



Fermanagh & Omagh
District Council

Comhairle Ceantair
Fhear Manach agus na hÓmaí

Adult Safeguarding Code of Practice



December 2015.

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Adult Safeguarding Policy



December 2015.

1. Introduction.

Fermanagh and Omagh District Council believes that harm caused to adults who are at risk of abuse, exploitation and/or neglect is not acceptable. Everyone has a fundamental right to be safe.

This Policy emphasises that safeguarding should be paramount to everyone and that the Council recognises its responsibility with regards to safeguarding, committing to protect people as far as is reasonably practicable.

2. Introduction.

- 2.1 An adult, for the purpose of this Policy, is any person(s) over the age of 18 years.
- 2.2 The risk of harm occurs in all socio-economic, racial and ethnic groups regardless of gender, age and sexual orientation.
- 2.3 An 'adult at risk of harm' is any person who is aged 18 years or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:
- Personal characteristics
- and/or**
- Life circumstances.
- 2.4 An 'adult in need of protection' is any person who is aged 18 years and over, whose exposure to harm through abuse, exploitation and neglect may be increased by their:
- Personal characteristics
- and/or**
- Life circumstances
- and**
- Who is unable to protect their own well-being, property, assets, rights or other interests.
- and**
- Where the action, or inaction, of another person or persons is causing or is likely to cause, him/her to be harmed.

3. Aim.

- 3.1 The aim of the Fermanagh and Omagh District Council Adult Safeguarding Policy is to put in place, and improve upon existing, safeguarding arrangements for adults who are at risk of harm from abuse, exploitation and/or neglect.
- 3.2 This Policy not only demonstrates how the council will meet its legal obligations, but will also act to reassure the public, service users, Councillors, employees and individuals/organisations working on behalf of the Council on what they can expect Fermanagh and Omagh District Council to do to Safeguard Adults, who are at risk of harm.

4. Objectives.

By working in accordance with this Policy, Fermanagh and Omagh District Council will:

- 4.1 Promote 'zero-tolerance' with regards to harm of adults who are at risk from abuse, exploitation and/or neglect.
- 4.2 Seek to continually improve safeguarding arrangements for adults who are at risk of harm from abuse, exploitation and/or neglect.
- 4.3 Ensure that appropriate training is available for councillors, employees and volunteers.
- 4.4 Implement robust recruitment, selection and management procedures.
- 4.5 Respond appropriately to all concerns reported.
- 4.6 Develop and implement effective procedures for recording and responding to incidents, ensuring confidentiality is maintained where appropriate.
- 4.7 Develop and implement effective procedures for recording and reporting any allegations or suspicions of harm or abuse.
- 4.8 Promote the welfare and wellbeing of individuals during and within Council services, including during the planning of services.
- 4.9 Maintain a good level of safe working practice at all times to minimise risk to anyone that comes into contact with councillors, employees, volunteers and Agency Workers.
- 4.10 Promote a continuous learning approach to Adult Safeguarding.

5. Underpinning Principles.

Adult Safeguarding activity will be guided by five underpinning principles:

1. **A Rights-Based Approach:** To promote and respect the rights of adults, who are at risk of harm, to be safe and secure; to freedom from harm and coercion; to equality of treatment; to the protection of the law; to privacy; to confidentiality; and freedom from discrimination.
2. **An Empowering Approach:** To empower adults, who are at risk of harm, to make informed choices about their lives, to maximise their opportunities to participate in wider society, to keep themselves safe and free from harm and enabled to manage their own decisions in respect of exposure to risk.
3. **A Person-Centred Approach:** to promote and facilitate full participation of adults, who are at risk of harm, in all decisions affecting their lives taking full account of their views, wishes and feelings and, where appropriate, the views of others who have an interest in his/her safety and well-being.
4. **A Consent-Driven Approach:** To make a presumption that the adult, who is at risk of harm, has the ability to give or withhold consent; to make informed choices; to help inform choice through the provision of information, and the identification of options and alternatives.
5. **A Collaborative Approach:** To acknowledge that Adult Safeguarding will be most effective when it has the full support of the wider public and the Council's safeguarding partners. Working in partnership and 'a person-centred' approach will work hand-in-hand.

Within this Policy there are a number of forms of abuse mentioned. These include: Abuse, Harm, Neglect, Exploitation, Domestic Violence/Abuse, Human Trafficking and Hate Crime.

- 5.1 **Abuse:** A single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual or violates their human or civil rights.

Abuse is the misuse of power and control that one person has over another and may be perpetrated by a wide range of people, including those who are usually physically and/or emotionally close to the individual and on whom the individual may depend upon and trust.

- 5.2 **Harm:** The impact on the victim of abuse, exploitation or neglect. It is the result of any action whether by commission or omission, deliberate or as the result of a lack of knowledge or awareness which may result in the impairment of physical, intellectual, emotional, or mental health or well-being.

Some of the main forms of abuse may include (full definitions can be found in the Council's Adult Safeguarding Code of Practice on page 11):

Continued overleaf

- 5.1.1 Physical Abuse** (physical force or mistreatment of an individual)
- 5.1.2 Sexual Violence and Abuse** (behaviour of a sexual nature which is unwanted or takes place without consent or understanding).
- 5.1.2 Psychological / Emotional Abuse** (behaviour which is psychologically harmful or may inflict mental distress by threat, humiliation or other verbal/non-verbal conduct).
- 5.1.3 Financial Abuse** (actual or attempted act(s) of theft, fraud or burglary).
- 5.1.4 Institutional Abuse** (mistreatment or neglect by either an individual or a regime).
- 5.2 Neglect** (Deliberate withholding, or failure to provide appropriate care and/or support which is necessary to carry out daily living activities).
- 5.3 Exploitation** (Intentional maltreatment, manipulation or abuse of power and control, or taking selfish/unfair advantage of another individual).
- 5.4 Domestic Violence and Abuse** (Threatening behaviour, violence or abuse on an individual, where they and the perpetrator have been intimate partners or family members).
- 5.5 Human Trafficking** (The acquisition and movement of people by improper means, including force, threat or deception).
- 5.6 Hate Crime** (An incident (criminal offence) which was motivated by prejudice, discrimination or hate towards an individual's actual, or perceived, race, religious belief, sexual orientation, disability, political opinion or gender inequality).

6. Implementation.

- 6.1 This Policy will be supported by an Adult Safeguarding Code of Practice.
- 6.2 The Code of Practice gives further guidance in relation to Awareness of Abuse, Reporting Procedures, Supervision of People, Code of Conduct and Code of Behaviour, Support and Training, Recruitment and Selection Guidelines, Use of Photography.
- 6.3 Information leaflets will be available for the public and for employees containing the relevant contact details.

7. Responsibilities.

All Councillors, employees and volunteers with Fermanagh and Omagh District Council are responsible for ensuring the successful implementation of the Adult Safeguarding Policy and Procedure.

All Councillors and employees will be required to attend any relevant training and/or awareness-raising sessions that are relevant to their position.

Other clear roles and responsibilities have been established and are outlined below:

Group or Individual	Role and Responsibilities
All Employees/Volunteers	<ul style="list-style-type: none"> ➤ Take due care to ensure compliance with and to promote the Safeguarding Policy and Procedure. ➤ Act in a way that protects them from wrongful allegations of abuse as far as possible. ➤ Bring matters of concern about adult welfare to the attention of a Safeguarding or Deputy Safeguarding Officer.
Fermanagh and Omagh District Council	<ul style="list-style-type: none"> ➤ Approve the Safeguarding Policy and consider any subsequent amendments
	<ul style="list-style-type: none"> ➤
Chief Executive	<ul style="list-style-type: none"> ➤ The Chief Executive has ultimate officer responsibility for embedding all safeguarding principles throughout the Council.
Senior Management Team	<ul style="list-style-type: none"> ➤ Allocate resources to enable the Council to meet its responsibilities. ➤ Promote the integration of safeguarding principles into the culture of the Council. ➤ Consider safeguarding issues at SMT meetings.
Heads of Service	<ul style="list-style-type: none"> ➤ Ensure employees are aware of this policy. ➤ Notify the Designated Safeguarding Officers in strict confidence of any safeguarding issues that are brought to their attention. ➤ Ensure that relevant employees attend the relevant training sessions.
Head of Policy and Strategic Services	<ul style="list-style-type: none"> ➤ Raise the profile of Safeguarding within the Council, and develop initiatives to ensure the protection of adults who are at risk of harm, within the Council area. ➤ Develop the Safeguarding Policy and Procedure with arrangements for periodic review ➤ Provide advice and support as required ➤ Continually improve and update safeguarding procedures based on current best practice and benchmarking results ➤ Co-ordinate audits as required by the Safeguarding

Group or Individual	Role and Responsibilities
	<p>Board.</p> <ul style="list-style-type: none"> ➤ Ensure there are effective internal procedures to handle concerns. ➤ Ensure that the Council is represented at Safeguarding Network meetings.
Designated Safeguarding and Deputy Safeguarding Officers	<ul style="list-style-type: none"> ➤ Establish contacts and liaise with Social Services, PSNI and other agencies in relation to safeguarding issues within the Council ➤ Provide information and advice on safeguarding issues. ➤ Ensure that appropriate information is available at the time of the referral and that the referral is confirmed in writing under confidential cover. ➤ Ensure that relevant people within the Council are informed on a timely basis about any issues, concerns, action taken and any further action required, whilst ensuring that all records are maintained in a secure and confidential manner. ➤ Ensure that an individual case record is maintained of the action taken by the Council, the liaison with other agencies and the outcome. ➤ Advise on suitable training content.

