

FORDEN CHURCH IN WALES SCHOOL
YSGOL FFORDUN

Happy Children, Healthy Minds
Plant hapus, Ymennydd Iachus



**CHILD PROTECTION &
SAFEGUARDING POLICY**

(Powys Schools Service)

**Reviewed September 2024
Next review September 2025**

1. Introduction

The school fully recognises the contribution it makes to safeguarding.

There are three main elements to our policy:

- Prevention through the culture, teaching and pastoral support offered to learners;
- Procedures for identifying and reporting cases, or suspected cases of abuse. Because of our day-to-day contact with children/young people, our staff are well placed to observe the outward signs of abuse; and
- Support to those learners who may have been abused.

This policy applies to all staff and volunteers working in the school and its governors. It is recognised by this school that all staff that come into contact with children/young people can often be the first point of disclosure for a child/young person. This first point of contact is an important part of the safeguarding process, and it is essential that all staff are aware of and implement the school's procedures as noted in this policy.

2. Prevention

This school recognises that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult helps to safeguard children at our school. The school will therefore:

- Establish and maintain an ethos where children/young people feel secure, are encouraged to talk and will be listened to;
- Ensure that children/young people know that all adults in this school can be approached if they are worried or in difficulty;
- Include in the curriculum, activities and opportunities for relationships and sexuality education and personal and social education which equip children/young people with the skills they need to stay safe from abuse and to know to whom to turn for help;
- Include in the curriculum material that will help children/young people develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills;

- Build relationships with other agencies and ensure early and appropriate referrals for support and intervention are made before risks escalate; and
- Take a whole-school approach to well-being which will incorporate safeguarding and preventative measures to support children and families.

3. Procedures

At this school we will follow the Wales Safeguarding Procedures (2019) and other guidance and protocols that have been endorsed and agreed by the Mid and West Wales Safeguarding Board.

The school will:

- A. Ensure it has a Designated Senior Person (DSP) and Deputy Designated Senior Person (Deputy DSP) for Child Protection, who have undertaken the appropriate training.
- B. Recognise the role of the DSP and arrange support and training.
The school will look to the Mid and West Wales Safeguarding Board and the Council's Designated Lead Officer for Safeguarding in Education for guidance and support in assisting the school's DSP.
- C. Ensure that all members of staff, including permanent, part time and adult volunteers, along with every governor knows:
 - the name, contact details and role of the DSP, the Deputy DSP and designated governor responsible for safeguarding;
 - that it is the lead person and/or their deputy who have the responsibility for making safeguarding reports within Mid and West Wales Safeguarding Board timescales, by completing the agreed multi-agency report form;
 - that they have an individual responsibility for reporting children at risk and protection concerns using the proper channels and within the timescales agreed with the Safeguarding Board;
 - how to take forward those concerns when the DSP is unavailable;
 - that the DSP and Deputy DSP will seek advice from Powys Front Door Team and/or the Designated Lead Officer for Safeguarding in Education if necessary when a referral is being considered; if in doubt a referral must be sent.
- D. Ensure that all members of staff are aware of the need to be alert to signs of abuse and neglect and know how to respond to a learner who may disclose abuse or neglect.
- E. Ensure that members of staff who are EWC registrants are aware of the *Code of Professional Conduct and Practice for registrants with the Education Workforce Council* and the expectation within the Code that the registrant has regard to the safety and well-being of learners in their care and related content.
- F. Ensure that all members of staff attend appropriate training and updates as arranged by the school.
- G. Ensure that parents/carers have a clear understanding of the responsibility placed on the school and its staff for safeguarding and child protection by setting out the obligations in the school prospectus and other forms of communication. In particular, there is a clear obligation that 'the welfare of the child is paramount' and in some circumstances this may mean that the parents are not initially informed of a referral made by the school. This circumstance is in line with Wales Safeguarding Procedures guidance.
- H. Provide training for all staff so that they:
 - understand their personal responsibility;

