

Statement of Procedures for Dealing with Allegations of Abuse Against Staff

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	The Review Period and Target Review Date refer to our internal policy review process. The published policy is current and is the most recent approved version.
Legislation or regulation:	<u>Guidance for Safer Working Practice for those Working with Children and Young People in Education Settings (October 2015)</u> <u>Keeping Children Safe in Education DfE (September 2018)</u> <u>Sexual Offences Act 2003</u> <u>Working Together to Safeguard Children (July 2018)</u>

CONTENTS

Section 1: Norfolk Academies Statement of Intent

Section 2: Scope

Section 3: Legal Requirements

Section 4: Policy

4.1 Introduction

Norfolk Safeguarding Children Board Protocol 8.3

4.2 Scope

4.3 Key Roles and Responsibilities

4.4 Responding to Allegations

4.5 Initial Considerations

4.6 Initial Multi-Agency LADO Meeting

4.7 Ongoing LADO Involvement and Outcome of the Safeguarding LADO Process

4.8 Cross Boundary Issues

4.9 Restrictions on Identifying Teachers Against Whom Allegations of Criminal Misconduct Have Been Made

4.10 Resignations and Compromise Agreements

4.11 Confidentiality and Recording Keeping

4.12 Learning Lessons

4.13 Guidance on Retention of Records

Section 5: Equal Opportunities Statement

SECTION 1: NORFOLK ACADEMIES STATEMENT OF INTENT

- 1.1 Norfolk Academies are fully committed to the protection of all children in our care. Due to the serious nature of allegations of abuse against staff who work with children, all Academies in the Norfolk Academies Multi Academy Trust (NAMAT) will follow the Norfolk Safeguarding Children Board Protocol 8.3 when allegations or concerns of abuse are identified.
- 1.2 An allegation may relate to a person who works with children who has:
- Behaved in a way that has harmed a child, or may have harmed a child;
 - Possibly committed a criminal offence against or related to a child;
 - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- 1.3 The procedures for dealing with allegations of abuse against Academy staff aims to:
- Ensure allegations are listed to, investigated and responded to quickly and effectively;
 - Ensure allegations are dealt with by the appropriate personnel;
 - Ensure outcomes of allegations are communicated in a timely manner to all relevant parties.
- 1.4 Allegations must be reported to the relevant Academy Principal who will contact the Local Authority Designated Officer (LADO). The LADO plays the key role in the process of dealing with allegations of abuse against staff. The LADO for Norfolk schools can be contacted on 01603 223473.
- 1.5 At appropriate stages in the process for dealing with allegations of abuse, support can be obtained from the Norfolk Educational Services (NES) Human Resources Team. Particularly during any internal investigation stage and if there appears to be foundation to the allegations, through the disciplinary process, Academies are strongly advised to involve the NES Human Resources Team to ensure that the various procedures are adhered to and that the rights of staff are recognised and met.

SECTION 2: SCOPE

- 2.1 This is a Norfolk Academies Statutory Document for Attleborough Academy Norfolk. As such, it provides the policy to be followed at the Academy.

SECTION 3: LEGAL REQUIREMENTS

- 3.1 This policy is required by the Department for Education (DfE) and falls into the category of:

D. Documents Referenced in Statutory Guidance

SECTION 4: POLICY

4.1 Introduction

- 4.1.1 As stated in the Norfolk Academies Statement of Intent, Attleborough Academy Norfolk follows the Norfolk Safeguarding Children Board policies and procedures. **Section 8.3** of the manual is the protocol to be followed when dealing with Allegations Against Persons Who Work/Volunteer With Children.

4.2 Scope

- 4.2.1 All allegations of abuse of children by those who work and/or volunteer with children must be taken seriously.

- 4.2.2 For the purposes of this protocol, the following definitions apply:

- A child is anyone under the age of 18;
- An employee is anyone working with children, be it in an employed (all sectors and settings) or voluntary capacity;
- An employer is anyone working with or providing services to children (all sectors and settings).

