**RATIONALE**

At LEAP we recognise the responsibility we have for safeguarding and promoting the welfare of children, young people and vulnerable adults. This policy demonstrates the organisations commitment and compliance with safeguarding legislation. Through their day-to-day contact with young people and direct work with families, staff at LEAP have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to Children’s or Adult Services. This also involves improving practice to prevent young people falling through the gaps.

The definition of Safeguarding and promoting the welfare of children and young people is defined for the purposes of this policy 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 to have the best outcomes

**(Working Together to Safeguard Children 2018)**

Child Protection is a part of Safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm

At LEAP the named personnel with designated responsibility for safeguarding are:

|  |  |
| --- | --- |
| **Designated Safeguarding Lead** | **Deputy Safeguarding Lead** |
| Val Moore, Operations Manager | Sarah Bliss, Team Leader |

|  |  |
| --- | --- |
| **Trustees with Safeguarding Responsibility** | Hannah Spencer and Jane Duncan |

The named personnel with Designated Responsibility for allegations against staff are:

|  |  |
| --- | --- |
| **Designated Senior Manager** | **Trustee** |
| Heidi Walton, Chief Executive | Graham Bratby (Chair) |

**PURPOSE**

The purpose of this policy is to ensure that:

* The welfare of the child and young person is paramount
* All children and young people regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection
* All staff have an equal responsibility to act on suspicion or disclosure that might suggest a child or young person is at risk of harm
* Children, young people and staff involved in Safeguarding issues receive appropriate support
* Staff adhere to a Code of Conduct and understand what to do if a child or young person discloses any allegations against staff or Trustees

The procedures contained in this policy apply to all staff, volunteers, sessional workers, students, agency staff or anyone working on behalf of LEAP. They are consistent with Lincolnshire Local Safeguarding Children’s Board (LSCB) multi-agency child protection procedures [www.lincolnshire.gov.uk/lscb](http://www.lincolnshire.gov.uk/lscb)

**TERMINOLOGY**

**Safeguarding and promoting the welfare of children and young people** refers to the process of protecting children and young people from maltreatment, preventing the impairment of children’s health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best life chances.

**Child Protection** refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm

**Staff** refers to all those working for or on behalf of LEAP in either a paid or voluntary capacity

**Child** refers to all young people who have not yet reached the age of 18

**Young Person** refers to all young people aged between 16 and 24

**Vulnerable Adult** refers to all persons 18 or above who has needs for care and support (regardless of the level of need and whether or not the local authority is meeting any of those needs); Is experiencing, or is at risk of abuse or neglect; and as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it

**Parent** refers to birth parents and other adults who are in a parenting role – step-parents, foster parents, carers and adoptive parents

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1. Prevention
2. Early Identification, recognising and responding to safeguarding needs
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5. Supporting children and young people at risk
6. Extremism and radicalisation
7. Female genital mutilation
8. Youth Produced Sexual Imagery (Sexting)
9. Peer to Peer Abuse
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11. Honour Based Violence
12. Forced Marriage
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14. Sexual Violence and Sexual Harassment Between Peers
15. Sexual Health and Relationships
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17. Criminal Exploitation and County Lines
18. Safer recruitment and professional boundaries
19. Grooming
20. Board of Trustees responsibilities
21. Allegations made against adults who work with children

There are 4 main elements to the Policy:

1. Prevention – through the support offered to young people and through the creation and maintenance of a whole organisation protective ethos
2. Procedures – for identifying and reporting cases, or suspected cases of abuse
3. Support to children and young people – who may have been abused
4. Preventing unsuitable people working with children – by following the LSCB Safer Recruitment procedures
5. **PREVENTION**

LEAP will establish an ethos where:

* 1. Young people feel secure in a safe environment in which they can develop and thrive
	2. Young people know that there are adults in LEAP whom they can approach if worried or in difficulty
	3. Adequate signposting to external sources of support and advice is in place for staff, parents and residents through staff training, one to one keyworker support sessions, notice boards, posters, leaflets and literature
	4. Importance and prioritisation is given to equipping young people with the skills needed to stay safe; including providing opportunities for young people to engage in group and individual workshops, activities and support sessions
	5. Young people develop realistic attitudes to their responsibilities in adult life and are equipped with the skills needed to keep themselves safe; including understanding and recognition of healthy/unhealthy relationships and support available
	6. Young people are supported in recognising and managing risks in different situations, including on the internet, being able to judge what kind of physical contact is acceptable and unacceptable, recognising when pressure from others, including people they know, threatens their personal safety and well-being and supporting them in developing effective ways of resisting pressure
	7. All adults feel comfortable and supported to draw safeguarding issues of the attention of the Chief Executive and/or the Designated Safeguarding Lead and are able to pose safeguarding questions with “respectful uncertainty” (thinking the unthinkable) as part of their shared responsibility to safeguard children and young people
	8. Emerging themes are proactively addressed and fed back to commissioners of services through safeguarding working groups
	9. There is a proactive approach to substance misuse. Issues of drugs and substance misuse are recorded and there is a standalone policy which is robustly delivered throughout the project
	10. Support and planning for young people in custody or hospital and their resettlement back into the project is undertaken, where necessary, as part of an inclusive approach
	11. It works in accordance with ‘Working Together to Safeguard Children 2018’ and supports the Lincolnshire Local Safeguarding Children Board (LSCB) Continuum of Need to ensure young people receive the most appropriate referral and access to provision; actively supporting multi-agency planning for those young people and, in doing so, providing information about the ‘voice of the child’ and the young person’s lived experience as evidenced by observations or information provided through the multi-agency forum
	12. Our organisation’s arrangements for consulting with, listening and responding to young people are through one to one support sessions, house meetings, drop-in sessions, participation groups and surveys/questionnaires
	13. There is a commitment to the continuous development of staff with regard to safeguarding training:
* All staff follow the LSCB 5 year training pathway <https://www.lincolnshire.gov.uk/lscb/professionals/support/training/124632.article> and receive a safeguarding update as part of their induction, to enable them to understand and fulfil their safeguarding responsibilities effectively
* The Designated Lead also follows the LSCB 5 year training pathway and also attends the LSCB Inter-Agency Safeguarding training
* The Designated Safeguarding Lead attends the Lincolnshire Support Partnership (LSP) Safeguarding Group therefore enabling them to remain up to date with safeguarding practices and be aware any emerging concerns/themes in Lincolnshire.
1. **EARLY IDENTIFICATION, RECOGNISING AND RESPONDING TO SAFEGUARDING NEEDS**

