



# Safeguarding Children and Young People Policy and Procedure

Owner: Hfh  
Date: March 2025

## Contents Page

Policy Statement.....	2
Our Commitment.....	2
Monitoring and Continuous Improvement .....	3
Definitions and Jargon .....	4
Safeguarding Children and Young Persons Dos and Don'ts .....	6
Roles and Responsibilities.....	7
Child and Young Person Safeguarding Procedure Guide .....	8
Introduction .....	8
Types of Child Abuse.....	8
Possible Signs of Abuse .....	10
Perpetrators of Child Abuse.....	11
How to Report Concerns of Abuse.....	11
If the Perpetrator is a Member of Staff .....	12
Appendix 1: Reporting Child Abuse Contact Details .....	13
Appendix 2: Care Support Agencies .....	14
Appendix 3: Legislation and Policies.....	17
Legislation.....	17
Policies .....	18
Document Information Sheet .....	19

# Policy Statement

## Our Commitment

1. Home from Home Housing Association (HfH) is committed to providing high-quality customer services to all of our customers.
2. The purpose of this policy is to ensure that all staff, contractors and volunteers in contact with children and young adults take all reasonable measures to safeguard their welfare; and where there are concerns about the welfare of children and young persons, appropriate actions are taken to address these concerns.
3. The central aims of this policy covers.
  - The principles and values underlying the our approach to safeguarding of our customers and their families
  - The ways in which we do this
  - The steps we take to prevent abuse/harm taking place
  - The actions we take to deal with abuse/harm if it occurs and
  - How we learn from incidents of abuse to prevent reoccurrence.
4. We have a zero tolerance policy towards individuals who abuse adults, children and young people in any way.
5. We have a separate policy specifically dealing with Domestic Abuse, Safeguarding Adults and hence this policy and procedure guide should be read alongside these separate policies.
6. We will also provide a copy of this policy in another language/format on request as appropriate to our customers need.
7. In particular we welcome and value your feedback because, without it, we would not be able to learn from and correct our mistakes; similarly, it is good to know when we have got the service right. Hence, we view any feedback following consultation of this policy as a valuable resource to help improve our service offer and delivery, as we are committed to excellence in everything we do.

## Embedding Policy into practice

8. **HfH** will ensure that employees, contractors and volunteers fully understand and comply with these procedures within their day to day practice through training, monitoring and supervision. This will include as a minimum
- That all staff read and understand this policy and procedure guide
  - That new employees attend Safeguarding training during induction period
  - That all staff undertake an annual e-learning refresher

### **Monitoring and Continuous Improvement**

9. This policy will be monitored by HfH's CEO and a report giving an overview of safeguarding incidents will be reported to the HfH Board on a quarterly basis. The Board will be responsible for ensuring any service improvement or learning as a result of all safeguarding incidents and/or near misses.

## Definitions and Jargon

- **Child:** an individual up until the age of 18 years old
- **Child protection:** The process of protecting individual children identified as either suffering, or at risk of suffering, significant harm as a result of abuse or neglect.
- **Child protection enquiry:** Section 47 of the Children Act 1989 gives LA children's social care a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.
- **Child safeguarding:** England has guidance that supports the legislation which aims, as a minimum to:
  - **Protect** children from maltreatment
  - **Prevent** impairment of children's health or development
  - Ensure that children are growing up in circumstances consistent with the provision of **safe and effective care**
  - Take action to enable all children to have the best outcomes
- **Children In Need:** Children in need are a legally defined group of children (under the [Children Act 1989 \(opens in a new tab\)](#)), assessed as needing help and protection as a result of risks to their development or health. This group includes: those on child in need plans, those on child protection plans, children looked after by local authorities, care leavers and disabled children. Children in need also include young people aged 18 or over who continue to receive care, accommodation or support from children's services, and unborn children.
- **Care order:** A court order under s.31 of the Children Act 1989 placing a child in local authority care to protect the child from harm they are suffering or may suffer, whilst under the care of his/her parent (and/or being beyond a parent's control).
- **Care Leavers:** A care leaver who is aged between 18 - 25 and looked after by Children's Services on or after their 16th birthday but no longer being looked after will still be eligible for Advice and assistance from Children's Services and help with accommodation during holidays if in higher education away from home In exceptional circumstances the Local Authority may provide assistance with housing or financial support; however, qualifying care leavers are usually responsible for their own accommodation and living costs
- **Common Assessment Framework (CAF):**The CAF is a standardised approach to conducting an assessment of a child's additional needs and deciding how those needs should be met. It can be used by practitioners across children's services in England. The CAF is intended to provide a simple process for a holistic assessment of a child's needs and strengths, taking account of the role of parents, carers and environmental factors on their development.
- **Disclosure and Barring Service (DBS):** The DBS has a role within the Government's Vetting and Barring Scheme to make independent barring

