

SAFEGUARDING POLICY

SEPTEMBER 2018



CONTENTS

1.0 Ethos.....	4
1.1 Safeguarding Designation	5
1.2 Overview	6
2.0 Procedures.....	6
2.1 Definitions.....	7
Abuse:	7
Physical Abuse:.....	7
Emotional Abuse:	7
Sexual Abuse:.....	7
Neglect:	8
2.2 Specific Considerations – Peer on Peer Allegations.....	8
2.3 Specific Areas of Safeguarding	9
Child Sexual Exploitation.....	9
Female Genital Mutilation	9
Children Missing Education	9
Self-Harm.....	10
Prevent Duty.....	10
3.0 Responding to Concerns	11
4.0 Disclosures/Concerns.....	11
5.0 Records	12
6.0 Storage of Records	13
7.0 Referrals.....	14
8.0 Child Protection Plan	15
9.0 Outreach Team/Psychology Service	15
10.0 Concerns involving members of staff, volunteers, external agents and visitors.....	16
11.0 Code of Practice for staff and volunteers	17
12.0 Staff Supervision and Support	17
13.0 Induction and Training.....	18
14.0 Safer Recruitment.....	18
15.0 The Use of School Premises by Other Organisations	19
16.0 Security	19
17.0 Prevention Strategies	20
18.0 Roles and Responsibilities.....	20
19.0 Monitor and Review.....	21

20.0 School Policies and Procedures Related to NHF Safeguarding..... 21

1.0 ETHOS

As the New Horizons Hub of London South East Academy Trust, the Body of Governors and staff within all of our Academy Schools (Aspire Academy, Endeavour Academy and Horizons Academy Bexley), take seriously our responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of all children by working together with other agencies to ensure robust and appropriate measures are in place within each of our schools to identify, assess and support those children who are at risk of or who are suffering harm whilst considering at all times what is in the best interest of the child. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and all related local and national guidance. This includes the DfES Guidance Childrens Act 1989 & 2004, Education Act 2002 Section 157 and 175 and Statutory Guidance Working Together to Safeguard Children July 2018, What to do if you're worried a child is being abused 2015, Keeping Children Safe in Education September 2018, and Disqualification under the Childcare Act 2006, Safeguarding Children. All our Academies will work in partnership with the Local Safeguarding Children Board or formats following comparable processes, who work in response and lead DfE safeguarding guidance and legislation.

Safeguarding our students and promoting their **welfare is everyone's responsibility**. Everyone who comes in contact with children and their families and carers has a role to play in safeguarding children through the use of a child-centred approach. Our Academies will endeavour to support the welfare and safety of all students through:

- Promoting and maintaining a whole Academy culture that student safeguarding is everyone's responsibility through awareness and a proactive response to concerns.
- Ensuring staff adopt a child centred approach to respond to and identify children who may be in need of early/extra help or who are likely to suffer significant harm;
- Providing appropriate early help, support and guidance to students to enable them to have a range of appropriate adults whom they feel confident to approach if they are in difficulty.
- Promoting the importance of regular, punctual school attendance.
- Ensuring the curriculum contains spiritual, moral, social and cultural aspects of learning.
- Ensuring safeguarding is included in the curriculum to enable students to keep themselves safe, recognise when they don't feel safe and identify who they might/can talk to help them.
- Promoting a positive and supportive environment where students can develop a sense of being valued and heard in their own right.
- Ensuring all steps are taken to maintain the Academy site security and students physical safety.
- Working and communicating regularly with parents/carers to build an understanding of the Academy's responsibility to ensure the welfare of all students including the need for external agency referral when it is deemed necessary.
- Regular whole staff safeguarding training (E-safety, FGM, Gang Awareness, CSE and Prevent Duty), creating skills and knowledge to adopt a measured, child centred generic approach to identify and address safeguarding and child protection concerns raised. This must also include updates relating to changes in legislation or to recognise community based safeguarding issues potentially impacting on NHF students.

- Ensuring all staff are suitably able to recognise the signs and symptoms of abuse and are aware of the Academies procedures, lines of communication in order to take appropriate action and regularly review a student’s situation.
- Monitoring and reviewing students who have been formally identified as having welfare or safeguarding concerns to ensure improvement of circumstance, with consideration given to a statutory external referral if appropriate.
- Keeping confidential records which are stored chronologically, securely and shared appropriately with other professionals in line with data protection protocols in-line with Sharing Information July 2018 and General Data Protection Regulation (GDPR) and Data Protection Act 2018.
- Developing and maintaining effective and supportive partnership working with external agencies in order to promote safeguarding, manage and reduce risk and increase student wellbeing.

1.1 SAFEGUARDING DESIGNATION

Jo Southby takes overall lead responsibility for the safeguarding and protection of all students and staff across the three Academies. A tiered approach exists, with Jane Baldwin Inclusion Manager (Safeguarding, Attendance & Careers) strategically overseeing and advising on the day to day practice as a Senior Member of New Horizons Hub and Kathy Spillane (Safeguarding Liaison Officer) providing day to day and individual advice, guidance and support to the designated Safeguarding Lead’s in each Academy.

This includes;

New Horizons Hub	Jo Southby Executive Headteacher Jane Baldwin Inclusion Manager Kathy Spillane Safeguarding Liaison Officer
Endeavour Academy	Head of School Beverley Evans Pastoral Support Co-ordinator Amy Mulrey
Aspire Academy	Head of School Phil Collins Pastoral Support Co-ordinator Leanne Michel
Horizons Academy Bexley	Head of School Alan Farrell Neil Hazlewood (Assistant Headteacher) Lucy Twist (Assistant Headteacher) Lorraine Reynolds (Welling Centre Manager – KS4) Emma Slater (Pastoral Support Co-ordinator) Alex Wilson (Pastoral Support Co-ordinator) Sue Graham (Primary Refocus Co-ordinator) Emma Stubbington (Head of Outreach Service)
Nominated Governors	Corrine Botton

Safeguarding and promoting the welfare of children is defined as ‘protecting children from maltreatment, preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children up to the age of 18 years, to have the best outcomes.’ (Dfe Sept 2018).