- 4.2.3 The scope of this inter agency procedure is not limited to allegations involving Significant Harm or suffering or likely to suffer Significant Harm to a child. The procedure should be applied in all situations where it is alleged that a person who works with children has:

- Behaved in a way which has harmed a child, or may have harmed a child (Norfolk's interpretation of 'may have harmed' is that there appears to be intent);
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

- 4.2.4 Whilst some behaviours may not constitute a criminal offence, and some may not reach the threshold of Significant Harm, consideration will need to be given as to whether they may indicate unsuitability to work with children. Any such behaviour should be considered within the context of the four categories of abuse i.e. physical, sexual and emotional abuse and neglect.

These include concerns relating to inappropriate relationships between members of staff and children or young people:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual;
- Grooming, i.e. meeting a child under 16 with intent to commit a relevant offence (see Section 16-19 Sexual Offences Act 2003);
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text/email messages or images, gifts, socialising etc (see Section 15 Sexual Offences Act 2003);
- Possession of indecent photographs/pseudo-photographs of children;

- Qualified/unqualified staff becoming involved in a relationship with an ex pupil under the age of 18, who is no longer at the school;
 - Sexual Exploitive behaviour;
 - Inappropriate Physical restraint or physical harm to a child.
- 4.2.5 Reference may be made to the DfES ‘Guidance for safe Working Practice for Adults who work with Children and Young People: and Keeping Children Safe in Education: The allegations may relate to the person’s behaviour at work, at home or in another setting.
- 4.2.6 It may concern, for example, a paid employee, unpaid volunteer, child-minder, approved foster carer or prospective adopter.
- 4.2.7 In the context of this procedure, the term “employer” means the organisation that has a working relationship with the person against whom the allegation has been made and includes voluntary organisations, employment agencies, fostering services, child minder services, youth clubs and others.
- 4.2.8 Allegations of historical abuse should be responded to in the same way as current concerns. Anyone over the age of 18, making a historical allegation of abuse needs to contact the Police in the first instance, it will then be the Police who refer to the LADO as per procedures.
- 4.2.9 In such cases, it is important to find out whether the person against whom the allegation is made is still working with children, the current employer is not informed until the LADO has discussed and agreed with the Police what information will need to be shared.
- 4.2.10 Where concerns arise about a person’s behaviour in relation to their own children, the current employer is not informed until discussed and agreed with Children’s Services Social Care and/or the Police. There may be a need to contact the current employer to assess whether there may be implications for children with whom the person has contact at work, in which case this procedure will apply.

4.3 Key Roles and Responsibilities

4.3.1 **Local Authority Designated Officers (*Working Together to Safeguard Children 2018 now refer to LADO’s as Designated Officers*)**

The Local Authority must appoint a Designated Officer(s). In Norfolk the title of LADO remained in use. The LADO’s responsibilities are:

- To be involved in the management and oversight of individual cases from all partner agencies of the LSCB which fall within this procedure;
- To provide advice and guidance to employers and voluntary organisations;
- To provide advice and guidance to Senior Managers (see Section 2.3, Senior Manager) about the operation of this procedure;
- To liaise with the Police and other agencies;
- To monitor the progress of cases – to ensure that they are dealt with as quickly as possible and consistent with a thorough and fair process; and
- To keep records of all advice given, actions taken and decisions made;

- Chairing Multi-Agency LADO Meetings and liaising with chairs of Multi-Agency LADO Meetings (if not chairing);
- To contribute to LSCB inter agency training programmes and awareness raising across all agencies;
- To provide assistance to agencies in the discussion regarding suspension (the power to suspend is vested in the employer alone, it is not a LADO decision);
- To liaise with the Police and the Crown Prosecution Service;
- To maintain information databases in relation of all allegations and produce qualitative and quantitative reports for the LSCB and Department for Education.