decisions and place or remove individuals on either the Children's Barred List or the Vulnerable Adult's Barred List, or both.

- **e-CAF:** An IT system to enable common assessment information to be shared securely with other agencies London-wide.
- **Looked After Children:** A child who has been in the care of their local authority for more than 24 hours is known as a looked after child. Looked after children are also often referred to as children in care, a term which many children and young people prefer.
- **Powers of Police protection:** Section 46 of the Children Act 1989 giving the police powers to protect a child from harm by removing the child to suitable accommodation or preventing a child from being removed (e.g. from hospital).
- **SEND Child:** A child who has special educational needs and disabilities. Adults who work with children and young people with SEND should be aware of the additional needs children may have that could mean they are more vulnerable to abuse and/or less able to speak out if something isn't right.

## Safeguarding Children and Young Persons Dos and Don'ts

### Do

- ✓ Remember that safeguarding is **everyone's responsibility**
- ✓ Remember that any child or young person under 18 that is at risk or being abused applies to this policy
- ✓ Ensure that dignity, safety and wellbeing of individuals is a priority.
- ✓ Discuss any concerns about the welfare of child young person, with your manager straight away
- ✓ Take personal responsible for any action or omission that would knowingly cause offence or risk to others
- ✓ Co-operate with safeguarding investigations to ensure that lessons are identified
- ✓ Fully support any customer that has been subject to abuse
- ✓ Do all you can to support HfH customers to prevent them from being abused
- ✓ Gain their consent prior to raising a safeguarding alert unless they lack mental capacity to make this decision for themselves

### Don't

- ✗ Ignore your concerns even if you are not sure whether abuse is actually taking place
- ✗ Ignore abuse even if it is carried out by your colleagues
- ✗ Ignore abuse even if it is carried out by other agencies e.g. care agencies, social workers etc
- ✗ **Do not** confront anyone who is alleged to be responsible for what has happened, and do not tell them that allegations have been made about them.

## Roles and Responsibilities

Job Role	Responsibility
<b>Board Members</b>	Board members are responsible for overseeing compliance of this Policy and Procedure Guide and reporting to the main HfH Board
<b>Chief Executive</b>	The Chief Executive is HfH's Safeguarding Lead and has overall responsibility for overseeing compliance with this policy and procedure guide.
<b>Tenant Scrutiny Panel</b>	Consulting on this policy and ensuring that guidance on Abuse of any kind and how to get help is provided to HfH Tenants
<b>Housing Manager</b>	<p>Is responsible for ensuring all staff, contractors and volunteers fully comply with this policy and procedure guide and is</p> <p>Responsible for ensuring that employees attend the appropriate level of training for their role and must</p> <p>Report all safeguarding concerns to the CEO and Children's services</p>
<b>Housing Officer/volunteers/Contractors</b>	<p>Are responsible for complying with this policy and procedure guide and</p> <p>Report any safeguarding concerns to managers immediately</p> <p>HfH staff/volunteers must complete all appropriate training and competency assessment</p>

