Safeguarding Children and Young People Policy

(Including Procedures and Code of Conduct)

Links with other Policies
• Whistleblowing • Confidentiality • Data Privacy • Lone Worker's Policy • Disciplinary Policy • Protection of vulnerable adults (POVA)

This Policy has been developed in accordance and under the guidance of the:

- Framework for the Assessment of Children in Need and their Families (2000)
- Education Act (2011)
- Children Acts 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Counterterrorism and Security Act (2015)
- What to do if You are Worried a Child is being Abused (Advice for practitioners March 2015)
- Working Together to Safeguard Children (December 2023)
- Keeping Children Safe in Education: Statutory guidance for schools and college (September 2024)
- Revised Prevent Duty Guidance: for England and Wales (Home Office December 2023)
- Guidance for safer working practice for those working with children and young people in education settings (February 2022)
- Safer Recruitment Principles
- Wiltshire Safeguarding Vulnerable People's Partnership (SVPP)
- Swindon Safeguarding Partnership

This policy deals with the protection of Children and Young People, the terms applied to people under the age of 18 years.

Community First keeps its Safeguarding Children and Young People Policy and Procedures under on-going review thereby aiming to ensure any new Government legislation, regulations or best practice documents are included and staff are kept fully up to date with their obligations and responsibilities.

The welfare of every child and young person in contact with our provision, always remains our priority. This principle is the central tenet of the Children Act and Working Together to Safeguard Children as updated by the Department for Education (DfE) in December 2023. It sets out how organisations and individuals should work together and how practitioners should conduct the assessment of children.

1. Safeguarding Strategy

Community First will:

1.1 Take a preventive approach to protecting children and young people from potential harm, damage, abuse, radicalisation or being drawn into terrorism (violent and non-violent extremism).

1.2 Take all appropriate actions to address concerns about the welfare of children and young people.

1.3 Work to agreed local policies and procedures in full partnership with other local agencies.

1.4 Plan, implement, monitor, and review policies and procedures to ensure that the maximum is done to provide a safe environment for children and young people.

1.5 Take all reasonable measures to ensure that risks of harm to children and young people's welfare are minimised by appropriate:

- Risk assessment and management
- Health and Safety procedures
- Vetting staff selection, recruitment, induction supervision and training
- Creation and promotion of an open work culture "Whistleblowing"
- Reacting to and reporting abuse

1.6 Community First is committed to promoting the welfare and safety of all who come into contact with it. Potential indications of vulnerability are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

1.7 Community First will respect the confidentiality of children and young people within clearly defined boundaries which are explained to all service users. They should be supported to give and receive personal information responsibly and in the knowledge of the possible consequences of doing so with reference to our Confidentiality Policy.

2. Policy Statement

2.1 Community First holds as one of its highest priorities the health, safety and welfare of all children and young people.

2.2 Community First and its staff, including contractors and volunteers, have a collective and individual duty of care to ensure that the charity fulfils its responsibilities to prevent the abuse of children or young people, to refer any abuse discovered or suspected and to prevent children and young people from being drawn into terrorism.

2.3 This Safeguarding of Children and Young People Policy and Procedure will be made available to all parent/carers who will be advised that cases may be referred to the investigative agencies in the interests of the child or young person.

2.4 Community First will advise children and young people about the standards of behaviour and conduct they can expect from staff, volunteers, and Trustees and of what to do if they experience or suspect abuse.

2.5 Community First will work with appropriate agencies, and all relevant Local Authority Child Protection Teams, Safeguarding Boards, Social Service and Local Prevent Partnership Boards to ensure that children and young people

are safeguarded through the effective operation of our Safeguarding children and young people's procedures. We adopt in totality the Safer Recruitment Consortium's Guidance for safer working practice for those working with children and young people in education settings (February 2022).

2.6 A consultative approach will be adopted with all relevant Local Authority Safeguarding Officers, Child Abuse Investigation Teams (CAIT) and the Local Prevent Partnership Board to ensure good practice and the best outcomes for children and young people.