In Lincolnshire an Early Intervention approach has been adopted to addressing all children and young people’s needs. LEAP uses the Early Help Assessment to identify the holistic needs of young people and seeks support through the Early Help Consultants or Team Around the Child Coordinators. (refer to section 2.7 for the specific types of support on offer)

* 1. LEAP acknowledges serious case review findings and shares lessons learned with staff with the aim to ensure no child or young person falls through the gap
	2. All staff understands the ‘Meeting the Needs of Children in Lincolnshire’ procedures and knows how to pass on any concerns no matter how trivial they seem. They are consistent with Lincolnshire’s Local Safeguarding Children’s Board’s (LSCB) child protection procedures
	3. LEAP knows how to identify and respond to:

Signs/symptoms of any type of abuse, e.g. Physical, Sexual, Emotional, Financial, Neglect

Drug/substance/alcohol misuse

Child Sexual and Criminal Exploitation/trafficked children

Modern Day Slavery

Children missing education

Domestic abuse

Peer relationship abuse

Sexting

Risky behaviours including concerns around extremism/radicalisation

Sexual health needs

Sexual Violence and Harassment

Obesity/malnutrition

Inclusion and diversity including SEND, HIV, LGBTQ+

On-line grooming

Inappropriate behaviour of staff towards children

Bullying including homophobia, racism, gender, ability and breaches of the Equality Act 2010

Self-harm

Female Genital Mutilation

Forced Marriage

Honour Based Violence

Unaccompanied asylum seeking children

* 1. LEAP staff contributes to assessments along the ‘Continuum of Need’ and actively support multi agency planning for those young people. Staff have an understanding of the ‘Framework for Assessment’ (see below) and make decisions based on a young person’s development needs, parenting capacity and family & environmental factors.



* 1. **Early Help**

Early Help is the term used to describe arrangements and services that identify the need for help for children and families as soon as the problems start to emerge, or when there is a strong likelihood that problems will emerge in the future. Working Together to Safeguard Children 2015 identifies the critical features of effective Early Help as:

A multi-disciplinary approach that brings a range of:

* Practice that empowers families and helps them to develop the capacity to resolve their own professional skills and expertise through a ‘Team around the Child’ approach
* A relationship with a trusted lead professional who can engage with the young person and their family, and coordinate the support needed from other agencies
* A holistic approach that addresses the young person’s needs in the wider family context
* Simple, streamlined referral and assessment process
* Early Help in Lincolnshire includes both the TAC and ESCO process. Signs of Safety is embedded throughout. ESCO is similar to the TAC process but specifically supports the care coordination of Children with Disabilities (CWD), further information can be seen at [www.lincolnshire.gov.uk/ESCO](http://www.lincolnshire.gov.uk/ESCO) All forms and guidance for Early Help including Signs of Safety, TAC Handbook, TAC Consultants details etc. are available at [www.lincolnshirechildren.net](http://www.lincolnshirechildren.net)
	1. **What is Team Around the Child (TAC)?**

TAC is a shared assessment and planning framework which is in use by a variety of agencies across the county and is employed in a similar format throughout the country. It aims to help with the early identification of additional needs of children and young people and promotes a co-ordinated multi agency response to meet them. TAC can be used to support children and young people between 0-19 years, including unborn babies and can also be used with consent up to the age of 24 where a young person has a learning difficulty or disability. There are four main stages in setting up a TAC;

* Early identification of needs
* Assessing strengths and needs in a consistent and methodical framework
* Developing and delivering integrated services
* Reviewing and refining the support arrangements
	1. **Support and Guidance Available;** Please refer also to the LSCB Website and publications (Particularly ‘Meeting the Needs of Children in Lincolnshire’) at [www.lincolnshire.gov.uk/lscb](http://www.lincolnshire.gov.uk/lscb) In addition the following staff are available to support professionals.

**Early Help Advisors** are available to support professionals. These advisors are based within Customer Service Centre (01522 782111). They offer consultations to professionals for new cases where practitioners need some advice or guidance. The advisors are qualified social workers who will advise on all levels of safeguarding and thresholds.

