



SAFER RECRUITMENT AND VETTING POLICY AND PROCEDURE

This document will be made available in other languages upon request.

All policy documents are maintained and updated in line with legislative and statutory changes irrespective of Review Date.

Date of Issue:	December 2013
Review Date:	December 2016
Lead Director:	Director of HR & OD
Persons Responsible for Update:	HR Business Partner
Approved on:	26 November 2013/12 December 2013
Approved by:	Senior Management Team/College Board
Published:	Staff Intranet and College Website
Date of Equality Analysis:	December 2013

This document outlines employment policy and future arrangements for the Safer Recruitment and Vetting process.

Equality of opportunity underpins all decision making.

Processes will be equitably and consistently applied to all categories of staff.

1. Introduction

- 1.1 Reaseheath College is committed to providing an environment which recognises that the delivery and management of effective safeguarding of children and adults identified as 'vulnerable', requires sound procedures, good inter-agency co-operation and highly competent and managed staff who are confident via ongoing training and development.
- 1.2 This policy provides a framework which incorporates the advised nationally recommended safeguarding practices, thereby ensuring that the College has in place a robust and rigorous recruitment and selection procedure which precludes unsuitable applicants from gaining a position with the College.
- 1.3 To ensure a secure environment is maintained the policy covers (at paragraphs 3.5-3.11) 'Visiting, Agency, Contracted and Casual Staff,' who are not directly employed by the College.
- 1.4 The policy should be read in conjunction with the following College policies and procedures:
- Recruitment of Ex-Offenders statement (Appendix C)
 - Recruitment and Selection Procedure (College intranet)
 - Single Equality Scheme (College intranet)
 - Equality & Diversity Policy (College intranet)
 - Conduct & Probity expected of residents on college premises (College Intranet)

2. Legal

- 2.1 The College recognises its explicit duty under Section 175 of the Education Act 2002, the Children Act 2004 and Working Together to Safeguard Children 2010 to provide an environment which safeguards and promotes the welfare of children.
- 2.2 The Policy refers to the provisions of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and defines the activities and work considered to be a 'regulated activity' (work that a barred person must not do.)
- 2.3 The new definition of 'regulated activity' in relation to children now comprises:
- i. Unsupervised activities – namely to teach, train, instruct children, care for or supervise children, or provide advice/guidance on well-being, and drive a vehicle only for children. Supervision means day to day supervision as is reasonable in all circumstances for the protection of the children concerned.
 - ii. Work undertaken by individuals in the College (a 'specified place' as defined by the Safeguarding Vulnerable Groups Act 2006) with the opportunity for contact.

Work carried out by volunteers supervised to a reasonable level, in accordance with the statutory guidance on supervision within the College is not a regulated activity. However, a supervised paid Reaseheath College employee does come under regulated employee status because of the definition applied under the Safeguarding Vulnerable Groups Act 2006 as working in a 'specified place.'

- iii. Work under (i) or (ii) is a 'regulated activity' only if it is done regularly. Regularly means carried out by the same person either:
- Once a week or more often or,
 - 4 or more days in a 30 day period or,
 - Overnight between 2.00 a.m. and 6.00 a.m.

- 2.4 The new definition of 'regulated activity' in relation to adults (any person aged 18 or over) has removed the previous reference 'vulnerable' adult.

Under the Protection of Freedom Act 2012, any adult is regarded as 'vulnerable' if they require regulated activities to be provided on their behalf at a particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics, or circumstances of the adult receiving the activities. There is also no requirement for a person to do the activities a certain number of times before they are engaged in regulated activity.

- 2.5 The policy has also been developed in accordance with the Department for Education guidance contained in 'Safeguarding Children and Safer Recruiting in Education' issued in January 2007.

3. Policy scope and purpose

- 3.1 The Secretary of State has the power to bar anyone from employment as a teacher and from work involving regular contact with Children or young people in Schools and Colleges. The College is under a statutory duty not to employ anyone that is barred by the Secretary of State whose name appears on any Vetting and Barring list.