8. Monitoring.

The council will monitor the implementation of this Policy at regular intervals and will respond in a positive fashion to both regional and local changes in circumstances or new initiatives.

9. Linkages.

- 9.1 This Policy provides the framework to guide the Council's practice in relation to Adult Safeguarding.
- 9.2 The Policy operates in accordance with the Council's Adult Safeguarding Code of Practice.

10. Review.

- 10.1 The Adult Safeguarding Policy will, under normal circumstances, be formally reviewed every three years.
- 10.2 The Policy will also be subject to routine scrutiny and, from time to time, updates and re-issues will be circulated.
- 10.3 The policy will be reviewed sooner in the event of any one or more of the following:
 - A failure or weakness in the policy is highlighted.

- Changes in legislative requirements.
- Changes in Government/Council or other directives and requirements.
- Or at the discretion of Council.

Section Two Awareness of Abuse

Living a life that is free from harm and abuse is a fundamental human right for every person. It is an essential element for an individual's health and well-being. Adult Safeguarding specifically regards the safety and well-being of anyone who interacts with the Council either by using its services or attending its facilities.

2.1 Signs and symptoms of abuse

Within the Adult Safeguarding Policy there are a number of forms of abuse mentioned. These include: Abuse, Harm, Neglect, Exploitation, Domestic Violence/Abuse, Human Trafficking and Hate Crime.

Abuse: A single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual or violates their human or civil rights.

Abuse is the misuse of power and control that one person has over another and may be perpetrated by a wide range of people, including those who are usually physically and/or emotionally close to the individual and on whom the individual may depend upon and trust.

Harm: The impact on the victim of abuse, exploitation or neglect. It is the result of any action whether by commission or omission, deliberate or as the result of a lack of knowledge or awareness which may result in the impairment of physical, intellectual, emotional, or mental health or well-being.

Some of the main forms of abuse may include:

Physical Abuse

Is the use of physical force or mistreatment of one person by another, which may or may not result in actual physical injury. Examples may include: hitting, pushing, rough handling, exposure to heat/cold, illegal use of restraint and deprivation of liberty, amongst others.

Sexual Violence and Abuse

Behaviour perceived to be of a sexual nature which is unwanted or takes place without consent or understanding. Sexual violence and abuse can take many forms and can include non-contact sexual activities such as indecent exposure, stalking, grooming, being made to look at or be involved in the production of sexually abusive material or being made to watch sexual activities.

It may also involve physical contact including non-consensual

penetrative sexual activities or non-penetrative sexual activities such as intentional touching (groping). Sexual violence and abuse can be found across all sections of society and is irrelevant of gender, age, ability, religion, race, ethnicity, personal circumstances, financial background or sexual orientation.

Psychological / Emotional Abuse

Behaviour that psychologically harmful or inflicts mental distress by threat, humiliation or other verbal/non-verbal conduct. Examples may include threats, humiliation/ridicule, provoking fear of violence, shouting, yelling/swearing, blaming, intimidation and coercion amongst others.

Financial Abuse

Actual or attempted theft, fraud or burglary. It is the misappropriation or misuse of money, property, benefits, material goods or other asset transactions which the person did not, or could not, consent to. Examples could include: exploitation, embezzlement, withholding pension or benefits, pressure exerted around wills, property and inheritance, amongst others.

Institutional Abuse

Mistreatment or neglect of an adult by a regime/individuals, in settings within which adults who may be at risk reside in or use. Institutional abuse may happen within a culture that denies, restricts or curtails the privacy, dignity, choice and independence. It involves the collective failure of the service provider or an organisation to provide safe and appropriate services and included a failure to ensure that the necessary preventative and/or protective measures are in place.

Neglect

The deliberate withholding, or failure through a lack of knowledge, understanding or awareness, to provide appropriate and adequate care and support which is necessary for an adult to carry out daily living activities. This may include: physical neglect to the extent that health or well-being is impaired, administering too much/too little medication, failure to provide access to appropriate health or social care, withholding the necessities of life such as adequate nutrition, heating or clothing and failure to intervene in situations that are dangerous to the person concerned or to others particularly when the person lacks the capacity to assess risk. (It's worth noting that self-harm and self-neglect do not fall within the scope of this definition).

Exploitation

Intentional maltreatment, manipulation or abuse of power and control over another person, to take selfish or unfair advantage of another person or situation usually but not always for personal gain from using them as a commodity. This may include many forms, including: slavery, servitude, forced/compulsory labour, domestic violence and abuse, sexual violence and abuse, human trafficking, amongst others.

Domestic Violence and Abuse

Threatening behaviour, violence or a abuse (psychological, physical, verbal, sexual, financial or emotional) inflicted on one person by another, where they have been intimate partners or family members, irrespective of gender or sexual orientation. It is essentially a pattern of behaviour which is characterised by the exercise of control and the misuse of power by one person over another. It is usually frequent and persistent and can include violence by a son, daughter, mother, father, husband, wife, life partner or any other person who has a close relationship with the victim.

Human Trafficking

The acquisition and movement of people by improper means such as force, threat or deception, for the purposes of exploiting them. It can take many forms, including domestic servitude, forced criminality, forced labour, sexual exploitation and organ harvesting. Victims can be male or female and can come from either migrant or indigenous communities.

Hate Crime

Any incident which constitutes a criminal offence perceived by the victim or any other person as being motivated by prejudice, discrimination or hate towards a person's actual or perceived race, religious belief, sexual orientation, disability, political opinion or gender identity.

2.2 Indicators and Effects of Abuse

Even for those experienced in working with abuse and Adult Safeguarding, it is not always easy to recognise a situation where abuse may occur or has already taken place.

The council has a responsibility to provide a safe environment for all its service and facility users, by employing people who are suitable to work in particular environments. This will be achieved by having effective and clear procedures for our employees to report any suspicions, through the Council's own internal procedures as well as referring on to the relevant external organisation, department, etc.

Below are some general signs of abuse, however they may not be recognisable at first as they may appear as symptoms of an illness (such as dementia, etc), frailty and so on.

- Frequent arguments between an individual and a specific person, for example a carer.
- Specific changes in an individual's personality or behaviour.
- Unexplained signs of injury for example bruises, burns/scars, or more serious (unexplained) injuries such as broken bones and so forth.
- Broken eye glasses or frames.
- Signs of restraint, for example bruises on the wrist and so forth.
- Unexplained bleeding.
- Torn, stained or bloody clothing.
- Injuries which do not seem consistent with the explanation given.
- An individual being threatened, belittled, or a victim of controlling behaviour by another person.
- Unexplained behaviour from an individual which can sometimes seems like dementia such 'rocking', 'sucking' or 'mumbling to themselves'.
- Unusual weight loss (because of not eating enough food or drinking enough fluids).
- Increasingly dirty or unkempt appearance.
- Someone else expressing concern about the welfare of the individual in concerned.
- Individuals showing distrust of a certain person(s).
- Individuals showing an unexplained distrust of others.

Section Three Reporting Procedures

3.1 How to react and what to do

Councillors, employees and/or volunteers are not responsible for deciding whether incidents of abuse have taken place. However they are responsible, both from a legal and moral perspective, for reporting concerns to the relevant person(s) outlined within the Council's Adult Safeguarding Code of Practice.

There is no single, simple set of rules to follow when you are dealing with suspected abuse but a good guideline to remember is:

- 1 Listen.**
- 2 Record** your suspicions or what you have been told, **and**
- 3 Report** to your line manager or the designated officer.

When dealing with a disclosure or concerns about possible abuse the following are some useful dos and don'ts:

Dos	Don'ts
Stay calm	Panic
Listen and hear - give the person time to say what they want to say	Ask leading questions Judge Probe
Reassure them that they have done the right thing in telling you	Promise to keep secrets
Record in writing what was said as soon as possible and keep this record safe and secure. It may be required by the Police or Social Services. To record, please use the 'Record of a Disclosure' form contained in Appendix 2, as well as completing the 'Incident report Form' contained in Appendix 1.	Make the individual repeat the story unnecessarily
Report the matter to your line manager or the designated officer	Try to take action yourself nor ask for details of the abuse – this is not your job and will be undertaken by Police and Social Services

Note: It is essential that you record the exact information (word for word if possible), rather than recording your interpretation of any statements. Remember,

confidentiality is essential and information should not be disclosed to any person other than those outlined in this policy.

3.2 How to report and respond to safeguarding concerns

Councillors, employees or volunteers could have their suspicion raised in a number of ways, for example:

- The conduct of a colleague.
- An individual 'disclosing' abuse.
- Bruising, or other evidence of physical hurt.
- Unusual behaviour.

