

Crawshaw School Child Protection Policy.

At Crawshaw we are committed to safeguarding and promoting the welfare of all our students. We believe all staff and visitors have an important and unique role to play in child protection.

We believe:

- Schools can contribute to the prevention of abuse
- All children have the right to be protected from harm
- Children need support which matches their individual needs including those who may have experienced abuse.

This Child Protection Policy sets out how our school will try to fulfil local and national responsibilities as laid out in the following documents:

- Education Leeds composite file 'Child Protection: Information and Procedures for Schools' (2004)
- Working Together to Safeguard Children (DfES 2006)
- Safeguarding Children & Safer Recruitment in Education (DfES 2007)
- Leeds Safeguarding Children Board Procedures (2007)
- Children Act 1989 (as amended 2004 Section 52)
- Education Act 2002 s175

Overall Aims:

To contribute to the prevention of abusive experiences in the following ways:

- Clarifying standards of behaviour for staff and pupils
- Introducing appropriate work within the curriculum
- Developing staff awareness of the causes of abuse
- Encouraging pupils and parental participation in practice
- Addressing concerns at the earliest possible stage

To contribute to the protection of our pupils in the following ways:

- Including appropriate work within the curriculum
- Implementing child protection policies and procedures
- Working in partnership with pupils, parents and agencies

To contribute to supporting our pupils in the following ways:

- Identifying individual needs where possible
- Designing plans to meet needs

In-School procedures for protecting children. Child protection is the individual and collective responsibility of all staff.

All staff:

- should be familiar with the school's child protection policy including issues of confidentiality.

- should be alert to signs and indicators of possible abuse. See Appendix One for current definitions of abuse and examples of harm.
- should record concerns on a “Cause for Concern” form (see appendix 4). Staff have blank copies of the “Cause for Concern” form, which, once completed, should be handed to the Designated Staff (AH, CPh, JRu). Composite File Section 7.2 – 7.5.
- should deal with a disclosure of abuse from a child in line with the recommendations in Appendix Two. These must be passed to one of the Designated Staff immediately, followed by a written account.
- should be involved in ongoing monitoring and recording to support the implementation of individual education programmes and interagency child protection and child support plans
- will be subject to Safe Recruitment processes and checks whether new staff, supply staff, contractors, volunteers etc..
- will be expected to behave in accordance with the Education Leeds’ guidance – “Safe Working Practice in Education Settings” (April 2008).

The Designated Staff.

- Currently these are AH and CPh. Along with the Head teacher, they will be responsible for co-ordinating all child protection activity. For full details of the role of the Designated Staff, see Composite File Section 7.10.
- Where the school has concerns about a child, the Designated Staff, in consultation with the Head teacher if appropriate, will decide what steps should be taken. See flowchart below.
- Child Protection information needs to be dealt with in a confidential manner. A written record will be made of what information has been shared with who, and when. Staff will be informed of relevant details only when the Designated Staff feels their having knowledge of a situation will improve their ability to deal with an individual child and /or family. Composite File Section 7.3 – 7.5.
- Child Protection records will be stored securely in a central place separate from academic records. They should be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation.
- Access to these by staff other than the Designated Staff will be restricted, and a written record will be kept of who has had access to them and when.
- Parents should be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents should be in line with any home school policies and give due regard to which adults have parental responsibility.
- **Do not disclose to a parent any information held on a child, if it would put the child at risk of significant harm.**
- If a pupil moves from our school, child protection records will be forwarded onto the new school, with due regard to their confidential nature. Contact between the two schools may be necessary,

especially on transfer from primary to high schools. We will record where and to whom the records have been passed, and the date.