**Early Help Consultants** provide support, advice and guidance to lead professionals on existing TAC cases. They will use Signs of Safety methodology to map and/or quality assure cases in order to secure improved outcomes for children, young people and their families. Contact via TAC Administrators.

**TAC Administrators** provide administrative support, maintain records, monitor processes and can signpost professionals to local services.

* 1. The **Designated Safeguarding Lead** acts as the focal point for all matters concerning child protection and safeguarding young people. One of the primary tasks is to act as a contact between LEAP, the family and other agencies. Incidents of possible child abuse obviously need to be handled with sensitivity and confidentiality consistent with the multi-disciplinary approach. If there is any cause for concern whatsoever it is vital that information is passed to the **Designated Safeguarding Lead** immediately. In the event, following statutory investigation, of concerns proving to be unfounded, staff should not reproach themselves for having raised the issue. In cases of this nature it is always better to be safe than sorry.
1. **PROCEDURES AND RECORD KEEPING**

LEAP will follow Lincolnshire’s safeguarding procedures with reference to Lincolnshire’s LSCB ‘Managing Individual Cases where there are Concerns about a Child’s Safety and Welfare’ (section 4 of LSCB Inter-Agency procedures).

Where there are safeguarding concerns staff will

* Discuss this with the **Designated Safeguarding Lead** and in their absence the Deputy Safeguarding Lead and decide a course of action. Out of hours a duty manager is available to discuss concerns and in addition staff should refer to the Emergency Duty Team (EDT) (01522 782333) for professional advice and support
* Complete a LEAP incident report on LIS (LEAP Information System) indicating a Safeguarding Concern. This will be updated throughout the incident and with the outcome when received
* Notify Customer Service Centre (01522 782111), out of hours EDT (01522 782333) and in the case of vulnerable adults Adult Social Care (01522 782155)
* Complete any paperwork instructed to do so by Social Care

The Designated Safeguarding Lead or Deputy will, where appropriate complete a Youth Housing Serious Incident Notification which will be securely emailed to Nacro as Lincolnshire Support Partnership (LSP) contract lead.

LEAP will ensure that:

* 1. Safeguarding information including Child Protection information is stored and handled in line with the principles of the Data Protection Act 1988 ensuring that information is:
* Used fairly and lawfully
* For limited, specifically stated purposes
* Used in a way that is adequate, relevant and not excessive
* Accurate
* Kept for no longer than necessary
* Handled according to people’s data protections rights
* Kept safe and secure
	1. Any concerns about a young person will be recorded on LIS within 24 hours. All records will provide a factual, evidence-based account. Timely, accurate recording of every episode/incident/concern/activity/actions will be made, including telephone calls to other professionals.
	2. Hard copies of records or reports relating to Safeguarding and Child Protection concerns will be kept in a separate section of the young person’s file which will be securely stored. Access to hard copy and electronic files is in accordance with LEAP’s Information Management Policies.
	3. There is a Designated Safeguarding Lead (DSL) available who has the necessary seniority and skills, undertakes appropriate Safeguarding training, and is given the time to carry out this important role. In the absence of the DSL there is access to a Deputy Safeguarding Lead who is trained and competent to give advice and guidance to staff in Safeguarding matters. Out of hours and in the unlikely absence of both the DSL and Deputy staff should seek advice from other Senior Managers and/or Customer Service Centre (01522 782111) or EDT (01522 782333)
	4. This policy is updated annually and that changes are made in line with any new guidance from LSCB
	5. In the case of a child protection referral or serious injury the DSL will contact Lincolnshire Customer Service Centre/EDT without delay to report concerns and seek medical attention as necessary
	6. Staff must report any concerns about adults who work with children or young people to the Chief Executive or to the Chair of the Board of Trustees in the event of allegation of abuse made against the Chief Executive. The Chief Executive or Chair must seek advice from the Local Authority Designated Officer(s) (LADO). EDT should be contacted outside of normal working hours (01522 782333).
	7. In the case of poorly explained serious injuries or where behaviour or concerns arouse suspicion if in any doubt the DSL should consult with Lincolnshire Children’s Services Customer Services Centre and seek advice from the Early Help Advisors.
	8. The DSL will keep records detailing any allegation and action taken as near to the time of disclosure as possible even when no investigation is undertaken; following up any verbal referral in writing within 24 hours.
	9. Conversations with a young person who disclosed abuse should follow the basic principles:
* Listen rather than directly question, remain calm
* Never stop a child or young person who is recalling significant events
* Make a record of discussion to include time, place, persons present and what was said (Young Person’s language – do not substitute words)
* Advise you will have to pass the information on
* Avoid coaching/prompting
* Never take photographs of any injury
* Allow time and provide a safe haven/quiet area for future support meetings
* At no time promise confidentiality to a child, young person or adult
1. **ROLES AND RESPONSIBILITIES**

LEAP will ensure that every member of staff and person working on behalf of the organisation:

