



# #Beewell

## Child Protection and Safeguarding Policy

Hampshire, Isle of Wight, Portsmouth & Southampton

Version 1 March 2023

Review due: September 2023

Author: Jade Bennett, Project Manager, HCC



**MAKING YOUNG PEOPLE'S WELLBEING  
EVERYBODY'S BUSINESS**



## Contents

Introduction .....	2
1. Policy .....	3
2. Responsibilities.....	5
3. Recruitment of #BeeWell staff.....	6
4. Safer working with children and young people .....	7
5. Core policy for working with young people: .....	8
6. Capturing work: Photos, interviews, and media work.....	10
6a. Use of social media .....	10
7. Partnership working.....	12
8. Research and safeguarding .....	13
9. Suspicions and reports of abuse.....	14
10. Flow Chart and Contact Details.....	15
11. Further info and supporting documents:.....	17
12. Review.....	19





## Introduction

#BeeWell seeks to co-create an environment where young people's wellbeing is everybody's business.

We aim to operate in ways where children, young people and adults can participate in programmes of work, research activities and engagement opportunities safely and meaningfully.

We want children and young people to be able to enjoy programmes provided through the work of #BeeWell and partnership with agencies and/or community voluntary sector organisations that we collaborate with.

The purpose of this document is to specify #BeeWell (HIOW)'s Safeguarding policy and procedures for the protection of children and young people.

The document applies to all #BeeWell staff, including interns, volunteers, freelancers, consultants and Local Authority employees involved within the #BeeWell programme. The policy and procedures apply to all #BeeWell activities.

The Children Act 2004 places a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in organisations are competent, confident, and safe to do so. (Guidance for Working together to safeguard children July 2018).

Safeguarding and promoting the welfare of children is defined as follows for this policy:

- 
- *Protecting children from maltreatment*
  - *Preventing impairment of children's health or development*
  - *Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care*
  - *Taking action to enable all children to have the best outcomes.*
- 

We can achieve a culture of safeguarding by ensuring organisations, staff and young people are supported through the following five principles:

- 
- *Ensuring a holistic youth centred, approach.*
  - *Co-production with young people; listening to and understanding their needs.*
  - *A skilled, supported and confident workforce*
  - *Leadership; senior staff and board members adopting a whole organisation approach.*
  - *Partnership and influence; seeking funding, regulatory, government and academic support, as well as effective procedural collaboration.*
- 

***Safeguarding is everyone's responsibility.***





## 1. Policy

1.1 These procedures should be used in conjunction with the current Local Hampshire Safeguarding Children Partnership Procedures for Hampshire, Isle of Wight, Portsmouth and Southampton and the central government guidance contained within Working together to safeguard children 2018 and any supplementary or subsequently updated guidance.

1.2 It is the policy of #BeeWell to safeguard the welfare of children, young people and adults involved in the work we do by protecting them from neglect, physical, sexual or emotional abuse and peer to peer violence, including children and young people at risk of exploitation, modern slavery, and domestic abuse environments. It is also #BeeWell's policy to provide those working for or with us with a framework to operate within to keep everyone who is engaged in #BeeWell activities safe. We work in a youth centred way that prioritises youth participation as a key element of protection and uphold all children's rights throughout our work in a trauma informed approach.

1.3 Whatever the level and frequency of involvement in children's lives it is paramount that staff understand the expectations upon them and have access to the procedures and policies to support them in this work. The purpose of this procedure is to give that guidance and this procedure should therefore be followed in all instances where suspected or alleged issues of safeguarding or child protection are recognised.

1.4 It is therefore #BeeWell's policy to do the following:

---

Ensure that all staff, interns, board members, consultants, commissioned partners, freelance staff and volunteers (legally responsible adults) working with children, young people or adults at risk are: carefully selected; checked by the Disclosure and Barring Service ("DBS"); have appropriate references; and understand and accept their responsibility for the safety of children, young people and adults at risk in their care.

Raise awareness of child protection issues amongst coalition members and partners within our network.