- know the agreed local procedures (Mid and West Wales Safeguarding Board and Powys local procedures) and their duty to respond;
 - are aware of the need to be vigilant in identifying suspected cases of abuse and neglect;
 - know how to support a child who discloses abuse or neglect; and
 - understand the role online behaviours may have in each of the above.
- I. Notify Children’s Services if:
- a learner on the child protection register is excluded either for a fixed term or permanently; or
 - there is an unexplained absence of a pupil on the child protection register of more than two days’ duration from school (or one day following a weekend).
- J. Work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at initial and review child protection conferences and core groups; and support these with the submission of written reports.
- K. Keep written records of concerns about children (noting date, event and action taken), even where there is no need to refer the matter to agencies immediately.
- L. Ensure that all records and files are kept secure and in locked locations (whether physical or electronic). The Designated Senior Person is responsible for the security, compilation and storage of all records and should be able to access and produce them in times of need. It is the responsibility of the Designated Senior Person to ensure that any transfer of records is conducted via the Authority’s agreed protocol and procedures for the transfer of sensitive information.
- M. Adhere to the procedures set out in Welsh Government Guidance Circular 002/2020 *‘Disciplinary and Dismissal Procedures for School Staff: Revised guidance for governing bodies’*.
- N. Ensure that all recruitment and selection procedures are made in accordance with Welsh Government guidance *‘Keeping Learners Safe’* and local guidance. The school will seek advice and guidance from the Authority’s Recruitment Team on recruitment and selection (recruitment@powys.gov.uk).
- O. Designate a governor for safeguarding who will oversee the school’s safeguarding policy and practice. This governor will feed back to the governing body on safeguarding matters as and when required, and will be required to write an annual report – based on the annual audit - for the governing body on the school’s safeguarding activities.
- P. Ensure that the Designated Senior Person and nominated governor complete an annual safeguarding audit which will be reported back to the Local Authority via the Designated Lead Officer for Safeguarding in Education.

4. Supporting the pupil at Risk

At this school we recognise that children who are at risk, suffer abuse or experience or witness violence may be deeply affected by this.

This school may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless when at school, their behaviour may be challenging and defiant or they may be withdrawn. At this school we will endeavour to be patient and supportive to the children at risk.

The school will endeavour to support the pupil through:

- The content of the curriculum to encourage self-esteem and self-motivation (see section 2 of this policy on Prevention);
- The school ethos which:

- promotes a positive, supportive and secure environment; and
- gives pupils a sense of being valued (see section 2 on Prevention);
- The school's behaviour policy which is aimed at supporting vulnerable pupils in the school. All staff will agree a consistent approach which focuses on the behaviour outcome of the child but does not damage the pupil's sense of self-worth. The school will endeavour to ensure that the pupil knows that some behaviour is unacceptable (shared with parents/carers via school brochures and other points of communication), but that each individual is valued and not to be blamed for any abuse which has occurred. Staff should read the school's behaviour policy in conjunction with this and other named policies noted in this policy.
- Liaison with other agencies who support the child/young person such as Children's Services, Child and Adolescent Mental Health services, the Educational Psychology Service, Education Welfare Service and advocacy services; and
- Keeping records and notifying Children's Services as soon as there is a recurrence of a concern with the individual.

When a pupil on the child protection register leaves the school, we will transfer the sensitive information to the new school immediately (using the procedure outlined in **Appendix D Safeguarding File – Transfer of Records**). The DSP will be central to this process and, if not already done, will inform Children's Services of the move.

5. Behaviour

This school has a behaviour policy which clearly states our values and expectations. This is a separate policy which is reviewed annually by the governing body and can be located on the school website and in the school office.

6. Anti-bullying

The school's policy on anti-bullying has been set out in a separate document. Within it is references to the Rights, Equality and Respect 2020 document. The school's Anti-Bullying Policy is reviewed annually by governors and can be located on the school website and in the school office.