1.2 OVERVIEW

Article 1 of The United Nations Convention on the Rights of a Child defines a child as a person below the age of 18, unless a country has legally set the age of adulthood as younger.

Where a student is suffering significant harm or is likely to do so, action should be taken to protect that student. Action should also be taken to promote the welfare of a student in need of early help or additional support even if they are not suffering harm or at immediate risk. Staff are expected to review student welfare on a daily basis to ensure improvements in the childrens situation is being evidenced.

All staff that come into contact with students and their families has a responsibility and role to play in safeguarding. As outlined in Working Together to Safeguard Children 2018, school staff are particularly important as they are in a position to identify concerns early and provide help for students to prevent concerns from escalating. All our Academies work closely with childrens social care, community safety, the police, education welfare, youth offending teams, health services (including CAMHS), and all other relevant agencies to promote and maintain the wellbeing of our students and protect them from harm.

All Academy staff receives appropriate Safeguarding training as part of their induction and refreshers on an annual basis or in line with new legislation/guidance. At New Horizons Hub we provide the following and as such determine it as embedded practice:

- All new staff receives safeguarding training session outlining our processes and expectations, including reading, understanding and verifying they have read and understood their responsibilities in line with Keeping Children Safe in Education September 2018 and this policy.
- Staff will receive statutory Prevent Duty and FGM training on a regular basis and any other training in relation to local needs relating to student welfare and protection,
- Updates and specific training is additionally provided as twilight sessions every 2 years including Self Harm, Child Sexual Exploitation and Gangs Awareness.
- All New Horizon Hub Governors receive Safeguarding and E-Safety training every two years.
- Specific training may be delivered or undertaken in relation to specific roles and duties.
- Executive Headteacher, nominated Safeguarding Governor(s), HR Officer and relevant senior members of staff receive external accredited Safer Recruitment Training every 2 years.
- The Executive Headteacher (Jo Southby), Safeguarding Leads and Pastoral Support Co-ordinators will maintain up-to-date safeguarding knowledge at local and national level and will be appropriately trained every 2 years.

2.0 PROCEDURES

Following their attendance for the full session and completion of Safeguarding Training (Induction & Annual), all staff will receive an individual Safeguarding Folder containing follow up literature providing an overview of the underpinning legislation and a clear outline of internal safeguarding procedures, responsibilities and expectations. This includes a copy of 'Keeping Children Safe in Education September 2018', 'What to do if you are worried a child is being abused, March 2015' and 'Working together to Safeguard Children July 2018'. Additionally they will be provided with knowledge of how we expect them to manage, record a disclosure and challenge, in addition to a 'what to do next' guide.

Each Safeguarding Lead and allocated Pastoral Support Co-ordinators will also hold an Overview Safeguarding File within their school designated area. This contains legislation in its entirety; documentation associated with our Safeguarding Policy and anonymised data which is accessible to all staff as a source of learning or clarity.

In order to ensure consistency and effectiveness of the Safeguarding Policy and procedures, unannounced Safeguarding Audits will be undertaken by the Safeguarding Liaison Officer. The Safeguarding Liaison Officer will work in partnership with the Designated Safeguarding Leads and Pastoral Support Co-ordinators within each area to ensure systems and protocols are being adhered to the standards expected within the Federation, including reviewing individual safeguarding files, chronological log, external referrals including timeframes, the appropriate prompt actioning of Cause for Concerns form submitted and the accurate nature of their completion.

2.1 DEFINITIONS

All Academy staff should be aware of the definitions and signs and symptoms of abuse. However abuse, neglect and safeguarding concerns rarely fall into just one definition therefore it is paramount staff should be mindful that issues can overlap into multiply definitions. There are four determined categories of abuse and the following definitions come from Keeping Children Safe in Education 2018.

ABUSE: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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

SEXUAL ABUSE: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or the production of, sexual images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

NEGLECT: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to: provide adequate food, shelter and clothing (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Staff should be vigilant and aware of the potential for early help for child who are particularly vulnerable or at risk, including but not limited to;

- Is disabled and has specific additional needs
- Has special education needs (may or may not be recognised within an Education Health Care Plan)
- Is a young carer
- Is showing signs of becoming involved in anti social behaviour, criminal activity; including gang involvement or organised crime groups
- Is frequently missing
- Is participating in drug or alcohol usage
- Is at risk of modern slavery, trafficking or exploitation

2.2 SPECIFIC CONSIDERATIONS – PEER ON PEER ALLEGATIONS

Staff must also remain vigilant to various student behaviours and open discussions regarding activities that can also jeopardise the safety and wellbeing of NHF students which can include but not limited to; alcohol misuse, substance misuse, truanting/unauthorised absence, gang association, sexual violence/harassment (including rape, assault by penetration and sexual assault), social media, sexting and sexual activity. To reduce the risk of social media bullying, sexual harassment (including ‘banter’) and sexting taking place, mobile phones are prohibited in school and are handed in at the start of each school day.

Staff must also acknowledge and be aware that not all safeguarding concerns stem from adults but can manifest themselves via child on child. This can include but not limited to; bullying (including cyberbullying), domestic violence, sexting, sexual exploitation, sexual violence/harassment and gang association. Staff are not expected to respond to such behaviours as normal part of growing as a child today and peer based abuse can vary depending on gender.

Should a member of staff discover or have concerns regarding any such student behaviour and activities either in or outside of school, they have a duty to and **must** follow the standard safeguarding reporting procedures as outlined in this policy. Students found to be suffering from peer based abuse have a right to receive the same support as those being abused by an adult and therefore both the victim, their family and the peer abuser will be offered referrals to Early Help agencies, appropriate external support and school based daily support which may include Restorative Approach working in partnership with external support. However, should intervention or a referral be refused by the student(s) and/or parent/carer, NHF Schools reserve the right to initiate appropriate intervention to ensure the protection and safeguarding of all students involved, which remains paramount.