Ensure that children and young people's welfare is always prioritised, regardless of age, gender, ability or race when planning, organising, advising on and delivering programmes.

Respond swiftly and appropriately to all suspicions or allegations of abuse, and to ensure information is shared timely and appropriately with partner agencies.

Raise the awareness of relevant staff, partner organisations and volunteers of child protection issues (including child in need and early help) through the provision of training and regular updates to risk assessments.

Review of this policy on a regular basis via the steering group.





Ensure that the principles of this policy are adopted by, or already exist as policies, in all organisations #BeeWell partner and work with.

---

1.5 This Safeguarding and Child protection policy and procedure also seeks to effectively manage the risks associated with activities and events involving children, young people, and adults at risk by completing a risk assessment process which involves identifying risks and means of reducing or eliminating risk.





## 2. Responsibilities

2.1 The #BeeWell Steering Group oversee the strategic and operational planning and delivery of #Beewell. Members of this Board have responsibility for ensuring that #BeeWell operates in a legal and ethical way.

2.2 The Steering Group will review the safeguarding and child protection policy once a year.

2.3 In the event of a disclosure, near miss or accident the #BeeWell DSO will notify the steering group chair, Suzanne Smith (Assistant Director for Business Development and Transformation, HCC) of the outcome of the procedure. In the event of an allegation, LADO will have involvement.

2.4 This policy will ensure clear and appropriate safeguarding measures are in place across #BeeWell.

2.5 The purpose of the Designated Safeguarding Officer (DSO) role is to take the lead in ensuring that appropriate arrangements for keeping children and young people safe are in place at #BeeWell in HIOW. The DSO will promote the safety and welfare of children and young people involved in #BeeWell activities at all times.

2.6 The DSO will be responsible for ensuring there are resources available to support staff on safeguarding/child protection issues and that these resources are maintained and kept up to date.

2.7 The DSO will act as a first point of contact for those who require advice or support to respond to concerns about a child or young person.





### 3. Recruitment of #BeeWell staff

3.1 All #BeeWell delivery staff (by this we mean UoM research team, HCC Project team, Local Authority partners, Anna Freud Centre, and The Gregson Family Foundation), Freelancers, consultants, interns, and volunteers are expected to adhere to the requirements of this policy and procedures and operate within codes of conduct outlined within the various policies that support the work of #BeeWell.

3.2 Everyone supporting #BeeWell work and working directly with young people will be provided with this policy at a minimum and an accessible flow chart of what to do in the case of a disclosure or concern.

3.3 Those with a contract or formal agreements to be working on the #BeeWell project will also be provided with safeguarding adolescents training (ran by Hampshire Safeguarding Children's Partnership) and other courses identified as relevant to their role.

3.4 Safe recruitment will include steps to ensure only individuals who are suitable for working with young people, whilst keeping them safe from harm and risks, are appointed. #BeeWell have adopted safe recruitment procedures for appointing staff, associates, and volunteers. Under the Protection of Children Act 1999, all individuals working on behalf of, or otherwise representing, an organisation are treated as employees whether working in a paid or voluntary capacity.

3.5 Each key partner (UoM, Hampshire County Council, Isle of Wight Council, Portsmouth City Council, Southampton City Council will adhere to their safer recruitment policies and procedures in place and a DBS check (at the appropriate level) will be completed with anyone working directly with young people.

