

# Safeguarding Policy

2.1 – September 2019

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# 1 General Policy Statement

- 1.1 INTO UEA is committed to, and has both a statutory and moral duty to ensure the Centre functions with a view to safeguarding and promoting the welfare of children and at risk adults receiving education at the Centre.

# 2 Definitions

## 2.1 Children

Those students under the age of 18 up to but not including their 18<sup>th</sup> birthday

## 2.2 Vulnerable Adults

While there is no formal definition, within INTO UEA context a vulnerable adult could include a person displaying any of the following:

- with a disability (e.g. physical, mental, learning)
- travelling away from home for the first time
- in an unfamiliar environment
- with a low level of language

## 2.3 Safeguarding

In this context is used as the generic term to describe approaches to ensuring the well-being of children or at risk adults

## 2.4 Child Protection

Describes the detailed approach to protect individuals/groups under 18 years of age from direct harmful behaviour.

# 3 Contextual safeguarding

- 3.1 INTO UEA recognises that safeguarding incidents and/or behaviours can be associated with factors outside of the centre environment and/or can occur between children outside of the school. This is known as contextual safeguarding. It is key that all centre staff are aware of the definition of contextual safeguarding and when reporting concerns, they include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

# 4 Scope

- 4.1 While there is no statutory requirement to safeguard adults who are not vulnerable it is best practice for preventative considerations and measures to extend to these individuals. This reflects the emphasis at INTO UEA of supporting the well-being of the whole student and staff community.

## 5 Context

- 5.1 This policy underpins all our pastoral and academic responsibilities to our students and should be considered alongside other related policies and procedures in place for students and staff.
- 5.2 To reflect emerging good practice and legislative changes into the future, additional information, advice and guidance will be sought from the Independent Schools Safeguarding Network in the local area, the local authority safeguarding advisor, government policy and information documents and other relevant sources.
- 5.3 The Joint Venture Board have ultimate responsibility and accountability for ensuring a safe learning and working environment for all our students and staff in the Centre.
- 5.4 The policy applies to all staff, managers, volunteers, contractors and consultants working for INTO University Partnerships.
- 5.5 The main elements and aims of the policy are as follows:
  - To promote good practice and raise awareness of Safeguarding issues amongst all INTO staff, managers, volunteers and consultants in order to provide a safe environment in which all children and at risk adults can learn and develop (Section 7);
  - To promote awareness of the designated senior members of staff with Safeguarding responsibility within the Centre, and at Senior Executive/Director level across the Company (Section 8);
  - To provide INTO staff with relevant training and guidance in order to make informed and confident responses to specific Safeguarding issues (Section 9);
  - To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse (Section 10);
  - To ensure that INTO practices safe recruitment in checking the suitability of staff to work with children and at risk adults (Section 11).

## 6 Safeguarding and GDPR

- 6.1 INTO UEA is committed to the principles of GDPR and handling data with due care and diligence. GDPR must not be an obstruction to safeguarding however- Keeping children safe In Education 2018 states:

*“Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”*
- 6.2 The DSL will lead on what information is shared in relation to safeguarding and student welfare, they will always take a risk based approach in this area.

## 7 Safer Working Practice – Guidelines

- 7.1 All employees are encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations.
- 7.2 All children and at risk adults regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse.
- 7.3 All employees should treat all students equally with respect and dignity.

- 7.4 It is important to understand that strong emotions can be aroused by certain Safeguarding situations, however it is vital that these feelings do not interfere with one's judgement about the appropriate action to take.
- 7.5 All employees should work to establish and maintain an environment where children and at risk adults feel secure, are encouraged to talk, and are listened to.
- 7.6 All employees are required to make written records of concerns about children and at risk adults, even where there is no need to refer the matter immediately, and pass these to the nominated person.
- 7.7 All employees have a crucial role to play in identifying welfare concerns and indicators of abuse and neglect at an early stage.
- 7.8 All staff should be aware of their duty to raise concerns about the actions or attitudes of their colleagues under the Whistleblowing policy (see Whistleblowing policy). We recognise that children and at risk adults cannot be expected to raise concerns in an environment where staff fail to do so.

