

**Address:**

7- 14 Great Dover Street London SE1 4YR

Helpdesk: 03333 21 30 30**Email:** talktous@cds.coop

Safeguarding Adult and Children Policy

Title	Safeguarding Vulnerable Adult and Children Policy
Date Created	September 2020
Next Review Date	September 2025
Author	Temi Awolaja
Approver	Board of Management
Applies to	All residents and/or users of services including children

1 Introduction

- 1.1 This policy outlines CDS' approach to safeguarding children, young people and adults who use or are connected to our services and are being abused or neglected or at risk of abuse or neglect. It also sets out our commitment to working collaboratively with local authorities and other relevant partners to effectively safeguard vulnerable people.

- 1.2 Safeguarding is everyone's responsibility and doing nothing is not an option. We have a duty to raise any safeguarding concerns about the abuse and/ or neglect of children, young people and adults at risk whether they are identified by staff, our agents or directly reported to us.
- 1.3 We will treat all incidents of safeguarding seriously and respond promptly in line with our procedures where a staff member observes or has concerns about an adult or child's welfare or receives a safeguarding disclosure from a third party.

2 Scope of the policy

- 2.1 This policy applies to all CDS and founder member cooperatives' residents, children and young people that live in our properties or use our services including leaseholders. The policy also applies to all CDS employees including temporary staff and volunteers. It does not apply to clients, but they may choose to adopt this policy as their own.
- 2.2 We expect partners from whom we commission external services to adhere to this policy. However, we expect them to have appropriate safeguarding procedures of their own in place.

3 Policy key objectives

- 3.1 The objectives of this policy are to: -
- 3.2 Provide clear guidance for all staff to be able to identify potential safeguarding issues and ensure they are aware of their responsibility to be vigilant and how to respond to any concerns or suspicions they may have.
- 3.3 Ensure a prompt and proportionate response when it appears that a child, young person or an adult is at risk or may be at risk of abuse and /or neglect (see section 5 for definitions).
- 3.4 Ensure we work with local authorities and partner agencies to minimise risk and where safeguarding concerns are identified, they are swiftly and appropriately raised, and information is effectively shared.
- 3.5 Ensure we comply with all statutory and regulatory requirements and best practice.
- 3.6 Outline the action we will take on suspecting, witnessing, or discovering abuse or inappropriate conduct.
- 3.7 Ensure that contractors working on behalf of CDS are aware of this policy.

- 3.8 All staff and managers are responsible for ensuring compliance with the policy key objectives.

4 Our approach

- 4.1 Our Policy adopts the Department of Health's six key principles that underpin all adult safeguarding work issued under the Care Act 2014:
- 4.1.2 **Empowerment** - Interventions must support people to make decisions and have a say in their care. Presumption of person-led decisions and informed consent.
 - 4.1.3 **Protection:** Supporting victims and allowing them to have a say. This includes support and representation for those in greatest need.
 - 4.1.4 **Prevention:** It is better to take action before harm occurs.
 - 4.1.5 **Proportionality:** Interventions must represent the least intrusive response appropriate to the risk presented.
 - 4.1.6 **Partnership:** Local solutions from services working within the community have a part to play in preventing, detecting and reporting neglect and abuse. Housing providers, their contractors and residents all have a role to play.
 - 4.1.7 **Accountability** - Accountability and transparency in delivering safeguarding. Housing providers have a duty to co-operate with local authorities implementing their statutory duties around safeguarding. This may include carrying out 'enquiries' into incidents and information sharing.
- 4.2 A key aspect of the statutory framework is 'Making Safeguarding Personal'. This means it should be person-led and outcome-focused. We work with individuals to decide actions and timescales.
- 4.3 Housing providers are expected to make staff familiar with the principles of safeguarding, train staff to be vigilant, recognise signs of abuse and know what to do if they see those signs.
- 4.4 This policy should be read in conjunction with the Safeguarding Adults and Children Procedure and other associated policies.

5 Key terms and definitions

Definitions of a “child”, “vulnerable adults”, abuse” and “safeguarding”.

5.1.2 Definition of a Child or young person

A child or young person is defined as being anyone who has not yet reached their 18th birthday under the Children Act 1989, irrespective of circumstances. The fact that a child has reached 16 years of age, is living alone, is in further education, is a member of the armed forces, is in hospital, is in prison or in a young offenders’ institution does not change their status or entitlement to services or protection.