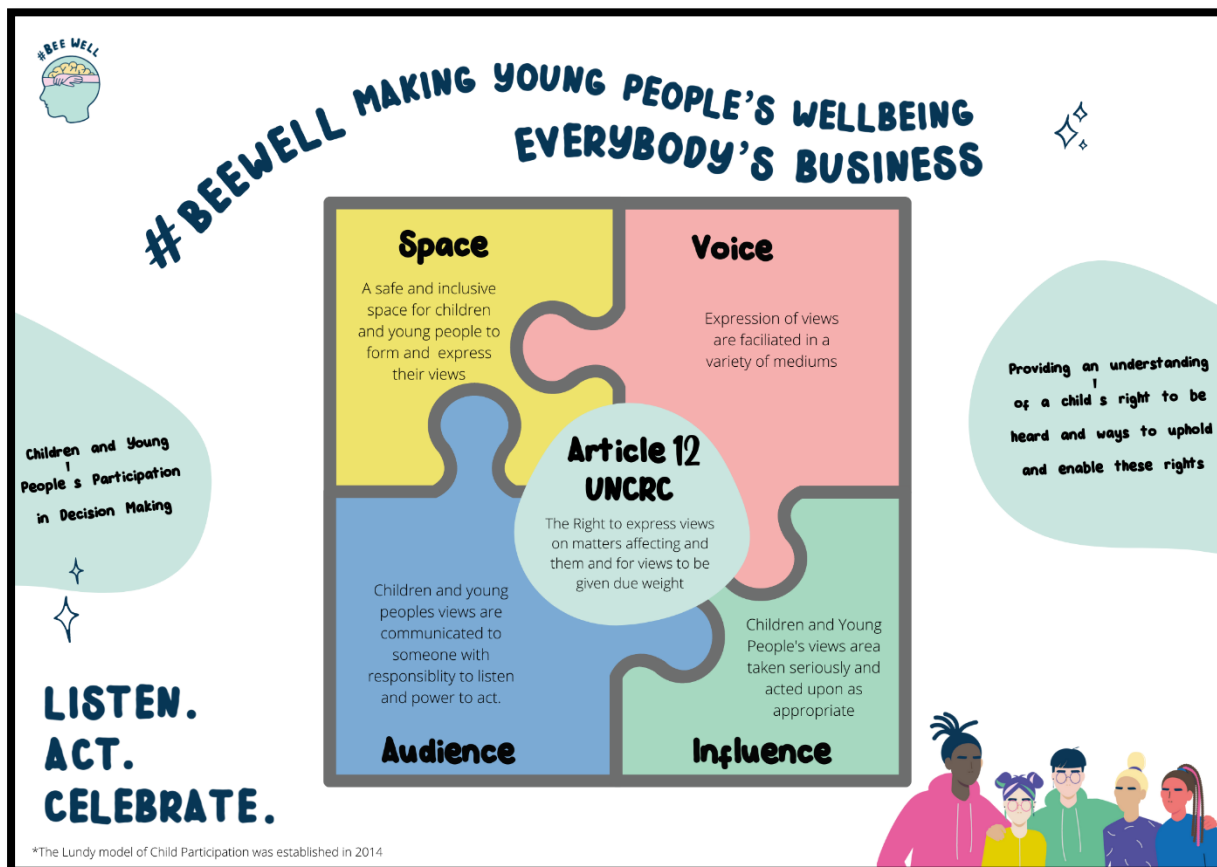




## 4. Safer working with children and young people

#BeeWell requires all those working directly with children and young people on behalf of the #BeeWell in any situation to follow the procedures and guidance.

We are a youth centred project, and our work follows the Lundy Model of Child Participation outlined below.



The value of children and young people's participation in decision-making is widely recognised in principle. By applying the model above and recognising the protective factors of participation, #BeeWell actively involves children and young people in conversations and decision making about our work.

Increasingly groups are delivered online and due to the geographic spread of young people across Hampshire and the IOW working online often offers an accessible way to bring young people from HIOW together. Working online with support of staff/facilitators offers more opportunities for young people to network, collaborate and participate in society. It also brings new and different challenges regarding safety and privacy and accessibility. Working online is about transferring the safeguarding best practice we use online into the virtual world, making activities safe and inclusive for everyone.

- Communication will be from organisation e-mail addresses only, not personal.
- Ensure appropriate privacy settings in place for virtual events/meetings.
- The reporting of concerns remains the same as advised in this policy for both virtual and in person events.