- 3.2 Since the introduction of the new 'regulated activity' on 10 September 2012 there are now three types of criminal record check that are available through the DBS:

- **Standard DBS check** – this checks only the information held on the Police National Computer
- **Enhanced DBS with barred list information** (for those individuals that fall under the new definition of regulated activity)
- **Enhanced DBS without barring information** (for those previously falling within regulated activity but not meeting the terms required under the new definition) This will therefore not check the ISA barring lists (Adults/Children/List 99)

- 3.3 Under the Protection of Freedoms Act 2012 if a role within the College requires an enhanced DBS check the College will therefore request if appropriate the barred list check (for children, adults or both). Enhanced DBS checks for work within 'regulated activity' will tell the College (when requested) if the person is on one of the Independent Safeguarding Authorities barred lists.

3.4 Equality and Diversity - Transgender applicants

The Disclosure and Barring Service has a confidential checking process for Transgender Applicants who do not wish to reveal details of their previous identity to the person who asked them to complete an application form for a DBS check. Further information from the DBS is available by telephoning: 0151 676 1452 or by sending an e-mail to the DBS Sensitive Applications Team at sensitive@dbs.gsi.gov.uk.

3.5 Applicants who have lived outside the United Kingdom

- 3.5.1 All new staff providing education at the College who have lived outside the United Kingdom are subject to such additional checks as are deemed appropriate where the required DBS Enhanced Disclosure check is not considered sufficient to establish suitability to work with Children and Adults in a regulated activity.

- 3.5.2 Applicants who have resided outside the UK in the past 5 years will need to provide Criminal Convictions Clearance from the country(ies) which they were residing in, because the DBS cannot generally trace individuals abroad. If the College recruits an individual from overseas, or an

individual who has lived abroad in recent years prior to appointment, and needs to check their overseas criminal record, a DBS check may not provide a composite picture of the criminal record.

- 3.5.3 Applicants will be asked to contact the relevant Embassy to obtain a disclosure which should not be dated more than 6 months at the time of receipt. Upon receipt before full clearance to work is issued the disclosure should be sent to the Human Resources Department. The DBS information line for overseas queries is: 0870 90 90 811 or the Foreign and Commonwealth website is www.fco.gov.uk.
- 3.5.4 Documents that are evidence of an individual's overseas identity will be retained securely by Human Resources in accordance with the UK Border Agency guidance for the duration of the individual's employment and for a further two years after the individual's employment with the College has ceased.

3.6 Visiting staff

- 3.6.1 Visiting staff such as education mentors **who do not** have regular and unsupervised access to children will not receive a DBS check. The normal risk assessment that applies to all College visitors will be sufficient.
- 3.6.2 Visiting staff **who do** have unsupervised regular access to children and adults requiring 'regulated activities' such as educational psychologists, sports coaches, and agency staff - their 'providing organisation' will request the check. Human Resources will prior to an individual's commencement seek written confirmation from the respective agencies, thereafter annually that the appropriate checks, including the DBS checks have been carried out and by whom.

3.7 Agency, Contracted and Casual staff

- 3.7.1 Human Resources will seek written confirmation from the respective agencies that the appropriate checks, including the DBS checks have been carried out and by whom, providing where reasonable and practicable the necessary reference number and certificate issue date.
- 3.7.2 When an agency has obtained an enhanced certificate, the agency will confirm to the Human Resources Department in writing that the disclosure provides the full details, namely the Police have not, using their common law powers under the Protection of Freedom Act 2012, passed on such relevant information to the agency about the individual which they consider to be justified and proportionate and this has been withheld.

3.8 Students on work /volunteer placements

- 3.8.1 A minimum age limit for criminal record checks has been set in the Protection of Freedoms Act 2012. This means that the College will not apply for a criminal check for individuals unless in circumstances of employment.
- 3.8.2 A separate procedure is provided for all categories of students who require checks i.e. work/volunteer placements and the College will take all reasonable and appropriate steps to ensure that other employers comply with the DBS Code of Practice and the safeguarding legislative framework.

