# 5. Child Safeguarding and Protection

#### 5.1 Overview, Definitions and Designated Leads

Tokotoko Solutions ensures a safeguarding culture in our workplace. We place a child's rights, safety and dignity at the forefront of every decision. Tokotoko Solutions ensures the safety and security of all children by practising open and accountable child-centred decision-making. Our child protection policies apply to all staff, contractors, board members and volunteers. It is designed to be used in conjunction with all other policies.

- We acknowledge that child protection is everyone's responsibility, and we promote our child protection policies to our community.
- We take concerns about the safety of children and young people seriously and respond to them quickly.
- The welfare of children is paramount for all decisions. Our child protection policies apply to all staff, contractors, board members, and volunteers.

The 'designated lead' is the staff member(s) with training to be the primary contact person for advice or concerns about a child - including concerns about abuse or neglect. Our current designated leads (as of January 2025) are:

Isopo Samu (Director)

- samu@tokotokosolutionsltd.co.nz

- 021 442 221

Arahia Nathan (Alt Ed Coordinator) - admin@tokotokosolutionsltd.co.nz

- 09 5533 764 ; - 021 950 346 (work mobile)

#### **Definitions**

#### **Child Abuse**

"Child abuse means the harming (whether physically, emotionally, or sexually), ill-treatment, abuse, neglect, or deprivation of any child or young person" (section 2 Oranga Tamariki Act 1989).

#### **Child Protection**

The actions taken to ensure the safety of a child or young person in cases where there is abuse or neglect.

#### **Cumulative Harm**

This refers to the effects of patterns of circumstances and events in a child or young person's life, which diminishes their sense of safety, stability and wellbeing. Cumulative harm is compounded experiences of multiple episodes of abuse or layers of neglect. Constant daily impact on the child or young person can be profound and exponential, covering multiple dimensions of their life.

#### Designated Person/Designated Lead

The person or people within an organisation who is responsible for providing advice and support to any individuals who is concerned about a child or wants advice about the Safeguarding and Child Protection Policy.

#### **Disclosure**

Information about abuse or neglect provided by a child, young person, parent, caregiver or any other person.

#### Neglect

Any act or omission that results in impaired physical/emotional functioning, injury or development of a child or young person.

#### Safeguarding

Keeping children safe through proactive and preventative actions.

## 5.2 Safeguarding Workplace

Tokotoko Solutions is a safeguarding workplace. We recognise that all adults who work with children have a responsibility to safeguard and promote their welfare. The public, employers, parents and whānau have the right to expect professionals working with children to behave to a certain standard, and to always maintain the safety, and protection, of children. When individuals accept a role that involves working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

#### We require all of our staff to:

- Always act, and be seen to act, in the child's welfare and best interests.
- Avoid any conduct which would lead any reasonable person to question their motivation and/or intentions.
- Take responsibility for their own actions and behaviour.
- Consult, share and discuss relevant information in a timely way regarding any concerns about an individual child with Management or the Designated Lead.

#### Tokotoko Solutions will:

- Promote and foster a culture of openness and support, where staff feel confident that they can constructively challenge poor practice or raise issues of concern without fear of reprisal.
- Ensure that systems are in place for concerns to be raised.
- Ensure that there are effective recording systems in place which confirm discussions, decisions and the outcomes of any actions taken.
- Ensure that staff are not placed in situations which render them particularly vulnerable.
- Ensure that all staff are aware of the organisations expectations, policies and procedures.

#### Safety Checking

Tokotoko Solutions ensures that all staff working with children, both paid and voluntary, have been appropriately safety checked. Before making any appointment, Tokotoko Solutions will complete a robust safety checking process to ascertain the suitability and safety of an employee or volunteer to work with children and young people. Please see Section 3 for further information on our recruitment policies and processes.

#### **Training**

All staff will read and be provided with a copy of the Child Protection Policy.

We facilitate training and meetings for staff and volunteers (where applicable) to help them identify suspected harm and/or neglect and to be able to respond appropriately. From time to time, we liaise with Oranga Tamariki and the NZ Police, as well as guidance counsellors or educational psychologists including from Group Special Education (GSE), for ongoing training opportunities.