## 5. Core policy for working with young people:

- 5.1 Staff must always give due regard to issues of safety. This includes carrying out appropriate risk assessments before all sessions.
- 5.2 Contextual Safeguarding helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Due regard should be given to associated risks that different groups will have on each other.
- 5.3 Staff working with children and young people should have the appropriate level of DBS and completed safeguarding training (Hampshire Safeguarding Children's Board) to ensure the safe delivery of the session activity.
- 5.4 Sessions should be carefully planned with safety of children and young people being central to decision making. Activities should be inclusive and include opportunities for children and young people to have their voice heard.
- 5.5 Follow the Lundy Model guidance to ensure that young people's participation in #BeeWell is safe, ethical and rights based and captures the voice of the young person.
- 5.6 Staffing ratio guidelines must be followed. In practice the ratio of responsible adults to children tends to be 1:8 for the age of children in the BeeWell remit as provided by NSPCC guidance.
- 5.7 Staff should plan events and sessions to avoid lone working with young people and work in a pair, as a minimum.
- 5.8 Staff planning sessions should comply with the standards set by their appropriate professional body, e.g. Sport National Governing Body, National Arts Council. Staff planning sessions at third party premises must ensure that they have a 24hour emergency contact system in place for the event for appropriate staff and services.
- 5.9 Parent and carer consent (for young people under 16) and medical information about the child or young person must be obtained in advance when #BeeWell is working directly with and has responsibility for them. The mental capacity act should be applied to those age 16 and 17.
- 5.10 Staff should have access to Information and Parental Consent Forms for all children taking part in sessions and this information should be treated as confidential and is governed by the provisions of Data Protection regulations. Consent forms will be held securely by the Project Team and shared prior to events.
- 5.11 Children, young people and adults at risk and their parents should be given a 'named appointment' to whom they may report any worries or concerns. The contact names and telephone numbers should be visibly displayed at events.





- 5.12 Staff should ensure that programmes follow agreed timings and locations.
- 5.13 Staff are expected to promote, demonstrate and incorporate the values of fairness, trust and ethical practice.
- 5.14 Staff must respect all individuals whatever their age, development stage, ability, sex, sexual orientation, or ethnicity throughout the session.
- 5.15 All accidents/incidents involving staff or participants should be recorded using the appropriate accident form used by the hosting venue or Local Authority and notified to the DSO as soon as practicably possible.
- 5.16 Staff and volunteers are responsible for familiarising themselves with building/facility safety issues, such as, fire procedures, location of emergency exits, location of emergency telephones and first aid equipment.

## 6. Capturing work: Photos, interviews, and media work

6.1 In order to capture, celebrate and learn from work we do with young people #BeeWell may photograph or film session outputs and session participation. We may also invite and support young people to represent #BeeWell in the media including TV, radio and press releases.

6.2 Any time that photography of filming might take place young people will be notified in advance and will be given multiple opportunities to opt out of having their photo taken without this affecting their participation the activity/session.

- *#BeeWell will only tell a child or young person's story or take photographs or recordings of them when we have a clear written record of informed consent.*
- *If a child is under 16, we need informed consent from both the child and a parent/legal guardian.*
- *If the young person is 16 or over, they do not need anyone to consent on their behalf, but they still need to give their own informed consent. The mental capacity act should be applied if they lack capacity and what is in their best interest.*
- *Signed consent forms must be dated.*
- *We will not use images of children which could be harmful to their reputations in the future.*
- *We will not use images showing children inappropriately clothed.*
- *We will not use images which perpetuate negative stereotypes about young people.*
- *Everyone featured in an image used by #BW (including adults and staff) should have given informed consent for the photograph to be taken.*
- *Consent is not required for crowd shots in public places where it would be impractical to ask everyone pictured – but everyone who's identifiable in the foreground – especially children – should have given consent.*
- *Any request for a young person to contribute to social media content or media work must also be offered wrap-around support for any abuse or negative experiences with social media.*
- *Young people will be given the opportunity to indicate preferences around being identifiable in photos and whether they will be named in any promotional material.*

### 6a. Use of social media

6.3 #BeeWell use twitter and Instagram to promote #BeeWell and disseminate research and practice findings and to promote opportunities for young people and schools to participate in different elements of #BeeWell Work.

6.4 #BeeWell staff should only use digital communication with young people in groups to support their work with the group, not for general socialising. Social media should not be used as a form of contact.