If an employee has any such concerns they should report them immediately to their Line Manager in the organisation. Volunteers should report to an appropriate manager or to the Designated Safeguarding Officer. If a Councillor, whilst on Council property or land, has any concerns they should report them immediately to either the Chief Executive or the Designated Safeguarding Officer.

In an emergency, where there appears to be in immediate and serious risk and a Designated Safeguarding Officer, or your line manager, cannot be contacted, the police or appropriate organisation should be contacted immediately.

All Councillors, employees and volunteers should be aware of who the Designated Safeguarding Officer is, as well as the Deputy Officers. They should ensure that they know their contact details in case they ever need to report an incident.

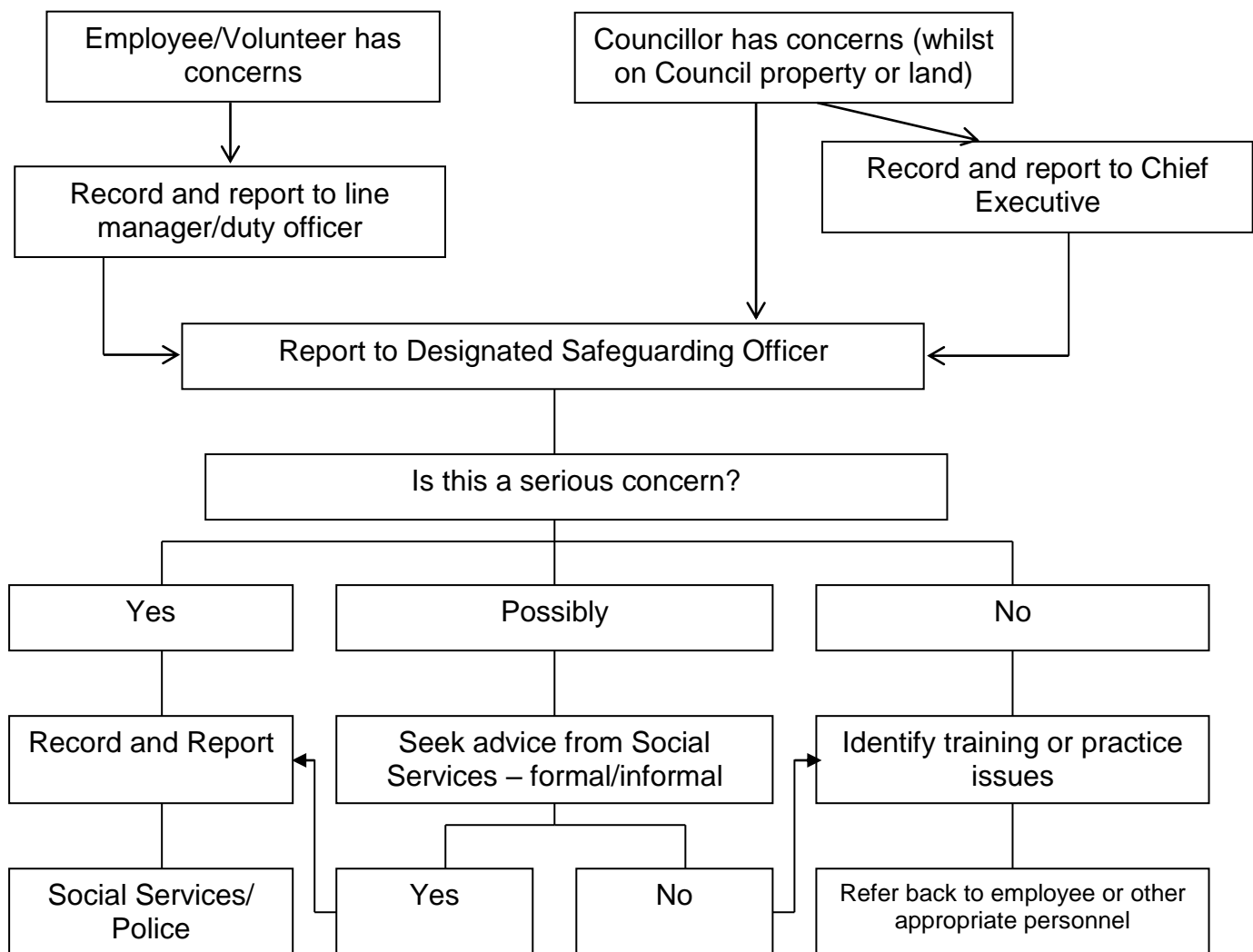
Incidents or concerns must be reported to the Designated Officer immediately, with some examples including:

- If someone has behaved in a way that has harmed another individual.
- If someone has possibly committed a criminal offence against or related to another individual(s).
- If someone has behaved towards a person in a way that indicates s/he is unsuitable to work within a particular environment.

All Incident Report Forms will be stored by the Council's Head of Human Resources and Organisation Development who also acts as a Deputy Safeguarding Officer.

As the Safeguarding Officer and the other Deputy Safeguarding Officer receives the form(s), they will immediately begin to deal with the incident(s) as well as forwarding the form(s) on to the Head of Human Resources and Organisation Development for safe storage.

3.3 Reporting diagram for safeguarding concerns



Outside normal working hours

If an employee, or Councillor, has a concern about the safety and/or welfare of an individual outside of working hours, they should immediately contact either the PSNI (101), Western Health and Social Care Trust's Social Services or other relevant organisation (i.e. ambulance), as needed.

3.4 Confidentiality

Confidentiality is about managing information in a respectful, professional and purposeful manner and this should be maintained at all times when dealing with issues and people involved in concerns about the safety and welfare of an individual.

This type of information has to be treated in a careful and sensitive manner and should be discussed only with those who need to know. Giving information to others on a “need to know” basis for the protection of an individual is not a breach of confidentiality.

Fermanagh and Omagh District Council will balance the right to confidentiality with the legal principle that the welfare of the individual is paramount. The aim is to protect both the rights of the individual and of the alleged perpetrator by ensuring that only those who need to know are given the relevant information.

3.5 Anonymous Complaints

Anonymous complaints can be difficult to deal with, however they should not be ignored. They should be taken seriously and brought to the attention of the Designated Safeguarding Officer who will treat them in accordance with the Adult Safeguarding Policy.

The information will be checked out and handled in a confidential manner. Any anonymous complaints relating to safeguarding concerns will be handled as far as possible in accordance with the procedures outlined within these guidelines.

3.6 Incident Report Form

The ‘Incident Report Form’ is included within this Code of Practice as Appendix 1, or it can also be accessed online at: www.fermanaghomagh.com.

The ‘Record of a Disclosure’ form is also included within this document as Appendix 2. This form should be filled out in conjunction with the ‘Incident Report Form’ contained in Appendix 1.

Both forms are available on the Council’s Intranet, or from the Designated Safeguard Officer / Deputy Officers.

Section Four Code of Conduct

It would be impossible to lay down hard and fast rules that will cover all the circumstances where Councillors, employees and/or volunteers interact with individuals, or where opportunities for the conduct of Councillors or employees could be misconstrued.

4.1 Code of Conduct

In many cases Councillors or employees will have to exercise their best judgement but this document is designed to give advice and points of guidance on how best to interact with individuals and to deal with any safeguarding issues which may arise.

All Councillors, employees and volunteers will be expected to observe the expected standards of conduct and follow the procedures and guidance contained within the Adult Safeguarding Policy document. If the expected standards of conduct, procedures and guidelines are not adhered to, employees may be subject to appropriate disciplinary action or reported to other authorities when considered necessary.

Please note that the 'Code of Conduct for Local Government Employees' includes a section on Whistle Blowing which states that:

"If an employee becomes aware of activities which he/she believes to be illegal, improper, unethical or otherwise inconsistent with this Code, the employee should report the matter, acting in accordance with the employee's rights under the Public Interest Disclosure Act 1998, and with the Council's confidential reporting procedure, or any other procedure designed for this purpose."

The Adult Safeguarding Policy will apply to **all** employees of Fermanagh and Omagh District Council with the term 'employees' referring to:

- Full-time employees
- Part-time employees
- Seasonal workers
- Coaches
- Standbys/Casual Employees
- Student placements
- Volunteers.

As an officer of Council employees have a duty of care to safeguard the health, safety and welfare of any individual they come into contact with during the course of their duties. Councillors and employees must always be mindful that they hold a position of trust and their behaviour must always be above reproach.

We need to work together to ensure the protection of all individuals with whom we come into contact either directly or indirectly through our work for Fermanagh and Omagh District Council. If we have any concerns about the protection of an individual we have a duty to act and the safety of that individual should always be of paramount concern.

4.2 Code of behaviour – Councillors, Employees and Volunteers

All Councillors and employees will follow the Council's Adult Safeguarding Policy, along with the associated Code of Practice, in the interest of creating a safe environment, which protects the individual as well as the employees and volunteers who work with them.

The following points are the **minimum** standards, which we expect all Councillors and employees to conform with when dealing with the public.