3.9 Staff

- 3.9.1 The College will ensure that the full range of employment checks for all Reaseheath College staff are carried out to minimize the possibility of any learners suffering harm from those whom they consider to be in positions of trust in whatever capacity.
- 3.9.2 Where a member of staff changes role and the role is directly concerned with dealing with college learners in the Safeguarding Children and Adult regulated categories, a further appropriate DBS Enhanced Disclosure check will be carried out to update their record.
- 3.9.3 If there is a break in service of 3 months or more a new DBS check will be carried out.

For the purposes of undertaking a DBS check, a ‘child’ is defined as an individual under the age of 18, except in employment situations where the age limit is 16.

3.10 Residential staff family members

3.10.1 Family members living in their own home within the College Community are required to provide a DBS disclosure certificate, and will be requested annually by the College to confirm in writing their acceptance to comply with the standards of conduct and probity expected of College residents.

3.11 Governors

3.11.1 Section 4.48 of the ‘Safeguarding children and safer recruitment in education’ states that there is no requirement for the College Governors to be DBS checked. However the College undertakes DBS checks in respect of all Governors.

4. **Employment checks**

4.1 In addition to the above **mandatory employment** checks, the College will also, as part of its safer recruitment and selection process, undertake the following checks on prospective staff, this will involve:

- Sourcing of a minimum of two written and verified professional references (where appropriate one of the references should be from the most recent employer where the person worked with, or was in contact with children) to confirm previous academic and employment gaps (checking the reasons provided for any identifiable gaps)
- Evidence of relevant qualifications and current memberships of professional bodies
- Right to Work within the United Kingdom through checking the authenticity of pre-employment documentation i.e. passport:

4.2 In addition the College will undertake monthly checks with the IFL to look at the updated list of teachers who must not be employed in the further education and skills sector and will also advise of any disciplinary circumstance affecting the individual’s employment at the College

4.3 All members of the immediate and wider Safeguarding team across College will be re-checked during their employment. This includes Student Service and Welfare, Domestic and Estates, Catering and IT. With the exception of IT this re-check will take place every 3 years. IT will be re-checked every 5 years.

5. **Appointment to post prior to receipt of a DBS check**

5.1 Managers wishing to appoint staff into post prior to the DBS check being received by the College may only in exceptional circumstances and when allowing an individual within a non student facing role (to attend induction training, or to undertake other duties which would not include them in engaging in any form of regulated activity) submit the Safer Recruitment and Vetting – Risk Assessment Form - Appendix A to the Principal, together with the Prospective Employee Statement of No Convictions Appendix B as only the Principal, or his substantive Deputy in his absence may sign this form.

6. **General**

6.1 Any person refusing to be checked by the College will be unable to be employed, as this is a pre-requisite to offering or continuing in any contract of employment. The College covers all fees paid to the DBS in the case of employees.

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7. Legislative changes

- 7.1 From June 2013, for an annual subscription of £13.00, applicants can join the Update Service and have their DBS Certificate kept up-to-date. They can take it with them from role to role, within the same workforce, where the same type and level of check is required. The service is free to volunteers.
- 7.2 If an applicant has subscribed to the Update Service, with their permission, the employer can use their current DBS Certificate and carry out a free, instant online Status Check to see if any new information has come to light since its issue.

8. The secure handling and use of disclosures and disclosure information

- 8.1 The College will continue to use the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust. It will also continue to comply fully with the respective Code of Practice regarding the correct handling and use of Disclosures and disclosure information.
- 8.2 The College complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling and use of disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.
- 8.3 Disclosure information will never be kept on an applicant's personal file and will be limited to those who are entitled to see it as part of their duties.
- 8.4 In accordance with section 124 of the Police Act 1997, Disclosure information will only be passed to those who are authorised to receive it in the course of their duties. The College maintains a record of all those to whom Disclosures or Disclosure information has been revealed and recognises that it is a **criminal offence** to pass this information to anyone who is not entitled to receive it.
- 8.5 Disclosure information will only be used for the specific purpose for which it was requested and for which the applicants' full consent has been given.
- 8.6 The College will keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique Certificate number and the details of the recruitment decision taken.