2.7 Community First recognises that any child or young person can be subject to abuse or radicalisation and all allegations of abuse or concerns about radicalisation will be taken seriously and treated in accordance with our procedures.

2.8 Community First recognises that it is the responsibility of all staff to act upon any concern, no matter how small or trivial it may seem.

2.9 Community First recognises its responsibility to implement, maintain and regularly review Safeguarding procedures.

2.10 We are committed to supporting, resourcing, and training those who work with or who come into contact with, children and young people and to providing appropriate supervision.

2.11 We require all staff to follow our Code of Conduct which is appended to this policy document, and will draw the attention of staff to it and the relevant procedures in induction and on-going training.

2.12 All staff working with children or young people will undertake training to equip them to carry out their responsibilities for Safeguarding including the PREVENT strategy. They will be kept up to date by refresher training at a maximum of three-year intervals. Our Designated Safeguarding Leads and Designated Safeguarding Officers (named within this policy) will undertake refresher training every two years to keep their knowledge and skills up to date. There is a designated trustee responsible for Safeguarding and PREVENT and it is our policy that all existing, and newly recruited, trustees undergo an enhanced DBS check, Safeguarding training and social media audit.

2.13 Community First has appointed Designated Safeguarding Leads as well as Designated Safeguarding Officers within the organisation, strategically placed within service areas, who are responsible for co-ordinating action within the organisation and liaising with other agencies. Contact details can be found in Appendix C.

2.14 Community First operates safer recruitment procedures and ensures that all appropriate checks are carried out on new staff, volunteers and Trustees who will work or come into contact with children and young people including enhanced Disclosure and Barring Service (DBS) checks, Proceeds of Criminal Act (POCA) and list 99.

Any deficiencies or weaknesses about the safeguarding of children and young people's arrangements will be brought to the attention of the Chief Executive and will be remedied without delay.

3. Definition of Abuse

Children and Young People (source: Working Together to Safeguard Children 2023)

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

3.2 Emotional Abuse
Emotional abuse is the persistent emotional maltreatment of a child such that it causes 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 so far as they meet the needs of another person. It may include age or developmentally inappropriate expectations being imposed on children, interactions that are beyond the child's developmental capability, as well as overprotection 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 cyberbullying), 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.

3.3 Sexual Abuse
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also 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 or grooming a child in preparation for abuse (including via the internet).

3.4 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, clothing, and shelter (including exclusion from home or abandonment); or failing to protect a child from physical and emotional harm or danger; not ensuring adequate supervision (including the use of inadequate caregivers); or preventing access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3.5 PREVENT
Any young person in danger of radicalisation or demonstrating extremist tendencies is deemed to be vulnerable and appropriate support under the PREVENT strategy will be sought. Appropriate support could involve referring the child or young person to CHANNEL.

3.6 Significant Harm - Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold.

4. Named Roles

4.1 Trustees

A named Trustee (Chair of the HR Committee) takes delegated responsibility for leading on Safeguarding issues and the Board should satisfy itself that:

- The roles outlined in this policy are being undertaken appropriately.
- An appropriate Safeguarding induction, support and training programme is implemented.
- Recruitment procedures safeguard children and young people's welfare.
- There is adequate financial support for the services and activities offered so that the service can operate effectively and safely.

4.2 **Designated Safeguarding Leads**

These are senior members of staff, and all staff, volunteers and service users should be made aware of who our Designated Safeguarding Leads are, their roles and when they are available.