* 1. Knows the name of the Designated Safeguarding Lead (DSL) and his/her role and responsibility
	2. Has an individual responsibility to refer Safeguarding concerns
	3. Will receive training at the point of induction and at regular intervals so that they know:
* Their personal responsibility/code of conduct/support standards
* LSCB child protection procedures and how to access them
* The need to be vigilant in identifying cases of abuse at the earliest opportunity
* How to support and respond to a child, young person or vulnerable adult who discloses significant harm
	1. Knows their duty concerning unsafe practices in regard to children, young people and vulnerable adults by a colleague
	2. The DSL will disclose information about a young person to other members of staff on a need to know basis
	3. LEAP will undertake appropriate discussion with parents prior to involvement with other agencies where a young person has given this consent
	4. LEAP will ensure that parents have an understanding in relation to Safeguarding
	5. Work to develop effective links with relevant agencies in relation to Safeguarding
	6. Ensure that, where there are unmet needs an Early Help discussion is initiated. Advice may be sought from the Early Help Consultants in the locality
	7. Complete reports and send representatives to case conferences, core groups, child protection review, Child In Need (CIN) and Team Around the Child (TAC) meetings
	8. Notify any allocated Social Worker if:
* A young person subject to a Child Protection Plan (CPP) is at risk of losing their accommodation
* If a young person on a CPP is not seen or spoken to by staff within a 24 hour period
	1. Ensure that all staff are aware of their duties under the Serious Crimes Act 2015 to report known instances of female genital mutilation (FGM) to the police via 101
1. **SUPPORTING CHILDREN AND YOUNG PEOPLE AT RISK**
	1. LEAP will endeavour to support vulnerable young people through:
* Its ethos which promotes a positive, supportive and secure environment, giving young people a sense of being valued
* Its behaviour policy aimed at supporting vulnerable young people in LEAP accommodation. All staff will agree a consistent approach which focuses on the behaviour of the offence committed by the young person; working to support young people in developing positive behaviour
* Liaison with other appropriate agencies which support the young person
* Developing supportive relationships
* Recognition that young people in LEAP are vulnerable and are in need of support and protection
* Monitoring young people’s welfare, keeping accurate records and notifying appropriate agencies when necessary
* Allowing designated staff opportunity to attend face to face Safeguarding training for example Prevent, Child Sexual Exploitation, Domestic Abuse, Substance Misuse
* Ensuring information is transferred safely and securely when a young person with a Safeguarding concern is referred into LEAP accommodation and notifying Social Workers, Lead Professionals and other key workers when a young person leaves the project
1. **EXTREMISM AND RADICALISATION**
	1. LEAP seeks to protect young people and vulnerable adults against messages for all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist parliamentary groups and extremist Animal Rights movements.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children, young people and vulnerable adults vulnerable to future manipulation and exploitation.

LEAP is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

Prevention work and reductions of risks will include drop-ins and workshops, anti-bullying policy and other issues specific to the organisation’s profile, community and philosophy.

* 1. **Risk Assessment**

LEAP needs to assess the risk, with local partners, of their clients being drawn into terrorism, as well as their support for extremist ideas and terrorist ideology. LEAP has robust safeguarding procedures to identify those at risk, appropriate intervention and the most appropriate referral option. This also applies to consideration of appropriateness of visiting speakers. Police in all regions are expected to produce a Counter-Terrorism local profile (CTLPs) which is to assess the risk of individuals being drawn into terrorism and is the risk assessment that LEAP needs to refer to. Further support can be provided by contacting prevent@lincs.pnn.police.uk

* 1. **Working in Partnership**

LEAP ensures that their safeguarding arrangements take into account policies and procedures of Lincolnshire Local Safeguarding Children Board (LSCB). The key aim of the PREVENT strategy in Lincolnshire is to help local authorities, police, community safety partnerships and other partners and partnerships to develop and implement effective actions, which will make their communities safer. This will reduce the risk from terrorism and violent extremism, so that the people of Lincolnshire can go about their business freely and with confidence.

Experience has shown that the best results are achieved by:

* Partnership working and community engagement
* Understanding the challenge and its context
* Developing an effective action plan
* Managing risk
* Tracking progress and evaluating success
* Sharing learning

Lincolnshire has a PREVENT steering board which provides the strategic direction and is attended by a variety of partners.

The CHANNEL panel is the operational group for Lincolnshire and has multi-agency representation.

* 1. **Staff Training**

 LEAP ensures that their staff are equipped to identify children, young people and vulnerable adults at risk of being drawn into terrorism, as well as challenging extremist ideas. Staff are aware of how to refer children, young people and vulnerable adults for further help.

 All staff undertakes PREVENT e-learning via the LSCB website. Face to face learning is available via the Stay Safe Partnership

* 1. **Referral Process**

 As part of the duty to protect young people from the messages of extremism, LEAP will refer any young person they are concerned about to the local Prevent team through the Channel process. The Channel referral form can be found through the LSCB website and should be returned by email to channel@lincs.pnn.police.uk staff may also email prevent@lincs.pnn.police.uk to seek advice and support. Should staff use the safeguarding referral process through Customer Service Centre (01522 782111), the CSC will ask staff to complete a Channel form if there are any concerns related to extremism and radicalisation. Where LEAP has serious concerns about the vulnerability of a young person in relation to extremist behaviour, then staff should call the police on 999.

* 1. **IT Policies**

 LEAP endeavours to ensure that young people are safe from online terrorist and extremist material typically via appropriate levels of filtering. LEAP requires young people to abide by acceptable user policies which make it clear that accessing such sites is unacceptable. Using LEAP equipment to send terrorist publications to others would be a criminal offence.

