

Heathrow Aviation Engineering UTC

Child Protection and Safeguarding Policy

Introduction

Heathrow Aviation Engineering UTC (UTC) recognises its legal duties and takes seriously its responsibilities to protect and safeguard the interests of all students. These procedures aim to provide a framework, which ensures that all practice in the area of child protection is consistent with stated values and procedures that underpin all work with children and young people. Safeguarding incidents can happen anywhere and staff should be alert to the possible concerns being raised in schools. For guidance refer to the latest editions of the [London Child Protection Procedures](#) and [Keeping Children Safe in Education 2016](#).

Key Contacts

Designated Safeguarding Lead	Dwayne Philip Vice Principal
Deputy Designated Safeguarding Lead	Lena Bhimani
Chair of Governors	Prof Geoff Rodgers
Safeguarding Governor	Sally Cawdery
Designated Teacher for Looked After Children	Samira Rajan SENCO
Hillingdon Safeguarding Children Team	01895 277930
Child Protection Officer – Education	Sally Morris 01895 277463 smorris2@hillingdon.gov.uk
LADO	Rob Wratten 01895 250975 rwratten@hillingdon.gov.uk
Prevent Lead	Fiona Gibbs fgibbs@hillingdon.gov.uk
NSPCC whistleblowing helpline	0800 028 0285 Help@nspcc.org.uk

Aims

This document seeks to make the professional responsibilities clear to all employees to ensure that statutory and other duties are met in accordance with the UTC's requirements and procedures.

Underpinning Values

The UTC believes that:

- A student's welfare is paramount. Each student has a right to be protected from harm and exploitation and to have their welfare safeguarded.
- Each student is unique. Action taken by child welfare organisations should be child-centred, taking account of a student's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs.
- Individual students and family members must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding student's welfare.
- Open-mindedness and honesty must guide each stage of assessment and of operational practice. The strengths of individual family members, as well as their needs, should be given due consideration.
- All information should be treated with confidentiality where possible. It should only be shared with the permission of the individual concerned, or unless the disclosure of confidential personal information is necessary in order to protect a student. In all circumstances, information must be confined to those people directly involved in the professional network of each individual student and on a strict "need to know" basis.
- As professionals we should be aware of the effects of outside intervention upon students, upon family life and the impact and implications of what they say and do. Therefore Parent's permission or the student's where appropriate, should be sought before discussing a referral about them with other agencies or before making a referral. Exception applies where seeking consent may itself place a student at increased risk of significant harm.
- Any explanations by professionals to students, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms.

Procedures - Making a referral

If employees have significant concerns or are uncertain about acting upon more unspecified concerns about any student they should make them known to the UTC's Designated Safeguarding Lead or Deputy Designated safeguarding Lead. These concerns may include:

- physical abuse;
- emotional abuse;
- sexual abuse or
- neglect. (Appendix 1 for detailed definitions)

The Designated Safeguarding Lead will then refer to the guidance procedures and the thresholds for and types of referral that need to be considered. (See Appendix 1 for detailed definitions and guidance). All staff may raise concerns with children's social care if they believe there is a risk of immediate serious harm to the child. If the child's situation does not appear to be improving, the staff member with the concerns should press for reconsideration.

Staff having safeguarding concerns about adults in the UTC should refer the matter to the principal. Where there are concerns about the Principal the matter should be raised with the Chair of Governors. If the Chair of Governors is not available the concern should be reported to the governor responsible for safeguarding.

All concerns **must be** reported in writing to the designated officers using the UTC's internal recording form. UTC staff must not, however, carry out investigations. That is a matter for the specialist agencies and where necessary the DSL. Professionals and members of the public should be aware that when contacting the local authority any information received which indicates that a student is suffering or is likely to suffer significant harm will be treated as a referral.

Any concern of a sexual nature relating to a student under the age of 13 **must** be referred to Local Authority Designated Officer (LADO) by the DSL.

This will be followed up with a written confirmation on [Early Help Assessment](#) (EHA) following submission of the appropriate inter-agency form.