4.3.2 **Named Senior Officer**

Norfolk Safeguarding Children Board must appoint a Named Senior Officer to have overall responsibility for ensuring that their agency operates procedures for dealing with allegations against those who work with children in accordance with the guidance set out in Working Together to Safeguard Children 2018. The responsibilities of the Named Senior Officer include:

- Ensuring that their organisation complies with the standards identified and agreed by the LSCB for managing allegations as outlined within the Working Together to Safeguard Children 2018;
- Ensuring that this LSCB procedure for managing allegations is reflected and implemented within their own agency procedure;
- Ensuring that the work force is aware of and implements this procedure in relation to all allegations against those who work with or on behalf of children;
- Ensuring that the organisation has systems in place to review cases and identify and implement any changes, therefore improving procedures and practice;
- Resolving any inter-agency issues which impede the implementation of LSCB procedures;
- Ensuring that the key roles of Named Senior Officer, Local Authority Designated Officer and Senior Manager (employer) are reflected in their agency policy and procedure;
- Ensuring that effective reporting and recording arrangements within their agencies are in place.

4.3.3 **Senior Manager (Employer/Organisation)**

Each employer must appoint a Senior Manager who has overall responsibility for ensuring that this procedure is followed at an operational level. This person may be, or may represent, the employer. The responsibilities of the Senior Manager include:

- Ensuring that this procedure is properly applied and implemented;
- Providing advice, information and guidance for staff within the organisation;
- Being the senior manager within the organisation to whom all allegations or concerns are reported;
- Liaising with the Local Authority Designated Officer (LADO) as required under this procedure;
- Referring allegations in accordance with the organisation's and this procedure;

- Gathering any additional information which may have a bearing on the allegation e.g. previous known concerns, care and control incidents, etc;
- Providing the subject of the allegation with information where they can obtain support from and advising them to inform their union or professional body as part of their duty of care to the person subject to the allegation;
- Should the allegation be malicious, considering, in consultation with the LADO, the need to make a referral to Children's Social Care Services for support or to the Police;
- Attending Multi-Agency LADO Meetings;
- Liaising with Human Resources where the employer's disciplinary action is required;
- Ensuring that risk assessments are undertaken where and when required;
- Ensuring that effective reporting and recording systems are in place which allow for the tracking of allegations through to the final outcome;
- Undertaking appropriate checks with data the agency may hold;
- Providing reports and information as required by the Named Senior Officer and LADO;
- Raising the awareness of the need to empower children and young people who are in vulnerable positions by ensuring their agency produce good whistle blowing and complaints procedures for all children;
- Ensuring appropriate and relevant training programmes are in place for and accessed by all staff;
- Ensuring relevant support programmes are in place for staff, parents and children/young people.

The employer must also identify an alternative person to whom reports should be made in the absence of the nominated Senior Manager, or in cases where that person is the subject of an allegation or concern.

4.3.4 **The Policy – Key Officers**

The Chief Superintendent (or designated deputy) of the Vulnerability and Partnerships Command will:

- Have Strategic oversight of the local police arrangements for managing allegations against staff and volunteers;
- Liaise with LSCB on the issue;
- Ensure compliance.

The Vulnerability and Partnerships Command should designate a Detective Inspector (or designated deputy – This may be an officer from another unit where they lead on the investigation) to:

- Liaise with the LADO;
- Take part in Multi-Agency LADO discussions;
- Review the progress of cases in which there is a police investigation;
- Share information, as appropriate, on completion of an investigation or related prosecution.

4.4 Responding to Allegations

- 4.4.1 All organisations which provide services to children, or provide staff or volunteers to work with or care for children, should operate a procedure for handling allegations that fall within this procedure in a way which is consistent with the guidance set out in Working Together to Safeguard Children 2018.
- 4.4.2 Where such allegations are made, consideration must be given to the following strands:
1. The police investigation of a possible criminal offence;
 2. An internal investigation by the agency/employer if there is not a criminal investigation;
 3. Enquiries and assessment by Children's Social Care Services as to whether the child is in need of protection or in need of services;
 4. Consideration by an employer of disciplinary action in respect of the individual.