Councillors and employees, whilst on Council property or land, will:

- ◆ Respect an individual's right to personal privacy.
- ◆ Remember that actions can be misinterpreted, for example:
 - ◆ Engage in rough, inappropriate games including horseplay.
 - ◆ Allow, or engage in, inappropriate touching of any kind. (Appropriate touching should always be in response to the individual's needs, be appropriate to the person's age and stage of development and it should always be with the person's permission.)
- ◆ Recognise and take action in the event of inappropriate behaviours such as:
 - Petting or fondling
 - Inappropriate physical contact.
 - Sexually explicit behaviour, or language, in games, etc.
 - Those who are spending an inordinately long time in changing area/cubicle/toilet area when there is no obvious reason for their presence.
 - Adults who are at risk who have strayed into an area restricted areas with no apparent explanation.
 - Those who are seen looking over/under cubicles.
 - Adults whose behaviour is causing distress to other individuals e.g. rough play, horseplay.
 - Make sexually suggestive comments.
 - Do things of a personal nature for individuals that they can do for themselves, or that their parent or the group leader can do for them.

4.3 Implications for employees

Employees who breach any of the above standards will be subject to the Council's disciplinary procedure.

If there are concerns raised or an allegation is made against a member of our employees, this will be dealt with under the reporting procedures as outlined in section 3 of this Code of Practice.

4.4 Dealing with allegations of Abuse

If an employee has any such concerns they should report them immediately to their Line Manager in the organisation. Volunteers should report to an appropriate manager or to the Council's Designated Safeguarding Officer. If a Councillor has any concerns they should report them immediately to either the Chief Executive or the Designated Safeguarding Officer.

If, however, the allegation involves the employee's line manager, a report must be made to the next level of management. The Designated Officer should also be informed.

Where an allegation of abuse is made against an employee or volunteer this must be reported to the Social Services and/or the police in the interests of protecting both the individual and the employee/volunteer.

Following advice from Social Services/PSNI consideration will be given to:

- (i) Whether the employee should be suspended from work while an investigation is carried out.
- (ii) Whether or not the Council need to carry out their own review of practice.

If gross misconduct is suspected, the employee will be suspended from work on full pay pending disciplinary action.

4.5 Guidance for Hirers.

We aim to ensure that all visitors are safe while visiting any of our properties. In addition to our responsibilities, we ask that hirers or other external organisations or persons using Council facilities exercise their own responsibilities and follow our Adult Safeguarding Policy, adhering to the following **minimum** standards.

In particular, you must:

- Make sure you have adequate employees supervision taking account of the number and age of the individuals participating (in line with relevant good practice guidelines);
- Ensure that you supervise individuals adequately at all times;
- Never abuse an individual in any way;
- Ensure adequate insurance cover for the group and leaders;
- Explain to your group what standards of behaviour you expect from the group while using the Council's facilities;

- Keep up to date with the necessary technical skills, qualifications and insurance and undertake relevant safeguarding training;
- Demonstrate exemplary behaviour in order to protect people in your care and yourself from false allegations;
- Act upon any concerns raised or allegations made of abuse (if it relates to a Council member of staff).

You have the primary responsibility for the welfare of individuals at all times.

4.6 Expected Standards of Behaviour from Groups Using Council Facilities.

We expect all our visitors and service users to show courtesy and respect for others and for our property at all times, abiding by their own Safeguarding Policies and those of the Council, if appropriate.

The Council has the right to refuse future requests to hire or use our facilities, and we can ask the group to leave, if Safeguarding Policies are not adhered to.

4.7 Contractors.

When a Contractor is hired, or brought in, and before any work is commenced the Project/Centre Manager should inform them of their responsibilities regarding safeguarding. If the Contractor does not have a Safeguarding / Protection Policy in place, they should adhere to the Council's Adult Safeguarding Policy and Code of Practice.

It is not the Contractor's responsibility to determine whether abuse is taking place. However, it is their responsibility to pass on any concerns that are raised by their employees.

All procurement procedures should include arrangements and wording regarding the Safeguarding of Adults who are at risk of harm where appropriate.

Section Five Support and Training

The Council recognises that working with adults, who are at risk of harm, is both worthwhile and fulfilling; however it can also be challenging.

Once we have recruited our employees and volunteers, we need to ensure that they are all well informed, trained, supervised and supported, so that they are less likely to become involved in actions that can cause harm or be misunderstood.

Councillors as well as all full time, part time, seasonal and on call employees, agency employees, student placements and volunteers, will receive training appropriate to their needs and their job/role.

This process should include the following:

5.1 Induction

New employees will receive guidance from their supervisor/Line Manager(s) on safeguarding matters relevant to their position. All new employees will be issued with an information leaflet highlighting the main features of the Adult Safeguarding Policy and guidance on where to get further information if needed.

Volunteers will receive guidance from the Manager who is supervising their placement where appropriate.

Councillors will receive information on induction and all councillors will be issued with an information leaflet highlighting the main features of the Adult Safeguarding Policy and guidance on where to get further information if needed.

5.2 Probationary or trial period

During their probationary period all employees will be monitored and for those in regulated positions particular attention will be paid to their suitability for working with/in particular environments. Employees on seasonal or short term contracts will have their suitability assessed within an early stage of their contract.

5.3 Training

We recognise the importance of continual training and development for all employees. Training is an ongoing process, and relevant to the roles that people play in the organisation.

The Council will provide suitable training in safeguarding for all relevant employees, this training will have three levels: -

- 1) General awareness training for all employees and volunteers;
- 2) Training for employees who work in regulated positions;
- 3) Comprehensive training for the Designated Safeguarding Officer / Deputy Officers, Line Managers and Duty Officers.

Section Six Recruitment and Selection Guidelines

Fermanagh and Omagh District Council operates transparent and clearly defined recruitment and selection procedures in line with legislative requirements and best practice, set out by the Local Government Employees Commission.

There are thorough procedures in place to help screen out those who are not suitable to work in particular environments.

A policy for the Employment of People with Convictions is under review and will contain the procedure to be applied in these circumstances. In the interim period, the policy which applied in one of the Legacy Councils, Fermanagh District Council, will be used as a point of reference. (Appendix 4)

Access NI

Access NI is a criminal history disclosure service in Northern Ireland. It supplies criminal history information to organisations and individuals on three levels of 'Criminal Record Check' i.e. Standard, Enhanced and Basic Disclosures.

The level of checks required will be determined at the beginning of the recruitment process and the related procedures will be managed by the Councils Human Resource Department.

An Access NI Enhanced Disclosure with Barred List Check is legally required for employees and volunteers for all posts designated as regulated activities ie those posts which work with vulnerable adults (as defined under the SVG (NI) Order 2007 (as amended by the Protection of Freedoms Act 2012)). Therefore, before advertising a post or a volunteering role, Fermanagh and Omagh District Council will make the decision if a position falls into the category of regulated activity. An Enhanced Disclosure without a barred list check is available for other specific posts which are not designated as regulated activity.

During the Council's recruitment and selection procedures candidates must give consent for the relevant Access NI Disclosure Check to be requested, if they are considered to be the preferred candidate for a post and have been conditionally offered the job/role subject to the results of the appropriate check.

6.1 Identification

The Council will require all those applicants who have to complete the Access NI check to produce evidence of their identity; e.g., a long birth certificate. This is important as Access NI can only make thorough checks if the person's identity is confirmed.

6.2 Access NI Disclosures

The disclosures will be returned to the individual who has been Access NI checked. Subsequently a decision will be made, in conjunction with the interview panel, on a candidate's suitability for working in a regulated position. The Council will not confirm any offer of employment in a regulated position until they are satisfied with the results of the Access NI check.

Whilst these checks provides valuable information to employers and is an essential part of the recruitment process for regulated positions, it is no substitute to good practice, in terms of the management and supervision of employees. Managers must ensure that employees do not commence work until Enhanced Disclosures are received.

The effective management of employees and volunteers ensures that everyone within the Council is clear about what we are trying to achieve and what their particular job/role is. The Council wants to prevent harm to the people we support through our facilities and/or services. The provision of on-going appropriate training, support and supervision of employees and volunteers helps to achieve this.

6.3 Posts Requiring Access NI Disclosures

Recruitment, whether permanent, temporary or casual, to the following posts will require a Disclosure Certificate

Posts		
Enhanced Disclosure (exc. Barred List)		
Chief Executive	Directors	Heads of Service
Enhanced Disclosure (inc. Barred List)*		
Community, Health and Leisure: Leisure Centre Manager, Duty Officer/Manager, Supervisor, Senior Recreation Attendant, Leisure Assistant, Recreation Attendant, Instructor/Coach, Creche Employees, Active Communities and Activity Referral Employees, Sports Development Employees, Summer Scheme Leader/Assistant, Geopark Manager, Geopark Development Officer, Senior Guide, Education Assistant, Education Officer, Museum Assistant, Events Employees, Front of House Manager/Officer, Operations Manager – Theatre, Arts Culture Manager, Manager – Museum Services, Development Officer Community and Good Relations Employees and Community Centre Employees		
Corporate Services & Environment & Place: HR employees and Waste Educational Officer		
Basic Disclosure		
Environment & Place: Public Convenience Attendants and Street Orderlies, Animal Welfare Officers, Enforcement Officer, Dog Control Employees Community Health & Leisure: Tobacco Control Officer, Home Assessment Officer, Visitor Services Advisor, Information Assistant, Maintenance Officer, Administrative Officer, Receptionist, Arts Technician, Cleaner Corporate Services and Governance: Registration Employees, Finance Employees i.e. Accountants/accounts officers/payroll and procurement; IT Employees, Senior Caretaker/Caretaker, Catering Employees, Cook		

*Regulated posts requiring an Enhanced Check, inclusive of the barred lists, have contact with children and/or adults who are at risk of harm in particular capacity such as caring for, supervising, training or being in sole charge.