5.2 Definition of a vulnerable adult

5.2.1 An adult is any person aged 18 years or over. Adults at risk within the Care Act 2014 are referred to as ‘people with care and support needs’. Safeguarding duties apply to an adult who:

- “Has needs for care or support (whether or not the local authority is meeting any of these needs) and
- Is experiencing, or at risk of, abuse or neglect, and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse and neglect. “

5.3 Definition of abuse

5.3.1 Abuse of an adult

We define abuse for the purpose of this policy as *‘the violation of an individual’s human and civil rights by another person or persons’*.

5.3.2 Examples of abuse that must be reported as a safeguarding concern by CDS staff are listed in **Appendix 1 – What is Abuse?**

5.4 Abuse of a child or young adult

5.4.1 Abuse of children is an act that could cause them significant harm.

5.4.2 Examples of abuse that must be reported as safeguarding concern are listed in **Appendix 1 – What is Abuse?**

5.5 Abuse is behaviour that either deliberately or unknowingly causes harm or endangers life or infringes on rights.

5.6 It may be a single or repeated act. It may be deliberate neglect or a lack of appropriate action. It can also be where the person is persuaded to do something which they have not consented to or cannot consent to.

5.7 Friends, strangers, family members, and professional staff can all be guilty of abuse.

- 5.8 Abuse causes harm or distress to a person and is often a crime. It often occurs where there is an expectation of trust.
- 5.9 Abuse cannot be excused for any cultural or religious reason and should always be reported.
- 5.10 **Definition of safeguarding**
- 5.10.1 Safeguarding refers to actions and processes that protect individuals' health, wellbeing and human rights, and enable people – especially children, young people and vulnerable adults – to live free from abuse, harm and neglect.
- 5.11 **Safeguarding vulnerable adults includes: -**
- 5.11.1 Protecting their rights to live in safety, free from abuse and neglect.
- 5.11.2 Organisations working collaboratively together to prevent the risk of abuse or neglect, and to prevent them from happening.
- 5.11.3 Ensuring individual's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account.
- 5.12 **Safeguarding children and young people include: -**
- 5.12.1 Protecting them from maltreatment or things that are bad for their health or development.
- 5.12.2 Making sure they grow up in circumstances that promote safe and effective care.

6 Reporting and responding to suspected or alleged safeguarding concern

- 6.1 CDS takes abuse or suspected abuse /neglect very seriously. It is the responsibility of each person working on behalf of CDS to consider the safety and welfare of the adults, children, and young people they come into contact with.
- 6.2 Who can be referred to local safeguarding services is set out in *Appendix 2*.
- 6.3 We will record and refer all concerns, suspicions or allegations of abuse, harm or neglect referrals promptly to the lead agencies responsible for carrying out safeguarding assessments and enquiries such as Adult Social Care, Children's Social Care, the Police and Multi Agency Risk Assessment Conferences (MARACs).
- 6.4 We will record the reasons why if a decision is made not to refer a concern (see section 7).
- 6.5 Staff are required to immediately report safeguarding concerns in accordance with CDS' Safeguarding Adult and children procedure where they observe or have concerns about an adult or child's welfare or receives a safeguarding disclosure from a third party.

6.6 Safeguarding of children and vulnerable adults is a complex area which must be dealt with by the appropriate agencies. Staff must refer any concerns over the abuse or neglect of a child or a vulnerable adult to Social Services in the first instance and where appropriate, the Police.

6.7 We will cooperate with local authorities and respond to their requests regarding safeguarding.

6.8 If a staff member is concerned for a non-resident, they should contact the local authority directly to raise the alert immediately.

6.9 If a resident witnesses or suspects abuse or neglect they should report it to their local Social Services Department or the Police. They can also report any suspected or identified abuse or neglect to us.

7 Consent and capacity

7.1 A key aspect of the Care Act 2014 guidance is putting the individual at the centre of the safeguarding process.

7.2 We will involve adults at risk of abuse in any safeguarding decisions. However, where someone is judged as not having capacity to make an informed decision about their own wellbeing, these will be made in their best interest on their behalf. This decision will be made in accordance with the requirements of the Mental Capacity Act 2005, and in liaison with the necessary statutory services and agencies, involving carers and family members as appropriate.