Designated Safeguarding Leads have the following responsibilities:

- To ensure that this policy is always implemented and adhered to.
- To be familiar with and have an understanding of all relevant legislation.
- To liaise with the 'Safeguarding Vulnerable People's Partnership' (which brings together those who lead Wiltshire's services to safeguard children, young people, and adults, and was previously the Local Safeguarding Children Board, (LSCB) and local Children's Social Care teams as appropriate and in Swindon the Safeguarding Partnership.
- To ensure that safeguarding is part of Community First's working culture.
- To arrange appropriate training and support for all relevant workers and volunteers.
- To provide support during and after incidents involving safeguarding and referrals to Children's Social Care teams or the police.
- To provide the HR Committee, Chief Executive and Board of Trustees with appropriate information on the number and outcomes of incidents or concerns involving safeguarding children and young people as requested.
- Offer support, advice and guidance to the DSO' where necessary and appropriate and conduct frequent review meetings with the safeguarding team as well as ensuring that internal safeguarding paperwork is correctly completed and logged.

Designated Safeguarding Officers are the first point of contact for all staff and volunteers to go to for advice if they are concerned about a child.

4.3 **Implementation**

All Community First staff will be briefed on the policy annually and must agree to apply it in practice. The policy is deemed to be incorporated in the contract of employment and it is a condition of service with Community First that the staff, volunteers and Trustees understand and fully comply with the policy. All staff, volunteers and Trustees will be given a copy this policy, a copy will be freely available to other groups involved in any events or meetings held by Community First and will be available on the Community First website.

Appendix A

Safeguarding Children and Young People Procedure

The purpose of these guidelines is to ensure that the rights of the child or young person are protected through staff awareness and that the statutory and local guidelines in the reporting of concerns is followed.

Community First will take steps to identify vulnerable children or young people on referral. Additional supervision measures will be put in place for all children and young people defined as vulnerable.

1. Advice to Staff on When to Take Action and How

1.1 Children and young people can be potentially abused within their own family, community, organisations by employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers and fellow children and young people.

1.2 It is the responsibility of **all** staff working within Community First to record and refer concerns regarding the safeguarding of children or young people even if they are just suspicious or overheard rumours, but not to discuss it with anyone other than a Designated Safeguarding Officer or Lead. (see contact details in Annex C).

1.3 If you believe a child or young person is at immediate risk of serious harm or injury, or you believe a criminal offence has been committed, call the police on 999. Do not place yourself in danger, in an emergency, get medical help.

1.4 If a child or young person comes to you with a report of apparent abuse or a concern over radicalisation or extremism, you should listen carefully to him/her, using the following guidelines. When listening staff must:

- allow the child or young person to speak without interruption.
- never trivialise or exaggerate the issue.
- never make suggestions.
- never coach or lead them in any way.
- reassure them, let them know you are glad they have spoken up and that they are right to do so.
- always ask enough questions to clarify your understanding, but do not probe or interrogate – no matter how well you know the child or young person – spare them having to repeat themselves over and over again.
- be honest – let the child or young person know that you cannot keep this a secret; you will need to tell the Designated Safeguarding Officer or Lead.
- try to remain calm – remember this is not an easy thing for them to do.
- do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them.
- let the child or young person know that you are taking the matter very seriously.
- make the child or young person feel secure and safe without causing them any further anxiety.

1.5 If you suspect any abuse or extremism / radicalisation you should immediately (within a maximum of two hours) contact a Designated Safeguarding Officer or Lead either in person or by telephone outlining what has been disclosed, what you have overheard or your suspicions. You should also contact them if you know or suspect that a member of staff or child or young person has a previous history of abuse of children or young people.

1.6 Contact will be made with the relevant local authority: Wiltshire Multi-Agency Safeguarding Hub **(MASH) 0300 456 0108** (08:45am-5pm Mon-Thurs) and (8:45am-4pm), Friday
Emergency Duty Service Out Of Hours **0300 456 0100**.
OR Contact Swindon (The front door for the Council's children's social care services) E-mail: contactswindon@swindon.gov.uk Telephone: 01793 464646 (during normal office hours which are 8.30am to 4.40pm Monday to Thursday, and 8.30am to 4.00pm Friday) The Emergency Duty Service (EDS) is available outside office hours on 01793 436699

If a child or young person is at immediate risk of serious harm or injury, or it is possible a criminal offence has been committed, the police will be called on 999, or the Police Child Abuse Investigation Team on 101, or Police Domestic Abuse Investigation Team on 101.