Please note: The above list is not a definitive checklist. In determining where a new post should require a Disclosure Certificate, the criteria for determining whether posts require enhanced disclosure detailed in Appendix 3 of the Policy for the Employment of People with Convictions.

6.4 References

The Council will ask for at least two referees who are not family members, at least one of which should be a present or most recent employer. Where a post involves work with adults who are at risk of harm, the Council may request references from any other previous employment, which would have involved working in a similar position.

6.5 Agency employees

The Council will ensure that any agency employees working in regulated positions have been checked by the Agency prior to their commencement.

6.6 Volunteers

Where volunteers work in our premises (e.g. community centres, leisure centres, parks and play areas), and may have unsupervised access to adults or adults who are at risk of harm, the Council will adopt the following procedures:

- Consider the skills needed for the job – is the person suited to the task?
- Ask all volunteers to complete a short application form.
- Confirm their identity (e.g., with a long birth certificate).
- Ask all volunteers for written references.
- Interview the volunteer, go through the information on their application form, and make sure they are aware of our Adult Safeguarding Policy and other induction materials.
- If this post is a regulated position the Volunteer will be required to give permission to apply for an Enhanced Disclosure.
- Carry out training and reviews in the same way as for paid employees.

Section Seven Photography

7.1 Photography in Council Facilities

Photography should only be allowed with the written authorisation of centre/facility management. As a result, photography within Leisure Centres will only be permitted by the facility manager and upon receipt of a completed 'Photography Permission Form' which is attached in the Appendix 3 of this document.

The use of all forms of photographic and recording equipment (including mobile phones) for photographic purposes, should be forbidden within all areas of any Leisure Centre.

(Please note, other areas can be added to this list at the discretion of the Centre/Facility Manager, Designated Safeguarding Officer or Head of Service).

7.2 Vigilance by the general public

No matter what arrangements are put in place to prevent the use of cameras, videos or mobile phones with digital image recording, the very nature of "peeping tom type photography" make it difficult to police. Managers should encourage all users to be vigilant by the use of signage in appropriate locations.

7.3 Use of Professional Photographers.

If officers are commissioning professional photographers or inviting the press to an activity or event it is important to ensure they are clear about the Council's expectations of them in relation to safeguarding. They should be issued with identification, which must be worn at all times. Athletes should be informed that a photographer will be in attendance at an event, and their consent obtained to both the taking and publication of photographs.

7.4 General Advice on Photography

When considering photography and safeguarding, the following information should also be considered:

- No personal detail of individuals should be listed in any promotional or editorial material or photography without permission.
-
- Permission must be obtained in order to use an image. This will ensure that individuals are aware of the way the image is to be used.
- Images of individuals in appropriate dress should only be used. This will further reduce the risk of inappropriate use.

Private and Confidential



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

Appendix 1.

Incident Report Form

Name of Employee making report: _____

Job Title: _____

Location: _____

Name of Individual: _____

Date of Birth: _____ Age: _____

Home Address: _____

Contact No: _____

Details of Incident (including date, time and location):

Signature: _____

Date: _____

NB: If a disclosure has been made the Record of a Disclosure should also be completed and attached to this form.

Action Checklist

Report to Designated Officer _____ (Date)

Advice from Social Services _____ (Date)

Action Taken _____

Referral to Social Services/PSNI _____ (Date)

This form should **always** be used in conjunction with the Child Protection Incident Report Form



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

Appendix 2

Record of a Disclosure

When was the disclosure made (dates and times)?

What were the immediate circumstances leading to the disclosure?

Were there others present at the time of the disclosure?

Yes

No

Don't Know

☐

If Yes, please state who (name and position) and what role they played.

Exactly what did the individual say and what did you say?

(Remember do not lead the individual – record actual details.

Continue on a separate sheet if necessary).

2. Signs

Describe any factual signs of physical injury evident on the person:

Describe any factual signs of behavioural changes displayed by the person:

Have they alleged that any particular person is the abuser? (If so, please record the details below)

Was the individual informed to any future course of action?

3. Signatures

Signed:

Date:

_____ (Person reporting concern)

_____ (Line Manager)

_____ (Designated Officer)



Fermanagh & Omagh
District Council
Comhairle Ceantair
Fhear Manach agus na hÓmaí

Appendix 3.

Photography Permission Form

Data Protection: Under the Data Protection Act, Fermanagh and Omagh District Council has a legal duty to protect any information, which we collect. The information will not be disclosed to any third party unless law or regulation compel such disclosure or unless we have been specifically asked to do so by the Data Subject.

Details of Photographer:

Name: _____

Address: _____

Telephone: _____

Name/s of subject: _____

Relationship of photographer and subject

The reason (or event) the images are intended (e.g. family record).

I declare that the information provided is valid and the images will only be used for the reasons given. If any customer complains or expresses concern, I respect the rights of other people and will stop taking photographs.

Signed: _____

Date: _____

The Manager gives permission for (name)..... to use a camera/video camera on (date)

Signed _____

Date _____

A copy of this page will be given to the person as proof of authorisation.



Useful Contacts

Family Intervention Centre - Enniskillen

2 Coleshill Road
Enniskillen
County Fermanagh
BT74 7HG

Telephone: 028 6634 4000

Family Intervention Centre - Omagh

Unit 4 Bankmore Business Park
Bankmore Road
Omagh
County Tyrone
BT79 0BE

Telephone: 028 8225 4500

Sport NI

House of Sport
Upper Malone Road
Belfast
BT9 5LA

Telephone: 028 9038 1222

Fermanagh and Omagh District Council

Child Safeguarding Officer

Liz Wilson
Telephone: 0300 303 1777 ext. 21170
Email: liz.wilson@fermanaghomagh.com
Mobile: 075 4004 8517

Deputy Child Safeguarding Officers

Emma McManus
Telephone: 028 6632 4121
Email: emma.mcmanus@fermanaghomagh.com

Amanda Whiteman
Telephone: 028 8224 6711
Email: amanda.whiteman@fermanaghomagh.com

Damian Maguire
Telephone: 028 6772 1299
Email: damian.maguire@fermanaghomagh.com

PSNI

Enniskillen PSNI Station	Omagh PSNI Station
48 Queen Street	1 Derry Road
Enniskillen	Omagh
County Fermanagh	County Tyrone
BT74 7JR	BT78 5DR

Telephone: 101

Enniskillen South West Acute Hospital (Out of Hours)

124 Irvinestown Road
Drumcoo
Enniskillen
County Fermanagh
BT74 6DN

Telephone: 028 6638 2000

Western health and Social Care trust Adult Safeguarding Service

124 Irvinestown Road
Drumcoo
Enniskillen
County Fermanagh
BT74 6DN

Telephone: 028 6638 2000

Lifeline

Freephone: 0808 808 8000

Fermanagh District Council

Code of Practice on the Employment of People with Convictions

October 2012.

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Introduction.

The **Rehabilitation of Offenders (Northern Ireland) Order 1978** enables criminal convictions to become 'spent' or ignored after a rehabilitation period. This means that once the rehabilitation period has expired an ex-offender is not obliged to mention their conviction when applying for a job. It is aimed at helping people who have been convicted of a criminal offence but who have not re-offended since.

The **Rehabilitation of Offenders (Exceptions) Order (Northern Ireland) 1979** sets out occupations and positions where there is a valid need to see a person's full criminal record (including 'spent' convictions) in order to assess their suitability for a position. These are called 'exempted' posts.

This document sets out:

1. Fermanagh District Council's Policy on the Employment of People with Convictions (pages 5-12), and
2. A Code of Practice to provide guidance on the implementation of the Policy and to ensure that Fermanagh District Council meets its legal obligations in relation to the recruitment and employment of people with convictions.

Fermanagh District Council

Policy on the Employment of People with Convictions

October 2010

1. Introduction.

Fermanagh District Council is committed to the principle of equality of opportunity and, subject to the over-riding consideration of protecting children and vulnerable adults, undertakes to treat all applicants for employment fairly and not discriminate unfairly against anyone on the basis of conviction or other information revealed.

Information about criminal convictions will be taken into account only when the conviction is considered materially relevant to the role; this includes conflict related offences that pre-date the Belfast (Good Friday) Agreement (April 1998). Any disclosure will be considered in the context of the job description, the nature of the offence and the responsibility for the protection of children and vulnerable adults.