Confidentiality

Employees must be aware that when a student discloses anything to them they have made it clear to the student/s involved that they cannot guarantee that anything they say will be kept confidential. All employees need to inform students and parents / guardians that they cannot guarantee to consult parents/carers first, or to keep student's concerns confidential, if referral must be made to the appropriate agencies in order to safeguard the child's welfare. Parents will normally be consulted and their consent obtained before any referral is made to an agency outside the UTC, but this may not be possible if the disclosure would place the student at risk of significant harm.

All employees should make a written record of any incidents and pass on to the DSL. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict "need to know" basis.

E-Safety

Child protection issues will be addressed through the curriculum as appropriate.

The growth of different electronic media in everyday life and an ever developing variety of devices including PC's, laptops, mobile phones, webcams etc place an additional risk on our students.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships. The anonymity of the Internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

The Internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with students.

Students can engage in or be a target of bullying using a range of methods including text and instant messaging. Mobile phones are also used to capture violent assaults of other children for circulation.

The UTC operates the following procedures to raise awareness about and to monitor Safeguarding issues:

- software is in place to minimise access and to highlight any person accessing inappropriate sites or information;
- software is in place to highlight any person using inappropriate language and any student who may use ICT to intimidate another student;
- students will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in Safeguarding concerns the UTC's designated child protection Staff should be informed immediately);
- all students are required to sign an Internet and ICT user agreement;

The police may be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

Employee Issues

- The UTC will ensure that all employees and volunteers are suitable to work with children and all adult details will be kept on the Single Central Record (SCR). All staff, volunteers and governors will be checked using the DBS system. Staff will be checked using the Enhanced Disclosure process. Governors and Volunteers will be checked using the Voluntary Enhanced Disclosure process.
- Any use of physical force or restraint against students will be documented.
- Any complaints about employee/s behaviour related to safeguarding children will be dealt with in line with the procedures outlined in KCSIE Part 4. The school will use the unfounded category if appropriate.

- All employees will receive Safeguarding Awareness Training.
- All staff will be issued with the latest version of KCSIE Part 1 and required to read it.
 - Key safeguarding documents will be held on the staff area of the computer system.
- All new employees will be made aware of internal and external safeguarding procedures.
- The Designated Safeguarding Lead and deputies will receive appropriate training.
- The UTC will ensure that the employee recruitment panel has at least one UTC employee who has undertaken Safer Recruitment training.

Roles and Responsibilities

Board of Governors

- Ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly under inter-agency procedures, including attending meetings, collating and writing assessment reports, staff training etc.
- Understand child protection issues and the policies and procedures, which are in place in the UTC to safeguard and promote the welfare of all students in the UTC.
- Review the Policy annually.
- Take Safeguarding Awareness training.
- Encourage governors to take the Safer Recruitment Training.

Governors must also appoint a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead, through the designated

teacher for looked after children, should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Leadership Team

- Monitor the role of and offer support to the Designated Child Protection Officers.
- Monitor, evaluate and review policies related to Safeguarding.
- Ensure that all adults are suitable to work with children.

Designated Child Protection Officer

- Ensure that employee training on the UTC procedures on the issue of safeguarding children is up to date and carried out in accordance to statutory guidelines.
- Act appropriately to all concerns reported by employees and take a decision if a referral is needed.
- Ensure that all records are well maintained and follow confidentiality procedures.
- Attend initial Child Protection Conferences and any subsequent core group meetings if deemed necessary.
- Inform parents and staff that the Policy is available on line.
- Ensure all new employees are aware of internal and external safeguarding procedures.

Teachers and Support Staff

- Ensure that they are aware of UTC procedures on Safeguarding Children.
- Attend all statutory training delivered on the issue of Safeguarding Children.
- Attend any relevant meetings concerning a student who is subject to a Child Protection Plan if deemed appropriate.

Concerns about safeguarding practices within the school or college

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and that such concerns will be taken seriously by the school leadership.

Appropriate whistleblowing procedures are in place for such concerns to be raised with the school leadership.