7. Physical Intervention

The school's policy on physical intervention has been set out in the Physical Restraint Policy and is consistent with the WG guidance document Safe and Effective Intervention- Use of Reasonable Force and Searching for Weapons 097/2013
It is reviewed annually by the governing body and can be located in the school office.

8. e-Safety

The school's policy on e-Safety has been set out in the e-Safety and Social Media Policy. It is renewed every 2 years and-can be located in the school office.

9. Children with Additional Learning Needs (ALN)

This school recognises that statistically children and young people with additional learning needs are most at risk of abuse. School staff who work with children with an additional learning needs, such as profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems need to be particularly sensitive to signs of abuse. The

school's ALN Policy is reviewed annually and can be located on the school website and in the school office.

10. Children who enter the care system

This school recognises that children who enter the care system (commonly referred to as Children Looked After) are often the most vulnerable and needy. Advice and guidance can be sought from the Local Authority's Education Manager for Children Looked After.

11. Community Cohesion – Preventing Extremism

This school is committed to providing a safe environment for all of our children/young people, staff and any visitors. There is no place for extremist views of any kind in our school. Our policy for community cohesion is attached as **Appendix E: Community Cohesion – Preventing Extremism**.

12. Transfer of records

Where children are transferred to or from this school, we will ensure appropriate record keeping of the transfer of child protection records through the use of the Safeguarding File – Transfer of Records Pro forma (see **Appendix D**).

13. Training

The school will be cognisant of national and local training requirements and guidance, which will include Mid and West Wales Safeguarding Board guidance, advice and training opportunities.

The school will ensure that the Designated Senior Person and Deputy Designated Senior Person will have received initial training when starting their role and continued professional updates as required. Specific updates as suggested by national and local requirements will be central to the Designated Senior Person's development. The Deputy will be initially supported by the Designated Senior Person and consideration for joint opportunities for training with the Designated Senior Person will be considered.

All staff will be regularly updated during the year, as appropriate, by the Designated Senior Person, but will receive specific awareness raising training within a 3-year period. It will be a recommendation that the governing body will also receive awareness raising training and the nominated governor will be offered opportunities for more specific training.

14. Guidance for Staff

What to do if a child/young person tells you they have been abused by a member of staff (including volunteers)

Where the allegation is against a member of staff you should refer to the Authority's guidance which takes into account the Welsh Government's guidance circular *002/2013 Disciplinary and Dismissal Procedures for School Staff* and Welsh Government guidance circular *009/2014 Safeguarding Children in Education: Handling allegations of abuse against teachers and other staff*. (A summary of procedures is included in the **Appendix C: Professional Allegations/Concerns**).

If an allegation of abuse is made against a member of staff this must be reported to the Headteacher. If the concern is about the Headteacher this must be reported to the Chair of Governors. If in doubt you should contact the Designated Lead Officer for Safeguarding in Education or the Powys Front Door Team for guidance and advice.

If there is an allegation against a Local Authority Officer then this must be communicated to the Designated Safeguarding Lead for Education.

If the concern is about the Designated Safeguarding Lead for Education then the Head of Education should be contacted. If there is a concern about the Head of Education, then this should be referred to the Chief Executive.

What to do if a child tells you they have been abused by someone other than a member of staff

A child may confide in any member of staff and may not always go to a member of the teaching staff. Staff to whom an allegation is made should remember:

