the Governing Body, particularly those relating to the identification and referral of suspected abuse and neglect, are understood and followed by staff.

The Governing Body will ensure that all Governors receive appropriate safeguarding and child protection training as part of their induction and that this training is kept up to date. Training will include online safety, including an understanding of the expectations, applicable roles and responsibilities relating to filtering and monitoring. This will equip Governors with the knowledge and understanding required to provide effective strategic challenge and assurance, and to test whether the safeguarding policies and procedures in place at Hummersea Primary School are effective and support a robust whole-school approach to safeguarding.

At Hummersea Primary School, the senior Governor/Board member with responsibility for safeguarding is **Mrs Gill Dove Hart**.

### **Responsibilities of the Safeguarding Governor**

The Safeguarding Governor will:

- Ensure that sufficient time, funding and resources are allocated to meet the school's safeguarding and child protection responsibilities, and provide appropriate challenge to the effectiveness of safeguarding arrangements.
- Ensure that the school's safeguarding self-assessment and the Designated Safeguarding Lead's report provide an accurate and comprehensive assessment of the school's safeguarding arrangements, including identified weaknesses, areas for development and actions required.
- Ensure that the Governing Body receives appropriate training to clarify its statutory safeguarding and child protection responsibilities and to support effective scrutiny and quality assurance of the school's safeguarding arrangements.
- Ensure that the Governing Body is aware of the arrangements of the Local Safeguarding Children Partnership and that the school understands and fulfils its role in effective multi-agency safeguarding and child protection arrangements.
- Provide appropriate challenge to the Headteacher and Designated Safeguarding Lead regarding the effectiveness of safeguarding arrangements, ensuring that safeguarding remains a strategic priority and is embedded throughout the school's culture and practice.

## Responsibilities of the Chair of Governors

Where the Safeguarding Governor is not the Chair of Governors, the Chair will have a specific role in supporting effective safeguarding arrangements and will:

- Liaise with the Local Authority and/or relevant partner agencies on matters relating to child protection and safeguarding, including where allegations or concerns relate to the Headteacher or another senior leader, in accordance with the school's procedures and local authority arrangements.
- Ensure that allegations or concerns about the conduct of staff, including supply staff, volunteers and contractors, are managed promptly and in accordance with the school's safeguarding procedures and the local authority's arrangements, including referral to the Local Authority Designated Officer (LADO) where the relevant threshold is met.
- Ensure that effective whistleblowing procedures are in place and that staff understand how to raise safeguarding concerns about adults working within the school.
- Ensure that the Safeguarding Governor provides appropriate challenge to the Headteacher and senior leaders on all matters relating to safeguarding and child protection, including the implementation and effectiveness of the Safeguarding and Child Protection Policy.
- Ensure that all staff receive regular safeguarding and child protection updates, including online safety, at least annually and whenever necessary to reflect emerging risks, changes in guidance or identified training needs. Updates may be provided through staff meetings, email communications, briefings, bulletins or other appropriate methods.
- Ensure that safeguarding and child protection training and updates are integrated, aligned and considered as part of Hummersea Primary School's overall safeguarding approach and culture of vigilance.

## Online Safety, Filtering and Monitoring

The Governing Body will:

- Ensure that appropriate filtering and monitoring systems are in place to protect children from illegal, inappropriate and potentially harmful online content.
- Ensure that clear roles and responsibilities are established for the oversight, operation, review and response arrangements relating to filtering and monitoring.
- Ensure that filtering and monitoring provision is regularly reviewed and, as a minimum, reviewed annually, with identified risks, actions and required improvements appropriately reported to the Governing Body.
- Ensure that the school has an effective whole-school approach to online safety which supports the protection and education of pupils, staff and visitors in the safe and responsible use of technology.
- Ensure that effective mechanisms are in place to identify, intervene in and escalate online safeguarding concerns where appropriate.
- Ensure that staff, pupils and visitors follow Hummersea Primary School's Online Safety and Social Media Policy and other relevant acceptable-use arrangements.
- Recognise that many children may have unlimited and unrestricted access to the internet through mobile phone networks and ensure that the school's safeguarding arrangements take account of this risk.
- Ensure that online safety arrangements are regularly reviewed and risk assessed to reflect emerging online harms, technologies and patterns of use.