6.5 Staff must not befriend young people via social media or accept friend requests.

Key Principles for our social media content are as follows:

- *All youth-facing content produced on Instagram must be supported by material from a list of trusted sources.*
- *When appropriate, content warnings should be included in image captions.*
- *Posts should signpost to support services when discussing mental health topics.*





- *Social media pages should make it clear there is not 24/7 monitoring of the account.*
- *In the event that a message is sent on social media that includes requests for help or disclosures staff will consult follow the disclosure policy and consult with the DSO.*
- *Young people who feature on our pages or represent #BeeWell in the media will have given consent to do this.*
- *Young people featuring in media will have had the opportunity to attend #BeeWell media training.*
- *Any request for a young person to contribute to social media content or media work must also be offered wrap-around support for any abuse or negative experiences with social media.*

If there is abusive or harmful content and comments:

- *#BeeWell team members must report abusive content as necessary and subsequently remove this content from the social media platform.*
- *Any concerning content or interactions between young people should be reported to the DSO at #BeeWell and/or YouthLeads.*



## 7. Partnership working

7.1 #BeeWell HIOW is a partnership between the University of Manchester, The Anna Freud Centre, Hampshire County Council, Isle of Wight Council, Southampton City Council and Portsmouth City Council.

7.2 We expect our partners to have robust safeguarding policy and procedures and to keep a record of any child/adult protection concerns or allegations that they identify, their response and how it was resolved.

7.3 Each partner has their own safeguarding policies and procedures. The #BeeWell policy will be followed unless there is an alternative documented arrangement for a specific piece of work/session.

Existing and ongoing partnership arrangements are as follows:

- **Hampshire County Council (employer of the Project Team)**
  - Holds the youth engagement, project management and HIOW partnership and collaboration work.
- **Isle of Wight, Portsmouth, Southampton**
  - Support the project team in identified workstreams.
- **The University of Manchester**
  - Holds responsibility for the research stream of work, this includes data collection, management and protection.
- **The Anna Freud Centre**
  - Holds responsibility to confidentiality engage with school level data in support of school-based responses and data informed development.
- **The Gregson Family Foundation**
  - Coalition of Partners meetings and chairs operational meetings.

In all cases if a safeguarding concern arises in relation to #BeeWell work activities, they will inform the #BeeWell DSO of the concern and procedure followed.

7.4 #BeeWell frequently works in partnership with other youth organisations and local VCISO's. In person events are often hosted at venues and sites beyond HIOW premises. We also visit and work in schools.

- When organising sessions at different venues we will request the risk assessment for the space in advance. A local risk assessment for the activity will be created, where necessary.
- We will run sessions in venues and places that are accessible and youth friendly.
- Explicit agreement between the host organisation and the #BW facilitator will establish who is responsible for safeguarding if the session is being co-delivered.
- When invited to deliver a session at a school or existing youth project we will follow their safeguarding policies and procedures and pass on concerns to their DSO/DSL.
  - In the event that there is a concern about a member of staff/organisation we are working with, contact the LADO.

LADO Hampshire and Isle of Wight : [LADO service initial enquiry form- \(office.com\)](#)

LADO Portsmouth 023 9288 2500 [LADO@portsmouthcc.gov.uk](mailto:LADO@portsmouthcc.gov.uk)

LADO Southampton 023 8091 5535/ 07500 952 [lado@southampton.gov.uk](mailto:lado@southampton.gov.uk)





## 8. Research and safeguarding

8.1 A significant amount of #BeeWell activity is linked to the University of Manchester, as a formal university research project about young people's mental health and wellbeing. The research element of the work has been through the University of Manchester's Ethical review board for scrutiny. This has considered safeguarding and other ethical decisions related to consent and participation for the research.

8.2 All #BeeWell related research will have gained ethical approval from the UoM ethics committee. Ethics committees fulfil a vital role in promoting stringent ethical standards in research and seek to ensure that risk and harm to participants, researchers and wider communities involved in the research are minimised (Block et al., 2013; ESRC, 2017).