- Yours is a listening role, do not interrupt the child when they are freely recalling events. Limit any questions to clarifying your understanding of what the child is saying. Any questions should be framed in an open manner so as not to lead the child;
- You must report orally to the school's Designated Senior Person for Child Protection immediately (or in their absence, their Deputy), to inform them of what has been disclosed. In the unlikelihood of both being absent seek out the most senior person in the school;
- Make a note of the discussion, as soon as is reasonably practical (but within 24 hours) to pass on to the school's Designated Senior Person. The note, which should be clear in its use of terminology, must record the time, date, place, and people who were present and should record the child's answers/responses in exactly the way they were said as far as possible. This note will in most cases be the only written record of what has been disclosed, and as it is the initial contact, an important one in the child protection process. Remember, your note of the discussion may be used in any subsequent formal investigation and/or court proceedings. It is advised that you retain a copy in a safe place;
- Do not give undertakings of absolute confidentiality (see note following this section for more details). You will need to express this in age related ways to the child as soon as appropriately possible during the disclosure. This may result in the child 'clamming up' and not completing the disclosure, but you will still be required to share the fact that they have a shared a concern with you to the Designated Senior Person. Often what is initially shared is the tip of an iceberg;
- That a child may be waiting for a case to go to criminal court, may have to give evidence or may be awaiting care proceedings;
- Your responsibility in terms of referring concerns ends at this point, but you may have a future role in terms of supporting or monitoring the child, contributing to an assessment or implementing child protection plans. You can ask the DSP for an update but they are restricted by procedures and confidentiality and may be limited in their response. The level of feedback will be on a need to know basis, but whatever is shared is strictly confidential and not for general consumption with others.

Confidentiality

The school and staff are fully aware of confidentiality issues if a child divulges that they are

or have been abused. A child may only feel confident to confide in a member of staff if they feel that the information will not be divulged to anyone else. However, education staff (that is all staff at this school) have a professional responsibility to share relevant information about the protection of children with the designated statutory agencies when a child is experiencing child welfare concerns.

It is important that each member of staff deals with this sensitively and explains to the child that they must inform the appropriate people who can help the child, but they will only tell those who need to know in order to be able to help. Staff should reassure the child and tell them that their situation will not be common knowledge within the school. Be aware that it may well have taken significant courage on the part of the child to disclose the information and they may also be experiencing conflicting emotions, involving feelings of guilt, embarrassment, disloyalty (if the abuser is someone close) and hurt.

Remember the pastoral responsibility of Education. Ensure that only those with a professional involvement i.e. the DSP and Headteacher, have access to safeguarding records. At all other times, they should be kept securely locked and separate from the child's main file or Additional Learning Needs file.

Key contacts

The Designated Senior Person for Child Protection at this school is:

Mrs Catherine Fowler

The Deputy Designated Senior Person for Child Protection at this school is:

Mrs Fiona Haine

The Designated Governor for Child Protection at this school is:

Mr Sean McLaughlin

The Council's Designated Lead Officer for Safeguarding in Education is:

Michael Gedrim

who can be contacted at:

Telephone – 01597 826431

E-mail – michael.gedrim@powys.gov.uk

Children's Services can be contacted via Powys Front Door Team:

Telephone – 01597 827666

Out of hours – 0845 054 4847

(A signed copy of this policy is stored in the school office)

Associated Policies, Guidance and Advice

- www.wales.gov.uk/educationandskills
- Wales Safeguarding Procedures – November 2019
- Keeping Learners Safe: The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 WG Circular 265/2020
- Educational Records, School Reports and the Common Transfer System – the keeping, disposal, disclosure and transfer of pupil information – WG Circular 18/2006
- Safeguarding Children: Working Together Under the Children Act 2004 – WG Circular 12/2007
- Teaching Drama: Guidance on Safeguarding Children and Child protection for managers and drama teachers – WG Circular 23/2006
- Procedures for Whistleblowing in Schools and Model Policy - WG Circular 36/2007
- Reporting Cases of Misconduct or Professional Incompetence in the Education Service – WG Circular 018/2009
- Disciplinary and dismissal procedures for school staff – WG Circular 002/2020
- Safeguarding in Education: handling allegations of abuse against teachers and other staff – WG Circular 009/2014
- Information and Guidance on Domestic Abuse: Safeguarding Children and Young People – March 2010
- Children Missing from Education - WG Circular 002/2017
- Safe and effective intervention - use of reasonable force and searching for weapons WG Guidance 097/2013
- Care Inspectorate Wales - Regulations for Day Care