4.5. Initial Considerations

- 4.5.1 All allegations within this procedure that come to the employer's attention should be notified to the Local Authority Designated Officer (LADO) within one working day by completing the LADO referral form from the NSCB website.
- 4.5.2 Contact with the LADO needs to be made before any contact is made either with the person subject to the allegation or the child and parent/carer. This is to ensure that the correct action is taken which will not impede the disciplinary or investigative processes.
- 4.5.3 The LADO will discuss the matter with the employer and where necessary obtain further details of the allegation and the circumstances in which it was made.
- 4.5.4 The Police should be consulted, in any case where a criminal offence may have been committed or where the parent wishes for the allegation to be reported to the Police, as soon as practicable. The Multi-Agency LADO discussion with the MASH should be undertaken to ensure that any live safeguarding or investigative procedures are implemented.
- 4.5.5 If there is reasonable cause to suspect that a child is suffering or is likely to suffer Significant Harm, the responsible person or employer will immediately refer the concerns around the child to Norfolk Multi-Agency Safeguarding Hub (MASH), and at the same time refer to the LADO Service in order for the safeguarding matters around the adult of concern to be dealt with. Wherever possible the LADO should be included in the Section 47 strategy discussion in order to consider whether the allegation/concern against the person of concern meets the LADO criteria.
- 4.5.6 In any case where there is a Section 47 Joint Investigation or a live Police investigation the Police should be represented at the initial Multi-Agency LADO meeting.

- 4.5.7 In other cases the Police should be consulted pre or post meeting as appropriate on any identified criminal concern.
- 4.5.8 When an allegation is against a residential children's home practitioner, the LADO Service will notify, discuss and update the Service Development Manager, Placement and Sufficiency as appropriate. Consideration will be taken to notify other authorities and Ofsted; and alerting senior managers about any systemic concerns.
- 4.5.9 Where involvement from Children's Social Care is not required as the child is not believed to be suffering or likely to suffer significant harm but a police investigation will continue, the LADO should convene an initial meeting/discussion to agree the agencies response and actions needed, whilst the police investigation is ongoing.
- 4.5.10 Where a decision is made that neither Children's Social Care nor the Police are required to continue any involvement, the LADO should discuss the next steps with the employer's senior manager about who and what further investigations are necessary and how this will be fed back to the LADO Service, to agree the safeguarding outcome and adjudication.
- 4.5.11 In the event of a Multi-Agency LADO Meeting being held, then this should be convened as soon as possible and include the LADO (usually as chair) and the Senior Manager for the organisation the referral is about.

4.6 Initial Multi-Agency LADO Meeting

- 4.6.1 The purpose of the Multi-Agency LADO Meeting is to share information relevant to the allegation that has been made and to plan any investigations that are necessary. It is important to consider previous concerns and allegations.
- 4.6.2 Attendance at these meetings must be prioritised as part of your organisations safeguarding responsibilities – as per these procedures.
- 4.6.3 Wherever possible, a Multi-Agency LADO discussion should take the form of a meeting, but on occasions a telephone discussion may be justified. The LADO will need to ensure that the relevant people are invited to a Multi-Agency LADO Meeting and any follow up meetings to ensure that the full scope of the enquiry can be effectively addressed.
- 4.6.4 The following is a list of possible participants (anyone implicated or potentially implicated in the allegation should not be involved):
- The LADO;
 - The Referrer;
 - Relevant Social Worker and his /her manager;
 - Police Sergeant or Inspector rank;
 - Designated senior manager for the employer concerned;
 - Human Resources representative;
 - Legal adviser where appropriate;
 - Senior representative of the employment agency or voluntary organisation if applicable;