# Child and Young Person Safeguarding Procedure Guide

## Introduction

1. At HfH believes that all children and young people have a right to enjoy an environment that is safe, caring, happy and free from fear and abuse.
2. This procedure guide will ensure that HfH staff will identify possible signs of abuse and follow the correct and local safeguarding procedures if we suspect abuse is taking place.
3. Safeguarding should be undertaken proactively to reduce the need for protection from harm. Safeguarding is a shared responsibility as children and young people are only safeguarded when all relevant agencies and individuals accept responsibility and co-operate with one another.
4. The wishes and feelings of children and young people are vital elements in assessing risk and hence their views should always be sought and given weight, according to the understanding of the child. However, it remains the adults' responsibility to take action to ensure the child's safety.
5. **Please note** that although the definition of a child is up to the age of 18, they may still be eligible for Children's Services up to the age of 25 if they are defined as a SEND child and/or Care Leaver still in education.

## Types of Child Abuse

6. Abuse can take many forms and it may be regarded not only as the commission or omission of an act, but also as the threat or risk of such. If a child/ young person is led to believe that they will be abused this is in effect the equivalent of the abuse taking place.
7. **Physical abuse** is non-accidental harm to a person caused by the use of force, which results in pain, injury or a change in the person's natural physical state. Some examples are hitting, shaking, slapping, pushing, kicking and rough handling.
8. **Sexual abuse** includes rape and sexual assault or sexual acts. It may include non-contact activities, such as grooming, inciting a child/ young person to be sexually active, or viewing inappropriate images.

9. **Emotional abuse** is behaviour that has harmful effect on a child/ young person's emotional health and development. It can include conveying to the child/ young person that they are unloved, worthless or valued only insofar that they meet the needs of another person; or inappropriate expectations of the child/ young person in terms of their age or development. Emotional abuse may include the use of threats, humiliation, intimidation, coercion or verbal abuse, and bullying.
10. **Neglect** is the persistent failure to meet a child/ young person's basic physical and/or psychological needs, and is likely to result in the serious impairment of their health or development. It can include failing to provide adequate food, shelter and clothing; failure to protect the child or young person from harm; or neglect of, or unresponsiveness to basic emotional needs.
11. **Bullying:** or cyberbullying (see below) of children at school or elsewhere, usually repeated abuse over period of time and can cause physical and/or emotional harm. It can happen on the web and through chat rooms and social networks and media platforms.
12. **Cyberbullying:** is bullying with the use of digital technologies and now becoming more prevalent. It can take place on social media, messaging platforms, gaming platforms and mobile phones. It is repeated behaviour, aimed at scaring, angering or shaming those who are targeted. Examples include:
- spreading lies about or posting embarrassing photos or videos of someone on social media
  - sending hurtful, abusive or threatening messages, images or videos via messaging platforms
  - impersonating someone and sending mean messages to others on their behalf or through fake accounts.

For more information on cyberbullying follow the link below:

<https://www.unicef.org/end-violence/how-to-stop-cyberbullying#2>

13. **Female Genital Mutilation (FGM):** Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.
14. **Child Trafficking:** Children are groomed and forcibly moved or transported and then forced to work or sold. Children may be trafficked for:
- sexual abuse
  - forced marriage

- domestic servitude
- forced labour
- criminal activity
- Many children are trafficked into the UK from abroad but children may also be trafficked around the UK.

15. **Grooming:** groomed online Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

16. **Radicalisation:** Radicalisation is the process through which a person of any age comes to support or be involved in extremist ideologies. It may involve being groomed on line or in person, exploitation including sexual exploitation, psychological manipulation, exposure to extremist materials.

## Possible Signs of Abuse

17. Some of the more obvious signs of abuse may include the following:

- Unexplained or repeated injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- Someone else expresses concern about their welfare.
- Unexplained changes in behaviour (e.g. becoming very quiet, withdrawn or displaying sudden outbursts of temper).
- Appears anxious or frightened.
- Engagement in sexually explicit behaviour.
- Difficulty in making friends or is prevented from socialising with others.
- Displays variations in eating patterns including overeating or loss of appetite.
- Loses weight for no apparent reason; frequently hungry.
- Becomes increasingly dirty or unkempt.
- Changes in style of dress
- Very low self-esteem.
- Self-harming behaviour.
- Making explicit extremist views/ visiting extremist websites.
- Spending increasing amounts of time talking to people with extreme views.