Where a staff member feels unable to raise an issue with the school leadership or feels that their genuine concerns are not being addressed they may raise the matter with the Chair of Governors or the governor responsible for safeguarding. If the member of staff or volunteer feel they cannot raise the matter internally other whistleblowing channels are open to them.

- The colleague may use the processes in the school whistleblowing policy.
- General guidance can be found at- Advice on whistleblowing

- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

Monitoring and Evaluation

The Board of Governors and Principal will monitor the operation and effectiveness of the UTC's Safeguarding Policy annually.

Further information

Statutory guidance on safeguarding children can be found at the website below:
<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

In the first instance, further information should be sought from the Keeping Children Safe in Education 2016.

Date created: April 2013

Date agreed: 16th April 2013

Date of Review: 26 August 2015

Date of next Review: August 2016

Reviewed in light of 2016 version of KCSIE. For consideration by governors at September meeting.

APPENDIX 1

Guidance on 'Whether this is a Child Protection Matter'

Teachers are not required to be experts at recognising child abuse. That is not their responsibility any more than a doctor can assess a child's special educational needs or reading performance. All professionals involved in child protection must perform their own role within the process, not act some other person's role. But a very large percentage of child protection referrals for school-aged children come via schools. This is not surprising. Children spend more time at school than almost anywhere else; relationships with the adults there are important, especially to younger children. The task of teaching (and non-teaching) staff is to be sufficiently confident to recognise those situations which give most cause for concern and to refer them within the UTC's own and inter-agency procedures. UTC staff are also involved in the longer-term protection of children where they are living in situations of identified risk. Every school **MUST** have a designated person for child protection who has ultimate responsibility for practice and decision-making. The designated person must be a member of the Senior Leadership Team.

Governing bodies have a statutory duty under section 175 of the 2002 Education Act to ensure that effective policies and procedures are in place to safeguard and promote the welfare of students in the UTC, and that the UTC is sufficiently resourced to enable staff to carry out these duties.

Categories of Abuse

All concerns need to be identified under four standard categories, which are used by all agencies:

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 fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse

Is the persistent emotional maltreatment 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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying, (including Cyber 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 maltreatment of a child, though it may occur alone.

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, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment;
- it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

There are three thresholds for and types of referral that need to be considered:

Is this a child with additional needs where their health, development or achievement may be adversely affected? The London Borough of Hillingdon's Children and Young People's Framework says practitioners should complete a Early Help Assessment (EHA) form when:

- age appropriate progress is not being made and the causes are unclear or
- the support of more than one agency is needed to meet the child or young person's needs.

If this is a child with additional needs discuss the issues with the EHA trained practitioner in your school, the child and parents. You will need to obtain parental consent for a EHA to be completed.

Is this child in need? Section 17 of the Children Act 1989 says:

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority;

- their health or development is likely to be impaired, or further impaired without the provision of such services;
- they are disabled.

Is this a child protection matter? Section 47 of the Children Act 1989 says:

- children at risk or who are suffering significant harm;
- children suffering the effects of significant harm;
- Serious health problems.

If this is a child in need, discuss the issues with the designated child protection teacher and parents. Obtain their consent for referral to First Response (see below) or any other agency.

If this is a child protection matter, this should be discussed with the designated teacher and will need to be referred to First Response by the school as soon as possible.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm.

It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.

In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

Making referrals

Where a child is registered at school, consultation must take place with the school's designated safeguarding lead who will often be the most appropriate person to initiate any referral. A written record of your concerns should be made using the UTC's internal recording form. This should then be given to the Designated Safeguarding Lead who will then make the decision if a referral is needed to the LAs Team

Confidentiality

Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of child protection. This is a complex area and involves consideration of a number of pieces of legislation.

You can never guarantee confidentiality to a child as some kinds of information may need to be shared with others. A suggested form of words that may help when talking to children is as follows:

“I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to.”

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. However, any disclosure of personal information to others, included social service departments, must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998 European Convention on Human Rights, Article 8). Wherever possible consent should be obtained before sharing personal information with third parties. In some circumstances, however, consent may not be possible or desirable but the safety and welfare of the child dictate that the information should be shared.