#### Safe Working Practices

Tokotoko Solutions believes that as far as possible, staff working with children and families should keep their personal and professional lives separate, and does not encourage close personal relationships or care-taking activities outside the work environment.

Staff are to inform their senior manager of any existing relationships with members, students, clients or their families which could constitute a conflict of interest, or place the staff member in a position of compromise. Please see Section 6 for further guidance on staff boundaries and limitations.

## **5.3 Identifying Suspected Abuse or Neglect**

It is important that all Tokotoko Solutions staff have an understanding of abuse and neglect, and how to identify the possibility of this occurring.

- Sexual abuse occurs when someone uses his or her power over the child, or takes advantage of the child's trust and respect, to involve the child in sexual activity.
- Physical abuse is non-accidental injury by somebody and also includes abusive administration of drugs or alcohol to a child.
- Emotional abuse is when a child's self-esteem is attacked by somebody to coerce the child into doing what the abuser wants them to do.
- Neglect and deprivation is a denial of the basic needs/rights of nurturing, food and shelter, so that the child fails to thrive.
  - Physical Neglect not providing the necessities of life.
  - Neglectful Supervision leaving children alone or without someone safe to look after them.
  - Emotional Neglect not providing the comfort, love and attention a child needs.
  - Medical Neglect failure to meet a child's health needs.
  - Educational Neglect- allowing chronic truancy, failure to enrol children in school, or inattention to their special education needs.
- Family violence is physical, emotional, sexual and other abuse by someone of a person with whom they have or have not had some form of intimate relationship with, such as marriage or

cohabitation, in order to maintain power and control over a person. It is important to be vigilant to any signs, particularly if children are being affected.

#### **Indicators**

Indicators are signs or symptoms that, when found either on their own or in various combinations, point to possible abuse, family violence or neglect. Indicators do not necessarily prove or mean that a child has been harmed. They are clues that alert that abuse may have occurred and that a child may require help or protection.

## These indicators may include:

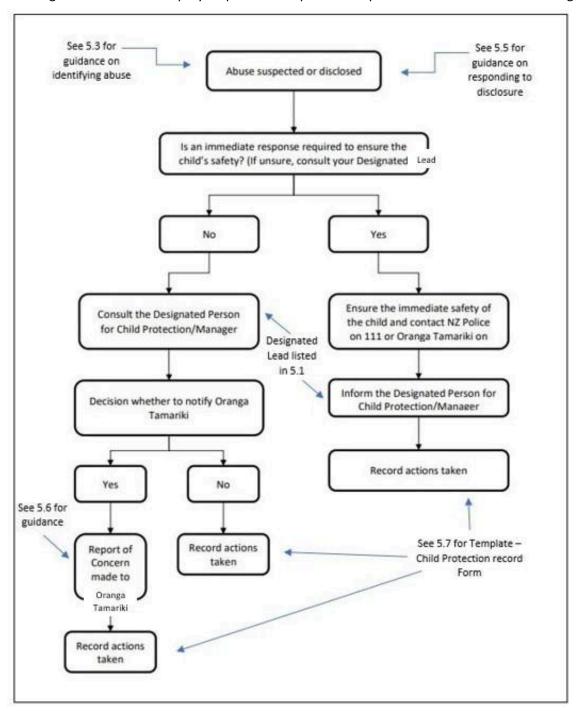
- Physical signs such as unexplained injuries, burns, fractures, unusual or excessive injuries
- Physical signs of neglect such as looking rough and uncared for, dirty, without appropriate clothing, hungry or underweight.
- Developmental delays e.g. small for their age, cognitive delays, falling behind in school, poor speech and social skills.
- Sleep problems, low self-esteem, obsessive behaviour, inability to cope in social situations, sadness/loneliness, evidence of self harm.
- Age inappropriate sexual interest or play, fear of a certain person or place, disengagement, neediness, eating disorders/substance abuse, or aggression.
- Disclosure a child talking about things that indicate abuse.
- Medical neglect such as persistent nappy rash or skin disorders, other untreated medical issues.

#### Indicators in parent/whanau behaviour include:

- Showing little concern for a child.
- Denying the existence of a child's problems at home or school.
- Blaming a child for their problems.
- Seeing the child as entirely bad, worthless, or burdensome.
- Demanding perfection that a child cannot achieve.
- Inability to prioritise a child's needs.
- Failure to keep/attend child related appointments.