8.3 The Research team will be given training on #BeeWell safeguarding policy and any safeguarding concerns or disclosures during research activities will follow the #BeeWell safeguarding procedure in the first instance.

8.4 Professor Neil Humphrey is the Research Lead for #BeeWell has responsibility for ensuring that all research meets high ethical standards.

8.5 Consent processes for participation in research are *additional* to the other Youth Participation work that #BeeWell supports and delivers. Young people who participate in research and youth involvement opportunities will complete different consent forms for these activities.



## 9. Suspicions and reports of abuse

9.1 Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing 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. They may be abused by an adult or adults, or another child or children (this is increasingly referred to as peer-to-peer violence or abuse).

9.2 We need to look out for minor as well as major harms against children and young people. And support them to recognise when their rights are not being upheld and respected. This includes risk of racialisation, grooming and exploitation.

Some signs that could alert staff and volunteers to the fact that a child or young person might be being abused include:

- Unexplained bruising and injuries
- Sexually explicit language and actions
- Sudden changes in behaviour
- Something a child has said
- A change observed over a long period of time e.g. losing weight or being increasingly dirty or unkempt.

9.3 If a child or young person displays these signs it does not necessarily mean that they are being abused. Similarly, there may not be any signs; you may just feel something is wrong. If you are worried, it is your responsibility to report your concerns. The local authority/Children's Services will work with partners to establish if abuse is present.

9.4 It is not the responsibility of staff or volunteers at #BeeWell to deal with suspected abuse but it is their responsibility to report concerns in line with guidance on reporting child abuse. You may find that these suspicions back up other recorded incidents.

---

*Do not investigate, do report!*

---

### 9.5 Categories of safeguarding concern

1. You are concerned that a child is at risk of or experiencing harm from an adult
2. You have observed or suspect another member of staff/volunteer has behaved in an unethical, unsafe, or threatening way
3. You have observed or are concerned that a child is at risk of peer-to-peer abuse.
4. There is a risk of exploitation (sexual and/or criminal), radicalisation or grooming.





## 10. Flow Chart and Contact Details

### #BeeWell DSO

Jade Bennett, #BeeWell Project Manager – employed by Hampshire County Council

☎ 07871990819 ✉ [jade.bennett@hants.gov.uk](mailto:jade.bennett@hants.gov.uk)

### Deputy DSO

Rebecca Reeve Mental Health Transformation Manager, Strategic Partnerships Team,  
Hampshire County Council ☎ 07740517644 ✉ [rebecca.reeve@hants.gov.uk](mailto:rebecca.reeve@hants.gov.uk)

The DSO will report to the Steering Group for oversight of risk assessments. In the event that a complaint or allegation is made concerning the DSO this complaint will be responded to by Rebecca Reeve.







# #BeeWell

Responding to disclosures and safeguarding concerns

## FLOWCHART OF ACTION

You are approached by a child, young person or adult at risk making a disclosure of harm, abuse or neglect, or you are notified of such disclosure, or you are concerned they may be subject to abuse or harm.

In all cases - listen and be transparent that you will have to share the concerns.

In an education or youth setting

Make a written note of the information, make a referral and contact the DSO for that setting for their safeguarding process to be followed.

Notify BeeWell DSO in writing the actions taken

BeeWell DSO to follow up with setting DSO and log case and outcome

At a BeeWell hosted event

Make a written note of the information, make a referral and contact the BeeWell DSO.

The above process should also be followed should you be concerned about the behaviour or actions of another person (including staff)

- If there is risk of immediate harm or illegal activity, contact emergency services

V1 22/03/2023





## 11. Further info and supporting documents:

How to respond to a disclosure from a young person [Let children know you're listening | NSPCC Learning](#)

**Dependant on where the young person lives (this can be determined via consent forms or speak to DSO for advice)**

### **Hampshire and IOW**

the Inter-agency Referral Form should be used when making a referral. For urgent Child protection enquiries, professionals can telephone: 01329 225379.