## Perpetrators of Child Abuse

18. Abusers can be anyone but in the context of our service, the following are in positions of trust and have access to children:

- Parents/ primary carers
- Other siblings
- Friends from school/clubs etc
- Relatives, aunts, uncles, grandparents, extended family members
- Friends of the family
- HfH staff and Managers
- Health, Social Services or other professional visitors
- Education workers - such as teachers, classroom assistants; caretakers
- Other HfH customers, children and adults
- Strangers

19. It should be recognised that this not a definitive list and the presence of one or more of the indicators is not proof that abuse is actually taking place. It is not the responsibility of staff to decide that abuse is occurring but it is their responsibility to act on any concerns by reporting it.

## How to Report Concerns of Abuse

20. Everyone working for HfH has a responsibility to report their concerns to ensure all children and young people are safe. If you are concerned that a child is suffering harm or is likely to suffer harm from another person you have a responsibility to protect the child by reporting your concern to a line manager/colleague immediately.

21. There are many forms of abuse and some are less clear than others, although this does not mean that they are less harmful. You are expected to heed your 'gut feeling' and to trust your instincts. What you see and what you know about a child is important and should be acted on and reported to Children's Services as soon as possible. (see Appendix 1)

22. The child or young person may already be known to the statutory services, especially if they are Care Leavers, SEND children or Looked After Children, (See Appendix 2 for Care and Support Agencies) and staff may be required to provide information or work together with these agencies to prevent or stop abuse from taking place.

23. In relation to Radicalisation the NSPCC also has a Radicalisation Helpline<sup>1</sup> to help you get more information and what you can do to alert the authorities if you are concerned.
24. If a customer leaves whilst we still have concerns for a child or young person in their care, they will be encouraged to contact Social Services and other agencies for support and help. If they do not agree to do so, we will give their details and forwarding address to the relevant Social Services department.
25. Follow up work may be offered with the child and carer concerned. This will be carried out in conjunction with the Social Services Department if they have become involved.
26. Please note that in all cases you must **not** attempt to investigate the matter yourself. Staff and volunteers are not equipped or qualified to do so.
27. **Do not** confront anyone who is alleged to be responsible for what has happened, and do not tell them that allegations have been made about them.

## **If the Perpetrator is a Member of Staff**

1. All staff have a responsibility to Whistle Blow if they suspect abuse is being carried out by another HfH member of staff. We have a duty to protect any staff member raising a concern about another member of staff through **The Public Interest Disclosure Act 1998**.
2. If any member of staff or volunteer is suspected of abuse of a child or young person, the member of staff will be removed from the situation and an investigation will immediately take place. If following this initial investigation it was felt that the child/young person is at risk, the member of staff will be suspended pending a full investigation.
3. Following a full investigation, if the member of staff is found guilty they will be disciplined appropriately. (Refer to the HfH Human Resources Manual).
4. We will ensure that we work in partnership with the local authority Children Services and inform them of our actions accordingly.

---

<sup>1</sup> <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/>

## Appendix 1: Reporting Child Abuse Contact Details

### **Newham Safeguarding Children & Young People**

Newham's Multi-Agency Safeguarding Hub (MASH) is a single point of contact for all safeguarding referrals for children. If you are worried about a child and you think they may be a victim of neglect, abuse or cruelty - please contact Newham's MASH below:

If your referral requires urgent attention, please contact Newham Contact Centre on 0208 430 2000, during day time and out of office hours, who will transfer you to the social work duty team.

In case of an emergency or you feel that a child is at immediate risk, please also call 999 and request support from the police.

For general advice or concerns you can contact the MASH (Multi-Agency Safeguarding Hub) on 0203 373 4600.