## 8 The Designated Staff with Responsibility for Safeguarding

- 8.1 The senior member of staff with lead responsibility for Safeguarding issues at the Centre will be the Head of Student Services. The Centre and Academic Directors will support the Head of Student Services in this role. All designated staff will receive appropriate training to fulfil their responsibilities.
- 8.2 The Head of Student Services will take lead responsibility for raising awareness amongst employees within their Centre of issues relating to the welfare of children and at risk adults, and the promotion of a safe environment within the Centre.
- 8.3 The Head of Student Services will also be responsible for ensuring the employees in the Centre know how to respond appropriately to Safeguarding situations/issues as they may arise.
- 8.4 This person is responsible for:
- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
  - Providing advice and support to other staff on issues relating to child and at risk adult protection.
  - Maintaining secure storage of all referrals, complaints or concerns, separately from the student file.
  - Ensuring that parents of children and at risk adults are aware of the Safeguarding Policy.
  - Liaising with appropriate agencies.
  - Ensuring that all staff are provided with appropriate training and are aware of the policy and procedures and conduct themselves appropriately including the joint venture board.
  - Ensuring that all suspicion and allegations of abuse are taken seriously and responded to swiftly and appropriately.
  - Ensuring that appropriate Safeguarding risk assessments are undertaken and any issues are addressed
- 8.5 The Centre Director and Academic Director will:
- Deputise, in Safeguarding matters, for the Head of Student Services in his absence
  - Will know how to make an appropriate referral.

- Will be available to provide advice and support to other staff on issues relating to child protection.
- As appropriate be available to listen to children and at risk adults studying at the Centre.
- Will deal with individual cases as necessary, including attending case conferences and review meetings as required.
- Will receive appropriate training and support for this role.
- Ensure appropriate risk assessments are undertaken and any issues are addressed.
- INTO University Partnerships has also nominated the Director – UK Operations to take overall responsibility for promoting Safeguarding and ensuring that the policy and processes are executed and reviewed appropriately.

## 9 Relevant Training and Guidance for INTO Staff

### 9.1 Training

- INTO UEA will ensure all staff are provided with sufficient training and support in relation to Safeguarding.
- All Centre staff will have access to Level 1 Safeguarding training, via either online or face-to-face methods. Designated members of staff will be trained to Level 3, which is conducted face-to-face. All staff will also receive relevant PREVENT training.
- Safeguarding training will be updated annually, however additional briefings may be provided within this period, driven by changes in legislation or local conditions/circumstances.
- Specialised training in aspects of Safeguarding will also be arranged by the Centre and this will include 'Prevent' training which describes the approach to the radicalisation of individuals or groups.
- The INTO UEA approach to Safeguarding will be covered in the induction sessions for all new staff.
- All staff will receive a copy of this policy and access to other related documents e.g. 'keeping children safe in education part 1'.
- All staff will have information accessible to them regarding appropriate behaviour and conduct, which is included in the IUP Staff Handbook.

### 9.2 Conduct

In all dealings with children and at risk adults, INTO UEA expect all staff, including group leaders, volunteers, homestay hosts, and students to:

- Respect people's right and their personal privacy;
- Use appropriate and respectful language;
- Be aware of and respect possible cultural differences;
- Challenge inappropriate or unacceptable behaviour and/or report to the designated senior member of staff;
- Report any allegation or suspected case to the designated senior member of staff;
- Maintain professionalism and keep clear boundaries;
- Be aware of company guidelines and policies set out for protecting both staff and students.

- Please note that this list is not exhaustive and all staff and students should apply sensible and appropriate conducts under any circumstances.
- Staff should refer to the staff handbook for further guidance on conduct, particularly section 38 which gives guidance on relationships between colleagues/ students. Section 38.3 of the staff handbook states “the Company considers it completely inappropriate for employees to have sexual or romantic relationships with students”.