7.3 If the resident does not give consent to make a referral, and there are insufficient reasons to override consent, a letter should be sent to the resident outlining the proposed action plan. The letter should confirm that these actions were not undertaken since they did not give consent.

7.4 If a child safeguarding concern arises, consent is not needed, and this must be reported. However, where possible, it is good practice to inform the parent/carer when a report is being made. If the resident does not give consent to make a referral, and there are insufficient reasons to override consent, a letter should be sent to the resident outlining the proposed action plan. The letter should confirm that these actions were not undertaken since they did not give consent.

7.5 We will develop and implement internal procedures for employees that establish clear lines of accountability, responsibility, and processes for reporting safeguarding concerns.

8 Responsibilities

8.1 All staff

Safeguarding is everyone's responsibility. If any members of staff are concerned about a safeguarding issue, concerns should be forwarded to the relevant Housing Officer.

8.1.1 All staff will:

- Ensure they maintain clear professional boundaries at all times. Refer to the Staff Code of Conduct for further information.
- Be aware of the different types and indicators of abuse. Refer to *Appendix 1* for further guidance.
- Be familiar with this policy and the supporting procedure
- Undertake any safeguarding awareness training, as appropriate to their role.
- Keep factual records of any incident/ concern and alerts relating to residents on the housing management system and raise any concerns they may have.
- If a staff member is concerned a colleague is suffering abuse (at or out of the workplace), they should raise their concerns with their line manager or HR (as appropriate).

8.2 Housing Officers

Housing Officers will usually manage all safeguarding or vulnerability concerns relating to residents.

8.2.1 They will:

- Signpost vulnerable adult, children and young people to appropriate agencies for support
- Identify adult, children or young people at risk
- If risk is apparent and consent is obtained, raise an alert with the relevant authority.
- Refer to the procedure for further guidance
- Follow the guidelines outlined for all staff
- Not knowingly enter a property where the sole occupant is or appears to be under 16 years of age. If this is the case, appointments must be re-arranged to a time where an appropriate adult is present.

8.3 All managers

8.3.1 All managers will:

- Contribute to developing a culture that encourages their team to raise concerns and does not tolerate abuse
- Listen to and support staff who raise concerns
- Ensure that their team is familiar with CDS's agreed Safeguarding Policy and procedure and identify any training needs.

8.4 Human Resources Director

8.4.1 They will:

- Support and advise on relevant HR policies and procedures, for instance, the disciplinary procedures.

8.5 Designated strategic safeguarding Lead

8.5.1 Our Operations Director is the designated strategic lead on safeguarding for CDS, supported by the housing Services Manager as operational lead. Our safeguarding leads provide clear lines of accountability for reporting abuse. The Strategic Lead via the Senior Management

Team is responsible for making sure lessons learnt are communicated to all relevant staff. Where necessary, supporting policies, procedures and guidance will be amended.

8.6 Contractors and agents providing frontline services on our behalf need to make sure their staff:

- Are suitable to provide frontline services
- Comply with our Supplier Code of Conduct & Expected Behaviours Code
- Are aware of who to contact with any safeguarding concerns in a CDS property.

8.6.1 Contractors must also:

- Notify us of all safeguarding concerns
- Fully co-operate with any investigation into received allegations
- Have adequate systems in place to take appropriate disciplinary action.

9 Staff training

9.1 Staff will receive awareness training on safeguarding in line with their roles and responsibilities to identify, record and report concerns of abuse, harm and neglect.

9.2 Staff may receive increased training depending on their level of contact with vulnerable adults, children and young people to be able to make decisions regarding referrals and to make referrals to LAs.

9.3 We recognise the emotional impact on staff of identifying and reporting safeguarding concerns. Employee support will be available through line managers and staff will have access to additional support such as counselling provided in line with our Wellbeing Policy.

9.4 We will address any allegations of or suspected abuse by CDS employees through formal statutory investigative procedures and our own internal disciplinary procedures.

9.5 In order to protect staff from allegations of abuse, or situations that could be misunderstood, staff members will maintain professional boundaries in line with the Code of Conduct Policy.