2.3 SPECIFIC AREAS OF SAFEGUARDING

There are also additional specific areas of safeguarding which also require individual guidance and policies which include;

CHILD SEXUAL EXPLOITATION – Children and young people under the age of sixteen cannot, by law, consent to sexual intercourse and anyone engaging in sexual activity with a child under the age of sixteen is committing an offence. Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where the young person (or third person/s) receive ‘something’ (eg food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child’s immediate recognition for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. Violence, coercion and intimidation are common. Involvement in exploitative relationships is characterised by the child’s or young persons limited availability of choice resulting from their social, economic or emotional vulnerability. A common feature of CSE is that the child or young person does not recognise the coercive nature of the relationship and does not see themselves as a victim of exploitation. Although the age of consent is sixteen, it is illegal for those under eighteen to be paid for sexual services in money or in kind. All children involved in sexual exploitation should be treated as victims of abuse, even those aged between 16 and 18. Concern that a child young person or vulnerable adult may be involved in sexual exploitation or at risk of being drawn into it should ALWAYS initiate IMMEDIATE action by a staff member to ensure a child’s safety and welfare.

**Please see Pan-London Sexual Exploitation Operating Protocol June 2017, Bexley Childrens Social Care & Bexley Borough Police Missing from Home, Care & Education Child Sexual Exploitation Joint Operating Procedures & Practice Guidance 2016, DfE Child Sexual Exploitation 2017 and Barnardos ‘Its not on the Radar’ 2016.*

FEMALE GENITAL MUTILATION & HONOUR BASED VIOLENCE - (FGM and HBV) is child abuse and is against the law, causing emotional and physical harm. HBV are incidents or crimes which have been committed to protect or defend the honour of the family and/or community and staff must always consider wider and dynamic risk factors to the victim when considering support and next steps, which are considered within our safeguarding reporting process. HBV also encompasses female genital mutilation. FGM comprises of all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. From October 2015, under the Female Genital Mutilation Act 2003 it is an offence for any person in England, Wales or Northern Ireland to perform FGM, or to assist a girl to carry out FGM on herself. It is also an offence to assist a non UK national or resident to carry out FGM outside the UK on a UK national or permanent UK resident. If a local authority has reason to believe a child is likely to suffer FGM it can apply for a court order to prevent the child being taken abroad for mutilation particularly during the summer holidays. This should be to prevent the child from undergoing FGM rather than removing her from her family. Concern that a child is at risk or has undergone FGM should ALWAYS initiate IMMEDIATE action by a staff member to ensure a child’s safety and welfare.

**Please see Multi Agency Statutory Guidance on FGM April 2016, Crown Prosecution Service Honour-Based Violence and Forced Marriage 2018 and Controlling or Coercive Behaviour in an Intimate or Family Relationship Guidance 2017 (CPS.gov.uk)*

CHILDREN MISSING EDUCATION – New Horizons Hub Academies have a safeguarding duty under Section 175 of the Education Act 2002 to investigate unexplained student absence. We robustly monitor absence through daily registers, home communication and daily home visits. We have a duty to liaise with relevant Local Authority Education Welfare Services and CME Teams if a student is regularly absent from school or have missed 10 school days or more without

permission or we are informed a student is not returning. This process may be initiated when we deem it is in the best interest of the child to do so and does not require consent. We notify Local Authority CME Team and all relevant agencies of all children who leaves the area but will undertake our own validation if forwarding address, new county or name of proposed new school is provided. We refer all students single registered with one of our Academies to the Local Authority Elective Home Education Officer when parents or carers with parental responsibility officially confirm in writing their decision to home educate. Where a student is dual rolled, allocated staff will liaise with the home school to ensure appropriate procedures are followed to prevent any child becoming missing from education and protect them from potential harm. We will also validate any students move to a new school via to a casual admission within 7 days and additionally report to the appropriate CME Team if there is no evidence this transfer has taken place. We record and track all students who meet the criteria of CME/EHE when a student is removed from roll which is also verified through the NHF Safeguarding Audits and is held on the CME Log.

****Please see the NHF Attendance Policy, DfE Children Missing Education 2016, Bexley Childrens Social Care & Bexley Borough Police Missing from Home, Care & Education Child Sexual Exploitation Joint Operating Procedures & Practice Guidance 2016.***

SELF-HARM – Self Harm is a serious public health problem which can result in significant harm to children and young people’s physical and emotional wellbeing. The Bexley Safeguarding Childrens Board affirms that self-harm and suicidal threats by a child/young person put them at risk of significant harm and should always be taken seriously and responded to without delay in liaison with parents/carers. Self-harming is NOT attention seeking behaviour, it is attention NEEDING behaviour. Self-harm is a way of coping with difficult overwhelming situation or emotional states. Concern that a child has, is at risk of or is self-harming should ALWAYS initiate IMMEDIATE action by a staff member to ensure a child’s safety and welfare via the Cause for Concern Form, liaison with allocated Safeguarding Leads and parents/carers. Early Help and other external agency referrals including CAMHS and social care may be initiated when school deem appropriate.

****Please see BLSCB Self-Harm Practice Guidance for all Agencies Working with Children and Young People August 2015 (currently in review)***

PREVENT DUTY – In a response to the Counter Terrorism and Security Act 2015 and Section 74 of the Serious Crime Act 2015, the Department for Education 2015 set out guidance for schools in relation to safeguarding children and young people against radicalisation and extremism. There are four themes contained in the Prevent Duty Guidance; Risk Assessment, Partnership Working, Staff Training and IT Policies. All staff receives mandatory WRAP Training and must adhere to the reporting methods outlined in the Prevent Duty Policy which works in tandem with the Attendance and Safeguarding Policies. Staff are also expected to promote British Values within the curriculum alongside developing students development of Social, Moral, Spiritual and Cultural understanding. If a member of staff has any concerns they must share them immediately.