- Ensure that appropriate information and guidance is provided to parents and carers to reinforce key messages about keeping children safe online, including the online platforms and services children may access and the ways in which they may communicate with adults and other children, including in relation to remote education.

### Safeguarding Education

The Governing Body will ensure that children are taught about safeguarding and how to keep themselves safe, including online safety, through the school's curriculum and, where appropriate, Relationships Education at primary level.

The approach to safeguarding education will be appropriate to the age, developmental stage, needs, abilities and circumstances of individual pupils. Appropriate consideration will be given to pupils who may be particularly vulnerable, including children who have experienced or may be experiencing abuse or neglect, children with special educational needs and disabilities (SEND), and children who may be vulnerable because of their identity or personal circumstances.

### Looked-After and Previously Looked-After Children

The Governing Body will ensure that a Designated Teacher is appointed to promote the educational achievement of looked-after and previously looked-after children.

The Designated Teacher will work with the Local Authority's Virtual School Head and other relevant professionals to support the educational progress and welfare of looked-after children and to ensure that appropriate use is made of available funding and support.

### Mental Health and Safeguarding

The Governing Body will ensure that clear systems and processes are in place for identifying and responding to possible mental health concerns. These arrangements will include clear routes for escalation, referral and accountability, and will recognise the relationship between mental health, vulnerability and safeguarding.

#### Safeguarding Children with SEND

The Governing Body will ensure that the Safeguarding and Child Protection Policy recognises the additional safeguarding barriers that may affect children with special educational needs and disabilities (SEND).

These may include:

- assumptions that indicators of possible abuse, such as changes in behaviour, mood or physical presentation, are related to a child's disability without further exploration;
- increased vulnerability to peer-group isolation;
- a disproportionate impact from bullying or other harmful behaviours, without the child necessarily displaying obvious signs;
- communication difficulties or barriers that may make it harder for children to disclose abuse or neglect; and
- the need for staff to adapt their approach to communication and reporting in order to support the child effectively.

The Governing Body will ensure that these vulnerabilities are considered within the school's safeguarding arrangements and that staff receive appropriate training and guidance to recognise and respond to safeguarding concerns involving children with SEND.

#### Safeguarding When Children Learn Online

Where children may need to learn online at home, the Governing Body will ensure that clear, safe and effective protocols and provisions are in place to support safeguarding and child protection.

These arrangements will include appropriate expectations for staff and pupils, online safety measures, secure use of technology, appropriate supervision and clear procedures for identifying, reporting and responding to safeguarding concerns.

#### Use of School Premises by External Organisations

Where Hummersea Primary School's premises are rented or hired to organisations or individuals, the Governing Body will ensure that appropriate safeguarding and child protection arrangements are in place to protect children.

The school will take reasonable steps to establish that organisations or individuals using the premises have appropriate safeguarding policies and procedures in place where children may be present. Appropriate liaison and communication will take place between the school and external organisations regarding safeguarding matters, including the reporting and management of concerns.

The school will have regard to relevant Department for Education guidance, including *Keeping Children Safe in Out-of-School Settings*, when considering the safeguarding arrangements expected of organisations or individuals using the school's premises.

### **Information for Parents**

At Hummersea Primary School, governors and staff are committed to keeping our children safe and will take all reasonable steps to safeguard and promote their welfare.

If a member of staff has a concern that a child may be suffering, or may be at risk of suffering, significant harm, ill-treatment or neglect, they are required to follow the school's safeguarding procedures and the arrangements of the South Tees Safeguarding Children Partnership. This may include sharing concerns with the Multi-Agency Children's Hub (MACH), the police or other appropriate agencies.

All concerns are taken seriously and dealt with appropriately, with the child's safety and welfare as our priority. Where appropriate, the school will work in partnership with parents and carers and other agencies to ensure children receive the support and protection they need.