### 9.3 Personal interaction

- Physical contact should be avoided and is usually unacceptable, except in some special cases, where consent is given in an open environment and the purpose is clear.
- If engaging in sporting activities, it should be in accordance with the national governing body (NGB) guidelines. More details can be found on <https://the cpsu.org.uk/help-advice/>.
- Any contacts on social networks or social media platforms should maintain professionalism and clear boundaries. (Please also refer to Social Media Policy set out in the IUP Staff Handbook).
- Staff and students should not share private accommodation or be involved in private social events.
- If alone with a child or at risk adult, doors should be kept open or the space is transparent, for example, with see-through glass windows or doors.
- In situations where a member of staff does not feel comfortable or shows concerns at meeting a child or at risk adult alone, the meeting should be conducted with a third party in presence, ideally, the designated senior member of staff.
- If circumstances require a member of staff to use their own vehicles with a child or at risk adult, the designated senior member of staff should be informed and the member of staff should hold appropriate insurances for such events.
- If arranging taxis or coaches for children or at risk adults, certified companies and DBS checked drivers are used.
- All staff and students should be aware of the rules and regulations around alcohol, drugs and smoking either at the premises, accommodation or other public areas, especially when there are children or at risk adults present.

## 10 Defining Abuse and Procedures for Identifying and Reporting Cases or Suspected Cases.

10.1 INTO recognises the following as definitions of the most common forms of abuse:

- **Physical Abuse** - Physical abuse causes harm to a child’s person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Neglect** – Neglect is the persistent or severe failure to meet a child or young person’s basic physical and/or psychological needs, likely to result in serious impairment of the child’s health or development. It may involve a failure to provide adequate food clothing or shelter, failing to protect a child from physical harm or danger, failing to ensure adequate supervision or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child’s basic emotional needs.

- **Sexual Abuse and Harmful Sexual Behaviour (HSB)** – Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Harmful Sexual Behaviour can be defined as sexualised behaviour by a young person which may lead to harm to themselves or others if behaviours continue or increase in severity.
- **Emotional Abuse** - Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. It may involve conveying to children that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all forms of abuse, though it may occur alone.
- **Radicalisation** - is a process by which an individual comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject & undermine the status quo or contemporary ideas and expressions of freedom of choice. This can lead to both violent and nonviolent reactions in individuals.
- **So-called 'Honour-abuse' and forced marriage** - At INTO UEA we recognise must be vigilant to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. Staff are also given guidance and training to support students who are subject to or at risk from Forced marriage (FM). If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police, children's social care and other relevant agencies (e.g. the Forced Marriage Unit). Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: Mandatory Reporting of Female Genital Mutilation- procedural information Home Office (December 2015)

- **Peer on peer abuse** - We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers to remember the impact on both the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to peer on peer abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Peer on peer abuse may require the DSL to complete a risk assessment around individuals to ensure risk is minimised around individuals affected by peer on peer abuse at INTO UEA. (see risk assessment in Appendix A)
- **Use of Social Media in an abusive way** - Abuse can also occur through social media and this is often harder to detect. It is important to remember that the type of abuse that can occur through social media does not always include emotional and psychological abuse and can include sexual and financial abuse. Social media includes (but is not limited to): networking sites such as Facebook, Twitter and LinkedIn, email, text messages, Skype and instant messaging services.
- **Others** – Abuse may take many additional forms (e.g. Financial, Modern Slavery, Exploitation, Omission etc.) and staff should always report their suspicions even if disclosures do not neatly fit into the above definitions.

#### 10.2 If a child or at risk adult tells a member of staff about possible abuse:

- Treat the matter seriously and keep an open mind.
- Listen carefully and stay calm.
- Do not interview the individual, although it may be necessary to seek clarity using open questions. DO NOT put words into the person's mouth.
- Reassure the child or at risk adult that by telling you they have done the right thing.
- Do not promise confidentiality. Inform the person that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully and make detailed notes of the date, time, place, persons present, what the individual said and did, what you asked etc. Ensure you sign and date this initial record.
- Immediately report to the designated person. DO NOT try to investigate concerns yourself and DO NOT tell others about the matter.

#### 10.3 Confidentiality

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children and at risk adults, facilitate enquiries, manage related disciplinary or suitability processes.