9. Responsibilities for implementation of the policy

- 9.1 The College Corporation together with the Principal will be responsible for ensuring that a regular review of the effectiveness of this Policy and Procedures takes place annually or in accordance with statutory change.
- 9.2 The Corporation will be provided with statistical data by the Director of Human Resources and Organisational Development which demonstrates the effectiveness of the process and which makes subsequent recommendations in development and guidance to support the implementation of the Policy and Procedures.
- 9.3 Line Managers will ensure that all aspects of the policy are adhered to in order to ensure that there is no discrimination against any employee.
- 9.4 It will be the Line Manager's responsibility to ensure that risk assessments are carried out in accordance with this policy and procedure and particularly in the case of paragraph 5.1 above and this is approved by the Principal or Vice Principal.
- 9.5 It will be the responsibility of the manager to seek advice from their Director, Head of Department, Director of HR and OD, or Strategic Human Resources and OD Business Partner where an employee needs to be removed immediately from an area/activity where it is felt a learner may be put at risk.
- 9.6 It is the Line Manager's responsibility to ensure that the Disciplinary Procedure is where appropriate invoked within **10 days of the incident occurring and the member of staff must be removed from**

site during this time. The employee will have the right to be accompanied during this process by a nominated work colleague, Trade Union or staff representative whilst an investigation is carried out.

- 9.7 The Director of HR and OD or Strategic Human Resources and OD Business Partner will support the manager in implementing the process at paragraph 9.6.
- 9.8 Visitors to the College, in whatever capacity, must be signed in and out and provided with a visitor's badge. You should clarify with the visitor(s) the areas in which they are working and identify with them where, when and how the facilities they require can be assessed. Please ensure that you are fully aware of their movements and whereabouts at all times whilst at the College. Whenever any type of building work is undertaken of any duration, the College will at the planning stage determine with the contractors and agree the safeguarding measures in relation to the works starting on site. The safe-guarding measures will then be detailed in the building contract. Thereafter, College staff affected will be briefed on the supervision required and the access arrangements with the contractor.
- 9.9 The HR Business Partners/Advisers and Strategic HR and OD Business Partner reporting to the Director of HR and OD will ensure compliance with the policy and be responsible for advising the Corporation on its effectiveness, by recommending where appropriate any revision and developments of the policy and procedure.
- 9.10 The Director of HR and OD will be responsible for ensuring all staff involved in the College recruitment and selection process undertake the mandatory recruitment and selection e-learning and Recruitment and Selection Workshop (as part of the Growing Your Potential programme for line managers), detailing their attainment on the iTrent self-service portal.
- 9.11 The Director of HR and OD will be responsible for overseeing an annual safeguarding audit to ensure that all staff have undertaken their e-learning modules and Recruitment and Selection Workshop, detailing their attainment on the iTrent self-service portal.

10. Review and monitoring

The policy and procedure will be reviewed on a regular basis according to legislative change. The initial review will take place one year after the Policy and Procedure comes into effect.

Appendix A – Safer Recruitment – Vetting and Barring Checks – Risk Assessment

Appendix B – The Prospective Employee's statement of no convictions

Appendix C – Recruitment of Ex-Offenders Statement

11. Single Central Record of recruitment vetting checks

- 11.1 The College's single central record of recruitment checks maintained by the HR Department will record:
- All staff employed who are employed to work at the College, and those staff providing further education, regularly caring for, training, supervising or being in sole charge of children and all other staff who have been employed to work in regular contact with children.
 - All staff who are employed as supply staff providing education to the College, whether employed directly by the College or through an agency
 - Any volunteers that the College has recruited to work regularly with children and for whom DBS checks have been requested because they are working unsupervised
 - People brought into the College to provide regular additional teaching or instruction who are not staff members; for example, a specialist sports coach
 - Confirmation and the details of whether the individual's identity was checked
 - Where the individual has been living outside the United Kingdom, whether further checks considered appropriate in respect of the person have been carried out.
 - Whether a check has been carried out to confirm that the person has a right to work in the United Kingdom
 - Whether the post requires the employee to hold a qualification in accordance with the Institute of Learning and by whom and the date these were checked

- 11.2 The Single Central Record will record the date when the check was completed, or the relevant certificate obtained and will document who carried out the check.
- 11.3 In recording individual educational attainments the primary qualifications required to perform the responsibilities of the role will be recorded i.e. PGCE or Cert. in Education.