Parents and carers should be aware that, in some circumstances, safeguarding concerns may need to be shared with children's social care or the police without prior consultation with parents. This will only be done where necessary to protect a child or promote their welfare.

If you have a concern about the safety or wellbeing of a child, please speak to the school's Designated Safeguarding Lead or a member of the safeguarding team.

## Procedures

The Designated Safeguarding Lead (DSL), or deputy DSL, must be informed without delay if any member of staff, pupil, parent/carer or other person:

- has a concern that a child may be suffering, or may be at risk of suffering, harm; or
- has information or evidence indicating that a child may have been harmed.

Safeguarding concerns must be acted upon promptly. Staff should not wait for proof before reporting a concern.

Under section 31(9) of the Childrens Act 1989, 'harm' means ill-treatment or the impairment of health or development, including, for example, impairment suffered as a result of seeing or hearing the ill-treatment of another. The threshold of 'significant harm' is relevant to the local authorities statutory child protection functions, including applications for care or supervision orders. School staff do not need to establish that significant harm has occurred before reporting or referring a safeguarding concern.

Working Together to Safeguard Children 2026 identifies four main categories of child abuse and neglect: **physical abuse, emotional abuse, sexual abuse and neglect**. Abuse and neglect can occur within or outside the family, in institutional or community settings, online or through technology, and may be perpetrated by adults or by other children.

The 2026 guidance also strengthens the focus on harms including teenage relationship abuse, coercive control, child sexual abuse and honour- or faith/belief-based abuse.

### Definitions of Abuse and Neglect

#### Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It can also include fabricating or deliberately inducing illness in a child.

#### Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes, or is likely to cause, adverse effects on their emotional development. It may include conveying that a child is worthless or unloved, imposing inappropriate expectations, silencing or humiliating them, exposing them to the ill-treatment of another person, or causing them to feel frightened or in danger. Serious bullying and exploitation may also constitute emotional abuse.

#### Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child understands what is happening. It may involve contact or non-contact activity and can occur online or through technology. Sexual abuse may be perpetrated by adults or by other children, and can affect children of any age or gender.

#### Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may include failure to provide adequate food, clothing, shelter, supervision, protection from harm, medical care or attention to a child's emotional needs. Neglect may also occur during pregnancy, for example as a result of maternal substance misuse.

### Children Potentially at Greater Risk of Harm

Hummersea Primary School recognises that some children may require additional support because of their circumstances, experiences or individual needs. These may include children who:

- have experienced abuse, neglect, adversity or trauma;
- have a social worker or have previously required statutory intervention;
- have SEND or medical conditions;
- experience difficulties with communication, behaviour, attendance or mental health;
- are affected by domestic abuse, substance misuse or other difficulties within the family;
- may be vulnerable to exploitation or other extra-familial harms; or
- experience bullying, discrimination, isolation or other forms of harm.

The school will consider the individual circumstances of each child and will not make assumptions about risk based on a child's characteristics or presentation.

Where the school is informed that a child has, or has had, a social worker because of safeguarding or welfare concerns, this information will be used appropriately to support the child's safety, welfare and educational outcomes. Information will be shared in accordance with safeguarding duties and on a need-to-know basis.

### Extra-familial Harm

Safeguarding concerns may arise from factors outside the home or school and may involve children being harmed or exploited by people or circumstances outside their family. Extra-familial harms can include child sexual exploitation, child criminal exploitation, serious violence, harmful sexual behaviour and other forms of exploitation or abuse.

Staff should remain alert to changes in behaviour, attendance, friendships, presentation or school performance, unexplained gifts or possessions, missing episodes, self-harm or other indicators that a child may require help or protection. Concerns must be reported to the DSL without delay.

### Children with SEND and Medical Conditions

Children with SEND or medical conditions may face additional safeguarding vulnerabilities, including communication barriers, social isolation, bullying or difficulties in expressing concerns. Safeguarding concerns must not be attributed automatically to a child's disability, medical condition or behaviour.

Staff should consider changes in behaviour, presentation, mood, attendance, physical or mental health and any unexplained injuries or other indicators in the context of the individual child.