****Please see Prevent Duty Policy and E-safety Policy for further information***

COUNTY LINES – Is primary the criminal activity exploiting children to carry drugs and money from urban areas to suburban, rural, market or seaside towns. County Lines is associated and can be identified through episodes of Missing, trafficking and non-attendance of school. All staff receives training to increase understanding and knowledge of indicators and affects through annual Gangs Awareness Training. Risk and identification are managed through the attendance procedures which work in tandem with this policy.

****Please see Home Office 2017 Criminal Exploitation of children and vulnerable adults: County Lines guidance for further information***

3.0 RESPONDING TO CONCERNS

Concerns for a student may come to the attention of staff in a variety of ways, for example through observation of behaviour, activities, prolonged absence, changes in appearance or beliefs, injuries or an actual disclosure. Any member of staff who has a concern for a student however insignificant they may feel it appears, **must verbally inform/ discuss their concern with a Safeguarding Lead, Pastoral Support Co-ordinator or Safeguarding Liaison Officer as soon as physically possible that day and record their concern on the yellow 'Cause for Concern' form by the end of the day. If a student is perceived in immediate danger or is potentially a victim of a crime, the concern must be verbally reported immediately with the Safeguarding Liaison Officer and/or the Inclusion Manager** to ensure that any intervention necessary to protect the student is accessed as early as possible and the risk of harm reduced. This will take the form of an immediate discussion and referral to Social Care and/or police notification. No staff member has the authority to decide if a disclosure is accurate or false as we are not investigators, however we have a duty to share disclosures to the correct agencies who can formally determine next steps.

**All our Academies schools reserve the right not to discuss with parents/carers such referrals should they deem that by doing so may further jeopardise the welfare of the child.*

Staff are also expected to pay additional awareness to the needs of Looked After Children, as many may have become so due to abuse, neglect or both. Looked After Children can have access to trusted appropriate staff who are able to understand and provide a forum in which the student can express their concerns. Safeguarding Leads and Pastoral Support Co-ordinators will work in regular liaison with carers, parents (when appropriate), social care and Virtual School to plan and remove potential barriers in a robust and timely manner to ensure the student sustains emotional and physical wellbeing. Our Academies are also expected to attend all statutory Looked After Child meetings they are invited to where viable, including Personal Education Plan Reviews (PEPs) and Looked After Child Reviews (LAC) when invited, and all other related meetings in order to ensure LAC students are able to meet their academic potential. When attendance is not possible current, accurate, full reports must be provided. School will liaise with social care to ensure information regarding LAC legal status is current and regularly update the safeguarding filing to reflect this information. Information relating to legal status will be shared with staff on a need to know basis, deemed so by Safeguarding Liaison Officer and/or Inclusion Manager.

Students within our Academies may also hold certain vulnerabilities, disabilities and/or special educational needs (SEN), which may or may not be reflected in a statutory Education Health Care Plan (EHC). Staff should be trained and/or experienced to understand and recognise behaviours within the SEN spectrum and should not assume such behaviours, including compromised communication skills or changes in mood are directly related to possible abuse. However staff should equally not assume that lack of discussion or any outward signs by an SEN student, does not mean the absence of safeguarding concerns. It remains the responsibility of every member of staff to share their concerns with the Safeguarding Leads or Pastoral Support Co-ordinators to allow further exploration to take place and any appropriate actions to be taken.

4.0 DISCLOSURES/CONCERNS

If a student makes a disclosure to a member of staff, or a member of staff has a concern regarding the welfare or protection of a student, staff must:

- Allow the student to make the disclosure or discuss their situation at their own pace and their own way with an appropriate member of staff.

- If a 3rd person disclosure is made, a discussion and plan must be formulated prior to conversations taking place in relation to the most appropriate member of staff to discuss this with the student.
- Any discussions with students, if not undertaken by a Safeguarding Lead then must be under the guidance of a Safeguarding Lead, Head of School, Safeguarding Liaison Officer or Inclusion Manager.
- Never promise confidentiality or make any promises that cannot be kept.
- Avoid interrupting, except to clarify what the student is saying (attentive listening/reflective feedback).
- Never ask leading questions or probe for information that the student does not volunteer; use open questions. This may compromise/jeopardise any future legal proceedings.
- Reassure the student that they have been heard and always explain what you will do next and to whom you will talk. Never tell a student everything will be ok.
- Pass on the disclosure or concern immediately, verbally, to a Safeguarding Lead, Pastoral Support Co-ordinator or if they are not on-site the Head of School, Safeguarding Liaison Officer or Inclusion Manager or if no one else available the Executive Headteacher.
- Record the conversation or the concern by the end of the same day on the standardised Yellow 'Cause of Concern' form, including a copy of all relevant evidence which may include a student's own written statement. Include body map if appropriate and pass to relevant Safeguarding member of staff the same day as the disclosure has been made. This must be completed on the same day. Separate Yellow Forms should be completed by each member of staff present to ensure clarity.
- It is every member of staff's right to complete a Yellow Cause for Concern form if they have a concern.
- Never make a judgement regarding whether a disclosure is accurate or false as this could prevent the process being followed.
- Never keep a copy for your own records to avoid breach of confidentiality and it is the responsibility of the Safeguarding Lead and Pastoral Support Co-ordinators to keep all safeguarding filing up to date.
- If the member of staff raising a concern has not received feedback within 24hrs, it is their responsibility to request feedback. Information feedback will be on a need to know basis but if the member of staff is not happy with the feedback received it is their responsibility to raise their concern with the Safeguarding Liaison Officer. If they are still not satisfied then they refer to the Inclusion Manager and then the Executive Headteacher.
- Safeguarding Leads will adopt a risk based approach to the level of information that is feedback or provided to agency staff or volunteers.
- The Safeguarding process can only be altered by either the Inclusion Manager or in her absence, the Safeguarding Liaison Officer. This will be introduced and underpinned by formal training and related policies.