- If a pupil is permanently excluded and moves to a Short stay School (Pupil Referral Unit), child protection records will be forwarded onto the relevant organisation.
- when a designated member of staff resigns their post/ no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder.
- In exceptional circumstances when a face to face handover is unfeasible, it is the responsibility of the head teacher to ensure that the new post holder is fully conversant with all procedures and case files

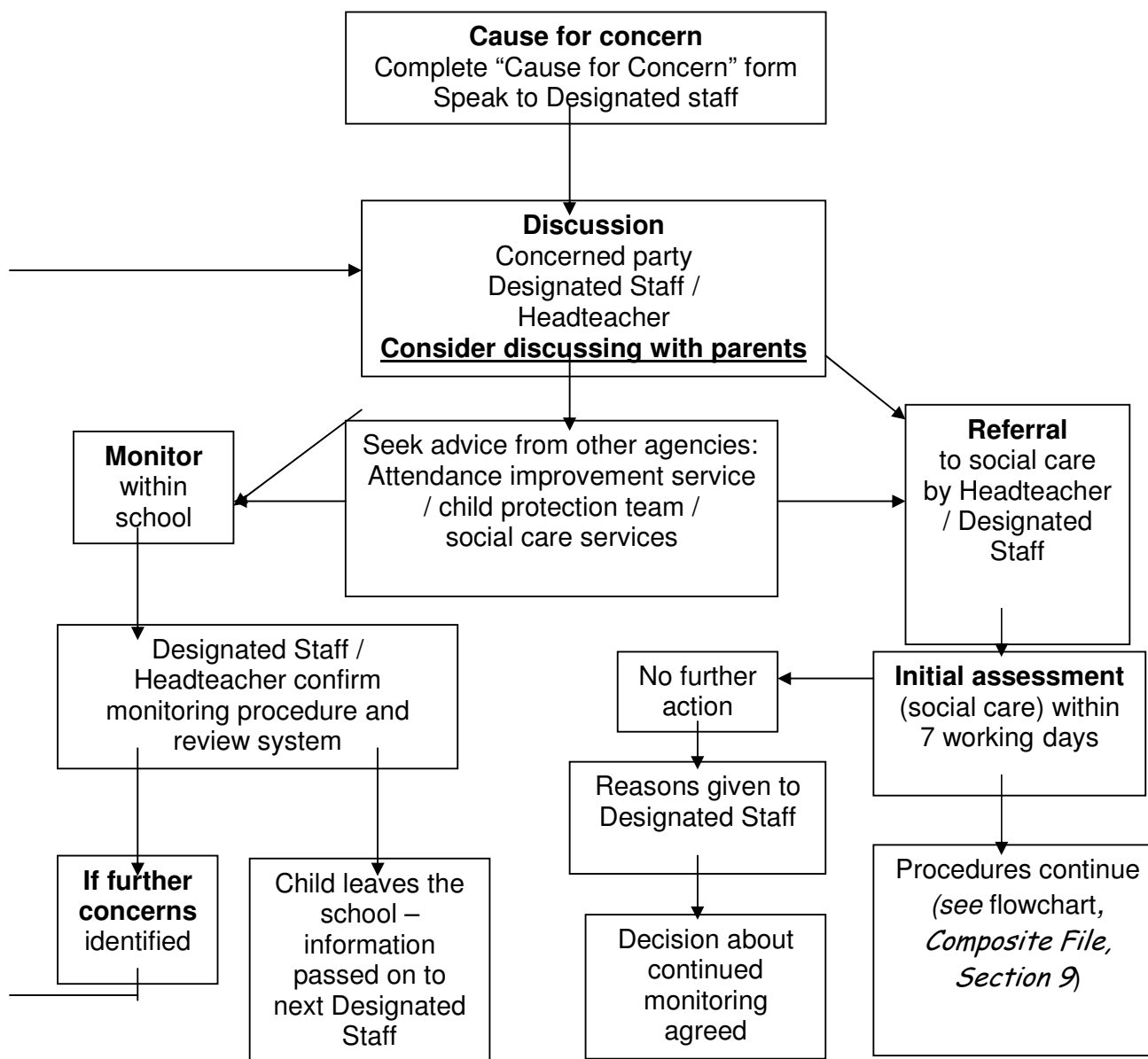
The Governing Body.