10 Customers right to appeal

10.1 If a resident is dissatisfied with our response, they can make a complaint via the CDS Complaints policy.

11 Equality and diversity

11.1 CDS will ensure that this policy is applied fairly and consistently and will not directly or indirectly discriminate against any person or group in line with equality laws and principles.

12 Monitoring and continuous improvement

- 12.1 This Policy will be reviewed every three years, unless legislation, business or sector developments require otherwise, ensuring that it continues to meet its objectives and take account of good practice developments.
- 12.2 Individual safeguarding cases will be reviewed at least annually, to identify any learning for the organisation.
- 12.3 We will ensure any systems related to the recording of safeguarding matters are robust, secure and confidential.
- 12.4 We will report to the board and services committee where there have being incidents of significant abuse reported to statutory agencies.

13 Confidentiality

- 13.1 CDS will collect and process data in line with our current Data Protection Policy.
- 13.2 All information provided will be treated with confidence and will only be passed to external agencies with prior consent.
- 13.3 Personal information may be shared between agencies without the consent of the person concerned where we consider a child or young person or vulnerable adult is at risk in any situation or if there is a high risk of serious harm to anyone.
- 13.4 CDS is committed to working in partnership with the police, social services, and other relevant organisations in accordance with their local procedures and information sharing protocols.
- 13.5 This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect vulnerable people.
- 13.6 We will ensure photographs and filming only take place with the explicit consent of parents or guardians.

14 Legislation and Regulation

- 14.1 This policy complies with the regulatory standards for registered providers of social housing in England.
- 14.2 The most important legislation, case law and national standards/guidance that currently govern registered provider policy and practice are set out in Appendix 3 – Safeguarding Legislation and Policy Framework for Adults and Children.

15 Associated policies and procedures

The following procedures are associated with this policy:

- ASB Procedure
- Allocation Sign up / lettings procedure
- Safeguarding procedure

The policy is supported by:

- Allocations policy
- Complaints policy
- Data protection policy
- ASB policy
- Staff wellbeing policy
- Code of conduct policy
- Disciplinary policy
- Domestic Abuse policy

Version control

Date	Amendment	Version control

Appendices

Appendix 1 – What is Abuse?

Appendix 2 – Who can be referred to local Safeguarding services?

Appendix 3 – Safeguarding Legislation and Policy Framework for Adults and Children

Appendix 1 – What is Abuse?

Examples of abuse that should be reported as a safeguarding concern:

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

Physical

Adults

Hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions, pulling hair, 'manhandling', scalding. This may include domestic violence.

Children

Any physical act that is likely to cause a child significant harm. For example: hitting a child with an instrument or such force as to leave a mark. Forced marriage, female genital mutilation

Sexual	Rape, sexual assault, indecent exposure, inappropriate looking or touching, sexual harassment, sexual photography, indecent exposure or involving people who lack capacity in sexual acts to which they did not or cannot consent.	Child Sexual Exploitation (using children for sexual gratification), rape, sexual assault, involving children in any sexual act including seeing/watching pornography, preparing a child for sexual activity (grooming), taking sexual images of children. Children do not need to actually be assaulted for sexual abuse to take place.
Psychological	Stalking, harassment, verbal abuse, restricting people's rights and freedoms, threats, coercion, intimidation, cyber bullying, humiliation, unreasonable and unjustified withdrawal of services or supportive networks, controlling behaviours or exploitation	Emotional Abuse that amounts to significant harm, for example: repeatedly telling a child they are worthless or using a child wholly to fulfil adult's needs
Self- neglect	Being unable to feed, hydrate or medicate self (where necessary), or to protect themselves from serious harm (fire), or with hygiene so poor that their health or the health of others is compromised. <i>Self-neglect includes cases of hoarding where the OCD Foundation's Clutter Image Rating scale rating exceeds '4' (in accordance with CDS's Hoarding Procedure).</i>	May affect older children especially those unable to eat, medicate or protect themselves adequately from abuse when there is no parent or other support available that can protect them. <i>A child or young person living with an adult in a property where the OCD Foundation's Clutter Image Rating scale rating exceeds '4' must also be reported as a safeguarding concern (in accordance with CDS's Hoarding Procedure).</i>
Financial	Stealing money, assets, misuse or misappropriation of property, possessions or benefits, using pressure, or intimidation to influence financial decisions such as the sale of property, wills or managing inheritances. Taking control over finances when the person does not lack capacity, Internet scamming.	Exploitation, extortion or using threats, coercion to involve children in fraud, crime or the misappropriation of their funds, benefits or assets.
Institutional	Processes, attitudes or behaviours that amount to discrimination through unwitting prejudice, ignorance or thoughtlessness and lead to the mistreatment of an individual by	Failing to act to protect children at risk of significant harm as an entire organisation. Failing to listen to children or being institutionally dismissive of their concerns, reports or requests for