All staff must be aware that it is a disciplinary offence not to share, discuss or action a disclosure or concern for a student on the day of disclosure, which could potentially place a child at risk of harm or detrimentally affect their wellbeing or criminal proceedings.

When in doubt – ALWAYS consult!

5.0 RECORDS

Any disclosure or observation of a student that gives cause for concern should be recorded on the generic yellow 'Cause of Concern' form.

- Records **must** be factual and reflect words used by the student if a disclosure is made to ensure the voice, perception and views are recorded accurately.
- If staff have a concern outside of a disclosure, the Cause for Concern form should contain any evidence to support the reason for their concern.
- Opinion should not be given unless there is some form of evidence base which can also be quoted, this includes but not limited to making decisions based on what is fact or false.
- Records must be signed and dated including timings as appropriate.
- Issues are confidential and staff will only receive feedback and information on a “need to know” basis.
- Staff should not discuss disclosures openly around the school site.
- For students who are on a respite placement, the Safeguarding Lead/Pastoral Support Co-ordinator (Safeguarding Liaison Officer or Inclusion Manager in their absence) will liaise directly with the home school in order to achieve continuity of safeguarding approach for the students return.
- We will always endeavour to pass Student Safeguarding Files in person to a new or home school, with a Receipt completed. Should the passing of the files be too far then it will be sent recorded delivery or scanned via email securely either via Egress or secure email from both sender and receiver in line with GDPR and Data Protection 2018.

Safeguarding records and information will be shared with both statutory and voluntary agencies if Safeguarding staff deems it in the interest of promoting the welfare and protection of the child (Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018).

The following information must be recorded on the Yellow Cause for Concern Form.

- Student’s name, date of birth, year group and home school (when appropriate).
- Student in normal context, e.g. behaviour, attitude - to establish the change.
- The incident(s) which give rise for concern with date(s) and time(s).
- A **verbatim** record of what the student has said if a disclosure has been made or a discussion had.
- If recording bruising/injuries indicate position, colour, size, shape and time on body map.
- ALWAYS take action the same day as the disclosure.

The Cause for Concern Form will initiate conversations and further exploration with all or some of the following; student(s), parent/carer, peers, staff, external agencies, education welfare service and police. It may also include review of CCTV footage when it is in the child’s interest or the interest of safety.

The written details, initial conversations and exploration process are vital to the information gathering process to ascertain the actual facts and determine what action needs to be taken by the Academy, but this does not constitute a formal investigation. As Academies, we would not advocate investigation by neither individual staff members nor as a whole but would refer to appropriate agencies to allow this to take place by trained, experience professionals.

6.0 STORAGE OF RECORDS

It is the responsibility of the Safeguarding Lead and Pastoral Support Co-ordinator to ensure records relating to concerns for the safeguarding or the welfare of students are kept separate from other school files and are stored securely with limited staff access. Each Safeguarding Lead and Pastoral Support Co-ordinator will use a standardised generic Safeguarding Rolling Log for

each individual student safeguarding file, with evidentiary paperwork relating to each entry on the Log included in this file in chronological order. All information will be shared on a strictly need to know basis and in line with Safeguarding Policy and GDPR guidance. Individual staff must not keep personal copies of Yellow Cause for Concern forms. Regular Safeguarding Audits will be undertaken by the Safeguarding Liaison Officer to ensure professional expectations are being upheld to ensure student safety and their right to confidentiality. Should a student move to another school, the original safeguarding file will transfer in person where possible, with a receipt being gained. All student safeguarding files will be securely archived for 10 years from date of completion of statutory education within each Academies archive, where their education was completed. Any files or information being destroyed must be done so via shredding with a log of all documents shredded being maintained. Any concerns relating to the storage of safeguarding files must be referred to the Inclusion Manager or the Network & MIS Manager or the Executive Head in their absence or as a point of escalation.

7.0 REFERRALS

All staff have the right to make a referral to social care if they feel a child is at risk or is suffering harm however it is the responsibility of the Safeguarding Lead and/or Pastoral Support Co-ordinator to make referrals to external agencies on a daily basis in liaison with the Safeguarding Liaison Officer and Inclusion Manager. To help ensure the correct decision is made and the correct agency referred to, designated staff can consult with:

- Local Authority Designated Officer contact (LADO – James McMillan);
- Children's Multi Agency Safeguarding Hub (MASH) and the Social Care 'Front Door' who offer opportunities for consultation as part of the Child in Need/Child Protection process;
- Relevant Education Welfare Service (Bexley - Sharon Hearne and Jennifer Tatlock EWO, Penny Grey Team Manager)

Issues discussed during external consultations must include the urgency and gravity of the concerns and the extent to which parents/carers are made aware of these. Some concerns may need to be monitored in school over a period of time before a decision to refer is made, but this is based upon level of risk to student and information gathered.

Referrals to Social Care will be made using Bexley Referral Form and with reference to the Bexley Threshold Criteria for Children in Need/Child Protection and Signs of Safety. Sometimes a telephone referral will be made prior to the form being completed. Such referrals might include and initiate access to Early Help (Family Wellbeing), Social Care as either Child Protection or Child in Need, to Police where there are potential criminal matters or referral to services such as Child and Adolescent Mental Health Service (CAMHS), counselling, MARAC, etc.,.

In all but the most exceptional cases where a child may be put at further risk or danger, parents/carers will be made aware of the concerns felt for a student at the earliest possible stage and in the event of this becoming necessary and their consent to a referral to Social Care and/or other external agencies will be sought.

However should designated staff believe that by informing parents/carers of a concern it may place the child at further risk of harm or compromise further formal processes, we reserve the right to inform parents/carers only when deemed safe to do so. This may also mean initiating social care and/or police involvement without parental/student consent.