Where appropriate, the school will provide additional pastoral, communication and safeguarding support and ensure that the child's voice is heard through whatever communication methods are appropriate.

#### Children Affected by Domestic Abuse and Other Family Circumstances

Children may be particularly vulnerable where there is domestic abuse, substance misuse, mental health difficulty or other significant family adversity.

Hummersea Primary School recognises its role in providing a safe, stable and supportive environment for children who may be affected by such circumstances. Staff will consider the context of a child's behaviour and presentation and will respond to concerns in accordance with safeguarding procedures.

As an Operation Encompass partner, the school works with the relevant Operation Encompass lead and responds appropriately when notified of a domestic abuse incident involving one of our pupils. This may include appropriate wellbeing and safeguarding checks.

#### Child-on-Child Abuse

Children can abuse other children. Child-on-child abuse can take many forms and must never be dismissed as "banter", part of growing up or simply poor behaviour.

Hummersea Primary School will respond to all concerns of child-on-child abuse in accordance with its **Child-on-Child Abuse Policy** and relevant safeguarding and behaviour procedures.

Staff should refer to the Child-on-Child Abuse Policy for detailed guidance on recognising, reporting and responding to child-on-child abuse, including sexual violence, sexual harassment, bullying, harmful sexual behaviour and other forms of abuse.

#### Safeguarding Culture and Preventative Education

Hummersea Primary School will support children through a whole-school safeguarding approach that includes:

- a curriculum that develops self-esteem, resilience, self-protection and help-seeking skills;
- a positive, supportive and secure school environment in which pupils and adults feel respected and valued;
- opportunities to develop critical thinking, literacy and digital literacy skills;
- preventative education addressing healthy and respectful relationships, human rights, equality, democracy, tolerance, abuse, exploitation and personal safety;
- a culture in which sexism, misogyny, misandry, homophobia, biphobia, sexual harassment, sexual violence, racism and discriminatory behaviour are challenged and not tolerated;
- age- and developmentally appropriate Relationships Education and Health Education, including consideration of the needs of pupils with SEND and other vulnerabilities;
- education that helps children understand and manage risk safely both online and offline;
- a whole-school approach to online safety covering content, contact, conduct and commerce;
- effective behaviour and discipline procedures, including the appropriate use of reasonable force;

- effective liaison with parents/carers and relevant professionals and agencies; and
- a knowledgeable and appropriately trained staff group able to respond effectively to safeguarding concerns.

### Children Who Are Abused or Witness Violence

Hummersea Primary School recognises that children who experience abuse or witness violence may experience difficulties with emotional wellbeing, behaviour, relationships, attendance and learning.

School may be an important source of stability and support for some children. Staff will therefore consider the context of behaviour and presentation and will not assume that challenging or defiant behaviour is simply a behavioural issue.

### Children Questioning Their Gender

Hummersea Primary School will respond sensitively and carefully to children who are questioning their gender or where a child or parent/carer requests support relating to social transition.

The school will follow the statutory guidance in **Keeping Children Safe in Education 2026** and will consider safeguarding, the welfare and best interests of the child and the impact on other children. KCSIE 2026 makes clear that schools should not initiate action regarding social transition. Where a child or parent/carer raises a request, the school will consider the circumstances carefully and document its decision-making.

### Safeguarding Concerns and Allegations About Adults

Hummersea Primary School has procedures for managing safeguarding concerns and allegations about adults working in or connected with the school. These procedures apply to all adults working with children, including staff, supply staff, trainee teachers, volunteers and contractors.

Where there is a concern or allegation that an adult has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children,
- behaved, or may have behaved in a way that indicated they may not be suitable to work with children, including behaviour outside the workplace which may create a transferable safeguarding risk,

the concern must be reported immediately in accordance with the school's safeguarding procedures. Concerns about the Headteacher must be referred to the Chair of Governors. Where the concern relates to the Chair of Governors or governing body, the matter must be referred to the appropriate Local Authority Designated Officer (LADO) or other relevant local authority process.

The school will consult the LADO without delay where required. The LADO will advise on the appropriate course of action and whether a multi-agency response is necessary.