The governing body ensures that the school:-

- Has a Child Protection policy & procedures in accordance with LA / LSCB guidelines
- Operates safe recruitment procedures and ensures appropriate checks are carried out on all new staff and volunteers (see appendix 7)
- Has at least one senior member of the school's leadership team designated to lead on Child Protection issues and at least one Designated person
- That the Designated staff have appropriate refresher training every two years
- The Head teacher and all other staff who work with children undertake training at three yearly intervals. Also that temporary staff and volunteers are made aware of the school's arrangements for Child Protection and their responsibilities (see appendix 6)
- The governing body remedies any deficiencies or weaknesses brought to its attention without delay
- Has procedures for dealing with allegations of abuse against staff/volunteers
- A member of the governing body (usually the Chair) is nominated to be responsible for liaising with the LA/partner agencies in the event of allegations of abuse being made against the Head teacher
- The governing body reviews its policies/procedures annually and provides information to the LEA about them.
- The Nominated Governors for child protection at the school are Simon Cliff & Damian Carpenter.
- They are responsible for liaising with the Headteacher / Designated Staff over all matters regarding child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual pupils. For further details of the role, see Composite File, Section 7.11.
- The nominated governor should liaise with the Headteacher and designated Staff to produce an annual report for governors. For example of the possible format of the report see appendix 5.

Adopted on - 29.09.09
To be reviewed on - September 2010
To be reviewed by - N. Tones

Summary of in-school procedures to follow where there are concerns about a child



Reference: Composite File, Section 7.8

Working with other agencies to protect children

1. Involving parents / carers

- In general, we will discuss concerns with parents/carers before approaching other agencies, and will seek their consent to making a referral to another agency. Appropriate staff will approach parents / carers after consultation with the Designated Staff. However, there may be occasions when school will contact another agency **before** informing parents / carers, if the school decides that contacting them may increase the risk of significant harm to the child.

2. Multi-agency work

- We work in partnership with other agencies in the best interests of the children. Therefore, school will, where necessary, liaise with the school nurse and doctor, and make referrals to Social Care. Referrals should be made, by the Designated Staff, to the central Local Authority Call Centre. Where a child already has a social worker, the referral should indicate that fact and the social worker should also be informed.
- We will co-operate with Social Care where they are conducting child protection enquiries. Furthermore, school will endeavour to attend appropriate inter-agency meetings such as Initial and Review Child Protection Conferences, and Planning and Core Group meetings, as well as Family Support Meetings (section 17 procedures).
- We will provide written reports as required for these meetings (14 copies in the case of Initial and Review Child Protection Conferences). If school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.
- Where a child in school is subject to an inter-agency child protection plan, school will contribute to the preparation implementation and review of the plan as appropriate.

Our role in the prevention of abuse

We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.

1. The Curriculum

- Relevant issues will be addressed through the PSHCE curriculum. For example, self esteem, emotional literacy, assertiveness, power, sex and relationship education, bullying.
- Relevant issues will be addressed through other areas of the curriculum. For example, circle time, English, History, Drama, SRE, Art.

2. Other areas of work

- All our policies which address issues of power and potential harm, e.g. Anti-Bullying, Equal opportunities, Handling, Behaviour for Learning, Looked After Children need to be linked, to ensure a whole school approach.
- Our child protection policy cannot be separated from the general ethos of the school, which should ensure that children are treated with respect and dignity, feel safe, and are listened to.

Our role in supporting children

We will offer appropriate support to individual children who have experienced abuse or who have abused others.

- An individual support plan will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved and the child's wishes and feelings.

- We will ensure the school works in partnership with parents / carers and other agencies as appropriate.

A Safer School Culture

Safe Recruitment and Selection

The school pays full regard to 'Safeguarding Children and Safer Recruitment in Education' (DfES 1/1/07). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking checks of the ISA barring lists and Criminal Records Bureau checks (**see appendix 7**). From November 2010, registration with the ISA vetting & barring scheme will be mandatory for all school staff.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.

Members of SLT have undertaken Education Leeds or NCSL Safe Recruitment training (www.ncsl.org.uk). One of the above will be involved in all staff / volunteer appointments.