1.7 With regard to concerns around radicalisation or extremist behaviour if the Designated Safeguarding Officer judges the child or young person to be in immediate danger or likely to act imminently then the Police will be called, otherwise advice from CHANNEL will be sought. https://www.wiltshire.gov.uk/article/1038/PREVENT-Safeguarding.
PREVENT - Swindon Safeguarding Partnership

1.8 The Community First Designated Safeguarding Officer or Lead will ask the referring member of staff to produce a full written record within 24 hours, through our internal Safeguarding Disclosure Form or MASH referral including:

- Name and position of the person who reported the matter.
- Whether the matter is a direct disclosure from a child or young, a suspicion or an overheard conversation.
- A factual account of what has been overheard, seen or what has been disclosed, including any questions they needed to ask to clarify understanding.
- The Report should contain as much detail as possible including observations (including physical signs of apparent abuse). It must not include opinions or personal interpretation of the facts.
- Signed, dated and forwarded to the Designated Safeguarding Officer or Lead or submitted to MASH, details will then be stored in a secure file.

1.9 Detailed information about a case will be confined to the Designated Safeguarding Officers and/or Leads, Chief Executive, and (if not implicated) the parents/carers.

1.10 The reporting member of staff will be kept informed on the progress of the case

on a ‘need to know’ basis only.

1.11 If the Children’s Social Care Team or Social Care Services deem it a safeguarding issue involving Community First’s practice the Chief Executive will advise the Trustee with a lead for Safeguarding.

1.12 Escalation of disputes -At no time must professional disagreement detract from ensuring that the child/young person is safeguarded. The child/young person's welfare and safety must remain paramount throughout. Escalation is a process of challenging a decision made by another professional or organisation. Both Wiltshire and Swindon Safeguarding Partnerships have in place a policy and processes for the management of disputes. These escalation policies ensure that all professionals have a quick and straightforward means of resolving professional differences in order to safeguard the welfare of children and young people. In the event of a dispute Community First, will follow the policy of the relevant Local Authority.

7. Confidentiality

7.1 Confidentiality and trust should be maintained as far as possible. The degree of confidentiality will be governed by the need to protect the child or young person who is always the primary concern. The child or young person must at the earliest opportunity in the disclosure be informed of the need to pass information on.

7.2 Community First complies with the General Data Protection Regulation (GDPR). (EU2016/679).

Legislation does not prevent sharing of information if:

- *those likely to be affected consent; or*
- *the public interest in safeguarding the child's or young person's welfare overrides the need to keep the information confidential; or*
- *disclosure is required under court order or other legal obligation.*

The member of staff reporting a disclosure, suspicion of abuse/ neglect or overheard rumours of abuse/neglect should not discuss the case with anyone other than a Designated Safeguarding Officer or Lead.

8. Allegations against a member of staff

8.1 The primary concern of Community First is to ensure the safety of the child or young person. It is essential in all cases of suspected abuse by a member of staff or volunteer that action is taken quickly and professionally whatever the validity. Designated Safeguarding Leads and Officers will work in conjunction with the Local Authority Designated Officer for Allegations (LADO), Wiltshire: 0300 456 0108 (option 6), or email LADO@wiltshire.gov.uk OR Swindon: Tel: 01793 463854 or Email: LADO@swindon.gov.uk in order to ensure that even apparently less serious allegations are followed up and examined objectively by someone independent of Community First. Where the Designated Safeguarding Leads or Officers considers that a concern or allegation indicates that a member of staff or volunteer has behaved in a way that has harmed or may have harmed a child or young person, or possibly committed a criminal offence against or related to a child or young person; or behaved towards a child or young person in a way that indicates s/he is unsuitable to work with them then a discussion will always take place with the LADO.