### **Portsmouth**

Tel: 023 9268 8793

Email: [pccraduty@portsmouthcc.qcsx.gov.uk](mailto:pccraduty@portsmouthcc.qcsx.gov.uk)  
Out of Hours (5:00pm – 8:30am): 0300 555 1373

### **Southampton**

Southampton Professionals should complete the online referral form or contact the Children's Resource Service on 02380 83 3004 (Monday to Thursday 8.30am to 5pm and Friday 8.30am to 4.30pm) or 02380 23 3344 (weekends, bank holidays and outside of office hours)

**In all cases, consider the welfare of the young person who has disclosed as the highest priority.**

If there is a concern the young person is in immediate danger:

- Contact the police and explain the situation to them.
- Stay with the young person.
- If necessary, move to a safe place away from immediate harm and that no situation arises which could cause any further concern.
- Call an ambulance if the young person requires urgent medical attention.
- Contact your DSO to let them know what is happening and ask for further advice and guidance.
- Make a factual record of events as soon as possible, phone MASH and follow up with an interagency referral form.
- Do not investigate further or take any further action unless authorised to do so. The police or social care will now take appropriate action and anything you do without their authorisation may harm an investigation.

If a young person is not in immediate danger but a disclosure has been made:

- Make a factual record of events as soon as possible, phone MASH and follow up with an interagency referral form.





- Do not investigate further or take any further action unless authorised to do so. The police or social care will now take appropriate action and anything you do without their authorisation may harm an investigation.
- Notify the DSO

If the concern relates to a staff member, the LADO of their registered place of work should be contacted (the details can be found on the Children's Local Partnership Board website).

### Children's Services

Children's Services are a department in your local council and their job is to ensure young people are safe, looked after and aren't suffering from abuse and neglect. They do this by providing services for children and families who need support. Social services will get involved if they have significant worries about a child's safety and will do what they can to ensure the child is safe and looked after.

### Local Safeguarding Children Board (LSCB)

The LADO co-ordinates the investigations and reviews the actions as necessary. They record all the information and actions ensuring where necessary that individuals are reported to regulatory bodies. outlines the roles, responsibilities and procedures for managing allegations of abuse made against adults who work with children and young people.

### Multi Agency Safeguarding Hub (MASH).

The purpose of a MASH is to bring together different agencies to enable fast information sharing with the purpose of making an efficient and fast decision to safeguard vulnerable children. The MASH setting allows professionals to efficiently and quickly gather and process information in order to assess risk. Because of this, multi-agency partnership and coordination professionals are better placed to make correct, appropriate, and proportionate decisions when it comes to child safety.

### The following charities and agencies offer useful support and guidance:

**NSPCC** - A registered charity established to prevent cruelty to children. They have a help line for concerns about a child's welfare 0800 800 5000 [NSPCC | The UK children's charity | NSPCC](#)

**Child exploitation and Online Protection (CEOP)** - Investigates inappropriate online behaviour such as grooming online or sexual exploitation 0870 000 3344 [CEOP Safety Centre](#)

**Whistleblowing advice line** from NSPCC 0800 028 0285

**Disclosure and Barring Service (DBS) Advice line** for criminal records checks 03000 200 190

**Local authority children's social care (England)** Use the following website to find out the details <https://www.gov.uk/report-child-abuse-to-local-council>

**Children England** – A registered charity created by other charities aimed at creating a society where all children and young people are valued, protected and listened to, their rights are realised and families are supported [Children England](#)





The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- The Police Act 1997
- Protection of Children Act 1989/2004
- Management of Health and Safety at Work Regulations 1999
- The Human Rights Act 1998
- Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012 -The Protection of Freedoms Act 2012 is of particular importance as all decisions made to bar individuals from working with children or adults are now made by the Disclosure and Barring Service (DBS) under this legislation.
- GDPR and data protection act 2018
- Modern slavery act 2015
- DA act 2021
- Working together 2018
- Mental capacity act 2004

## 12. Review

This policy and related procedures will be reviewed and updated to reflect changes in legislation that would require #BeeWell to amend its policy and procedures. Initially, this policy will be reviewed six monthly.