- Manager from the Fostering Service Provider when an allegation is made against a foster carer;
 - Supervising social worker when an allegation is made against a foster carer;
 - Those responsible for regulation and inspection where applicable;
 - Designated Safeguarding Leads for Health representation where appropriate;
 - Where a child from another local authority is placed or resident in Norfolk where the alleged incident took place, the child's social worker and/or manager;
 - The Independent Reviewing Officer for the Looked After Child;
 - Representative from the school, for the child concerned;
 - Complaints officer if the concern has risen from a complaint;
 - Representation from Governor Services and/or Academy Trust where allegations are about a Head Teacher or School Governor;
 - Senior Manager from Early Years, if allegation relates to an early years setting;
 - Service Development Manager, Placement and Sufficiency.
- 4.6.5 Notifications will be required to be made to OFSTED by the employer/agency, regarding day care and child-minders, residential staff, foster carers and prospective adopters.
- 4.6.6 The Multi-Agency LADO Meeting will be chaired by the LADO or a suitable senior safeguarding manager from Children's Services in unusual circumstances.
- 4.6.7 The Multi-Agency LADO Meeting will need to:
- Share all relevant information about the person who is the subject of the allegation and about the alleged child victim;
 - Consider the current allegation in the context of any previous allegations or concerns;
 - Check whether there are any diversity or equality issues / special needs to consider for either the victim or person of concern;
 - Consider whether any other children are affected by the allegations e.g. the persons own children or other children in the agency setting for example children placed with foster carers, child-minders, a youth club, grandchildren, residential unit;
 - Determine any action that needs to be taken in respect of any other children identified including discussions with MASH/Social Care about a Section 47 Enquiry;
 - Plan the investigation/enquiries and set timescales for tasks to be undertaken;
 - Consider whether the circumstances suggest that the person who is subject to the allegation should be suspended from contact with children, so as to inform the employers decision about this issue (including whether a foster carer's approval should be suspended and the implications for other children in the placement); this may change as the investigation progresses and should be reviewed regularly;
 - Decide how regular information and support will be provided to the child and family and by whom including the outcome of the process;
 - Ensure that the person who is the subject of the allegation is kept informed and supported as part of the employers duty of care;

- Consider whether any parallel disciplinary process can take place and agree protocols for sharing information;
- Consider issues for the attention of senior management e.g. media interest, resource implications, systemic concerns impacting on commissioning of services;
- Consider whether a Complex Abuse investigation is applicable.

4.7 On-going LADO Involvement and Outcome of the Safeguarding LADO Process

- 4.7.1 The progress of the investigation and enquiries needs to be reviewed by the LADO to prevent drift and delay.
- 4.7.2 Agencies are required to keep the LADO informed of the progress of the investigation, including the conclusion of any investigation in order that a final Multi-Agency LADO Meeting can be held to make an adjudication.
- 4.7.3 The Police or the Crown Prosecution Service (CPS) should inform the employer's Senior Manager and Local Authority Designated Officer (LADO) as soon as practicable when a criminal investigation and any subsequent trial are complete, or if it is decided to close an investigation without charge, or not to prosecute after the person has been charged.
- 4.7.4 A final Multi-Agency LADO meeting will be held to ensure all tasks have been completed and an adjudication on the Outcome of the allegation will be made, and, where appropriate, agree an action plan for future practice based on lessons learnt. Those who attended the first meeting should attend all subsequent meetings unless the LADO has agreed that their attendance is not required or necessary or a suitable representative has been identified.
- 4.7.5 The LADO has the deciding adjudication where there is a split decision.
- 4.7.6 The record of the LADO meeting is not verbatim, it is a summary of the discussion and allows for clear decisions and actions to be recorded.
- 4.7.7 It is the employer's responsibility to share the Safeguarding LADO Process outcome with their employee/volunteer.
- 4.7.8 There is no appeal to the outcome of the Safeguarding LADO Process. It is a multi-agency professional decision based on the balance of probability which is a lower threshold than that used in a court of law.
- 4.7.9 The Norfolk County Council Complaints Process needs to be followed if the person considers the allegations procedures as set out in this document to be flawed.
- 4.7.10 A referral to the DBS is made by the employer or volunteer manager only when both the harms test has been met and the person has been dismissed /resigned/ removed from regulated activity.

4.8 Cross Boundary Issues

- 4.8.1 Where a child from Norfolk Local Authority makes an allegation in a setting or placement which is outside their own area, the lead responsibility for action lies with the LADO for the area where the alleged abuse occurred. If an alleged incident happens in Norfolk it is the responsibility of the Norfolk LADO to lead the process regardless of where the employer or employment agency is based.
- 4.8.2 In these circumstances, the Local Authority Designated Officer and the child's social worker will liaise with the relevant LADO for that area and agree a joint strategy.
- 4.8.3 Where the referral relates to a child from another local authority temporarily placed in an establishment located within Norfolk Local Authority Area's area, for example a boarding school or holiday activity centre etc, the Local Authority Designated Officer should liaise with the child's home authority about the roles and responsibilities in carrying out this procedure.