2. Aim.

The aim of the Policy on the Employment of People with Convictions is to ensure that the Council focuses on an applicant's merit and ability to do the job whilst also operating in accordance with the Guidelines produced by Access NI in response to legislative requirements. (Appendix 1)

3. Scope.

The Policy will apply to existing employees of the Council and all potential job applicants.

4. Objectives.

By working in accordance with the Policy and associated Code of Practice, Council intends to

- i. ensure that all those involved in recruitment and employees management processes have been trained to identify and assess the relevance of Disclosure information.
- ii. establish a framework to guide the Council's practice in relation to the protection of children and vulnerable adults;
- iii. agree and publicise a Policy Statement (Appendix 2) to inform existing employees and potential job applicants.

5. Responsibilities.

The Chief Executive has overall responsibility for the implementation of the Policy on the Employment of People with Convictions. Councillors and employees are expected to follow this policy and take the appropriate action to meet the aims and objectives.

6. Linkages.

This Policy links into the associated Code of Practice, the Codes of Conduct for Councillors and Employees, the Disciplinary Procedure, the Data Protection

Policy, the Equal Opportunities Policy and the Local Government Employees Commissions Code of Practice on Recruitment and Selection.

7. Review.

The Employment of People with Convictions Policy will, under normal circumstances, be reviewed every three years and from time to time, updates and re-issues may be circulated.

However, the policy will be reviewed sooner in the event of any one or more of the following:

1. Failure or weakness in the policy is highlighted.
2. Changes in legislative requirements.
3. Changes in Government/Council or other directives and requirements.

Relevant Legislation.

Part V of the Police Act

Sections 112 to 127 of the Police Act 1997

Enhanced criminal record certificates: prescribed purposes

The Police Act 1997 (Criminal Records) (Disclosure) (Amendment No.2) Regulations (Northern Ireland) 2009

The Police Act 1997 (Criminal Records) (Disclosure) Regulations (Northern Ireland) 2008

The Police Act 1997 (Criminal Records) (Registration) Regulations (Northern Ireland) 2007

The Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups (NI) Order 2007

Rehabilitation of Offenders (Northern Ireland) Order 1978

Rehabilitation of Offenders (Exceptions) Order (Northern Ireland) 1979

Data Protection Act 1998

**Fermanagh District Council
Policy Statement on Employing People with Convictions.**

1. Statement for posts requiring Access NI Disclosure.

Having a criminal record will not necessarily prevent you from working with Fermanagh District Council. This will depend on the nature of the position, together with the circumstances and background of your offence(s) or other information contained on a disclosure certificate or provided directly to us by the Police. Failure to disclose information on a criminal record may disqualify you from appointment.

1. Fermanagh District Council complies fully with the Code of Practice, issued by the Department of Justice, in connection with the use of information provided to registered persons, their nominees and other recipients of information by Access NI under Part V of the Police Act 1997, for the purposes of assessing Applicant's suitability for employment purposes, voluntary positions, licensing and other relevant purposes. We undertake to treat all applicants for positions fairly and not to discriminate unfairly or unlawfully against the subject of a Disclosure on the basis of conviction or other information revealed.
2. This policy is made available on the Council's website and on request to all applicants for posts requiring an Access NI Disclosure.
3. Fermanagh District Council is committed to equality of opportunity, to following practices, and to providing a service which is free from unfair and unlawful discrimination. We ensure that no applicant or member of employees is subject to less favourable treatment on the grounds of religious belief, political opinion, racial group, age, marital status, gender, disability or dependant's status. Council is also committed to providing equality of opportunity for those people with an offending background **unless** that background is materially relevant and manifestly incompatible with the post applied for.
4. Fermanagh District Council actively promotes equality of opportunity for all with the right mix of talent, skills and potential, and welcomes applications from a wide range of candidates, including those with criminal records. The selection of candidates for interview will be based on those

who meet the required standard of skills, qualifications and experience as outlined in the Job Description.

5. We will request an Access NI Disclosure only where this is considered proportionate and **relevant** to the particular position. This will be based on a thorough risk assessment of that position and having considered the relevant legislation which determines whether or not a Basic or Enhanced Disclosure is required for the position in question. Where an Access NI Disclosure is deemed necessary for a post or position, all applicants will be made aware at the initial recruitment stage that appointment to the position will be subject to a Disclosure check and that Fermanagh District Council will request the individual being offered the position to undergo an appropriate Access NI Disclosure check.
6. In line with the Rehabilitation of Offenders (Northern Ireland) Order 1978, Fermanagh District Council will only ask about convictions which are defined as "unspent" within the terms of that Order, unless the nature of the post is such that we are entitled to ask questions about an individual's entire criminal record.
7. We undertake to ensure an open and measured discussion on the subject of any offences or other matters that might be considered relevant for the position concerned e.g. the individual is applying for a driving job but has a criminal history of driving offences. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of the conditional offer of employment.
8. Fermanagh District Council may consider discussing any matter revealed in a Disclosure Certificate with the person who is the subject of that Disclosure. We are only able to discuss what is contained in a Disclosure Certificate with the subject of that Disclosure before considering withdrawing a conditional offer of employment.
9. We ensure that all employees in Fermanagh District Council who may participate as a member of the Disclosure Assessment Panel have been suitably trained to identify and assess the relevance of Disclosure information. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to employment of ex-offenders (e.g. the Rehabilitation of Offenders (Northern Ireland) Order 1978).
10. We undertake to make every subject of an Access NI Disclosure aware of the existence of the Code of Practice, and to make a copy available on request.

2. Statement for posts not requiring Access NI disclosure

Information on the Rehabilitation of Offenders (NI) Order 1978

Under this Order you are required to disclose details of previous convictions, until a certain length of time passes and the convictions become “spent”. You do not need to provide details about either minor motoring offences or previous convictions once they become “spent”. The period for assessing whether or not a conviction has become “spent” will be calculated up to the date you sign the application form.

The information you provide will be treated as strictly confidential. Having a conviction will not necessarily prevent you from working with Fermanagh District Council. This will depend on the circumstances and background to the offence(s) which will be taken into account when considering how suitable you are for the type of work involved, should your application be successful. Failure to disclose any “unspent” convictions may result in the offer of employment being withdrawn. If already appointed, you could be dismissed without notice.

The following sentences become ‘spent’ after fixed periods from the date of conviction:

Sentence	Aged 18 or over at conviction	Under 18 years at conviction
Absolute Discharge	6 months	
Probation Order, Bind Over, Conditional Discharge, Care/Supervision Order	Date Order ceases OR 1 year – whichever is longer	
Attendance Centre Order Juvenile Justice Centre Order	1 year after Order expires	
Hospital Order under the Mental Health Act	5 years or 2 years after the Order expires – whichever is longer	
Fine, Community Service Order, Combination Orders, Youth Conference Order, Reparation Order, Community Responsibility Order	5 years	2 ½ years
Prison – (immediate or suspended) OR Young Offenders Centre – sentence of 6 months or less	7 years	3 ½ years
Prison – (immediate or suspended) OR Young Offenders Centre over 6 months up to and including 30 months	10 years	5 years
NB: Custodial Sentence of more than Two and a Half Years (30 months) can never become spent		

Notes:

- Consecutive prison sentences count as a single term when calculating the rehabilitation period.
- If more than one sentence was imposed for an offence, the longer rehabilitation period applies.
- If a person receives a new conviction during a rehabilitation period:
 1. for a summary offence (ie : can only be tried at Magistrates Court) both rehabilitation periods expire separately.
 2. for a more serious offence (ie: which could be tried at the Crown Court) neither conviction will become spent until the longest period expires.

- Cautions, reprimands and final warnings are not considered to be convictions and become 'spent' immediately unless relevant to 'Excepted' posts.
- A spent conviction will remain on your criminal record.
- Any conviction for a conflict-related offence that pre-dates the Good Friday Agreement (April 1998) will not be taken into account unless it is materially relevant and manifestly incompatible with the post applied for.

Code of Practice on the Employment of People with Convictions

Posts requiring Access NI Disclosure.

Recruitment, whether permanent, temporary or casual, to the following posts will always require an Enhanced Disclosure Certificate:

Regulatory Services Department.

Director

Head of Environmental Health

Home Assessment Officer.

Leisure Development and Arts Department.

Director

Geopark Development Officer

Geopark Manager

Neighbourhood Renewal Co-ordinator

Museums Assistant

Education Assistants

Activity Referral Co-ordinator

Senior Guide

Leisure Centre Employees -	Manager
	Supervisor
	Administrative Officer (Forum)
	Senior Recreation Attendant
	Instructor
	Recreation Attendant
	Recreation and Events Attendant
	Creche Leader.

Coach

Cleaner – Basic Disclosure

Receptionist – Basic Disclosure

This is not a definitive checklist. In determining whether a new post should require a Disclosure Certificate, the Criteria for determining whether posts require enhanced disclosure detailed in Appendix 3 should be used.

Recruitment and Selection Guidelines.

1. All Posts within the Council.

Applicants will be asked to declare if they have any unspent criminal conviction(s) at the time of the application for employment. This information will be treated in strict confidence and will only be shared with the Disclosure Assessment Panel if the candidate has been selected for appointment.