The law requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate. Therefore, if the Police or Social Care/Services are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt from the Trust's Legal Services Department.

Talking to and listening to students

If a student chooses to disclose, you **SHOULD**:

- be accessible and receptive;
- listen carefully and uncritically at the student's pace;
- take what is said seriously;
- reassure the student that they are right to tell;
- tell the student that you must pass this information on;
- make a careful record of what was said.

You should **NEVER**:

- take photographs or examine an injury;
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to students about confidentiality or keeping 'secrets';
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what you have been told;
- fail to pass the information on to the correct person;
- ask a child to sign a written copy of the disclosure.

For students with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other students.

Record keeping

Well-kept records are essential in situations where it is suspected or believed that a student may be at risk from harm.

Records should:

- state who was present, time, date and place;
- use the student's words wherever possible;
- be factual/state exactly what was said;
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation;
- be written in ink and signed by the recorder;

Attendance at Child Protection Conferences

The Designated Child Protection Officer or their deputy will be expected to attend relevant training courses and conferences.

If a student is made subject to a Child Protection Plan it may be appropriate for other staff to attend.

APPENDIX 2

Further information on so-called 'honour based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (HM Government, April 2016) (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (HM Government June 2014).

Actions

If staff have a concern regarding a child that might be at risk of HBV they should immediately follow the safeguarding referral procedure set out in this policy.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see below).

FGM mandatory reporting duty

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out (Not required if another teacher has

already reported). Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow the normal safeguarding procedure. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet (Home Office).

Appendix 3 - Child Sexual Exploitation

Child sexual exploitation is a form of child abuse, which involves children and young people (male and female, of a range of ethnic origins and ages, in some cases as young as 10) receiving something in exchange for sexual activity. Perpetrators of child sexual exploitation are found in all parts of the country and are not restricted to particular ethnic groups.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Local Safeguarding Children Boards (LSCBs) are responsible for ensuring that appropriate local procedures are in place to tackle child sexual exploitation. Appropriate staff within the school including the Senior Leadership Team and the Designated Safeguarding Lead are aware of these procedures (including ones for early help) and how they relate to their own areas of responsibility and accordingly ensure that actions to safeguard and promote the welfare of children and young people who are sexually exploited focus on the needs of the child.

Staff should be made aware of the key indicators of children being sexually exploited, which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

Recording

All interventions should be accurately recorded.

Appendix 4 - Prevent

The aim is to safeguard vulnerable individuals against hate crime/ extremism/ violent crime/ criminal damage

The main strategy is to provide early intervention to combat the alternative messages that young people may be exposed to.

Young people are at risk from Push and Pull Factors. Push factors include situations which make them feel unhappy/ alienated with everyday life. Pull factors include attractive images/ messages which make the alternative groups appear appealing.

The alternative groups often focus on making the disillusioned people feel special and valued for an extended period of time before beginning the process of indoctrinating them. They are often unaware that they are initially being targeted in this way.

Once part of the group pressure is applied, through fear and indebtedness, to prevent them from leaving.

The secret to identifying pupils at risk of radicalisation is to know your pupils. Possible indicators could often be simply symptoms of pupils growing up. However, it is important to be aware of them, particularly if multiple become apparent.

Emotional Indicators	Verbal Indicators	Visual Indicators
Becoming introverted (isolating themselves)	Asking questions which are not linked to topics being taught	Physical change in appearance
Aggressive Behaviour	Language traits/ use of new terminology	Change in food habits (typical of far left groups)
Erratic Behaviour		Clothing
Becoming extroverted (more vocal)		Tattoo's/ Hair style
		Conformity – following a group

Strategies

All staff will receive training and a dedicated prevent policy will be developed

Channel is a strategy employed by the government to investigate possible instances of radicalisation. It is a multi-agency approach which involves a panel which includes the Safer Schools Police Officer and the Stronger Communities Officer reviewing referrals made to them through schools, the public or other organisations. This is not a criminal intervention.

Within school this should be dealt with following the same safeguarding procedures as any other child protection issues.

Useful Reference:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf