

# Safeguarding Policy

## Appendix C

The following are the current Safeguarding Team members:

### Seevic Campus

Andy Shepherd Designated, Safeguarding Lead, Head of Student Services

Michelle Lagden, Safeguarding, Wellbeing and Mental Health Coordinator

Jonathan Briggs, Assistant Principal Vocational

### Palmer's Campus

Nickie Hillebrandt, Student Services Manager

Mandy Monksfield, Wellbeing Adviser

Emma Roles, Positive Behaviour Officer

### Governor with Safeguarding responsibilities

Ian Hockey

Policy Details	
Policy Owner	Head of Student Services
Date produced	September 2020
Approved by	SMT, Policies & Procedures Committee, Corporation Board, Quality Committee
Date approved	December 2020
To be reviewed	Annually
Publication	4Policies, Website
Version	1

## 1. Statement of Intent

- 1.1 This policy applies to all staff, Governors, apprentices and volunteers working for USP College and everyone else working for or on behalf of the college including contractors. This policy must be followed and promoted by all staff.
- 1.2 The college recognises that the welfare of young people and vulnerable adults is paramount. The Children Act 2004 states, any individual under the age of 18 years, without exception, has the right to protection from abuse regardless of gender, ethnicity, disability, age, sexuality or beliefs. This right to protection extends to the siblings of students that are under 18. It also extends to vulnerable adults defined as a person aged 18 years or over “Who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation” and includes 16-24 year olds with an Education, Health & Care Plan (EHCP).
- 1.3 For those that are over 18 but not considered to be vulnerable the college still has a duty of care and will provide support, guidance and advice to those individuals.
- 1.4 Keeping Children Safe in Education 2020 provides key information on safeguarding young people and promoting the welfare of all young people in education.

The September 2020 update includes further guidance on Children’s mental health and mental health support. There is also adjustment wording around extra-familial abuse which emphasises that children may be vulnerable to multiple harms including (but not limited to) Sexual exploitation, criminal exploitation, and serious youth violence. Further information has been included in regards to Child Criminal Exploitation (CCE) and Child sexual Exploitation (CSE).

All current staff have received Part One of this publication as a summary document and have undergone safeguarding training. All new members of staff receive the same training as part of their induction. A Safeguarding booklet is available to all staff to guide on key safeguarding matters.

- 1.5 The college is committed to promoting and safeguarding the welfare of young people and staff and ensures it is a priority across all aspects of college. The college is committed to providing the best and safest learning environment possible to ensure learners can succeed and both young people and staff feel secure.

The college will:

- a. Endeavour to identify young people who are experiencing significant harm and provide support and take appropriate action where necessary.
- b. Provide procedures for reporting such concerns and work in partnership with the appropriate agencies.
- c. Acknowledge that the term ‘safeguarding’ embraces both child protection and a preventative approach to keeping young people safe. This encompasses abuse, health and safety, bullying, honour based abuse, meeting the needs of those with a disabling condition and/or medical condition, providing first aid and security. Appendix B provides descriptions of some of the main types of abuse
- d. Seek to create a safe environment for young people to learn and staff to work.
- e. Provide emotional safety in classrooms, e.g. obtain parental permission for 18 certificate films to be viewed where appropriate.

- f. Ensure visiting speakers are vetted prior to attendance and chaperoned at all times.
- g. Ensure safeguarding measures are taken for all trips and visits.
- h. Take measures to prevent unsuitable people from working with young people.
- i. Allow for reporting and dealing with allegations of abuse against members of staff.

## 2. Relevant Legislation

Keeping Children Safe in Education 2020  
 Working Together to Safeguard Children 2019  
 Safeguarding Vulnerable Groups Act 2006  
 The Children's Act 2004  
 Prevent Duty 2015

## 3. Linked Policies

Prevent  
 Mental Health, Wellbeing and Fitness to Study  
 Student Positive Behaviour

## 4. Implementation, Responsibilities and Timings

4.1 The college will take action to:

- a. Appoint and train a Designated Safeguarding Lead and deputies who will co-ordinate reporting procedures.

Designated Safeguarding Lead: Head of Student Services

### Sevic Campus

Deputy Designated Safeguarding Person: Safeguarding & Wellbeing Coordinator  
 Deputy: Wellbeing Adviser to deputise in their absence.

### Palmer's Campus

Deputy Designated Safeguarding Person: Student Services Manager  
 Deputy: College Wellbeing Advisor.

- b. The college has a designated Governor with Safeguarding responsibilities

4.2 All staff within the Student Services team hold responsibilities linked to the welfare of students. The team will contribute to the maintenance and development of the college's Safeguarding Policy. They can also offer advice to staff and students where appropriate.

4.3 The college will:

- a. Make available to all staff and students, the names of the Safeguarding Team, role and procedures.
- b. Train all staff in recognising signs of abuse and responding appropriately including referral procedures. This will be updated every year. All new staff to receive this in induction and undertake refreshers where appropriate.

- c. Train staff in safe practices to safeguard young people in the learning environment and also to protect themselves from false allegations of abuse.
- d. Keep accurate records of concerns about individuals, even when there is no immediate referral to outside agencies.
- e. Provide support and monitoring for young people thought to be at risk of harm and contribute to support plans with other agencies.
- f. Provide support through student services and tutorials to help young people keep safe.

4.4 Human Resources will ensure:

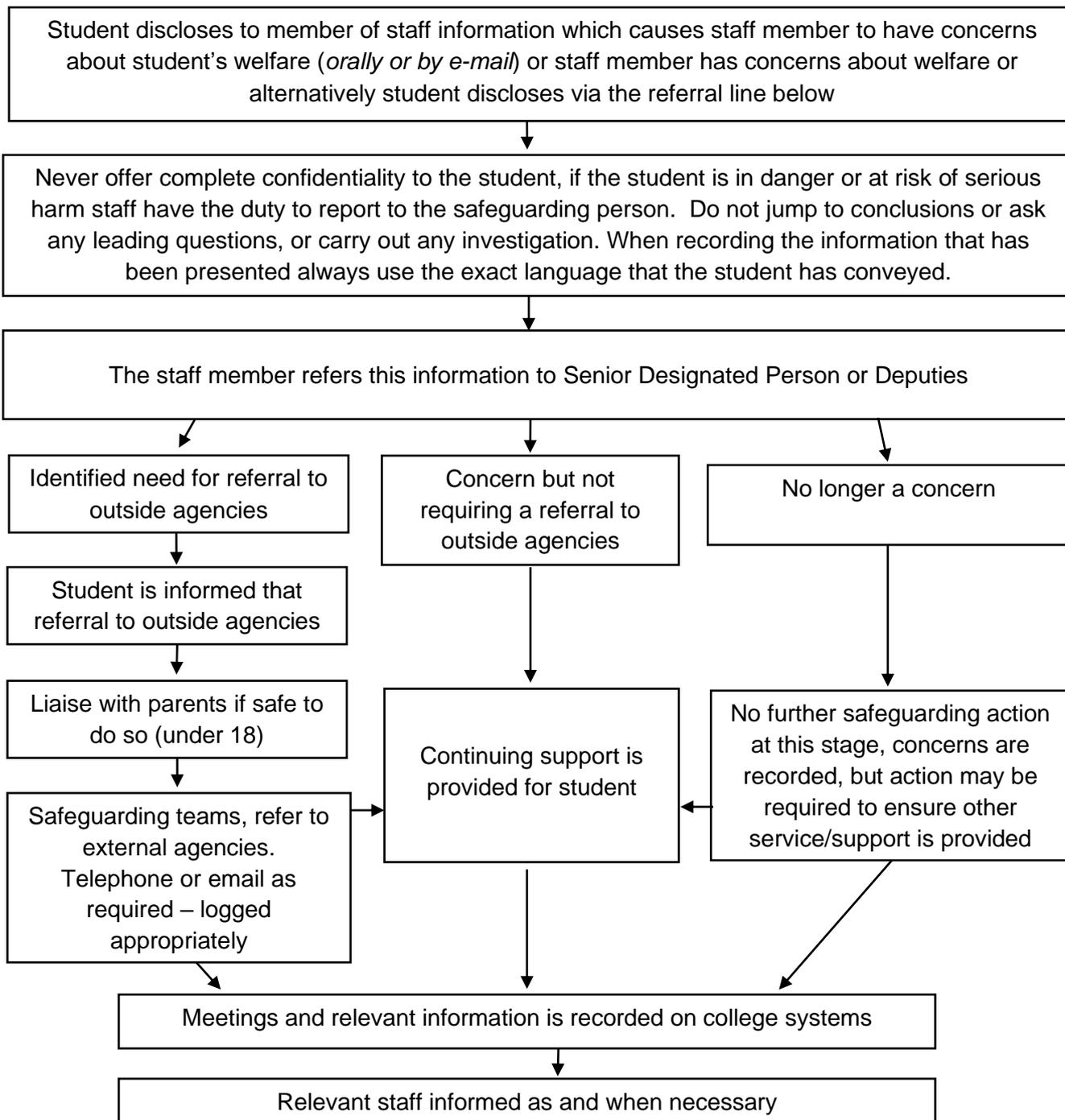
- a. All staff are aware of the Whistleblowing Policy and Procedures.
- b. Safer recruitment practices by adherence to the college's Safer Recruitment & Selection Policy and the Protection of Children Act 2004.
- c. Interviewers undertake Safeguarding and Safer Recruitment training.
- d. All new staff to have either received their Disclosure and Barring Service, (DBS) Disclosure or have applied for one, by commencement of employment. For those staff not in possession of a current disclosure on commencement, a risk assessment will be carried out authorised by a member of the Senior Management Team, and a DBS declaration form will be completed.
- e. The DBS disclosure number and date will be logged on the single central record.
- f. All existing staff to be DBS re-checked on a rolling five-year programme.
- g. This policy is reviewed annually by the Designated Safeguarding Lead in consultation with HR. It will also be endorsed by Governors.
- h. All complaints, allegations and suspicions are taken seriously and discussed by the Designated Safeguarding Lead and the Principal & CEO informed before any steps are taken.
- i. Staff allegations (including agency staff) will be dealt with appropriately and reported to the necessary professional external agencies.

## Appendix A

### Safeguarding Referral Procedure

(This applies to all college students regardless of age)

Staff have been informed that they must refer students who disclose any information relating to safeguarding to the Designated Safeguarding Lead, or the Deputy Designated Officers at each campus.



**If an allegation is made against a member of staff, the HR team will be informed immediately. The Safeguarding Team will support HR if and when appropriate.**

#### Dedicated Safeguarding Referral Line

Direct Dial 01268 882665

**In the absence of both the Designated Senior Person and Deputy Designated Person, the following out of hours number should be called:**

Social Care Southend and Essex & Thurrock: 0345 6061212

## Appendix B

### What school and college staff should look out for

#### Early help

**Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves; • has returned home to their family from care; and
- is a privately fostered child.

#### Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

**All** staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

#### Indicators of abuse and neglect

**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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by 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 a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, 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 that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the 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 in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 27).

**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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; 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.

### **Peer on peer abuse**

**All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; •
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

### **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

### **Female Genital Mutilation**

Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the

course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

### **Extra-Familial Harm**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

### **Mental Health**

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

## Annex D

### Annex to Safeguarding Policy March 2020

#### Response to COVID-19

There have been significant changes within our setting and within the UK in response to the outbreak of COVID-19.

This annex sets out some of the adjustments USP College is making in line with the changed arrangements in the college and following advice from government and local agencies.

The current position is that, following the Government announcement, all college sites are closed and timetables have been postponed.

Despite the changes, the College's Safeguarding Policy is fundamentally the same: the welfare of children and young people always comes first, staff should respond robustly to safeguarding concerns and referrals should continue to be made in line with our established safeguarding procedure.

The pressures on children, young people and their families at this time are significant. There will be heightened awareness of family pressures for a variety of reasons including through having to stay within the household, through financial hardship or health anxiety. These areas should be considered in terms of setting any work for students to undertake at home (including recognising the impact of online learning and ability to access on line resources). Staff may be aware of the mental health of both students and their parents or carers, and should refer to safeguarding about any emerging concerns.

We have undertaken a scoping exercise to identify the most vulnerable students and individual arrangements have been made with students who have an attached social worker and those with an EHCP.

**For students subject to a Child Protection Plan and Child In Need Plan, and who have an allocated social worker:** contact will be made by the safeguarding team at a frequency agreed with these students, with their family and social worker. But no less than once a week.