All relevant concerns, decisions, actions and outcomes will be recorded securely and retained in accordance with the school's safeguarding record-keeping procedures.

### Low-Level Concerns

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the harm threshold but may be inconsistent with the Staff Behaviour/Code of Conduct or could indicate a wider safeguarding concern.

All low-level concerns must be reported and recorded in accordance with the school's **Staff Behaviour/Code of Conduct and Low-Level Concerns Policy**. A concern should not be dismissed simply because it does not meet the harm threshold.

The purpose of recording and reviewing low-level concerns is to support a culture of openness, enable patterns or emerging concerns to be identified, and support appropriate action to safeguard children.

### Whistleblowing

All staff and volunteers have a responsibility to raise concerns about safeguarding practice, including concerns about the conduct of adults working with children or the school's safeguarding arrangements.

Concerns should normally be raised through the school's whistleblowing procedures. Where a member of staff feels unable to raise a concern internally, or believes that it has not been dealt with appropriately, they may seek advice through an appropriate external whistleblowing route, including the NSPCC Whistleblowing Advice Line.

Staff must not be prevented from raising genuine safeguarding concerns and must not be subjected to detriment for doing so in accordance with the school's whistleblowing arrangements.

### Training and Support

All staff must understand the school's safeguarding systems and procedures. This information will be provided as part of induction and reinforced through regular safeguarding training and updates.

This includes:

- the Safeguarding and Child Protection Policy;
- the Child-on-Child Abuse Policy;
- the Behaviour Policy, including bullying, cyberbullying, prejudice-based and discriminatory bullying;
- the Staff Behaviour/Code of Conduct and Low-Level Concerns Policy;
- the school's whistleblowing procedures;
- the Attendance Policy, including procedures relating to children missing from education;
- the identity and role of the DSL and deputy DSLs; and
- relevant procedures for information sharing and record keeping.

All staff receive safeguarding and child protection training, including online safety, which is regularly updated. Safeguarding training is integrated into the school's wider training and curriculum planning.

Staff will receive regular safeguarding updates throughout the year and at least annually, with additional updates provided where required by changes in legislation, statutory guidance, local safeguarding arrangements or emerging safeguarding issues.

**All staff, including teaching and non-teaching staff, must read Part One of Keeping Children Safe in Education 2026 in full.** KCSIE 2026 removes the former shorter Annex A version and confirms that all staff should follow the same safeguarding expectations.

Information sharing is essential to effective safeguarding. Data protection legislation does not prevent the lawful and proportionate sharing of information where this is necessary to safeguard and promote the welfare of a child. Staff must follow the school's information-sharing procedures and relevant statutory guidance. Information should be shared lawfully, fairly, proportionately and on a need-to-know basis, while recognising that safeguarding concerns may justify or require information sharing without consent.

Information will be shared lawfully, proportionately and on a need-to-know basis with those who require it to safeguard a child. This may include the DSL or deputy DSL, children's social care, the police, health professionals, the Local Authority Designated Officer and other relevant safeguarding partners.

Confidentiality should never prevent a safeguarding concern from being reported. Staff must not promise a child, parent/carer or another person that information will be kept confidential where sharing is necessary to protect a child.

Safeguarding records must be accurate, contemporaneous, factual and stored securely.

Records should include:

- a clear summary of the concern;
- relevant information and the child's voice, where appropriate;
- actions taken;
- decisions made;
- the rationale for decisions;
- referrals or information shared with other agencies; and
- the outcome and any further action required.

All staff will follow the school's Information Sharing and Record Keeping Policies and applicable data protection requirements, including the UK General Data Protection Regulation and Data Protection Act 2018.

Safeguarding records will be maintained securely through the school's electronic safeguarding management system, CPOMS, in accordance with the school's retention and access arrangements.

When a child leaves the school, child protection information will be transferred securely to the receiving school or setting in accordance with statutory guidance and local procedures. Relevant safeguarding information will be shared to support continuity of protection and provision. Information will only be shared where there is a lawful basis and in accordance with safeguarding requirements.

Relevant information concerning children who have required statutory safeguarding intervention will be shared with the receiving school where required to safeguard and promote the child's welfare.