* 1. **Monitoring and enforcement**

Commissioners of LEAP services will assess the settings approach to keeping children and young people safe from the dangers of radicalisation and extremism and what is done when LEAP suspects that young people are vulnerable to these threats.

* 1. **Wider issues to consider:**

These are some further areas to consider in implementing the Prevent agenda:

* LEAP seeks to promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs
* LEAP will identify where young people are victims of racism or are perpetrators of racism or have racist views and can signpost to other organisations which will be able to offer support
1. **FEMALE GENITAL MUTILATION (FGM)**

Female Genital Mutilation (FGM) is child abuse and illegal. As of 31st October 2015, all professionals are required to report cases of FGM to the police. This is a personal duty that cannot be transferred to anyone else. The new mandatory reporting duty related to a disclosure that FGM has already happened and this should be reported to the Police on 101. Where a girl discloses information that identifies her as at risk of FGM, professionals should follow the normal safeguarding procedures.

**8** **YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)**

8.1 We have a duty of care towards our young peopl and an obligation to support them in being safe in the online world as well as the physical world. There are a number of definitions of sexting but for the purposes of this policy sexting is simply defined as: Images or videos generated

* by children under the age of 18, or
* of children under the age of 18 that are of a sexual nature or are indecent

These images are shared between young people and/or adults via a mobile phone, handheld device or websites with people they may not even know.

8.2 Sexting or youth produced sexual imagery does not refer to one single activity: it can have multiple facets and activities, be connected to sexual pleasure and be linked to a ‘normal’ part of sexual development; however, something that transpires online can quickly spiral out of control as it becomes freely available in the public domain. It can then be transferred, forwarded, downloaded, uploaded and shared.

Any situations involving clients and youth produced sexual imagery are taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour. The understanding of children and young people around the potential implications of taking and/or sharing youth produced sexual imagery is likely to be influenced by the age and ability of the children involved. In some cases children under 13 (and indeed older) may create youth produced sexual imagery as a result of age appropriate curiosity or risk-taking behaviour or simply due to naivety rather than any sexual intent.

8.3 All incidents involving youth produced sexual imagery will be responded to in line with the LEAP’s safeguarding and child protection procedures;

When an incident involving youth produced sexual imagery comes to the attention of LEAP:

* The incident is referred to the DSL as soon as possible and recorded using an incident report
* The DSL should hold an initial review meeting with the young person’s key worker
* There should be subsequent interviews with the young people involved (if appropriate)
* At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children’s social care and/or the police immediately.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort and they may have already tried to resolve the issue themselves.

8.4  **Securing and handing over devices to the police**

The young person should be encouraged to report the matter to the police, who may want to secure the device for evidence. LEAP are unable to remove any devices from young people unless they are willing to give them to staff for safekeeping whilst awaiting a police response. Young people should be encouraged not to delete any materials, including images, text or social media messages etc. until they have spoken to the police.

**9 PEER TO PEER ABUSE**

Children and young people may be harmful to one another in a number of ways which would be classified as peer on peer abuse.

9.1 **Types of abuse**

There are many forms of abuse that may occur between peers and this list is not exhaustive;

* Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)
* Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)
* Financial abuse and exploitation
* Bullying (physical, name calling, homophobic etc.)
* Cyber bullying
* Youth Produced Sexual Imagery (Sexting)
* Initiation/Hazing e.g. Forced or coerced alcohol or other drug consumption
* Prejudiced Behaviour
* Banter

We constantly develop strategies in order to prevent the issue of peer on peer abuse rather than manage issues in a reactive way.

We recognise that peer on peer abuse can and will occur in any setting even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting our young people to talk about any issues and through sharing information with all staff.

We support this by ensuring that LEAP has an open environment where clients feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a programme of activities that tackles such issues as prejudicial behaviour and gives young people an open forum to talk things through. All new residents to LEAP are considered ‘Residents at Risk’ whilst they settle into the project and staff should be vigilant to indicators that they are being ‘targeted’ or ‘singled out’ by other young people.

9.2 **Expected actions from all staff**

Although the type of abuse may have a varying effect on the victim and initiator of the harm, we follow simple steps to help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred. It is equally important to deal with it sensitively and think about the language used and the impact of that language on the young people, for example the use of the word perpetrator can quickly create a ‘blame’ culture and leave a young person labelled.

All staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff are not prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

All incidents are recorded or shared with the designated safeguarding lead. Information is shared appropriately with family and agencies involved with the young person.

**10** **DOMESTIC ABUSE**

The Government definition of domestic violence and abuse is:

‘Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

* Psychological
* Physical
* Sexual
* Financial
* Emotional

‘Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.’

LEAP complies with Lincolnshire County Council’s Domestic Abuse Policy <http://lincolnshirechildcare.proceduresonline.com/chapters/p_dom_abuse.html>

LEAP seeks to ensure that young people are educated about healthy and equal relationships and does this through one to one support, group activities, and awareness raising campaigns, posters, leaflets and signposting to appropriate agencies.

**11 HONOUR BASED VIOLENCE**

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Staff need to be alert to the possibility of a young person being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child or young person that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy) who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

**12 FORCED MARRIAGE**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

**13 CHILD SEXUAL EXPLOITATION**

A person under 18 is sexually exploited if they are coerced into sexual activities by one or more persons who have deliberately targeted them due to their youth, gender, inexperience, disability, vulnerability and/or economic or social position. The process usually involves a stage of 'grooming' involving the use of a variety of manipulative and controlling techniques to target a vulnerable person.