4.9 Restrictions on Identifying Teachers Against Whom Allegations of Criminal Misconduct Have Been Made

- 4.9.1 With effect from 1 October 2012, the Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. Breaching the reporting restrictions is a criminal offence.
- 4.9.2 The Headteacher/Chair of Governors should take advice from the LADO, police and children's social care services to agree the following:
- Who needs to know and, importantly, exactly what information can be shared;
 - How to manage speculation, leaks and gossip;
 - What, if any information can be reasonably given to the wider community to reduce speculation; and
 - How to manage press interest if and when it should arise. Please note that this provision applies only to teachers, not to other staff in educational establishments.

4.10 Resignations and Compromise Agreements

- 4.10.1 The fact that a person resigns, or ceases to provide their service, must not prevent the allegations being followed up in accordance with these procedures.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process, having been given a full opportunity to answer the allegation and make representations.

- 4.10.2 Compromise agreements should not be reached whilst the safeguarding process is ongoing.

4.11 Confidentiality and Record Keeping

- 4.11.1 Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being considered or investigated.
- 4.11.2 Each agency should not provide any information to the press or media that might identify an individual who is under investigation, unless or until the person is charged, except in exceptional circumstances, e.g. an appeal to trace a suspect. In such cases, the reasons should be documented and partner agencies should have been consulted beforehand.
- 4.11.3 The outcome of the Safeguarding LADO Process is confidential to the person subject to the allegation or concern and cannot be shared with anyone unless agreed by the LADO.
- 4.11.4 Individuals have a right under section 7 of the Data Protection Act to have access to information about themselves. This does not however give them a right to access information about others, even though they may be the person of concern and subject of the LADO process; or the victim or the parent or carer of the victim making the allegation in the LADO process.
- 4.11.5 HR or the Designated Manager of the employee in question must keep a clear and comprehensive record of any allegations made.
- 4.11.6 Each agency must take great care to ensure that the records they keep respect the confidentiality of the victim and/or the alleged person of concern i.e. the child's file should contain limited information about the person of concern and the their (his/her) file should contain limited information about the child victim.
- 4.11.7 Information of the Multi-Agency LADO process including outcome must not be included on a child's Social Care record. Only that a Safeguarding LADO process has taken place and the Norfolk LADO can be contacted for further details.

4.12 Learning Lessons

- 4.12.1 The employer and the LADO should review the circumstances of the case to determine if there are any improvements to be made to the organisations procedure or practice.
- 4.12.2 In some cases, a Serious Case Review may be appropriate. This will be discussed at a Lessons Learnt meeting and appropriate referral/discussion had with the Chair of Serious Case Review Group.

4.13 Guidance on Retention of Records

- 4.13.1 HR or the Senior Manager of the employee in question should keep a clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved, and of any action taken and decisions reached. These should be kept in a person's confidential personnel file and a summary should be given to the individual by the employer. Please note that the record of Multi-Agency LADO meetings must not be given to the person subject of the process. They may apply for the record through the Norfolk County Council Information Management Service.
- 4.13.2 Such information should be retained on file, including for people who leave the organisation at least until that person reaches normal retirement age, or for 10 years if that is longer. The purpose of the record is to enable accurate information to be given in response to any future request for a reference under safer recruitment procedures. It will provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re investigation if, as sometimes happens, allegations resurface after a period of time.

SECTION 5: EQUAL OPPORTUNITIES STATEMENT

- 5.1 This policy has been assessed against the nine protected characteristics outlined in the Equality Act 2010.
- 5.2 There is no apparent impact on most characteristics although care must be taken to ensure that there is full access to this policy, particularly to those individuals who have a visual impairment or whose first language is not English to ensure there is no discrimination direct or indirect applied to the effective implementation of the procedures outlined in the policy.