## Review and Oversight

The Governing Body and school leadership team will monitor the effectiveness of these procedures and ensure that they remain aligned with current statutory guidance, local safeguarding arrangements and the school's wider safeguarding policies.

The DSL will ensure that safeguarding concerns, patterns, actions and outcomes are appropriately reviewed and that lessons learned inform safeguarding practice, staff training and policy development.

## Attendance

Regular attendance is an important safeguarding measure, as unexplained or prolonged absence from education may indicate that a child is at risk of harm, neglect, exploitation or other safeguarding concerns. The school will monitor attendance and punctuality closely and will follow up unexplained absences in accordance with its **Attendance Policy**, which sets out the procedures and responsibilities for recording, monitoring and responding to attendance concerns. Staff should remain alert to patterns of absence or changes in attendance that may indicate a safeguarding concern and should report these promptly in line with the school's safeguarding procedures. The school will comply with the requirements and guidance set out in **Keeping Children Safe in Education (KCSIE)**, including the expectation that schools and colleges consider attendance and children missing education within their wider safeguarding arrangements.

## Safeguarding in EYFS

The school's Early Years provision will comply with the EYFS statutory framework for group and school-based providers applicable from 1 September 2026, including requirements relating to safeguarding and welfare, staffing ratios, qualifications, paediatric first aid, health, food and drink, information and record keeping and the suitability of staff.

## Intimate Care

Hummersea Primary School is committed to ensuring that all staff responsible for providing intimate care to children undertake their duties in a professional, respectful and appropriate manner. We recognise the importance of treating all children with dignity and respect when intimate care is required. No child should receive intimate care in a way that causes distress, embarrassment, discomfort or pain.

Children's dignity and privacy will be preserved at all times, with children provided with an appropriate level of choice, control and independence wherever possible. Staff who provide intimate care will maintain a high level of awareness of safeguarding issues and will follow the school's agreed procedures at all times. The school will work in partnership with parents and carers to ensure continuity of care and to meet the individual needs of each child.

All staff involved in providing or supporting intimate care must read and familiarise themselves with the school's **Intimate Care Policy** and ensure that they understand and follow the procedures and safeguarding expectations outlined within it. The **Intimate Care Policy** should be read in conjunction with this **Safeguarding Policy** and any concerns

arising from the provision of intimate care must be reported in accordance with the school's safeguarding procedures.

### Safer Recruitment

The school is committed to robust safer recruitment practices to ensure that all reasonable steps are taken to prevent unsuitable individuals from working with children and young people. Recruitment and selection processes will be undertaken in accordance with **Keeping Children Safe in Education (KCSIE) 2026**, relevant employment legislation and the **Redcar and Cleveland Borough Council safer recruitment policies and procedures applicable to maintained schools**. The school will ensure that appropriate checks are completed before an individual commences employment (or volunteer work), including verification of identity, qualifications and employment history, satisfactory references, appropriate Disclosure and Barring Service (DBS) checks and, where applicable, checks relating to the right to work, prohibition from teaching and other relevant restrictions or requirements. At least one person involved in the recruitment process will have appropriate safer recruitment knowledge and training. The school will maintain accurate records of all recruitment and vetting checks and will ensure that safer recruitment principles are applied consistently to employees, volunteers, agency staff, contractors and other adults working with or having regular contact with pupils. Further details are set out in the school's **Safer Recruitment/Recruitment and Selection Policy** and the relevant **Redcar and Cleveland Council policies and procedures**.

### **This policy must be read in conjunction with other related school policies.**

These include:

- Staff Code of Conduct (including low level concerns) Policy
- Behaviour Policy
- Intimate care policy
- Online Safety (including filtering and monitoring) policy
- Social Media Policy
- Child-on-Child Abuse Policy
- Safer Recruitment Policy (Redcar and Cleveland Council)
- Attendance Policy
- CIOC policy

**ALL staff, including teaching and non-teaching staff, MUST read Part one KCSIE 2026 in full.**

This Policy will be reviewed annually or in light of any changes in legislation and/or guidance.