#### 5.4 Responding to Suspected Abuse or Neglect

The following flowchart shows step-by-step how to respond to suspected or disclosed abuse and neglect.



If unsure whether the threshold for a formal report of concern has been met, staff are encouraged to consult with Oranga Tamariki. Consultations do not require identifying the child unless a formal report is made and help clarify the appropriate next steps.

## 5.5 Responding to a Child when the Child Discloses Abuse

It is important that Tokotoko Solutions staff have an awareness of how to appropriately respond to disclosures, particularly if they are working directly with children as a core children's worker.

Staff should never extensively question a child who has disclosed abuse, or who is displaying signs of possible abuse. However, it is important that a child is listened to and responded to appropriately.

Staff should also be aware that there are different types of disclosures, including indirect disclosure where comments are made in "roundabout" ways, and disguised disclosure, such as something that happened to "another child".

Listen to the child	Disclosures by children are often subtle and need to be handled with care, including an awareness of the child's cultural identity and how that affects interpretation of their behaviour and language.  Look at the child directly but do not panic or appear shocked, remain calm.  Do not seek help while the child is talking to you.  Ensure that cultural considerations are respected when interpreting disclosures, particularly when engaging with tamariki Māori and their whānau. Seek advice from cultural advisors or iwi liaison officers where necessary.
	Avoid making any promises to the child that may conflict with your obligation to report disclosures of abuse or neglect.
Reassure the child	Let the child know that they are not in trouble and have done the right thing. While reassuring the child it is important to keep in mind that you cannot agree 'not to tell anyone'.  Be aware the child may have been threatened.
Ask open ended prompts, e.g. "What happened next?"	Do not interview the child (do not ask questions beyond open prompts for the child to continue). Do not ask leading questions, make assumptions, or push for information.  Respond briefly, slowly, and gently.
If the child is visibly distressed	Provide appropriate reassurance and engage in appropriate activities under supervision until they are able to participate in ordinary activities.
If the child is not in immediate danger	Re-involve the child in ordinary activities and explain what you are going to do next.
	Let the child know you will need to seek help in order to help them.

	Do not make the child repeat the story unnecessarily.
As soon as possible formally record the disclosure	Record:  • Word for word, what the child said.  • The date, time, place, and who was present.  Consult the designated person for child protection as soon as possible.

## 5.6 Confidentiality, Information Sharing and Reporting

The safety and wellbeing of a child is more important than upholding the privacy of others. Provided the report/disclosure is made in good faith, no civil, criminal or disciplinary proceedings may be brought against the reporter. This is confirmed in Section 16 of the Oranga Tamariki Act 1989.

Section 15 reinforces that sharing information to others for the protection of a child is a justifiable breach of confidentiality, and where a vulnerable child is at risk of harm, is a legal duty.

Our guiding principles are:

- The child's safety is always the paramount consideration in the notification process.
- No decisions or actions in respect of suspected or actual child harm are to be made by any staff
  member in isolation unless there are concerns for the immediate safety of the child. A
  consultative approach is essential to ensure the safety of both the child and the staff member.
- For an urgent referral, call the police on 111.

#### 5.7 Internal Child Protection Record Form

Tokotoko Solutions has a Child Protection Record Form template to be completed by any staff who suspect abuse or neglect of a child within our care. It is a tool to assist with recording factual observations. Even if a Report of Concern is made to Oranga Tamariki, this form must be completed in addition for our internal records. The form can be found on the shared drive, and at the front desk, and captures the following information:

Date	
- 11	
Full name of person completing	
-	
form	
Contact number	
Contact number	
Email	
Eman	
	•

Information about the event	
Child's Full Name	

Age / date of birth:	
Name of parent / guardian	
Contact phone numbers	
Full Name of alleged abuser (if known)	
Date and time of incident	
Persons present at time of incident	

Factual observations about the incident	
Action taken	
Any other relevant information or observations	

Forms are updated securely onto our NOTED client management system.

## 5.8 Report of Concern - Oranga Tamariki

Below is the process to be followed if considering notifying Oranga Tamariki about suspected child abuse or neglect. Where possible, this should be led by the Child Protection Lead or Management Team.

Process to follow	Example	Key Considerations
Recording	Formally record in the Tokotoko Solutions Child Protection Record Form  • Anything said by the child. • The date, time, location and the names of any staff that may be relevant.	Relevant information can inform any future actions.

	<ul> <li>The factual concerns or observations that have led to the suspicion of abuse or neglect (e.g., any physical, behavioural or developmental concerns).</li> <li>The action taken by your organisation.</li> <li>Any other information that may be relevant.</li> </ul>	
Decision- making	Discuss any concern with the Manager/Director or the Designated Person.  Do not attempt to deal with the situation yourself.	No decisions should be made in isolation.
Notifying authorities	Notify Oranga Tamariki promptly if there is a belief that a child has been, or is likely to be abused or neglected. A phone call to the National Contact Centre is the preferred initial contact with Oranga Tamariki (see below) as this enables both parties to discuss the nature of the concerns and appropriate response options.  Phone: 0508 Family (0508 326 459)  Email: contact@ot.govt.nz  If there is an urgent, severe threat to the child's safety, call the police.	I. Make the decision to inform the parents or caregivers, in consultation with our organisation.  II. Advise what, if any, immediate action may be appropriate, including referring the concern to the Police.
Following the advice of Oranga Tamariki	Oranga Tamariki advice will include what, if any, immediate action may be appropriate, including referring the concern to the Police.	Oranga Tamariki is responsible for looking into the situation to find out what may be happening, whether our organisation needs to work with the family/whānau or put them in touch with people in their community who can help.
Storing relevant information	Securely store on NOTED:  The record of the concern. A record of any related discussions (including copies of correspondence, where appropriate).	Records assist in identifying patterns.

<ul> <li>A record of any advice received</li> <li>The action your organisation</li> </ul>	
took, including any rationale.	

## **Writing an Effective Report of Concern**

The quality of the information shared can make the difference between an individual of concern receiving the help they need or not. When making a Report of Concern, take time to plan the information you intend to include.

#### Key Information to Consider:

- Name, date of birth or approximate age, contact phone numbers and address if known.
- Names of any other children in the household/whanau/group/team as applicable.
- Names of any adults/caregivers/parents in the household/group/team.
- Name of the adult you are concerned about.
- Who, what, when, where, why and how of concern.
- Direct quotations/speech marks of the child.
- One-off or recurring incident?
- Body map of injuries if present.
- Record of how injury happened/other details if known.
- What have you done to safeguard or protect the child?
- Who else is aware of or shares your concern(s)? Have you spoken to the child's family of your concern(s)?
- If you have any reason to believe that a child will be at increased risk of harm as a result of submitting the Report of Concern, please ensure you highlight this concern in your report.
- Include your full name, job title or relationship to the child or young person. Also, your contact number and name of organisation.

In the interest of child protection, it is encouraged that staff include their details in the report. This provides the agency the option to contact the staff for more detail or clarification if necessary.

If a staff member still wishes to remain anonymous, they should clearly state why they wish to remain anonymous.

When there are serious concerns for the safety and/or wellbeing of a child, a Report of Concern (ROC) will be made to Oranga Tamariki – Ministry for Children.

#### Procedure:

- The staff member who has identified the concern must complete the Internal Child Protection Record Form and provide it to their Programme Manager.
- The Programme Manager or designated child protection officer will review the form, consult with management if necessary, and determine whether a formal ROC should be submitted.

- If a ROC is deemed necessary, it will be made via phone (0508 FAMILY 0508 326 459) or online via the Oranga Tamariki secure portal.
- A written ROC must be followed up with documentation confirming the details of the report.
- Tokotoko Solutions must request and retain an acknowledgment of receipt from Oranga Tamariki confirming that the ROC has been received and logged.
- This acknowledgment will be stored securely with the ROC and associated notes in the internal child protection file.
- Where possible, the child's whānau or guardians should be informed of the ROC unless doing so places the child at further risk.
- All information must remain confidential and only shared on a strict need-to-know basis, in line with the Privacy Act and Tokotoko Solutions confidentiality policy.

#### 5.9 Managing Allegations against Staff

Allegations, suspicions or complaints of abuse against staff will be taken seriously and reported to the Manager who will deal with them immediately, sensitively and expediently within the procedures outlined in this policy.

When there are suspicions of abuse by a staff member, both staff and children's rights are to be attended to. This means that the safety of the child is of first concern, and that the staff member must have access to legal and professional advice, in accordance with the Employment Relations Act.

In all child protection cases, Tokotoko Solutions will cooperate fully with both Oranga Tamariki and the Police in their investigations and assessments.

The following steps are to be conducted simultaneously:

#### Step 1: Reporting Procedure

- Document the disclosure or suspicion.
- Consult immediately with the director or other trusted staff member if the director is not available (or if the allegations are against them).
- The nominated person in charge should contact the police or Oranga Tamariki and should follow their advice. If advised to do so during this contact, complete a referral form.
- Ensure there is no further contact between the child and the person whom the allegation is against.

## Step 2: Process for Employee Investigation

- Initiate an initial investigation against the person whom the allegation is against.
- Avoid any action that compromises the investigations of the police or Oranga Tamariki.
- Notify the person of the allegation and advise of potential consequences.

- Consider whether it is appropriate for the person to continue to remain on the premises (follow advice).
- Advise the person of their rights to seek support.
- Ensure records are kept of any comments relating to the allegations as well as the follow up actions taken.
- The Director will need to determine whether they will defer or proceed with the employee investigation while the police do their preliminary investigation.
- The Director/Management will work with police and/or OT to follow appropriate procedures and for guidance and how/when to notify affected parties.

#### 5.10 Working Guidelines for Staff Working with Children

This section, though not exhaustive, is designed to provide practical advice to all Tokotoko Solutions staff working with children, to ensure best practice and appropriate working practices are maintained. The topics listed below are commonplace situations that can arise during work as a Tokotoko Solutions Youth Worker, Specialist Teacher, and Navigator.

## Communication with Children, Including Use of Technology

All interactions with children and young people need to be carefully considered and planned in order to ensure these occur in ways that reduce potential risk to children.

Adults should clearly understand the need to maintain appropriate professional boundaries in their communication with children, and expectations around boundaries need to be firmly established to provide guidance to adults. These situations include communicating with children at work, at home, in public settings and through the use of mobile technology and social media.

This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Children are at increased risk of sexual abuse and exploitation where adults have the opportunity to gain access to children and young people in a setting that is not open to casual observation by other adults.

Adults should also be careful when it comes to their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.

#### Guidelines:

- Ensure that their communication with children takes place within the boundaries of a professional relationship and that it is open to scrutiny from other adults.
- Have no secret social contact with children or their parents.
- Take care that their language or conduct does not give rise to comment or speculation.
- Be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations.
- Consider the appropriateness of the social contact according to their role and the nature of their work and always have any contact approved by senior colleagues.
- Report and record any situation, which may place a child at risk or which may compromise the service or their own professional standing.

- Be aware that the sending of personal communications, such as birthdays, should always be recorded and/or discussed with a manager.
- Understand that some communications may be called into question and need to be justified.
- Never use or access the social networking sites of children.
- Do not give their personal contact details to children, including their mobile telephone number.

#### Confidentiality

Adults may have access to confidential information about children in order to undertake their everyday responsibilities. This may be highly sensitive and private information about them or their family and whānau. Care and consideration must be taken with the sharing of information. It is important that if a child is at risk of, or suffering, abuse then that information is passed to the appropriate person to take action.

#### Day Trips, After Hours Activities, and Overnight Camps

Adults should take particular care when supervising children on trips and outings, where the setting is less formal than the usual workplace. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries. Where out of workplace activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, young people, adults and parents should be informed of these prior to the start of the trip. In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/child ratios and to the gender mix of staff especially on overnight stays.

Tokotoko Solutions must maintain Level 2 Social Services Accreditation to offer any overnight excursions for youth mentoring services.

#### **De-Escalation and Physical Restraint**

See Policy in Section 6.

#### First Aid and Administration of Medication

Some children may need medication to be administered while in the care of Tokotoko Solutions. In circumstances where children need medication regularly a health care plan should be drawn up to ensure the safety and protection of children and staff. With the permission of parents, children should be encouraged to self-administer medication or treatment including, for example any ointment, sun cream or use of inhalers. Staff are discouraged from administering injections and where possible this should be done by the child/young person or whanau. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents and caregivers should always be informed when first aid has been administered.