Like domestically abusive relationships, sexually exploitative relationships are characterised by an imbalance of power and the use of controlling behaviours to maintain a young person's subordinate or dependent position, and to regulate his or her everyday behaviour. Coercive behaviours are also extremely common including the use of assault, threat, humiliation and intimidation as a means of ensuring the compliance of a victim.

Child sexual exploitation can occur through the use of technology without the child's consent or immediate recognition. A central mechanism for offenders to extend their control of their victim is through the use of mobile technology.

Staff concerned that a young person may be a victim or at risk of Child Sexual Exploitation should complete the LSCB multi-agency risk assessment tool and follow the recommended action. The risk assessment toolkit can be found on the LSCB website <https://www.lincolnshire.gov.uk/lscb/professionals/abuse/sexual-exploitation/124636.article>

**14 SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN PEERS**

Sexual violence and sexual harassment can occur between two children or young people of any age and sex. It can also occur through a group of young people sexually assaulting or sexually harassing a single child/young person or group of children/young people. Children and young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their whole lives. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children and young people with SEND and LGBTQ+ children and young people are at greater risk. Staff should be aware of the importance of:

* Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
* not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
* challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts and Upskirting which is the act of taking a photograph of underneath a person’s skirt without their consent.

Dismissing or tolerating such behaviours risks normalising them.

**What is Sexual violence and sexual harassment?**

14.1 **Sexual violence**

It is important that staff are aware of sexual violence and the fact children and young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

* **Rape**: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
* **Assault by Penetration**: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
* **Sexual Assault**: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

<https://www.legislation.gov.uk/ukpga/2003/42/contents>

14.2 **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

14.3 **Sexual harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a child or young person’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

* sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
* sexual “jokes” or taunting;
* physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (staff should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
* Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
	+ non-consensual sharing of sexual images and videos;
	+ sexualised online bullying;
	+ unwanted sexual comments and messages, including, on social media; and
	+ sexual exploitation; coercion and threats

14.4 **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child or young person is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a young person or a young person makes a report to them they should speak to the designated safeguarding lead.

**15 SEXUAL HEALTH AND RELATIONSHIPS**

Staff at LEAP are trained to support young people in maintaining good sexual health and relationships. Support staff undertake training for C Card; pregnancy and chlamydia testing and an e-learning module on Teenage Pregnancy in Lincolnshire. Support to young people around sexual health and relationships are available through one to one support and group activity to raise awareness.

Consensual sexual activity is not an offence over the age of 16, nevertheless 16 and 17 year old young people are still vulnerable to harm through an abusive sexual relationship. Staff need to assess and address their safety and wellbeing in line with LSCB procedures.

Young people aged 16 and 17 are not deemed able to give consent if the sexual activity is with an adult in a position of trust (i.e. and individual working with a young person in any setting) or a family member as defined by the Sexual Offences Act 2003 and/or any pre-existing legislation.

<http://lincolnshirechildcare.proceduresonline.com/chapters/g_sexual_health.html?zoom_highlight=sex+and+relationship+education+policy>

**16 YOUNG PEOPLE WHO RUN AWAY OR GO MISSING**

 A young person is deemed ‘missing’ if their whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be subject of crime or at risk of harm to themselves or another. A person not at a place where they are expected to be are ‘absent’ this category should comprise of cases in which people are not presently where they are supposed to be and there is no apparent risk. ‘Absent’ cases should not be ignored, and must be monitored over periods of time with consideration given to escalating to ‘missing’ if there is a change to the circumstances that has increased the level of risk.

Each young person accommodated by LEAP has a comprehensive risk assessment which should identify whether there is a history (where known) of being missing or absent. Where this is identified a risk management plan will outline the actions that staff should take in any given circumstance. Where there is no known history of a young person being missing or absent, staff should still be vigilant to the possibility and any behaviours outside of the norm for that young person should be acted upon in line with the LSCB procedures for missing and absent children and young people. <http://lincolnshirescb.proceduresonline.com/chapters/pr_joint_miss.html>

When a child is found, they must be offered an independent return interview. Independent return interviews provide an opportunity to uncover information that can help protect children from the risk of going missing again, from risks they may have been exposed to while missing or from risk factors in their home.

**17 CRIMINAL EXPLOITATION AND COUNTY LINES**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support) should be considered. <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>

Like other forms of abuse and exploitation, county lines exploitation:

* can affect any child or young person (male or female) under the age of 18 years;
* can affect any vulnerable adult over the age of 18 years;
* can still be exploitation even if the activity appears consensual;
* can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
* can be perpetrated by individuals or groups, males or females, and young people or adults; and
* is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**18 SAFER RECRUITMENT AND PROFESSIONAL BOUNDARIES**

LEAP staff (paid or unpaid) are in a position of trust. LEAP ensures that all appropriate measures are applied in relation to everyone who works in the organisation who is likely to be perceived by the young people as a safe and trustworthy adult. We do this by:

* 1. Operating safer recruitment practices including appropriate Disclosure and Barring Service (DBS) and reference checks, verifying identity, academic and vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the Children’s List in accordance with DBS and the right to work in the UK.
	2. Ensuring staff and volunteers adhere to a working relationships policy and other professional standards at all times. Staff are aware of social media/on-line conduct
	3. Ensuring any disciplinary proceedings against staff related to Child Protection matters are concluded in full in accordance with LSCB, LADO and HR policy, procedures and guidance
	4. Ensuring that all staff and other adults on site are aware of the need for maintaining appropriate and professionals boundaries in their relationship with young people, following the working relationships policy
	5. Establishing adequate risk assessments are in place including for on and off site activities
	6. Supporting staff confidence to report misconduct
	7. At least one member of every recruitment panel has completed Safer Recruitment training within the last 5 years. At least one member of staff has completed the LSCB face to face Safer Recruitment training within the last 5 years. E-learning is also available.