If a student is referred, the Safeguarding Lead and Pastoral Support Co-ordinator will ensure that relevant staff receives feedback on a need to know basis. If a member of staff feels that

appropriate action is not being taken, he/she should discuss this with the Safeguarding Liaison Officer or the Inclusion Manager in the first instance and if they still remain unsatisfied, with the Executive Headteacher.

The role of the school in situations where there are safeguarding concerns is NOT to investigate but to recognise, record and refer to the appropriate agencies.

Safeguarding Supervision Meetings will be held termly. All designated Safeguarding Lead and Pastoral Support Co-ordinators are invited to provide an overview of all students with safeguarding concerns and child protection status. The purpose of the meeting is to monitor and review cases to ensure support and intervention is being delivered in relation to concerns and status. The meeting employs a standardised framework which will determine if designated staff agree escalation or challenge is required alongside highlighting and promoting good practice. It also provides a forum for designated safeguarding staff to request guidance, intervention or in some cases, now lead in individual student safeguarding concerns from the Safeguarding Liaison Officer (via referral system) in addition to identify training needs.

Allocated Safeguarding Governor Corrine Botton may further be invited to attend, with the meeting Chaired by Inclusion Manager and Deputised by Safeguarding Liaison Officer who will also Chair in her absence. External agency representatives may attend through invite only, including but not limited to Family Wellbeing, Youth Offending Service Education Officer or Schools Police.

8.0 CHILD PROTECTION PLAN

The Safeguarding Lead and Pastoral Support Co-ordinator hold and maintain the CP register and will inform staff who have direct pastoral responsibility for students, of those students who are held on the Register or involved with external agencies relating to wellbeing on a need to know basis. These students must be monitored carefully and any concerns passed to relevant Safeguarding Leads and/or Pastoral Support Co-ordinators with their progress and attendance being discussed and reviewed at the weekly Attendance Meetings and monitored at Safeguarding Supervision Meetings held termly.

9.0 OUTREACH WORK & TEAM

All members of the Outreach Team who are working with students in their home school setting are still required to adhere to the Safeguarding Policy. There is the clear expectation that all members of staff who work on an outreach basis works in partnership with the home school to ensure safeguarding concerns/disclosures are addressed promptly. However staff delivering outreach work have a statutory duty to ensure concerns/disclosures are responded to in a prompt, appropriate manner despite the student attending a school outside of the organisation. The Policy and procedure structure allows and supports this statutory duty. All staff delivering outreach should adhere to the follow safeguarding process whilst working in non-New Horizons Hub schools.

Steps	Actions to be Taken
1	All staff undertaking outreach must carry a Yellow Cause for Concern forms with them
2	All staff undertaking outreach should carry envelopes with them.
3	All staff undertaking outreach should carry a list of all the non-New Horizons Hub schools Designated Safeguarding Leads with them.
4	If a student makes a disclosure, or if staff delivering outreach has a concern, disclosure or witnesses unexplained/bruises or marks they must immediately record this on the Cause

	for Concern form.
5	In the action box at the bottom of the Yellow Cause for Concern form the staff member delivering outreach would write the time and to whom they passed the form to in the non-New Horizons Hub school. This would either be the School Reception (in a sealed envelope with the name of the SG Lead clearly marked on it) or directly to the SG Lead, again in a sealed envelope.
6	All staff undertaking outreach should ask the non-New Horizons Hub school office, to take a photocopy of the completed Yellow Cause for Concern Form and the member of staff delivering outreach will retain this copy for records.
7	Upon the member of staffs return to base, the photocopy should then be handed to the relevant member of staff in their area on the same day. This would be the Co-ordinator either Outreach or Reintegration or in their absence Head of Outreach. In the event that no member of Outreach staff is available Safeguarding Liaison Officer or Inclusion Manager should be notified.
8	The non-New Horizons Hub school should confirm receipt of the Yellow Cause for Concern form the same day.
9	If confirmation is not received then the relevant Co-ordinator/Manager/Head must call the non-New Horizons Hub school to confirm both receipt and action taken within 24hrs.
10	All related communication and verbal feedback must be logged/printed out and stapled to the original Yellow Cause for Concern form.
11	Relevant information as to the actions taken/outcome should be fed back to the OR worker in preparation for the next session.
12	Photocopies of all SG Yellow Cause for Concern and related documents should be filed in a separate secure filing cabinet, in individual student records in the relevant area delivering the outreach.
13	These files are not for public access and storage must adhere to GDPR 2018.
14	If OR staff/team remain unsatisfied with the outcome or actions taken in relation to the submitted Cause for Concern form, then they must escalate to Safeguarding Liaison Officer who will liaise directly with the non-New Horizons Hub school to discuss next steps.
15	If the non-New Horizons Hub school refuses to take action then the duty to do so will remain with the Safeguarding Liaison Officer which may include statutory referrals.

10.0 CONCERNS INVOLVING MEMBERS OF STAFF, VOLUNTEERS, EXTERNAL AGENTS AND VISITORS

Any concerns that involve allegations against a member of staff, volunteers, external agent and visitors (including parents/carers) are dealt with under the Allegations Against Staff Policy 2018.

Should a member of staff or volunteer feel unable to discuss their concern with the designated members of staff or feel that their concerns have not been appropriately addressed then formal complaint or whistleblowing route may be an option. Further information can be found in the Complaints Policy 2018 and Whistleblowing Policy 2018.

The NSPCC Whistleblowing Helpline is also available to staff who find themselves in this situation. Telephone 0800 028 0285.

All staff must be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a student at risk.

When in doubt – ALWAYS consult.

11.0 CODE OF PRACTICE FOR STAFF AND VOLUNTEERS

- All school staff and volunteers should take care not to place themselves in a vulnerable position regarding safeguarding or potential allegations.
- Staff, volunteers or external agents must never lock themselves in a room with a student. The only circumstance this would be acceptable is to protect the student/staff from imminent harm or to prevent the student from imminently harming others.
- It is always advisable for interviews or work with individual students or parents to be conducted in view of other adults and with management knowledge.
- Physical intervention should only be used when the student is endangering him/herself or others and in accordance with Team Teach procedures and Positive Handling Policy. Such events should be recorded appropriately in the Bound Book, signed and parents/carers made aware. Any such interventions must be in line with agreed policy.
- Play fighting and physical affection is not acceptable.
- Individual staff should not purchase and give gifts to individual students. All gifts to students should be recorded by relevant Managers within each area in their Gift Log.
- Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in Keeping Children Safe in Education 2018 and Working Together to Safeguard Children 2018 and the Staff Handbook (Code of Conduct) and information provided during inset and safeguarding training and person/organisation risk training September 2018.
- Staff must not let students use their electronic devices, even to assist with classwork.
- Staff should not advertise on social media where they work and the position they hold.
- Staff should not be 'virtual' friends with current or prior students.
- All school staff should work towards providing an environment and atmosphere for students to enable them to feel safe to talk and feel listened to.
- Staff must not administer any kind of prescribed medication to students. Students who we deem 'Gillick Competent' can self-administer over the counter medication only if they have their own supply kept securely in the School Office.
- Staff should value the voice of the student and not make judgments.
- Staff should not impose political or religious views on to students.
- Staff should NEVER promise a student to keep information confidential. Staff must always explain to students they have a responsibility to keep a student safe emotionally and physically which may involve informing other staff.

12.0 STAFF SUPERVISION AND SUPPORT

- Any member of staff affected by issues from concerns for student's welfare or safety can seek support from the Safeguarding Liaison Officer or the Inclusion Manager.
- All staff, including NQTs and trainee teachers has a Line Manager with whom they can discuss concerns, including the area of safeguarding.
- The Inclusion Manager or Safeguarding Liaison Officer can additionally signpost staff to outside agencies for professional support if they so wish.
- Staff can request a referral to Occupational Health.
- Staff who may be subject to investigation in relation to breach of Policy, should be informed in a supportive professional manner with a clear outline of why they are being investigated and the process it entails including any referral pertaining to the investigation.

Staff should also be advised of additional support including Bromley Trust HR, Bexley LADO, Occupational Health and their Line Manager.

- Staff can also approach Support Line directly – www.supportline.org.uk

13.0 INDUCTION AND TRAINING

- The Safeguarding Leads, Pastoral Support Co-ordinators, Safeguarding Liaison Officer and Inclusion Manager undergo regular Safeguarding Training via the Local Authority or recognised training providers to ensure a standardised approach.
- The Safeguarding Liaison Officer is responsible for ensuring all staff have access to and receive training in the area of safeguarding in line with government expectations and local safeguarding concerns including mandatory WRAP (Prevent Duty), CSE, FGM, E-Safety, Gang Awareness and Self-Harm to whole Federation.
- All school-based staff will be expected to undertake internal training offered at an appropriate level (to include internal school procedures and responsibilities; safeguarding expectations and processes; how to recognise and respond to signs and symptoms of concern and abuse; safe working practice) and they must undergo refresher training every year, or when determined it is required. Twilight training sessions will also take place in response to local needs and national expectations e.g. Prevent (WRAP Training). Induction Basic Safeguarding Awareness is organised by the Safeguarding Liaison Officer who is a qualified Train the Trainer.
- The Inclusion Manager will ensure the Safeguarding Lead attends the required safeguarding training via the Local Authority or recognised training provider when they first take up the role and that they continue to update their knowledge on an on-going basis and as required by guidance.
- The Safeguarding Liaison Officer will ensure that all new staff and volunteers completing the Basic Safeguarding Awareness Training which is run every term.
- All staff will complete Section 1 of Keeping Children Safe in Education September 2018 and verification entered on to the Single Central Record held by Business Manager.
- The Inclusion Manager, in partnership with the Safeguarding Liaison Officer and Safeguarding Leads will provide an annual Report to the Governing Body which will detail safeguarding training undertaken by all staff.
- The Safeguarding Liaison Officer will maintain up-to-date extended safeguarding CPD register to accompany the SCR.

14.0 SAFER RECRUITMENT

We are committed to ensuring all steps are taken to recruit staff and volunteers who are safe to work with our students and have their welfare and protection as the highest priority. The Governing Body and School Leadership Team are responsible for ensuring that the school follows safe recruitment processes including, Disqualification Declaration Guidance, accurate maintenance of the Single Central Record; and an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role. The Single Central Record is subject to regular audit.

All Governors have an enhance DBS check and it is the responsibility of the Governing Body to ensure this is in place.

Any potential candidate who is found to be in receipt of a Prohibition Order will not and cannot be employed by us. Should a member of staff be found to subject to a Prohibition Order during

their employment, then New Horizons Federation reserve the right to terminate the contract in liaison with Bromley Trust HR and DBS guidance and expectations. Any necessary referrals will automatically be made including but not limited to; directly to DBS.

At least one member of staff who lead or participate in the interview process have completed accredited Safer Recruitment training including a member of the Governing Body.

15.0 THE USE OF SCHOOL PREMISES BY OTHER ORGANISATIONS

Where services or activities are provided separately by another body using the school premises, the Executive Headteacher and Board of Governors will seek assurance that the organisation concerned has appropriate DBS, policies and procedures in place with regard to safeguarding children and that relevant safeguarding checks have been made in respect of staff and volunteers. If assurance is not achieved, an application to use premises may be refused.

16.0 SECURITY

All staff has a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-school community ethos and welcome comments from students, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors, volunteers and external agents coming into school. Any external agent or volunteer wishing to undertake work with an student on a one to one basis will be required to provide ID and confirm they have a valid DBS certificate. Although we have no authority to demand copies of valid DBS certificates (KCSIE 2018), we may make a request if an external agencies is undertaking prolonged work in one of our Academies as this will recorded with our SCR. This may be photocopied, returned and will remain on file within the students safeguarding/school file. **One to one work may not be authorised to take place in school until this has been received.** All staff and visitors are required to sign in and out via the office visitors' log and to display a visitor's badge whilst on school site. Staff also wear identity badges. Any individual who is not known or identifiable should expect to be challenged for clarification and reassurance.

Students within our Academies are expected to hand their school bags in at the start of every morning and collect at the end of every day. Should school staff have suspicions, information or evidence that warrant further investigation into the contents of a student bag, we reserve the right to undertake a bag search which may be undertaken without consent of the student or parent/carer if it is in the interest of safety to the student body and school site. Outcomes of a student's bag search will depend upon contents and may and can result in police, social care or parental involvement in line with the Behaviour Policy 2018.

We take the safety of our students and staff extremely seriously and all our Academies will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site on a temporary or permanent basis. If the threat is deem significant enough or there is a refusal to leave school site, the police will be called.

17.0 PREVENTION STRATEGIES & EARLY HELP

When early help is required, a Designated Safeguarding Lead will liaise directly with families and encourage partnership working in order to reduce risk and prevent safeguarding escalation. In order to achieve this aim we may be required to refer to external agencies and professionals in order to access the required intervention. However, safeguarding issues can equally be addressed in a preventative manner in a number of areas of school life;

- The curriculum, notably PSHE, tutor time and developing students Social, Moral, Spiritual and Cultural awareness as well as how to keep them safe.
- The curriculum will be used to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others. Systems have been established to support the empowerment of children to talk to a range of staff when they are in difficulty and to raise comments, complaints and feedback about their school experience.
- It is recognised that the use of new technologies presents particular challenges and risks to children both inside and outside of school relating to E-Safety. Each Academy ensures a comprehensive curriculum response to enable all students to learn about and manage the associated risks effectively and will support parents/carers and the school community (including all members of staff) to become aware and alert to the needs of keeping children safe online.
- Regular assessment, review and monitoring of safeguarding concerns through the Safeguarding Supervision Meetings.
- Pastoral Support Co-ordinators.
- Behaviour Learning Mentors.
- Progress Coaches.
- School Policies and guidance on related Safeguarding issues.
- Partnership working with Early Help Teams (e.g. Family Wellbeing, Community Safety Team) to provide families with the tools to respond to their child's needs.
- Partnership working with the Integrated Youth Service and Community Safety Team for positive targeted early intervention.

All these factors contribute to achieving the ethos in Section 1 of this policy.

18.0 ROLES AND RESPONSIBILITIES

All staff provides a safeguarding system for our students and we are all responsible to ensure and promote the wellbeing of all our students. It is every member of staff's role to work in the best interest of the child and their responsibility to act upon any concern they may have.

However on a daily basis the Safeguarding Leads and Pastoral Support Co-ordinators, have overall responsibility for the day-to-day oversight of safeguarding and all related systems in each school, working in liaison with the Safeguarding Liaison Officer, Inclusion Manager and the Heads of School. This includes but is not limited to:

- Co-ordinating safeguarding actions within each school with a measured approach in partnership with Safeguarding Liaison Officer and/or Inclusion Manager.
- Prioritising the voice and needs of the child.
- Liaising with other agencies and professionals.

- Ensuring locally established procedures are followed, including reporting and referral processes.
- Acting as a consultant for staff to discuss safeguarding concerns.
- Role model the Safeguarding policies, procedures and culture.
- Not to judge or make determinations regarding accuracy of disclosure.
- Initiating referrals as necessary.
- Maintaining a confidential robust recording system.
- Representing or ensuring the school is appropriately represented at inter-agency safeguarding meetings, in particular Child Protection Conferences. Normally the relevant Safeguarding Lead will attend; only appropriately experienced agreed members of staff should attend in the Safeguarding Lead absence.
- Alternative attendees must be agreed by the Inclusion Manager or Safeguarding Liaison Officer in her absence.
- Managing and monitoring our part within Child in Need/Child Protection plans encouraging consistency in approach.
- Attending termly Safeguarding Supervision and weekly attendance meetings.

19.0 MONITOR AND REVIEW

The Safeguarding Policy will be reviewed annually and updated will take place outside of the annual review process to reflect New Horizons Hub, local and government changes in legislation, policy and procedure. Appropriately experienced staff are encouraged to voice their views in relation to reviews of policy and how it can be improved as a working document.

Termly unannounced Safeguarding Audits are undertaken by the Safeguarding Liaison Officer, which includes student, parent and staff feedback on knowledge, process and levels of feeling safe. Feedback will be provided directly to each individual Head of School.

Every two years Section 175 Audit Tool will be completed in partnership with Bexley Safeguarding Childrens Board, with an annual interim review also taking place. This is supported by the Ofsted Inspection recommended audit of Spiritual, Moral, Social and Cultural Development being undertaken annually and review every term by individual schools.

Students and parent/carers feedback regarding views of safeguarding are collated twice a year and are included in the annual report. This report aims to provide a clear and accurate safeguarding view to the Governing Board, Heads of School and Executive Headteacher and creates a platform for improvement and lessons learnt.

20.0 RELATED DOCUMENTS

- Attendance Policy
- Prevent Duty Policy
- Staff Handbook (Code of Conduct)
- Risk Policy
- FGM Guidance
- CSE Guidance
- Self-Harm Guidance
- Managing Allegations Against Staff Policy
- Behaviour Policy
- Positive Handling Policy

- Whistleblowing Policy
- E-Safety Policy

DOCUMENT REVISION

Date	Who	Description
Sep 2015	JB	Initial version
Dec 2015	JB	Minor alterations
Sep 2016	JB	Reviewed
Nov 2016	JB	Section numbers added
Nov 2016	JH	Document re-formatting – no alterations
Sep 2017	JB	Reviewed
Dec 2017	JH	Re-formatted