8.2 The term 'member of staff' applies to all contracted personnel within Community First, volunteers and people employed by other agencies that are providing services for the organisation.

8.3 If any member of staff suspects any other member of staff of abusing a child or young person, it is their responsibility to bring these concerns to either the Designated Safeguarding Lead/s/Officers or the Chief Executive except where the suspect is one of the aforementioned.

8.4 If the allegation concerns the Chief Executive or Designated Safeguarding Lead/s or Officer/s, the matter should be discussed with the Trustee with a lead for Safeguarding who will discuss it with the Chair, in addition to following the normal procedures for Child and Young People's Protection.

8.5 Where there is suspicion that a child or young person may suffer significant harm a Strategy Discussion will take place where the Designated Safeguarding Lead will be asked to represent the organisation.

8.6 If it is determined that there is no cause to suspect significant harm but a criminal offence might have been committed they will immediately inform the police and a similar discussion will take place with the Designated Safeguarding Lead being asked to represent the organisation.

8.7 **Referral to the Disclosure and Barring Service**

The Safeguarding Vulnerable Groups Act 2006 places a legal duty on Community First to refer any person who has:

- harmed or poses a risk of harm to a child or young person
- satisfied the harm test
- received a conviction or caution for a relevant offence.

Such a referral will be made under the guidance of the Local Authority Designated Officer (LADO).

9. Type of Investigations

9.1 **Criminal Investigations** - If a crime is suspected, an investigation will not be carried out by the organisation, other than to establish the facts. All the information obtained will be handed over to the police who will carry out any investigation necessary, with the support of Community First.

9.2 **Disciplinary Investigations** - If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under the Community First's disciplinary policy.

Community First may be unable to carry out any disciplinary proceedings until the police investigation is complete, but depending on the seriousness of the allegation, the member of staff may be suspended from work, until the investigation is completed.

10 Community First's responsibilities to the member of staff following an allegation

10.1 Staff who are accused of a breach of the code set out in Appendix A may be subject to disciplinary procedure.

10.2 Where an allegation from a child or young person occurs, an investigation will be carried out in accordance with procedure (available from HR). The Investigating Officer will be required to liaise with the Designated Safeguarding Lead to clarify whether there are any relevant records or relevant information in relation to the individual.

10.3 Community First will inform the accused member of staff as soon as possible after initial consultation has taken place. However, this should not be before the Strategy Discussion or police discussion, if needed, has taken place and agreement has been reached as to what information can be disclosed to the member of staff.

The member of staff should be advised to:

- Contact their union representative
- Keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.

10.4 Whilst the case is ongoing, Community First must arrange to provide appropriate support to the member of staff.

10.5 Where it is subsequently found that an allegation has been made maliciously, we may take the decision to pursue an allegation of abuse through our Disciplinary Procedure. Discussions should be held with the relevant Social Care Team.

10.6 If the accused member of staff tenders their resignation or ceases to provide their services, the allegation must continue to be investigated in accordance with the procedures. Compromise agreements by which a person agrees to resign or Community First agrees not to pursue the disciplinary action must not be used in these cases.

10.7 Every effort must be made to maintain confidentiality and guard against publicity whilst the allegation is being investigated.

11 Record Keeping and Timekeeping

Community First will keep clear and comprehensive records of any allegations made, details of how the allegation was followed up and resolved, as well as details of any actions taken, and decisions reached. These will be placed indefinitely on a staff member's confidential personnel file.

In the interests of all parties, it is important to resolve cases as quickly as possible whilst ensuring a consistent, fair and thorough investigation.

Interpretation of this policy shall be made by the Chief Executive; and or the Designated Safeguarding Lead if required. Any challenges to the policy by children, young people or staff will be considered by the HR Committee who will respond to the challenge.

APPENDIX B

Code of Conduct for Safeguarding Children and Young People

Community First recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff come into contact with children and young people. However, below are the standards of behaviour required of staff to fulfil their roles within the organisation. This code should assist in the protection of both children, young people, and members of staff.