**19 GROOMING**

You should be aware that on very rare occasions people will enter this field of work in order to have access to vulnerable children and young people with a view to exploiting or abusing their relationship with them. In order to have the ability to groom a young person the employee will first need to groom the team, or members of the team, to assess how a target will react when they are groomed. Specifically, they are likely to form a judgement in terms of:

* How you respond to their grooming: confidently, uncomfortably or somewhere in between
* The degree to which you successfully send back a clear message that you are neither intimidated nor confused, and will report any wrongdoings or that you are willing to keep their confidence, embrace the friendship and not report your concerns

Anyone can be groomed. People who are assertive and know how to handle confrontation can be groomed; people who don’t like conflict or don’t know how to stand up for themselves can also be groomed; from the most senior managers to the most junior of staff. But not everyone will be subject to a ‘*campaign’* of grooming. In many cases, people who have a hard time using assertive behaviour may be the preferred targets because their responses at the time of being groomed leave them vulnerable.

The groomer ultimately wants to ensure the organisation’s confidence in them to enable unsupervised access to their intended victim(s). There are 6 distinct stages to grooming that you should be aware of:

Stage 1 - Targeting - the groomer targets a victim by sizing up vulnerability—emotional neediness, isolation and lower self-confidence.

Stage 2 – Gaining Trust – the groomer gains trust by watching and gathering information about his/her colleagues, getting to know their needs and how to fill them. In this regard, groomers mix effortlessly because they generate warm and calibrated attention. Only more awkward and overly personal attention, or a gooey intrusiveness, provokes the suspicion of others. Otherwise, a more suave offender is better disciplined for how to push and poke, without revealing themselves. Think of the groomer on the prowl as akin to a spy—and just as stealth.

Stage 3 – Filling a Need - Once the groomer begins to fill the colleague's needs, they may assume noticeably more importance in their life and may become idealised. Gifts, extra attention, affection may distinguish one person in particular and should raise concern and greater vigilance to be accountable for that person.

Stage 4 - Isolating - The groomer uses the developing special relationship with the colleague to create situations in which they are alone together. This isolation further reinforces a special connection. Dating, nights out, visits to the colleague’s home and special trips all enable this isolation.

A special relationship can be even more reinforced when a groomer cultivates a sense in the colleague that (s)he is loved or appreciated in a way that others, not even close friends and family, provide. Others may unwittingly feed into this through their own appreciation for the unique relationship.

Stage 5 - Advancing the relationship - At a stage of sufficient emotional dependence and trust, the groomer progressively cements the relationship.

Stage 6 - Maintaining control - Once the relationship is established, groomers commonly use secrecy and blame to maintain the colleague's continued participation and silence —particularly because some of their behaviour may cause the colleague to withdraw from the relationship.

People in these entangled relationships—and at this point they are entangled—confront threats to blame them, to end the relationship and to end the emotional and material needs they associate with the relationship, whether it be special outings or gifts. The colleague may feel that the loss of the relationship and the consequences of exposing it will humiliate and render them even more unwanted.

Once the groomer is confident that they have the trust and secure relationships of their colleagues, and when they are not being so closely supervised in their roles they are free to start grooming the vulnerable young people resident in LEAP.

Not all grooming of colleagues is necessarily to the levels outline in the 6 stages above but could just rest at securing close, trusting friendships with one or two team members, it would be too difficult to try to groom the whole team.

If you have any concerns about the conduct of one of your colleagues or you just have a ‘gut feeling’ that something is not right and it makes you feel uncomfortable you have a duty to report your concerns to management by following LEAP Whistleblowing procedures. It is better to raise the concern and be wrong than to not raise it at all and have regrets about not doing so.

**20 BOARD OF TRUSTEES RESPONSIBILITIES**

The Board of Trustees fully recognises its responsibilities with regard to Safeguarding and promoting the welfare of children in accordance with Government guidance

The Board of Trustees have agreed processes which allow them to monitor and ensure that LEAP:

* 1. Has robust Safeguarding procedures in place
	2. Operates safer recruitment procedures and appropriate checks are carried out on new staff
	3. Has procedures for dealing with allegations of abuse against any member of staff or adult on site
	4. Has a member of the Senior Management Team who is able to take lead responsibility for dealing with Safeguarding and Child Protection issues
	5. Takes steps to remedy any deficiencies or weaknesses with regard to Safeguarding arrangements
	6. Is supported by the Board of Trustees nominating a member(s) responsible for liaising with the local authority and/or partner agencies in the event of allegations of abuse against the Chief Executive, this is the Chair
	7. Carries out an annual review of the Safeguarding policy and procedures