**For students who are Looked after Children and recent Care Leavers :** contact will be made by the Safeguarding Wellbeing and Mental Health Coordinator who will call ,at a frequency agreed with the student, carer and social worker. But no less than once a week.

**For students with an EHCP:** Tutors and LSA's will maintain regular contact as agreed with student and parents / carers. Support can be delivered through individual arrangements based on curriculum activity.

**For students on the edge of social care involvement or pending allocation of a social worker, or identified as high risk:** contact will be made by the safeguarding team once per week for a welfare check. The Progress Coach team will also be contacting students to ensure the necessary level of support is offered.

NB Contact will be made remotely through telephone calls.

## **Reporting arrangements:**

### **Student Services and Wellbeing**

Our Wellbeing teams and counsellors will continue to support students remotely. Students have been informed of the methods they can use to contact the team

Seevic Campus – [wellbeingsevic@uspcollege.ac.uk](mailto:wellbeingsevic@uspcollege.ac.uk)

Palmer's Campus – [wellbeingpalmers@uspcollege.ac.uk](mailto:wellbeingpalmers@uspcollege.ac.uk)

In addition our counsellors will offer Skype meetings with students in accordance with the BACP Guidelines.

Safeguarding Emergency Designated Line - 01268 882 665.

The safeguarding team are only available between 8.30am and 4.30pm,

Links to some alternative resources should students require support out of hours.

- Kooth – chat online to friendly counsellors, read articles written by young people and receive anonymous online support
- Samaritans – often through the phone they can provide emotional support
- Mind – a mental health charity who can provide information and advice
- SANEline – out of hours mental health helpline
- Students Minds – student mental health charity
- Every Mind Matters – they offer simple and practical advice to help you stay mentally healthy
- NHS – they have dedicated resources available to help deal with stress, anxiety or depression

### **If students need urgent wellbeing help they can contact:**

- Samaritans - Tel: 116 123 who are available any time and any day
- Mind - Tel: 0300 123 3393
- SANEline - Tel: 0300 304 7000 (4.30pm-10.30pm)
- Your local GP for medical advice by making an emergency appointment
- NHS (England & Wales) Tel: 111 999 or go to Accident and Emergency (A&E) for immediate help

### **Safeguarding Concerns**

Staff will continue to follow the safeguarding procedures and advise the safeguarding leads immediately about concerns they have about any child, whether in college or not. COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Normal safeguarding procedures apply for referrals to children's services. This contact will go through a member of the safeguarding team, who will follow appropriate measures in seeking the appropriate and necessary support.

## **Allegations or concerns about staff**

With such different arrangements in place, young people could be at greater risk of on line abuse. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team.

## **New staff or volunteers**

All new starters must have an on line induction. They must have taken the online Safeguarding awareness Training, and online Prevent awareness training and read the staff Code of Conduct. The DSL or deputy will ensure new recruits know who to contact if worried about a child or young person and ensure the new starters are familiar with the child protection procedure.

All new starters need to confirm that they have read Part I of Keeping Children Safe in Education

## **Peer on peer abuse**

We recognise the potential for abuse to go on between young people, especially in the context of a college closure or partial closure. Our staff will remain vigilant to the signs of peer-on-peer abuse.

## **Risk online**

Young people will be using the internet more during this period. The College may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when students are learning at the College. The College continues to ensure appropriate filters and monitors are in place. The College has taken on board the guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium.

It is extremely important that professional boundaries do not slip during this exceptional period and protocols for on line working have been issued. (See Attached Presentation)

Staff can access further guidance here:

<https://www.tes.com/news/coronavirus-10-safeguarding-rules-teachers-home>

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely/>

Students accessing remote learning will receive guidance on keeping safe online and know how to raise concerns with the college and external agencies.

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/internet-connected-devices/>

## **Mental Health**

Restrictions to movement and contact with other people means pupils are more likely to be at risk of mental health problems. Student have been provided with links to external support and the Wellbeing Team are working remotely to support students.

<https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>

## **Ongoing Sharing of Information**

Weekly newsletters will be produced for staff and students during the period of remote studying. This will provide information and links to additional support and activities to assist with coping with the current social distancing measures that are in place.

## Equality and Diversity Impact Assessment

This form should be used by managers and policy authors within their area of responsibility to carry out Equality and Diversity Impact Assessments (EDIAs) in relation to protected characteristics including: Marriage/Civil Partnership, Age, Disability, Gender Reassignment, Race, Religious Belief and Sex.