APPENDIX A



RISK ASSESSMENT: SUPERVISION PENDING DBS DISCLOSURE

It is a legal requirement that all new staff appointed to Reaseheath College who are providing education and regularly caring for, teaching, training, instructing, supervising or being solely in charge of persons under 18 and/or adults who require 'regulated activities' to be provided on their behalf at a particular time MUST have the appropriate type of Enhanced DBS Disclosure with children and or adult barred list information.

The policy of Reaseheath College is that staff working for the College will have one of the levels of Enhanced DBS Disclosure. The Governing Body are all subject to checks and this is handled by the Clerk to the Board in conjunction with the Human Resources Department. All contractors and visitors (working in the College for a period of time) must provide written confirmation that their staff have been checked as this forms part of any contract with the College.

In circumstances where a DBS Disclosure is pending, the Principal/Vice Principal (only in his absence as the substantive Deputy) has the discretion to allow an individual within a non-student facing role only to commence work, and PROVIDED that the following Risk Assessment form is completed and the name of the Supervisor/s is provided. This permission will only be given once all other Vetting and Barring checks have been carried out and these prove satisfactory. Completion of this Risk Assessment form is compulsory by the appropriate line manager. Once completed it should be forwarded to the HR Department who will check the detail and place the Assessment before the Principal/Vice Principal for their consideration.

This applies to staff working on or off the main Reaseheath College site.

Name of new member of staff

Department/Unit

Proposed start date

Brief Description of their Job Role

What is their previous experience and do they currently hold a DBS?

If they hold a current DBS what is the Disclosure No

Who will their Supervisor/s be (e.g. contact name)?

Briefly describe the supervisory arrangements and restrictions to their role that are proposed (these might typically include wearing a visitors badge at all times, regular rotation of duties, restriction of movement to social areas of the College, being accompanied and supervised at all times)

Briefly describe the business reasons why the new starter needs to join the College urgently

HR Department to complete

Have all the reference checks been completed (e.g most recent employer) Yes/No

Are these satisfactory? Yes/No

List 99 check and date Yes/No

DBS & Vetting and Barring checks Yes/No Ref No: F

Any other relevant information:

I understand that this person will not have access to any student or any staff data while employed under this arrangement

Signed(Line Manager)

Date received by HR --/--/----

Date forwarded to Principal/Vice Principal --/--/----

Decision of Principal/Vice Principal

The Risk Assessment is approved/not approved

Signed
(Principal/Vice Principal)

Date

This risk assessment is valid until --/--/---- only.

This form should be destroyed upon receipt of a clear enhanced DBS clearance certificate

APPENDIX B



SAFEGUARDING CHILDREN AND VULNERABLE ADULTS STATEMENT

The area you are to work in wishes to ensure they have cover for the safety of all learners and you are therefore asked to sign the following statement and return this immediately to the Human Resources Department, with the completed DBS application form and identification documents.

- 1 I understand that the College will carry out a Vetting and Barring list check and I declare that I do not have a record of being barred from working with young people and vulnerable adults.
- 2 If the Vetting and Barring check shows this statement to be untrue I acknowledge that the College will inform the relevant authorities.
- 3 As I have not previously had a DBS check I hereby declare that I have had no convictions or cautions.
- 4 I understand that I must be supervised at all times whilst I am working for the College during the period.

Declaration

I confirm that the information I have provided is complete and true and understand that knowingly to make a false statement is a criminal offence

Signature Date

APPENDIX C

Policy Statement on the Recruitment of Ex-offenders

It is a requirement of the DBS's Code of Practice that all Registered Bodies must treat DBS applicants who have a criminal record fairly and do not discriminate because of a conviction or other information revealed. It also obliges Registered Bodies to have a written policy on the recruitment of ex-offenders; a copy of which can be given to DBS applicants at the outset of the recruitment process.