Staff administering first aid must have a current NZ First Aid Certificate.

#### Infatuations

Occasionally, a child or young person may develop an infatuation with an adult who works with them. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own

behaviour is above reproach. An adult, who becomes aware that a child or young person is developing an infatuation, is required to discuss this at the earliest opportunity with a senior manager and the child's parent or caregiver so that appropriate action can be taken to avoid any hurt, distress or embarrassment.

#### **Intimate or Personal Care**

When working with young children, or children with disabilities or extra needs, it is sometimes required to provide care in intimate ways. Consideration needs to be given to meeting the child's needs in a sensitive and caring manner, whilst ensuring this is done in a safe way.

Some job responsibilities necessitate intimate physical contact with children on a regular basis, for example assisting young children with toileting, providing intimate care for children with disabilities or in the provision of medical care. The nature, circumstances and context of such contact should comply with professional codes of practice or guidance and/or be part of a formally agreed plan, which is regularly reviewed. The additional vulnerabilities that may arise from a physical or learning disability should be taken into account and be recorded as part of an agreed care plan. The views of the child should be actively sought, wherever possible, when drawing up and reviewing formal arrangements.

All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, ages and maturity, should be encouraged to act as independently as possible.

The emotional responses of any child to intimate care should be carefully and sensitively observed, and, where necessary, any concerns passed to senior managers and parents or caregivers.

#### **Physical Interaction with Children**

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and will in some circumstances be inappropriate. When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Appropriate physical contact in organisations will occur most often with younger children.

Tokotoko Solutions requires that all staff:

- Are aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described.
- Never touch a child in a way which may be considered indecent.
- Are always prepared to report and explain their actions and accept that all physical contact can be open to scrutiny.
- Do not engage in horseplay.
- Always encourage children, where possible, to undertake self-care tasks independently.
- Work within Health and Safety regulations.
- Are aware of cultural or religious views about touching and are always sensitive to issues of gender.

There may be occasions when a distressed child needs comfort and reassurance and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for example after a

fall, or following separation from a parent. Adults should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

#### **Photo Consent**

Working with children may involve the taking or recording of images. Informed written consent from parents or caregivers must be obtained before images are taken of children. A photo consent form can be obtained from the Tokotoko administration. All staff need to be aware that photos of children cannot be shared without this consent.

#### Separated Parents, Day-to-Day Care, and Guardianship

Day to day care arrangements for children can be agreed to informally, recorded in a formal agreement, or determined by a parenting order from the Family Court. Parents and/or guardians are responsible for informing the organisation if there are any changes to day to day care arrangements for a child. It is not the job of Tokotoko Solutions to resolve any disputes over the rights of separated parents regarding their child.

It is very important that family contact details are kept up to date. Information about family contact details, including any court orders or formal agreements, will be shared with the main mentor/teacher, administration, and any other key staff personnel as determined by the Manager. All personal information is managed in accordance with the Privacy Act.

#### The Use of Personal Living Space

No child or young person should be invited into the home of an adult who works with them. It is not appropriate for any organisation or service to expect, or request, that private living space be used for work with children. Under no circumstances should children assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.

## **Transporting Children**

Working at Tokotoko Solutions may involve transporting children and young people.

Adults who are expected to use their own vehicles for transporting children should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the manager and has been agreed with the parents and caregivers. There may be occasions where the child or young person requires transport in an emergency situation or where not transporting the child may place the child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/caregivers.

Children under 14 years of age must sit in the backseat if space is available. Children under 7 years of age must be in appropriate child restraints. Please see the Tokotoko Solutions Vehicle Policy for further information.

### **Further Resources**

## NZ Support Services:

https://safeguardingchildren.org.nz/wp-content/uploads/2020/09/Support-Services SC-Resource.pdf

## Information Sharing Provisions:

 $\frac{https://safeguardingchildren.org.nz/wp-content/uploads/2021/03/3.6.2\_Information-Sharing-Provisions}{-OT.pdf}$ 

## **Review Details**

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Review Date	January 2025
Reviewed By	Charlotte Moss
Review Cycle	Annually or as required
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