Safe Practice

All staff and volunteers work within the guidance of the Education Leeds' guidance "Safe Working Practice in Education Settings" (April 2008) and "E-Safety Guidance for Schools and Services within Education Leeds" (August 09)

Staff support

We recognise the stressful and traumatic nature of child protection work. Support is available for any of the Designated Staff. The Education Leeds Child Protection team are also available for advice and support (**Tel: 0113 395 1211**).

Staff training

- The Designated Staff will aim to have attended the Education Leeds 3-day training course, and the inter-agency 2-day course *Working Together*. They will attend refresher training at least every two years.
- The school will aim to ensure all staff receive induction and updated INSET appropriate to their roles and responsibilities, especially staff new to the school. All staff will access refresher training at least every three years. Access to training can be via the Education Leeds Child Protection Team.
- The Head teacher will attend training at least every three years.
- Governors, including the Nominated Governor, will aim to have attended specific training on their role, updated at least every three years.
- Training completed will be recorded by the school; a print out of the school's training history can be obtained from the Education Leeds Child Protection team.

Procedures in the event of an allegation against a member of staff or person known in the school

These procedures should be used in any case in which it is alleged that a member of staff, visiting professional or volunteer has:-

- a. behaved in a way that has harmed a child or may have harmed a child
 - b. possibly committed a criminal offence against or related to a child
 - c. behaved in a way that indicates s/he is unsuitable to work with children.
- (DfES 1/1/07)

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse children. All potential allegations will be notified **immediately** to the school's Education Leeds HR business partner in line with 'Safeguarding Children and Safer Recruitment in Education' (DfES 1/1/07 chapter 5). We will follow the procedures laid out in **Composite File Section 15, 'Safeguarding Children in Education'** (DfES/0027/2004 p22 - 23). See also **Education Leeds Personnel Handbook** chapter 8, '**Working Together to Safeguard Children**' (DfES 2006) and **LSCB** procedures 2007 (www.leedslscb.org.uk).

Children with additional needs

Crawshaw School recognises that while all children have a right to be safe, some children *may* be more vulnerable to abuse eg. those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

Children Missing from Education

This school follows the Education Leeds / LSCB 'Children missing from Education' procedures – see *infobase* or www.leedslscb.org.uk

Appendix One

Definitions and indicators of abuse

Reference: Composite File, Section 2

Neglect

Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect or, or unresponsiveness to, a child's basic emotional needs.

Examples which **may** indicate neglect (it is not designed to be used as a checklist):

Hunger
Tiredness or listlessness
Child dirty or unkempt
Poorly or inappropriately clad for the weather
Poor school attendance or often late for school
Poor concentration
Affection or attention seeking behaviour
Untreated illnesses/injuries
Pallid complexion
Stealing or scavenging compulsively
Failure to achieve developmental milestones, for example growth, weight
Failure to develop intellectually or socially
Neurotic behaviour

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes ill health to a child whom they are looking after.

Examples which **may** indicate physical abuse (it is not designed to be used as a checklist):

Patterns of bruising; inconsistent account of how bruising or injuries occurred
Finger, hand or nail marks, black eyes
Bite marks
Round burn marks, burns and scalds
Lacerations, wealds
Fractures
Bald patches
Symptoms of drug or alcohol intoxication or poisoning
Unaccountable covering of limbs, even in hot weather
Fear of going home or parents being contacted
Fear of medical help
Fear of changing for PE
Inexplicable fear of adults or over-compliance
Violence or aggression towards others including bullying
Isolation from peers

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities such as involving children in looking at, or in the production of, online sexual images or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Examples which **may** indicate sexual abuse (it is not designed to be used as a checklist):

Sexually explicit play or behaviour or age-inappropriate knowledge
Anal or vaginal discharge, soreness or scratching
Reluctance to go home
Inability to concentrate, tiredness
Refusal to communicate, selective mutism
Thrush, Persistent complaints of stomach disorders or pains
Eating disorders, for example anorexia nervosa and bulimia
Attention seeking behaviour, self mutilation, substance abuse
Aggressive behaviour including sexual harassment or molestation
Unusually compliant
Regressive behaviour, Enuresis, soiling
Frequent or open masturbation, touching others inappropriately
Depression, withdrawal, isolation from peer group
Reluctance to undress for PE or swimming
Bruises, scratches in genital area

Emotional abuse

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as over-protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child though it may occur alone.