Other documents

- Sexual Offences (Amendment) Act 2000: Chapter 44 - Sections 1-7, Her Majesty's Stationery Office and Queen's Printer of Acts of Parliament.
- Safeguarding Children and Safer Recruitment in Education (Came into force 1st January 2007 in England)
- Every Child Matters: Change for Children
- The Children Act 2004
- The Education Act 2002
- The Education Act 2011
- The Human Rights Act 1998
- General Data Protection Regulations 2018
- The Children Act 1989
- Social Services and Well-being (Wales) Act 2014

Hyperlinks to websites that have important links to Safeguarding, and in particular Child Protection

(This is not an exhaustive list)

- www.wales.gov.uk
- www.homeoffice.gov.uk (use this for Disclosure and Barring Service)
- www.ewc.wales
- www.ico.gov.uk
- www.thinkuknow.co.uk
- www.everychildmatters.co.uk
- www.wales.gov.uk/domesticabuse
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_PREVENT_Duty_Guidance_England_Wales_V2-Interactive.pdf

Mid and West Wales Safeguarding Board documents can be found on their website:
www.cysur.wales

Powys County Council has policies and procedures related to Whistleblowing and Disciplinary Procedures. These are available on page 7602 of the Powys County Council intranet.

Definitions of Child Abuse and Neglect

A child is abused or neglected when somebody inflicts harm, or fails to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. A child or young person up to the age of 18 years can suffer abuse or neglect and require protection via an inter-agency child protection plan.

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 caregiver fabricates or induces illness in a child who they are looking after.

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 a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home or being bullied, 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.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

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. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. In addition, neglect may occur during pregnancy as a result of maternal substance misuse.