Statement

- As an organisation using the Disclosure and Barring Service (DBS) service to assess applicants' suitability for positions of trust, Reaseheath College complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.
- Reaseheath College is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, marital status, age, disability or offending background.
- The College has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the outset of the recruitment process.
- The College actively promotes equality of opportunity for all with the right level of talent, skills and potential and welcomes applications from a wide range of candidates.
- Having a criminal record will not necessarily be a bar from working at Reaseheath College. It will depend on the nature of the position and the circumstances and background of the offence.
- The College selects all candidates for interview based on their skills, qualifications and experience.
- A DBS check is only requested after a thorough risk assessment has indicated that one is proportionate and relevant to the position concerned. For those positions where a DBS check is required, all job adverts and job descriptions will contain a statement that a DBS check will be requested in the event of the individual being offered the position.
- Where a DBS check is to form part of the recruitment process, the College will encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. The College will request that this information is passed under separate, confidential cover, to Human Resources. The College guarantees that this information will only be seen by those who need to see it as part of the recruitment process.
- The College will ensure that all those involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.
- The College will also ensure that all recruiting staff have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- On the subject of any offences or other matter that might be relevant to the position the College will ensure that an open and measured discussion takes place as defined in the Rehabilitation of Offenders Act 1974. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer.
- The College will make every individual who is the subject of a DBS check aware of the existence of the DBS Code of Practice and will make a copy available upon request.
- The College will undertake to discuss any matter revealed in a DBS check with the individual seeking the position before withdrawing a conditional offer of employment.



Equality Analysis Form

1. Author: Andrew Turner Date analysis commenced: 19th April 2013

2. Brief Description of Strategy, Proposal, Policy, Procedure or Practice

Scheduled update to Policy

Policy Name: Safer Recruitment and Vetting Policy and Procedure

Policy Number: HR 15

- Revised / ~~New~~

3. Relationship where appropriate with other policies/procedures or practice

The policy should be read in conjunction with the following College policies / documents: -

- Recruitment and Selection Policy and Procedure

4. Does the Strategy, Proposal, Policy, Procedure or Practice impact on the College, learners, employees or others? If yes, the document is 'equality relevant.' If not please record the reasons for this decision.

Yes, the policy is 'equality relevant'

5 i Who are the Key Stakeholders involved with this analysis:

College Governors, Directors and CMT, HR, Staff Partnership Forum, Association of Colleges, ACAS, Equality Committee and Focus Group

5ii Identify source of stakeholder views:

College Governors, Directors, E&D Focus Group, HR, Staff Partnership Forum

6. Summarise the key comments and evidence from stakeholders which reflects upon how the proposed document assists in meeting the three aims of the Public Sector Equality Duty:*

The Policy is compliant with the latest legal guidance received from ACAS and the Association of Colleges. .

The Policy advances the three aims of the Public Sector Duty.

What evidence has been collated to inform this analysis. If there is no evidence available, detail should be provided for this decision.	
Characteristic	Comments
Age	There is no evidence that this Policy has a negative effect.
Disability	A disabled person may not be able to access the policy in its current format. IT will as appropriate identify what reasonable adjustments are available to ensure access to this policy other than electronically or in paper form.
Gender	There is no evidence that this Policy has a negative effect.
Transgender	There is no evidence that this Policy has a negative effect.
Race or ethnicity	An employee whose first language is not English may have difficulty in understanding the Policy. However translation services could be provided as appropriate.
Religion or belief	There is no evidence that this Policy has a negative effect.
Sexual orientation	There is no evidence that this Policy has a negative effect.
Pregnancy / maternity	Staff on maternity leave/paternity leave or adoption leave can access this policy via the intranet
Marriage or Civil partnership (only in respect of eliminating unlawful discrimination)	There is no evidence that this Policy has a negative effect.

No major change needed: No Adjustment required: NO

SMART actions required to address any Equality & Diversity issues raised through consultation:

Proposed Date of Equality Analysis review: December 2016

When this form is completed, please send it with the relevant Strategy, Proposal, Policy, Procedure or Practice for validation by the Senior Management Team.

Authorised by the Senior Management Team:

Date: 26 November 2013

Copy to the Clerk to the Board (Policies only)

Date: 26 November 2013

Copied received by the PA to the Clerk to the Board

Date: 26 November 2013