Examples which **may** indicate emotional abuse (it is not designed to be used as a checklist):

Over-reaction to mistakes, continual self deprecation
Delayed physical, mental, emotional development
Sudden speech or sensory disorders
Inappropriate emotional responses, fantasies
Neurotic behaviour: rocking, banging head, regression, tics and twitches
Self harming, drug or solvent abuse
Fear of parents being contacted
Running away
Compulsive stealing
Masturbation, Appetite disorders - anorexia nervosa, bulimia
Soiling, smearing faeces, enuresis

Responses from parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- An unexpected delay in seeking treatment that is obviously needed
- An unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

Appendix Two

Dealing with a disclosure of abuse

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm
- Do not transmit shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to social services without delay, by the Headteacher / Designated Staff using the correct procedures as stated in the guidelines.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated staff or Headteacher; alternatively the agencies listed in the **Composite File, Section 13** can be contacted.

Appendix Three

Allegations against a member of staff or volunteer

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical** includes, for example, intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- **Emotional** includes, for example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, disability or

sexuality.

- **Sexual** includes, for example, sexualised behaviour towards pupils, sexual harassment, sexual assault and rape.
- If a child makes an allegation against a member of staff, visitor or volunteer the Head teacher should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Head teacher should not carry out the investigation itself or interview pupils. As part of this initial consideration, the Head teacher should consult with the education personnel section who will then contact Social Care.
- The consultation between school, personnel and social care will determine the need for further investigation. Only if the allegation is demonstrably false or trivial would further investigation not be warranted. A Strategy Meeting is usually held to determine the mechanics of the investigation, and to address such issues as who will interview the child/ren, informing the staff member, informing parents, the need or not for suspension, and to what extent disciplinary or criminal procedures need to be invoked alongside any child protection procedures (where more than one set of procedures is invoked, child protection procedures take precedence, to ensure the best interests of the child are catered for).
- Where the allegation has been made against the Head teacher, then the Chair of the Governing Body takes on the role of liaising with the education personnel section and social care in determining the appropriate way forward. For details of these specific procedures, see **Composite File Child Protection Section 15, Safeguarding Children & Safer Recruitment in Education (DfES 2007 chapter 5)** and **Education Leeds Personnel Handbook chapter 8. LSCB Procedures 2007 (www.leedslscb.org.uk)**

Cause for Concern Form

Note: Please do not interpret what is seen or heard; simply record the facts. After completing the form, pass it immediately to the Designated Teacher.

Name of child..... Class / Tutor group.....

Name of staff member completing form.....

Day..... Date..... Time..... Place.....
 (of observed behaviour / discussion / disclosure)

Nature of incident / concern including relevant background (Record child's word verbatim)

For Designated Teacher use (please tick relevant items)

| Action Taken | By whom | Outcome |
|--------------------------|----------------|----------------|
| discuss with child | | |
| monitoring sheet | | |
| check behaviour database | | |
| contact parents | | |
| check SEN Register | | |
| refer to Social Care | | |
| other (Please specify) | | |

Name of child..... Class / Tutor group.....

| Day & Date | Observation / incident | Staff initials | Action taken |
|------------|------------------------|----------------|--------------|
| | | | |

GOVERNORS REPORT
(SUGGESTED PROFORMA)

In accordance with recommendations in the Council of Local Education Authorities Guidance 1/96, every school should have a nominated governor whose role is to ensure child protection procedures are implemented effectively by the school.
The guidance further recommends a report be produced annually in collaboration with the Headteacher and Designated child protection teacher, and presented to the governing body.

INTRODUCTION

Outlining the role of school in legislation and guidance.

Indicating number and names of any designated teachers and staff with any particular responsibility e.g. senior lunchtime supervisor.