an institution. It can also occur through repeated acts of poor or inadequate care or bad professional practise, threats, enforcement of rules or regulations outside of tenancy agreements, common law or human/ civil rights. Creating an institution around someone's own home.

help when they are in need of protection.

Neglect

Deliberately neglecting needs, failing to report abuse, self-neglect. Omitting to share information that could protect a person at risk of harm from abuse/neglect/self-neglect. Ignoring service failure. The withholding of the necessities of life, such as medication, adequate nutrition and heating.

Failing to provide children with their basic needs; food, water, clothing, warmth, security, safety, education, protection and emotional support.

A child or young person living with an adult in a property where the OCD Foundation's Clutter Image Rating scale rating exceeds '4' must also be reported as a safeguarding concern (in accordance with CDS's Hoarding Procedure).

Self-neglect includes cases of hoarding where the OCD Foundation's Clutter Image Rating scale rating exceeds '4' (in accordance with CDS's Hoarding Procedure).

Morden slavery

Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A child or young adult being subjected to slavery, forced labour and domestic servitude.

Appendix 2 – Who can be referred to local Safeguarding services?

Any adult who is unable to protect themselves from abuse, self-neglect or neglect, because they have support and/or care needs regardless of their mental capacity.

Every child at risk of significant harm (under 18 years of age)

Who to?

The local authority where the adult normally lives and/or the Police where a crime is suspected or known. Social Services have a duty to ensure that further enquiries are made – Care Act 2014

The local authority where the concern arises or the Police, both have a duty to investigate urgent and non-urgent concerns – Section 47: The Children Act 1989

Immediate Action

- Make sure everyone is safe and that evidence is preserved.
- Do not interview victims or perpetrators beyond the initial disclosure.
- Record all facts immediately and report to line manager.
- If staff are implicated, then senior managers must consider immediate employment action in line with policy.

- Make sure everyone is safe and that evidence is preserved.
- Never interview victims or perpetrators beyond the initial disclosure.
- Record all facts immediately and report to line manager.
- If staff are implicated senior managers must consider immediate employment action.

What to expect

Social services will decide if the adult meets the criteria for enquiries to be made. If so, Social Services will make or ask another agency to make enquiries.

Social Services/Police will investigate and determine any action.

Will authorities intervene?

The local authority is guided to consider the least intervention necessary in order to safeguard adults. Social Services will intervene if either someone who fits the criteria:
1) lacks capacity
2) is unable to protect themselves and agrees to the suggested intervention

Agencies are guided to do what is proportionate, possible and necessary in order to safeguard children.

Appendix 3 – Safeguarding Legislation and Policy Framework for Adults and Children

Safeguarding Adults

White Paper Modernising Social Services 1998	Stresses the importance of protection for adults needing care and support
Human Rights Act 1998	Placed a positive duty on public bodies to intervene proportionately to protect the rights of citizens
Sexual Offences Act 2003	Outlines a range of offences against children and adults with a mental disorder
Disability Discrimination Act 2003	Significantly extends the rights of disabled people
Domestic Violence Crime and Victims Act 2004	Strengthens the protection available to victims of domestic violence by: <ul style="list-style-type: none">• Criminalising any breach of a non-molestation order• Extending the availability of restraining orders• Making common assault a criminal offence• Introduces a new offence of causing or allowing the death of a vulnerable adult.
Mental Capacity Act 2005	It aims to protect people who cannot make decisions for themselves due to a learning disability or mental health condition. It sets out a single clear test for assessing whether a person lacks capacity to make a decision at a particular time.
Safeguarding Adults – National Framework of Standards 2005	This document collects best safeguarding practice and sets it within 11 good practice standards. These are to be used as an audit tool and guide for those implementing adult protection work.
Safeguarding Vulnerable Groups Act 2006	Strengthens the local governance arrangements for safeguarding by putting Safeguarding Adults Boards on a statutory footing.
Mental Health Act 2007	This makes changes to the procedures for authorising the deprivation of liberty of a person in a hospital or care home who lacks capacity to consent to being there.
Protection of Freedoms Act 2012	Scaling back the criminal records and barring systems to more proportionate levels whilst ensuring that they continue to provide effective protection for those who need it. From 1st December the CRB & Independent Safeguarding Authority merged to become the Disclosure and