Identifying significant harm

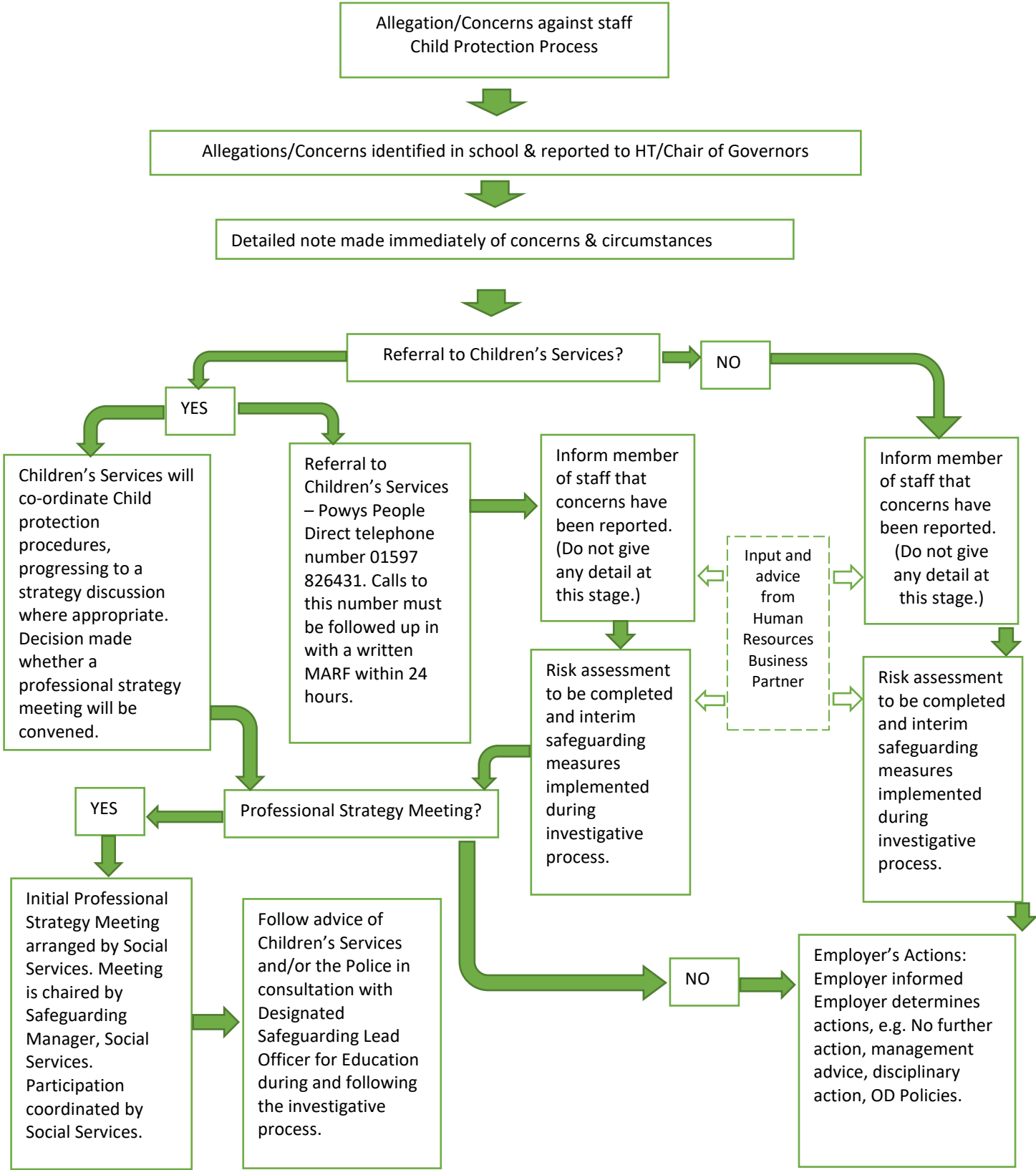
The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in order to protect children. Significant harm is defined in legislation as ill treatment or the impairment of health and development. It describes the effects of sexual, physical, emotional abuse or neglect, or a combination of different types. Local authorities have a statutory duty under the Children Act 1989 section 47(1)(b) to make enquiries, or cause enquiries to be made, where they have reasonable cause to suspect that a child who lives, or is found in their area, is suffering, or likely to suffer, significant harm.

There are no absolute criteria on which to rely when judging what constitutes significant harm. A single, serious event of abuse, such as an incident of sexual abuse or violent assault, might be the cause of significant harm to a child. However, more frequently significant harm occurs as a result of a longstanding compilation of events, which interrupt, change or damage a child's physical and psychological development. The significant harm resulting from the corrosive effect of long-term abuse is likely to have a profound impact on the future outcomes for the child.

Follow advice of Children's Services in consultation with the Designated Lead Officer for Safeguarding in Education during and following the investigative process.

Professional Allegations/Concerns

This Flowchart should be used as a brief checklist of procedure for allegations/concerns against a professional in school.
 Detailed procedures are outlined in All Wales Child Protection Procedures 2008, Section 4.
 Also refer to Safeguarding Children in Education: Handling Allegations of abuse against teachers and other staff Circular 009/2014



Safeguarding File - Transfer of Records

A receiving school must be made aware of the existence of a Child’s Safeguarding file prior to the child transferring from their original school.

The confidential Safeguarding File must be securely transferred to the new school either in Person, or via secure mail that requires a signature of receipt. This Transfer of Records form should be completed and forwarded with the file to the new school. Either the Headteacher or the Designated Senior Person for Child Protection should sign receipt for the file.

Sending School should retain a copy of the signed Transfer of Records form as evidence of the transfer, and ensure appropriate signatures are obtained.

Child Name:	
DoB:	

Name of school moving from		
Date record ended at this school (pupil end date)		
School moving to		
Date of contact with new school		
Has sensitive and urgent information been shared with new school?	Yes / No	If No, why not?