REVIEW OF THE PAST YEAR

Indicate any actions regarding;

Policy and procedures in school

Training of staff groups, designated teachers, whole staff, lunchtime supervisors, including induction and updating

Number of cases causing concern **(NO NAMES OR DETAILS)**

Number of referrals to other agencies **(NO NAMES OR DETAILS)**

Number of single or interagency meetings held/attended, and any relevant recommendations for action as a consequence. **(NO NAMES OR DETAILS)**

FUTURE DEVELOPMENTS OR TARGETS

Recommendations for action - who is responsible and timing.

Training

Curriculum Issues

Pastoral Support and Welfare Issues

Policy Review

Monitoring good practice in school

Interagency Communication

Appendix 7 – Recruitment and Selection Checklist

| PRE-INTERVIEW: | Initials | Date |
|--|-----------------|-------------|
| PLANNING Timetable decided: job specification and description and other documents to be provided to application reviewed and updated as necessary. Application form seeks all relevant information and includes relevant statements about references etc. – paragraphs 3.17 – 3.20 and 3.22 to 3.29. | | |
| VACANCY ADVERTISED (where appropriate) Advertisement includes reference to safeguarding policy, i.e. statement of commitment to safeguarding and promoting welfare of children, and need for successful applicant to be CRB checked – paragraphs 3.15, 3.16 and 3.21. | | |
| APPLICATIONS on receipt Scrutinised – any discrepancies/ anomalies/ gaps in employment noted to explore if candidate considered for shortlisting – paragraphs 3.30, 3.31 and 3.33. | | |
| SHORTLIST PREPARED | | |
| REFERENCES – seeking Sought directly from referee on short listed candidates: ask recommended specific questions: include statement about liability for accuracy – paragraphs 3.32 and 4.30 to 4.36. | | |
| REFERENCES – on receipt Checked against information on application; scrutinised; any discrepancy/ issues of concern noted to take up with applicant (at interview if possible) – paragraphs 4.35 and 4.36 | | |
| INVITATION TO INTERVIEW Includes all relevant information and instructions – paragraphs 3.36 – 3.39 | | |
| INTERVIEW ARRANGEMENTS At least 2 interviewers: panel members have authority to appoint: have met and agreed issues and questions/ assessment criteria/ standards – paragraphs 3.40 - 3.42. | | |
| PRE-INTERVIEW: | Initials | Date |
| INTERVIEW Explores applicants' suitability for work with children as well as for the post – paragraphs 3.43 and 3.44. | | |
| NB Identity and qualifications of successful applicant | | |

| | | |
|---|--|--|
| verified on day of interview by scrutiny of appropriate original documents: copies of documents taken and placed on file; where appropriate applicant completed application for CRB Disclosure – paragraphs 3.37 and 3.38. | | |
| CONDITIONAL OFFER OF APPOINTMENT: PRE APPOINTMENT CHECKS Offer of appointment is made conditional on satisfactory completion of the following pre-appointment checks and for non-teaching posts a probationary period – paragraphs 3.45 – 3.49. | | |
| REFERENCES (if not obtained and scrutinised previously). | | |
| IDENTITY (if that could not be verified straight after the interview) – paragraph 4.13. | | |
| QUALIFICATIONS (if not verified on the day of interview) – paragraph 4.28. | | |
| Permissions to work in UK if required – paragraph 4.65. | | |
| CRB – Where appropriate satisfactory CRB disclosure received – paragraphs 4.18 – 4.21. | | |
| LIST 99 – person is not prohibited from taking up post – paragraph 4.15. | | |
| HEALTH – the candidate is medically fit – paragraph 4.38. | | |
| GTC England – (for teaching post in maintained schools and non-maintained special schools) the teacher is registered with the GTC or exempt from registration – paragraph 4.39. | | |
| QTS – (for teaching posts in maintained schools the teacher has obtained QTS or is exempt from the requirement to hold QTS (for teaching posts in FE colleges the teacher has obtained a Post Graduate Certificate of Education (PGCE) or Certificate of Education (Cert. Ed) awarded by a higher Education Institute (HEI), or the FE Teaching Certificate conferred by an awarding Body – paragraph 4.40. | | |
| STATUTORY INDUCTION (for teachers who obtained OTS after 7 May 1999) – paragraphs 3.50 and 3.51. | | |