Where a conviction is disclosed, or information is provided by Access NI, a Disclosure Assessment Panel consisting of at least two officers who were not involved in the original recruitment decision will be established to determine whether this is materially relevant or not for that particular post, using the procedure at Appendix 4.

If the panel consider the conviction/disclosure is not materially relevant, then the appointment is made.

If the Panel consider the conviction/disclosure is or could be materially relevant and is manifestly incompatible with the post, then the appointment is not immediately offered and the candidate is invited to meet the Panel to discuss the issue. After this meeting, if the Panel still considers the conviction/disclosure to be materially relevant and manifestly incompatible, their decision will be reported back to the Recruitment and Selection Panel. The candidate will be informed of the outcome of the process and offered a right of appeal to the Chief Executive. If an appeal fails then the position will be offered to the next highest ranked candidate.

Additional procedures are required to deal with recruitment to those posts which require Access NI Disclosure Certificates as detailed below.

2. Posts which require Access NI Disclosure Certificates

The Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups (NI) Order 2007 aims to improve existing safeguards for children and vulnerable adults by preventing unsuitable people obtain work, in any capacity, whether paid or unpaid, with children or vulnerable adults. The Council have put in place robust recruitment and employees selection procedures to ensure only those people with the necessary skills, knowledge and experience are considered suitable for work with children and vulnerable

adults, whilst ensuring those whose behaviour could be a threat to the safety and well-being of children and vulnerable adults are screened out.

A **regulated position** is defined in detail in the legislation and includes those whose normal duties require them to care for, train, advise, counsel, or are in sole charge of children and vulnerable adults, or have unsupervised contact with children and vulnerable adults, as well as the supervisors/managers of individuals in regulated positions.

Applications for regulated positions

Before making an appointment to a regulated post, the Council is required to make a Disclosure Certificate application to Access N.I. This enables us to ensure that individuals who might be a risk to Vulnerable Groups are not appointed. If an applicant is selected for appointment, they will be asked to give consent to this check and complete an Access N.I. Disclosure Certificate application form. Failure to comply with this process will mean that Council cannot consider an application further.

Identification

When an applicant is required to complete an Access NI Application Form, it will be necessary to produce evidence of their identification to the Council as laid down by Access NI. The Council will issue them with guidance notes on the type of ID necessary.

Access NI Checks

The Access NI checks will be returned to the nominated officer within the Human Resources Department. The nominated officer will decide, in conjunction with the Disclosure Assessment Panel, on a candidate's suitability for working in a regulated position. The Council will not confirm any offer of employment in a regulated position until they are satisfied with the results of the Access NI check. In determining the relevance of an issue which gives cause for concern, the Head of Human Resources will nominate a Disclosure Assessment Panel to make an assessment based on the criteria shown in Appendix 4. In refusing employment, the onus of proof rests with the Council to show material relevance.

If the panel consider the conviction/disclosure is not materially relevant, then the appointment is made.

If the Panel consider the conviction/disclosure is or could be materially relevant and is manifestly incompatible with the post, then the appointment is not immediately offered and the candidate is invited to meet the Panel to discuss the issue. After this meeting, if the Panel still considers the conviction/disclosure to be materially relevant and manifestly incompatible, their decision will be reported back to the Recruitment and Selection Panel. The candidate will be informed of the outcome of the process and offered a right of appeal to the Chief Executive. If an appeal fails then the position will be offered to the next highest ranked candidate.

Whilst the Access NI check provides valuable information to employers and is an essential part of the recruitment process for regulated positions, it is no substitute to good practice, in terms of the

management and supervision of employees.

References

We will ask for at least two referees who are not family members, at least one of which should be a present or most recent employer. Where a post involves work with children and vulnerable adults, the Council, may request references from any other previous employment, which would have involved working with children and vulnerable adults.

Agency employees

The council will ensure that any agency employees working in regulated positions have been Access NI checked prior to commencement.

Volunteers

Where we employ individuals as volunteers to work unpaid in our premises (e.g., community centres, leisure centres, parks and play areas), where they may have unsupervised access to children and vulnerable adults we will adopt the following procedures:

- Consider the skills needed for the job - is the person suited to the task?
- Ask all volunteers to complete a short application form.
- Confirm their identity (e.g., with a long birth certificate).
- Ask all volunteers for written references.
- Interview the volunteer, go through the information on their application form, and make sure they are aware of our Children and Vulnerable Adults Protection Policy and other induction materials.
- If this post is a regulated position we will seek an Enhanced Disclosure check.
- Carry out training and reviews in the same way as we do for paid employees.

Handling, Use and Storage of Disclosure Information

Fermanagh District Council will comply with Access NI's Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosure Applications and Disclosure information. The Council will also comply with its obligations under the Data Protection Act 1998 and other legislation pertaining to the safe handling, storage, retention and disposal of Disclosure information.

Disclosure information will be kept securely, in a lockable, non-portable storage container with access strictly controlled and limited to those who are entitled to see it as part of their duties.

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties except where an individual has given their express permission for their information to be divulged to third parties. The Council maintains records of all those to whom Disclosures or Disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Disclosure information is used only for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Once a recruitment (or other relevant e.g. regulatory or for licensing purposes) decision has been taken, Disclosure information will not be kept for longer than necessary. Information will not be retained and will be destroyed within 6 months of a decision, recruitment or otherwise, being made.

Once the retention period has elapsed, the Council will ensure that any Disclosure information is immediately destroyed by secure means. The Council will not keep any photocopy or other image of the Disclosure or representation of the contents of a Disclosure. However, the Council may 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 Access NI unique reference number of the Disclosure Certificate and the details of the recruitment decision taken.

Disclosure of Criminal Records by Existing Employees

Existing employees are required to inform their manager if, during the course of their employment or between checks where relevant, they obtain a new criminal conviction. Any matters disclosed by the employee or revealed through such Disclosure, will be discussed with the employee to determine their suitability to continue working in the post.

Depending upon the nature of the conviction, the matter may be dealt with in accordance with Fermanagh District Council's Disciplinary procedure. Failure to reveal such information may also lead to disciplinary action being taken.

Criteria for determining whether posts require enhanced disclosure.

Does the post involve one to one contact with children or vulnerable groups?
Are there any other legal constraints? e.g. motoring convictions for driving posts.
What level of supervision will the post holder receive?
Does the post involve any direct responsibility for finance or items of value?
Does the post involve direct contact with the public?
Will the nature of the job present any opportunities for the post holder to re-offend in the place of work?

Risk Assessment Procedure.

1. Having received copies of all relevant documentation from the Head of Human Resources, the Panel consider whether the conviction/disclosure is or could be materially relevant and is manifestly incompatible with the post. If they find that this is the case, the Panel will meet with the candidate for the post in order to determine whether the appointment should proceed.
2. In completing the Risk Assessment pro-forma, the Panel will consider the following Criteria in determining the relevance of the Disclosure Information:
 - i. The seriousness of the offence and its relevance to the safety of service users, other employees and property.
 - ii. The impact on the Council in the event of a further offence occurring, including the impact relating to service delivery and reputation.
 - iii. The length of time since the offence occurred.
 - iv. Any relevant information offered about the circumstances which led to the offence being committed, for example, the influence of domestic or financial difficulties.
 - v. Whether the offence was a one off, or part of a history of offending.
 - vi. Whether the applicant's circumstances have changed since the offence was committed, making re-offending less likely.
 - vii. The degree of remorse or otherwise expressed by the applicant and their motivation to change.

Risk Scores

(i) Likelihood

Score	Degree of Likelihood	Definition
High	Likely	This uncertainty is likely to occur in the next 2 years
Medium	Unlikely	This uncertainty is unlikely to occur in the next 2 years
Low	Extremely unlikely	This uncertainty is extremely unlikely to occur in the next 2 years

(ii) Impact

The impact criteria are based on the following Key Areas.

Score	Finance	Employees/Public	Department	Reputation
High	Additional expenditure / associated costs of between 5% < 12.5% of service revenue	Impacts on particular group	Serious disruption in service standards. Significant impact on some employees in department.	Affects more than one group of stakeholders with widespread medium-term impact on reputation
Medium	Additional expenditure / associated costs of between 1.5% < 5% of service revenue	Impacts on individual and family members	Moderate fall in service standards. Impact on a number of employees.	Affects more than one group of stakeholders but only short-term impact on reputation
Low	Additional expenditure / associated costs of < 1.5% of service revenue	Impacts on individual	Small fall in service standards. Impacts on 1 employee only.	Affects only one group of stakeholders with minimum impact on performance

Appointment of Post of.....