The word 'policy' is taken to include strategies, policies, procedures and guidance notes; both formal and informal, internal and external.

The Impact Assessment may be carried out on any policy, service, function or plan you are engaged in, or are about to commence. All policies should be clearly stated. However, in reality, some policies are built into everyday procedures and customs therefore not all policies are open to inspection and review.

Any assessment of a policy should include these customs and practices as well as the formal written policy. 'Functions' means your duties and powers and includes internal and external functions, including service delivery.

**1. Name of Policy**

Safeguarding Policy

**2. What is the aim (s) objective (s) and/or purpose of the policy?**

The college is committed to its duty in respect of Safeguarding. The purpose of the policy is to set out clearly the responsibilities of its staff in this regard and to provide a clear process to be followed in discharging those duties.

**3. Who is the policy lead?**

Head of Student Services

**4. Which of the following groups could be affected by this policy?**

*(Tick all that apply)*

<b>Learners</b>	<b>x</b>
<b>Staff</b>	<b>x</b>
<b>Wider Community</b>	<b>x</b>

**5. Team**

Names and positions of Impact Assessment Team (minimum of 3 people and preferably from areas across the College):

Name	Position
Michelle Lagden	Safeguarding, Wellbeing and Mental Health Coordinator
Lorraine Stoten	Head of Human Resources
Nickie Hillebrandt	Student Services Manager

Date EDIAs undertaken:

EDIA undertaken as a result of: Renewal  Revision of Policy  Procedure  New Policy/ Procedure   
 SAR Process   
 Other   
 Please state:

Date of Last EDIA (if applicable):

**6. Complaints**

Have complaints been received from anyone with one or more protected characteristic about the service provided?  
 If yes then please give details.

Not Applicable

**7. The Impact**

Four possible impacts should be considered as part of the assessment:

- a. **Positive Impact** - Where the policy might have a positive impact on a particular protected characteristic.
- b. **None or Little Impact** – Where you think a policy does not disadvantage any of the protected characteristics
- c. **Some Impact** – Where a policy might disadvantage any of the protected characteristics groups to some extent. This disadvantage may be also differential in the sense that where the negative impact on one particular group of individuals with protected characteristic is likely to be greater than on another.
- d. **Substantial Impact** – Where you think that the policy could have a negative impact on any or all of the protected characteristics. This disadvantage may be also differential in the sense that the negative impact on one particular protected characteristic is likely to be greater than on another.

Use the guidance provided above and complete the following table:

Gender/Age	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Woman		✓		
Men		✓		
Age		✓		

Disability	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Visually Impaired		✓		
Hearing impaired		✓		
Physical Disability		✓		
Specific Learning Difficulties		✓		
Global Learning Difficulties		✓		

Autistic Spectrum Disorder		√		
Any other disability – Various		√		

Race or Culture	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
White		√		
Other minority groups		√		

Other Factors	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Religious Belief		√		
Sexual Orientation		√		
Trans		√		

Please comment on any areas where some or substantial impact is indicated. Any resulting actions must be added to the attached action plan.

**8. Is there anything that cannot be changed?**

What cannot be changed?	Can this be justified?	If so, how?
Not applicable		
E.g. Disabled people can be treated more favorably under the 2005 DDA. If a policy appears to treat disabled people more favorably than other equality groups, the disadvantage may be justifiable		

Please list the main actions that you plan to take as a result of this assessment in your area of responsibility. (Continue on separate sheets as necessary)

--

**DIVERSITY IMPACT ACTION PLAN FOR INCLUSION IN QUALITY IMPROVEMENT PLAN FOR INCLUSION IN QUALITY IMPROVEMENT PLAN**

Area for improvement and expected impact (linked to Corporate Objectives) N/A

SMART actions/ activities N/A

Staff development or resources required N/A

Timescale including milestones N/A

Success indicators and evaluation

N/A

Distribution: Copies of the final EIA should be sent to:

To those whom this Impact Assessment will cause to have further work to do in either changing processes or re-writing the policy(s) concerned.

All actions recorded here should be carried forward into the QIP, so that actions can be monitored and evaluated to measure the impact. There will be random sampling of action plans through the Equality and Diversity Forum.