**21** **ALLEGATIONS MADE AGAINST ADULTS WHO WORK WITH CHILDREN**

Child Protection procedures must be followed whenever any member of staff or volunteer becomes aware of a concern, or an allegation of abuse is made, about any adult working with children and young people. The Chief Executive must be notified or, where the allegation is against the Chief Executive the Chair of Board of Trustees must be informed. The first priority is whether any immediate action needs taking to ensure the child or other children are safe. **All allegations of alleged or suspected abuse against an adult who works with children must be reported to the Lincolnshire’s Local Authority Designated Officers (LADO).**

20.1 Reporting to the LADO applies even where the nature of the alleged assault would not normally meet the threshold if applied to young people in other circumstances. For example, a report of a young person being hit by someone, with no injury caused, would be unlikely to require any response by Police or Social Care. However, a similar report of a young person being hit by a member of staff should be responded to because of:

* The vulnerability of young people away from home
* The higher standards of conduct demanded by law and regulation of those caring for and supporting young people
* The position of trust enjoyed by such people

20.2 Contact should be made with the LADO when it is alleged, or there are concerns that, a person who works with children has

* Behaved in a way that has harmed a child or young person, or may have harmed a child or young person
* Possibly committed a criminal offence against or related to a child or young person; or
* Behaved towards a child or young person in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children or young people

20.3 This process should be followed for members of staff/volunteers who are currently working in LEAP regardless of whether the project is where the alleged abuse took place- i.e. the allegation may relate to the individuals personal life or be historic

20.4 Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. Decisions about suspension are made on a case by case basis and will depend on the nature and seriousness of the allegation. It is essential that any allegation of abuse made against a member of staff or volunteer in LEAP is dealt with in a timely manner, in a fair and consistent way that provides effective protection for the young person and at the same time supports the person who is the subject of the allegation.

20.5 Disclosure and Barring Service (DBS) caseworkers make decisions about who should be placed in the child barred list and/or adults barred list and are prevented by law from working with children or vulnerable groups.

 Referrals should be made to DBS when an employer or organisation believes a person has caused harm or poses a future risk of harm to vulnerable groups, including children.

An employer is breaking the law if they knowingly employ someone in a regulated activity with a group from which they are barred from working.

A barred person is breaking the law if they seek, offer or engage in regulated activity with a group from which they are barred from working.

Guidance on making a referral to DBS is available at <https://www.gov.uk/government/publications/dbs-referrals-referral-chart>

**OTHER RELATED POLICIES AND PROCEDURES**

LEAP takes safeguarding seriously and understands this policy is over-arching. The organisation also maintains other linked policies in line with legislative requirements; together these make up the suite of policies to safeguard and promote the welfare of young people in this organisation

* **Information Management Policies**
* **Working Relationships Policy / Staff handbook**
* **E-safety Policy and Procedures**
* **Anti-bullying Policy and Procedures**
* **Complaints Policy and Procedures**
* **Acceptable Use Procedures**
* **Substance Misuse Policy**
* **Lone Working Policy**
* **Incident Reporting Policy**
* **LSP Safeguarding and Serious Incident Procedure**
* **Recruitment, Selection and Induction Policy**
* **Harassment Policy**
* **Self-Harm, Attempted Suicide and Sudden Death Policy**
* **Public Interest Disclosure (Whistleblowing) Policy**
* **Infection Control Policy**
* **Risk Assessment Policy and Guidelines**

**PARTICIPATION & CONSULTATION PROCESS**

* Awareness raising programmes
* Survey/questionnaires distributed to staff and clients
* LEAP Participation Group
* Seeking the views of Stakeholders
* Monitoring evaluation and review

**RESPONSIBILITIES OF ALL STAKEHOLDERS.**

**The Responsibilities of Staff**

Our staff will:

* Be vigilant to noticing indicators of possible abuse or neglect and referring them to Children’s Services;
* Adopt an approach which ascertains the early identification of additional needs of young people and promotes a co-ordinated multi agency response to meet them.
* Ensure that all young people and vulnerable adults living in LEAP accommodation have equal access to support and are provided with education to support them to keep themselves safe from harm

**The Responsibilities of Clients**

We expect our clients to:

* Engage in a process which enables LEAP to support them when additional needs are identified

**The Responsibilities of All**

Everyone should:

* Have an equal responsibility to act on suspicion or disclosure that might suggest a child, young person or vulnerable adult is at risk of harm

**CONTINUOUS PROFESSIONAL DEVELOPMENT OF STAFF**

* LEAP is committed to training its staff to the highest standards. This is through internal and external training, through team meetings and supervision.

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| **Name of policy:** | **Author of review /revision** | **Date approved** | **Approved By** | **Next review/ revision date:** |
| **Safeguarding** | Val Moore | 30/01/19 | Full Board | Jan 2020 |

**Document Control**

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| Version  | Date | Changes made |
| Version 4 | January 2019 | Revision: Working Together 2018; inclusion of: Sexting; Peer to Peer Abuse; Honour Based Violence; Forced Marriage; Sexual Violence & Sexual Harassment between Peers; Criminal Exploitation and County Lines; Grooming |
| Version 3 | January 2018 | Review |
| Version 2 | January 2017 | Full review and revision |
| Version 1 | October 2014 | Revision |