Risk Assessment - Proceed with appointment

Area of Risk	Panel Member 1	Panel Member 2	Comments
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	Low	Medium	High	Low	Medium	High	
Likelihood							
Finance							
Employees/Public							
Service							
Reputation							
Overall							

Appointment of Post of.....
Risk Assessment - Do not proceed with appointment

Area of Risk	Panel Member 1			Panel Member 2			Comments
	Low	Medium	High	Low	Medium	High	
Likelihood							
Finance							
Employees/Public							
Service							
Reputation							
Overall							

	Proceed with appointment			Do Not Proceed		
	Low	Medium	High	Low	Medium	High
Name 1						
Name 2						
Total						

Fermanagh District Council
Risk Assessment – Appointment of to the post of

Panel:

A. Background.

1. The Panel met with on to establish background information to the conviction. A copy of the report is attached.
2. The Panel also considered:
 - i. The Basic Disclosure Information
 - ii. Any other relevant information
 - iii. Job Description for post of
 - iv.application for post of

B. Findings.

3. Following the meeting with and having given consideration to all relevant information, the Panel completed a Risk Assessment process to determine the level of risk associated with the appointment. Copies of the report are attached.
4. The Panel found that:

C. Conclusion.

The Panel consider that the appointment of to the post of should be confirmed/should not be confirmed. (Set out details.)

D. Recommendation.

Having considered all the above, the Panel recommend that the appointment of to the post of should be confirmed/should not be confirmed.

Signed	
Date	
Signed	
Date	

Screening Matrix.

Statement of Intent. The Council intends to screen its policies, in accordance with Paragraphs 5 and 6 of the Equality Scheme, to determine which would require a fuller equality analysis in the form of an impact assessment

Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy or policy area:

Is this an existing, revised or a new policy/policy area?

Existing	Revised	New
		X

Brief Description

Fermanagh and Omagh District Council believes that it is always unacceptable for a child to experience abuse or harm of any kind and recognises its responsibility to safeguard and promote the welfare of all children by a commitment to a practice that protects them as far as is reasonably practicable.

What is it trying to achieve? (intended aims and outcomes)

The aims of the policy are:

The aim of the Child Safeguarding Policy is to demonstrate how the Council will meet its legal obligations and reassure members of the public, service users, councillors, employees and people working on behalf of the Council of what they can expect Fermanagh and Omagh District Council to do to safeguard children.

Are there any Section 75 categories which might be expected to benefit from the intended policy?

YES	NO	N/A
X		

If YES, explain how.

The Policy will promote the welfare and wellbeing of children during and within Council services, including in the planning of services.

Who initiated or wrote the policy?

Fermanagh and Omagh District Council

Who owns and who implements each element of the policy?

The Council owns and will implement the Policy, acting in partnership with other bona fide groups when appropriate.

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
	X	

If YES, are they

Financial:

Legislative:

Other, please specify:

N/A

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

All Councillors and Council employees are expected to follow this Policy and to take appropriate action to meet its aims and objectives.

The Chief Executive has overall responsibility for the implementation of the Policy. In addition, the specific responsibilities have been outlined in the policy.

Service users:

The Policy will impact on Fermanagh and Omagh District Council's residents, customers and visitors.

Other public sector organisations:

DHSSPSNI, Safeguarding Board, Safeguarding Panel.

Voluntary/community/trade unions:

The Policy will be delivered in partnership with other bodies whenever appropriate.

Other, please specify:

N/A

Other policies with a bearing on this policy

What are they and who owns them?

Guidance from DHSSPSNI and the Safeguarding Board.

Children (NI) Order 1995.

United Nations Convention on the Rights of the Child ratified by the UK Government on 16 December 1991.

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

Section 75 Category	Details of Evidence/Information
Religious Belief	64.23% belong to or were brought up in the Catholic religion and 33.08% belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion
Political Opinion	<p>The political opinion of the Council's elected members is as follows:</p> <p>Sinn Féin 17 Seats UUP 9 Seats SDLP 8 DUP 5 Independent 1</p> <p>This breakdown is taken as an approximate representation of political opinion among people within the Fermanagh and Omagh District Council area.</p>
Race	<p>On Census day 2011, 13.4% of the population of Fermanagh and Omagh was not born in Northern Ireland.</p> <p>0.84% were from an ethnic minority population and the remaining 99.16% were white (including Irish Traveller).</p> <p>To date Council has received no requests for signage in a minority ethnic language.</p>
Age	<p>Below is the age profile of the Fermanagh and Omagh District Council area:</p> <p>0 – 15 yrs: 24,808 16 – 39 yrs: 35,897 40 – 64 yrs: 36,517 65 – 84 yrs: 13,972 85+ yrs: 1,967</p>
Marital Status	<p>On Census Day 2011 the marital status profile of the Fermanagh and Omagh District Council area was:</p> <p>Single (never married or never registered a same-sex civil partnership)- Aged 16+ yrs: 31,598</p>

	<p>Married- Aged 16+ yrs: 44,296</p> <p>In a registered same-sex civil partnership - Aged 16+ yrs: 48</p> <p>Separated (but still legally married or still legally in a same-sex civil partnership)- Aged 16+ yrs: 2,851</p> <p>Divorced or formerly in a same-sex civil partnership which is now legally dissolved - Aged 16+ yrs: 3,573</p> <p>Widowed or surviving partner from a same-sex civil partnership - Aged 16+ years: 5,987</p>
Gender	<p>On Census Day 2011 the gender breakdown of the Fermanagh and Omagh District Council area was:</p> <p>Males: 56,649 (50.06%) Females: 56,512 (49.94%)</p>
Disability	<p>20.75% of residents in the Fermanagh and Omagh District Council area have a long term health problem or disability, split as follows:</p> <p>Long-term health problem or disability: Day-to-day activities limited a lot: 13, 304</p> <p>Long-term health problem or disability: Day-to-day activities limited a little: 10, 178</p> <p>Long-term health problem or disability: Day-to-day activities not limited: 89, 679</p>
Dependants	<p>Families in households - No dependent children:14,962</p> <p>Families in households - One dependent child:5,571</p> <p>Families in households - Two dependent children:5,068</p> <p>Families in households - Three or more dependent children:3,871</p>

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for each of the Section 75 categories

Section 75 Category	Details of Needs/Experiences/Priorities
Religious Belief	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.
Political Opinion	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.
Race	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.
Disability	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.
Age	Young people are more involved in bonfires (gathering materials and building is an activity often identified as a job for young males aged 10-14) than the older age ranges. Elderly people, particularly those living on their own, may feel particularly vulnerable from perceived anti-social behaviour incidents.
Marital Status	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.
Sexual Orientation	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.
Gender	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.

Section 75 Category	Details of Needs/Experiences/Priorities
Dependents	There is no qualitative or quantitative data to suggest that this policy would have an adverse impact on this group.

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy out. If a policy is ‘screened out’, you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

In favour of a ‘major’ impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of ‘minor’ impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief		None
Political opinion		None
Racial / ethnic group		None
Age	The Policy aims to promote the welfare and wellbeing of children within Council services and facilities, including in the planning of services	Major (+ve)
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability		None
Dependants		None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
Religious belief		There is no data to indicate that this policy will have an adverse impact on this group.
Political opinion		There is no data to indicate that this policy will have an adverse impact on this group.
Racial / ethnic group		There is no data to indicate that this policy will have an adverse impact on this group.
Age	The Policy aims to promote the welfare and wellbeing of children within Council services and facilities, including in the planning of services	

Marital status		There is no data to indicate that this policy will have an adverse impact on this group.
Sexual orientation		There is no data to indicate that this policy will have an adverse impact on this group.
Men and women generally		There is no data to indicate that this policy will have an adverse impact on this group.
Disability		There is no data to indicate that this policy will have an adverse impact on this group.
Dependants		There is no data to indicate that this policy will have an adverse impact on this group.

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/Major/None		
Good Relations Category	Details of policy impact	Level of impact Minor/Major/None
Religious belief		None
Political opinion		None
Racial group		None

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes, provide details	If No, provide reasons
Religious Belief Political Opinion Race		The policy has no impact on good relations.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

5. Is there an opportunity to better promote positive attitudes towards people with disabilities by altering the policy or working with others in government or the wider community? No

6. Is there an opportunity to encourage people with disabilities to participate in public life by altering the policy or working with others in government or the wider community? No

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should: (please indicate one):

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies)**
- 3. Not be subject to an EQIA at this time**
- 4. Be subject to an EQIA**

Option 1:

The policy should not be subject to an EQIA (with no mitigating measures required.

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

The impact of the reviewed policy is to protect children and vulnerable adults from potential of harm and harm. The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible. Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people namely people of different age. At this time there is no counter indication of an adverse impact on any Section 75 group.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

Timetabling and Prioritising EQIA

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Please answer the following questions to determine priority for timetabling the EQIA. On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people's daily lives	
Relevance to a public authority's functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: _____

Any further comments on the screening process and any subsequent actions?

The Policy will, under normal circumstances, be formally reviewed every three years and will also be subject to routine scrutiny and, from time to time, updates and re-issues will be circulated.

The policy will be reviewed sooner in the event of any one or more of the following:

- A failure or weakness in the policy is highlighted.
- Changes in legislative requirements.
- Changes in Government/Council or other directives and requirements.

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

The Policy will, under normal circumstances, be formally reviewed every three years and will also be subject to routine scrutiny.

Where there is an indication of adverse impact then the policy will be reviewed more frequently and necessary adjustments will be made.

Monitoring arrangements will be put in place for all events, training etc. linked directly to the Policy, and action taken where indicates potential adverse effects.

Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
	Head of Policy and Performance	
Approved by:		
	Chief Executive	