Name of school and DSP sending records:	
Date file sent	

This section to be completed by the Receiving School if file delivered by hand

Receiving School	
Signed	
Print name and position	
Date	

This section to be completed by the Sending School with the postage receipt reference if file sent via secure post as proof of sending

Reference number of postage receipt	
Name and address of recipient	
Date of postage	

Policy Statement

Community Cohesion – Preventing Extremism

Our school is committed to providing a safe environment for all of our pupils, staff and any visitors.

There is no place for extremist views of any kind in our school.

Community cohesion is the term used to describe how everyone in a geographical area lives alongside each other with mutual understanding and respect. A cohesive community is where a person has a strong sense of belonging. It is safe, vibrant and able to be resilient and strong when tensions occur. Those involved in supporting terrorism look to exploit and radicalise vulnerable people, including children and young people. Since July 2015, the Counter Terrorism and Security Act 2015 introduced a statutory duty on school staffs 'to have due regard to the need to prevent people from being drawn into terrorism'.

We are aware that young people can be exposed to extremist influences or prejudiced views from an early age which spring from a variety of sources, including the internet. At times pupils, visitors or parents may themselves reflect or display views that may be considered as discriminatory, prejudiced or extremist, including using derogatory language; this will always be challenged and where appropriate dealt with.

Education is a powerful deterrent against this and we will strive to equip pupils with the knowledge, skills and resilience to challenge and discuss such issues in a facilitated and informed way.

This way our pupils are enriched, understand and become tolerant of difference and diversity where they can thrive, feel valued and not marginalised.

We have a clear safeguarding framework on how to manage and respond to issues where a pupil develops or expresses extreme views and ideologies, which are considered inflammatory and against the community cohesion ethos of our school.

Where such cases are identified a Multi-Agency Referral Form should be completed and submitted to Children's Services. The Local Authority Lead Officer for PREVENT should also be contacted (see Key Points of Contact on page 35 for details).

Safeguarding Channel Panel

Safeguarding and promoting the welfare of children, young people and adults is everyone's responsibility. We are committed to working with our partners to protect and support our pupils, and where a Multi-Agency Referral Form leads to one of our pupils needing safeguarding, we will support the Channel programme.

Channel is a multi-agency approach to protect vulnerable people by identifying individuals at risk; assessing the nature and extent of that risk; and developing the most appropriate support plan for the individuals concerned.

Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist related activity.

Training

We are committed to ensuring that all staff in our school will receive the Workshop to Raise Awareness of PREVENT (WRAP) and are encouraged to make use of other counter-terrorism related training modules and the reference material below.

Key Points of Contact

Forden School's Designated Senior Person for Child Protection is:

Mrs Cath Fowler

Michael Gedrim

PREVENT Lead for the Schools Service, Powys County Council

Email: michael.gedrim@powys.gov.uk

Tel: 01597 826431

Reference Material

Respect and resilience - Developing Community Cohesion - A Common Understanding for Schools and their Communities

<http://gov.wales/docs/dcells/publications/110209respecten.pdf>

Respect and Resilience – Developing Community Cohesion (updated January 2016, 196/2016)

<http://gov.wales/docs/dcells/publications/160111-respect-and-resilience-update-en.pdf>

Respect and Resilience – Developing Community Cohesion: Assessment tool:

<http://gov.wales/docs/dcells/publications/160112-respect-and-resilience-self-assessment-tool-en.pdf>

E-learning training on PREVENT: <https://elearning.prevent.homeoffice.gov.uk/>

Free online resource: http://course.ncalt.com/Channel_General_Awareness

Channel Guidance: <https://www.gov.uk/government/publications/channel-guidance>

PREVENT Duty Guidance: <https://www.gov.uk/government/publications/prevent-duty-guidance>

Website: <http://educateagainsthate.com> Resources for parents and teachers

Tackling Hate Crimes and Incidents: A Framework for Action

<http://gov.wales/docs/dsjlq/publications/equality/140512-hate-crime-framework-en.pdf>