These guidelines also apply to volunteers who work in an unpaid capacity on Community First youth projects.

Staff must:

- Implement the Safeguarding of Children and Young People's Policy and Procedures at all times
- All workers must understand and abide by Community First's Confidentiality policy
- Workers must do everything possible to protect those using the service from discrimination, bullying, aggression, intimidation or verbal or physical abuse.

Staff must never:

- engage in inappropriate rough, physical games including horseplay with children or young people.
- invite children and young people into their own house.
- do things of a personal nature for children or young people that they can do for themselves or that their parent/carer can do for them.
- physically restrain a child or young person unless the restraint is to prevent physical injury of the child/other children/visitors or staff/yourself. In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault.
- make sexually suggestive comments to, or within earshot of, a child or young person.
- use any language or behaviour that is inappropriate to the worker's relationship with a child or young person.
- abuse trust: While it is always an offence for any adult to engage in sexual activity with a young person under 16, it is also unacceptable and possibly an offence (an "abuse of trust") for a worker to have an intimate relationship with a young person aged 16-18 when the adult holds a "position of trust" over the young person.
- allow or engage in inappropriate touching of any kind. The main principles of touch are:

    - touch should always be in response to the child or young person's need
    - touch should always be appropriate to the age and stage of development of the child or young person
    - touch should always be with a child or young person's permission or a necessary response to an emergency, in which case parents/

guardians should be fully informed as soon as possible. Support of a physical nature should only be provided by a worker if:

- It is absolutely necessary, due to an individual's young age or disability,
- recorded in the child or young person's case notes and consented to by the young person and their parent/ guardian.

Planned Work

Unless pre-planned, workers should not give a child or young person a lift in their own car without prior arrangements being made with the young person, their guardian, and the worker's line manager, except in emergency.

Workers should not be alone with a child or young person, unless this is; a necessary part of supporting that individual for example 1:1 mentoring session, recorded appropriately and discussed with the young person, the worker's Line Manager and the young person's parent/ guardian. In this instance workers must ensure that they are aware of and ensure that relevant guidance in our lone working policy is adhered to and taken into account.

Consent is permissible from the young person themselves if aged 16 or over and living independently.

Staff who breach any of the above may be subject to the Disciplinary Procedure.

APPENDIX C

Community First Designated Safeguarding Leads Contact Details:

Youth Services and Corporate Development Manager – Steve Crawley
steve@youthactionwiltshire.org 07818 077764 or 01380 729813

Youth Action Wiltshire Young Carers Service Team Lead– Niki Andrews
niki@youthactionwiltshire.org 07984 181214 or 01380 720671

Community First Designated Safeguarding Officers Contact Details:

Damien Maloney (Outdoor Education) dmaloney@oxenwoodcentre.com 07921 574491 or 01380 732806

Gayle Harper (Building Bridges) gharper@communityfirst.org.uk 07767 101284 or 01380 722475

Stuart Ilbury (Carers Together Wiltshire) silbury@communityfirst.org.uk 07742072235 or 01380710299

Ben Jarvis (Youth Action Wiltshire) ben@youthactionwiltshire.org 07967 657996 or 01380 729813

Community First Leadership Group Safeguarding Lead - Steve Crawley
steve@youthactionwiltshire.org - 07818 077764 or 01380 729813

Chief Executive - Lynn Gibson lgibson@communityfirst.org.uk - 07905 679031 or 01380 732811

Lead Trustee Chair of Human Resources Committee
Name: Merope Sylvester (Chair of HR Committee)
Email address: mjsylvester@hotmail.com
Telephone number: 07768 721 814

Whistleblowing

Whistle-blowing https://protect-advice.org.uk/
Free, confidential whistleblowing advice on **020 3117 2520**

Monitoring

Date issued	June 2014	**Date last reviewed**	July 2026	**Date of next review**	July 2026

This policy will be reviewed annually by the HR Committee with any proposed amends ratified by the trustees.