## 11 Safe Recruitment of Staff

#### 11.1 INTO UEA will ensure that as part of its recruitment policy all staff working in the Centre:

- Safeguarding procedures are highlighted in all adverts. Specifically, all adverts state;



- references will be followed up;
- all gaps in CVs must be explained satisfactorily;
- proof of identity and (where applicable) qualifications will be required;
- reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18;
- appropriate suitability checks will be required prior to confirmation of appointment;
- applicants who are offered employment will be subject to a Disclosure and Barring Service check before the appointment is confirmed. This will include details of cautions, reprimands or final warnings as well as convictions.
- All staff will have appropriate DBS checks PRIOR to the start date as far as is practically possible. All staff will have *enhanced* DBS checks.
- All managers will be checked to ensure they are not barred as a result of being subject to Section 128 direction.
- All will have been interviewed, and reference checked as far as practically possible to a satisfactory level PRIOR to start date.
- The Interview panel for all jobs consists of at least two people, usually with a member of the HR team also present. At least one member of the interview panel will have completed the National Society for the Prevention of Cruelty to Children (NSPCC) safeguarding training.
- Staff will have had their identity checked PRIOR to start date as well as their right to work in the UK.
- Staff will have seen documentary evidence of their qualifications and right to work in the UK PRIOR to start date where required.
- All offers of employment are conditional upon meeting the above requirements.
- All staff receive Safeguarding training following successful appointment.

## 12 Managing Allegations against Staff and Volunteers

- 12.1 Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at our centre. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.
- 12.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- 12.3 We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in *Norfolk Safeguarding Children Board Protocol: Allegations Against Persons who Work with Children* and Part 4 of 'Keeping Children Safe in Education', DfE (2018) are adhered to and will seek appropriate advice. The first point of contact for schools regarding LADO issues is via the Local Authority Duty Desk on 01603 307797. A duty advisor will give advice and guidance on next steps. If the advice is to make a referral to LADO then a form should be completed. Direct contact details for the LADO are e-mail: LADO@norfolk.gov.uk or telephone 01603 223473.

- 12.4 If an allegation is made or information is received about any adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Centre Director or Deputy immediately. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Centre Director, this will be reported to the [Bridget?].
- 12.5 The Centre Director or deputy will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.
- 12.6 Any member of staff or volunteer who does not feel confident to raise their concerns with the Centre Director or Deputy should contact the LADO directly on 01603 223473. Further national guidance can be found at: Advice on whistleblowing. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- 12.7 The Centre has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

## 13 Contact Details

### 13.1 INTO UEA Designated Officers

- Simon Duckworth, Head of Student Services (Designated Safeguarding Lead);
- Debbie Price, Centre Director;
- Jeremy Moyle, Academic Director;
- Leila Lynch, Welfare and Social Officer;
- Rebecca Curtis, Welfare and Social Officer
- Gareth Goodge, Welfare and Social Officer.

### 13.2 Key Reporting Contacts

- Norfolk Children's Advice and Duty Service Team (CADS) – 0344 800 8021
- Norfolk Police – 101 (in an emergency always dial 999)
- Norfolk LADO Team- 01603 223473
- Harmful Sexual Behaviour team- 01603 224467 [hsbproject@norfolk.gcsx.gov.uk](mailto:hsbproject@norfolk.gcsx.gov.uk)
- Forced Marriage Unit (FMU) telephone: +44 (0) 20 7008 0151 [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)
- Kelly Waters (Senior Safeguarding Adviser Norfolk Children's Services) - 01603 307729
- Lucy Canning (Safeguarding Adviser Norfolk Children's Services)

## Serious Case Review Risk Assessment

This risk assessment should be undertaken where a student:

- is alleged to have undertaken any act of misconduct which may also constitute a criminal offence, or
- has reported to have been subject of any act of misconduct which may also constitute a criminal offence

and should be reviewed at regular stages during the investigation.

### Persons Involved

Name:				
Student No.:				
Role:	Reporting / Accused / Witness / Other	Reporting / Accused / Witness / Other	Reporting / Accused / Witness / Other	Reporting / Accused / Witness / Other

### Case Overview

Date reported:		Reported by:				
Type of misconduct:						
General circumstances:						
Individual circumstances:						
Details of charge, caution, bail condition or conviction:						
Views of police (e.g. status of case; other conditions or advice):						
Review dates:						
Review by:						

### Safeguarding Management Risks – Reporting Student

	Risk to student, or others (please identify), or to investigation	Control measures or precautionary actions
Accommodation		
Academic/Placement		
Clubs/Societies/Other (specify)		

Examples of risks:

- Contact directly or indirectly with reporting party
- Contact directly or indirectly with witnesses involved in investigation

Examples control measures:

- No-contact order
- Ban from accommodation block
- Change seminar groups
- Change module
- Move accommodation
- Temporary suspension from specific club or society
- Suspension from placement or from course
- Exclusion from campus

### Safeguarding Management Risks – Accused Student

	Risk to student, or others (please identify), or to investigation	Control measures or precautionary actions
Accommodation		
Academic/Placement		
Clubs/Societies/Other (specify)		

Where precautionary action is required it must be reasonable and proportionate, with minimum possible impact on accused, and may be put in place if it is necessary:

- To ensure that a full and proper investigation can be carried out (either by police or University); and/or
- To protect the reporting student or others while the allegation is being dealt with as part of a criminal process or disciplinary process.

A recommendation to suspend a student should only be taken where the risk level is high and no alternative measures can be put in place to mitigate the risk.

## Other risks

Risk	To whom	Likelihood	Seriousness	Manageability	Control measures or precautionary actions	Risk Level
Physical injury						
Psychological injury						
Reputational harm						
Significant damage to property						

### Consider:

- Generality of students or specific group?
- Past activity will help inform.
- Random and uncontrolled?
- Social Media used?
- Pattern or profile emerging?
- Charged with offence?
- Can the risk be managed?
- Alcohol or drug abuse?
- Any other factors which cannot be controlled for?
- If risks cannot be controlled for then risks are High

### Support arrangements – reporting students

	Measures Required	Action by whom and when?	Completed?
Academic progress			
Health and Wellbeing			
Safety			
Other (specify)			

Example measures:

- Extenuating circumstances supporting statement
- Referral for ongoing emotional and psychological support
- Concerns re. being approached by accused, or other people (e.g. revenge action)
- Parking permits for specific car park or other security escort arrangements etc.

### Support arrangements – accused student

	Measures Required	Action by whom and when?	Completed?
Academic progress			
Health and Wellbeing			
Safety			
Other (specify)			

Example measures:

- Extenuating circumstances supporting statement
- Referral for ongoing emotional and psychological support
- Concerns re. being approached by accused, or other people (e.g. vigilante action)

### Serious Case Review Risk Assessment Agreed by

Delete as appropriate

Asst. Head L&L (Student Life) / Head of Student Services (L&L) / Head of Security / Head of Student Services (Wellbeing) / Director of Student Services / Disciplinary Officer / Accommodation Manager / Asst. Head of Wellbeing

Recommendations to **suspend and/or exclude** a student under VC's action must be agreed by **at least three** and **confirmed by the Director of Student Services**

## 14 Creation and Revision History

To be reviewed annually by Head of Student Services.

Next review due September 2020.

Version	Owner	Purpose/Change	Date
1.0	Simon Duckworth, Head of Student Services	Created	October 2015
1.1	Simon Duckworth, Head of Student Services	Review and rebranding	July 2016
1.2	Simon Duckworth, Head of Student Services	Recruitment section update and amendment to designated officers	January 2017
1.3	Simon Duckworth, Head of Student Services	Review and update	September 2017
1.4	Simon Duckworth, Head of Student Services	Amendment to section 7	October 2017
2.0	Simon Duckworth, Head of Student Services	Addition of sections 3, 6, 12 and risk assessment plus amendments to sections 9, 10, 11 and 13	December 2018
2.1	Simon Duckworth, Head of Student Services	Annual review – no amendments	September 2019