Barring Service. Legislative changes came into effect during 2013/14.

Care Act 2014

The key principles for the Care Act are promoting the wellbeing of individuals and in turn making safeguarding personal. It outlines six key principles which seek to increase the protection of vulnerable adults.

The Care Act contains replacement and mandatory requirements around adult safeguarding. See chapter 14 of 'Care and Support Statutory Guidance'.

Modern Slavery Act 2015

Addresses the problem of slavery and human trafficking in the 21st century. It is designed to improve law enforcement tools, strengthen criminal penalties, and deliver better support and protection for victims.

Department of Health's Care and Support Statutory Guidance 2017

Replaces, No Secrets 2000, which was repealed by the Care Act 2014 on 1 April 2015. The act contains replacement and mandatory requirements around adult safeguarding for Local Authorities and other agencies. See chapter 14 of 'Care and Support Statutory Guidance'

Making Safeguarding Personal: What might 'good' look like for those working in the housing sector? Local Government Association (November 2017)

Making Safeguarding Personal sits firmly within the Department of Health's Care and Support Statutory Guidance, as revised in 2017. It means adult safeguarding:

- is person-led;
- is outcome-focused
- engages the person and enhances involvement, choice and control
- improves quality of life, well-being and safety

Making Safeguarding Personal must not simply be seen in the context of a formal safeguarding enquiry (Care Act 2014, Section 42 enquiry) but also in the whole spectrum of activity.

Safeguarding Children

Children Act 1989

Key aspects:

- Welfare of the child is paramount
- Delay is not in the child's best interests and to be avoided
- Children's wishes to be taken seriously

United Nations Convention on the Rights of Child 1989 (ratified by the UK 1991)	In 1989, governments worldwide promised all children the same rights by adopting the UN Convention on the Rights of the Child (CRC). These rights are based on what a child needs to survive, grow, participate and fulfil their potential. They apply equally to every child, regardless of who they are, or where they are from.
Protection of Children Act 1999/POCA	Changed the route by which employers can check whether an actual or potential employee has criminal offences against children and whether they are unsuitable to work with children.
Education Act 2002	Emphasises duty to make arrangements for the safeguarding and promoting of the welfare of children
Homelessness Act 2002	Housing Authorities are required to refer to adult social care services homeless persons with dependent children who are eligible for homelessness assistance
Sexual Offences Act (2003)	Sets out a new legal framework to protect children from sexual abuse, covers internet pornography, grooming & exploitation. Puts restrictions on convicted sex offenders.
Children Act 2004	Key aspects: <ul style="list-style-type: none"> • New role of children commissioner for England • Duty of local authorities to promote cooperation between agencies • Establish Local Safeguarding Children's Boards • Develop local arrangements to safeguard and promote the welfare of children • Develop index/data base to hold basic info on children and families • Establishment of new post of Director of Children's Services
Every Child Matters: Change for children 2004	Focuses on a shared programme of national change to provide services "around the needs of children & young people". Achieving better outcomes: <ol style="list-style-type: none"> 1. Be healthy 2. Stay safe 3. Enjoy and achieve 4. Make a positive contribution 5. Achieve economic wellbeing
Education Act 2011	Makes changes to provisions on school discipline and will place restrictions on the public reporting of allegations made against teachers. The intention is for most of the sections of the Act to have commenced by the start of the 2012 academic year.
Protection of Freedoms Act 2012	Scaling back the criminal records and barring systems to more proportionate levels whilst

ensuring that they continue to provide effective protection for those who need it. These came into effect 10th September 2012.

DRAFT