If you are making a referral on behalf of a parent and the child does not have a social worker, you would need to complete an online referral form by using the link below:

[Request support or protection of a child](#)

***If you are unable to get through to the MASH on the telephone number above in urgent matters, please send an email directly to: [mash@newham.gov.uk](mailto:mash@newham.gov.uk)***

## **Appendix 2: Care Support Agencies**

Everyone working with children and young people have a duty to keep them safe. The agencies which have a legal right to intervene if child abuse is suspected are Social Services, the Police and the National Society for the Prevention of Cruelty to Children (NSPCC). When different agencies and professionals share information and work together effectively they can protect children and young people from harm as well as safeguard their welfare. Once a child's name is placed on the child protection register it is essential that agencies and professionals remember that they are all responsible for implementing a plan to protect the child.

### **Social Worker**

The job of the social worker is to safeguard and promote the welfare of children. They work with families/carers and with other professionals to keep children safe and healthy. They may become involved with families/carers due to poverty, child abuse, mental health problems, disabilities or conditions such as ADHD (Attention Deficit Hypersensitivity Disorder). Their job includes doing their best for the family and keeping it together if possible.

### **Police**

The police work alongside other agencies to share the information it has. If records have been kept for adults involved with the child in question the police will need to check those records and specifically identify whether there is a history of unlawful treatment and drugs or alcohol. They will also need to consider any history of violence including domestic abuse, sexual offences and any other matter relevant to the welfare of the child. The police will share information with other agencies in child protection conferences.

### **National Society for the Prevention of Cruelty to Children (NSPCC)**

This is a voluntary organisation with a statutory right to apply for a court order to safeguard children. It has a team of social workers who work together with local social workers. Its goal is to prevent abuse and it works with those children who are most vulnerable. NSPCC staff and volunteers go into schools regularly to give information to children about keeping safe from harm and the importance of speaking to someone if someone is hurting them.

### **Local Safeguarding Children Boards**

In accordance with the Children Act 2004 all local authorities in Wales are required to establish a Local Safeguarding Children Board. As a result, they will be able to keep order and monitor the work of other agencies as well as ensuring that everyone works together effectively to safeguard and promote the welfare of children and their families/carers. This will all comply with local policies and procedures.

### **Health Visitors**

Health Visitors carry out several functions including supporting and advising families/carers. For example, if a mother is suffering from postnatal depression they can help her and ensure that she is getting the right care and accessing the services which are available to support her. In caring for a family they can come across problems including child abuse. They are in a good position to identify which children are suffering or are likely to suffer neglect or harm as they monitor the growth and development of children. They work with families/carers with children on the child protection register as well as providing support to victims of domestic violence. Health visitors often have the closest contact with the family/carers in the home and they can build good contacts with other agencies which are beneficial to children.

### **Medical Staff**

Medical workers will collect all the relevant medical information and prepare written reports on children, young people and adults if necessary. When children visit the surgery regularly staff can see when a family/carers is under pressure and discover whether there are any signs of abuse or neglect. They have a responsibility to pass on this information to social services and take appropriate action to safeguard the welfare of the child.

### **Care and Educational Staff**

Staff in early years and childcare settings observe children regularly. They have a clear understanding of the stages of child development and can recognise the signs of abuse or neglect. They collect and check all relevant records, including the child's school attendance and any matter they feel is important to record for the welfare and protection of the child. They prepare written reports.

### **Child Psychologist**

Psychologists deal with problems relating to emotional, social and intellectual development. They assess children and help them to deal with stress in their lives such as family break ups, a death in the family and abuse. They assess children and take into consideration their circumstances. They discuss their findings with the family/carers and other professionals. They are trained to be able to give a diagnosis

for children with mental disorders and treat them through counselling sessions or behavioural therapy.

### **Youth Justice Service**

In accordance with the Crime and Disorder Act 1998 all local authorities have a responsibility to establish and maintain a Youth Justice Service. The Justice Service is a multi-agency partnership which works together with the police and the national probation service to provide intervention and support for young people 10-18 years old and their families/carers. One of its aims is to prevent antisocial behaviour where young people regularly break the law. They try to meet the needs of the young people and prevent them from re-offending. This can be done by providing intervention programmes resulting from a court order and by implementing these actions sooner there is more hope of preventing regular offending.

### **Probation Service**

Probation officers are responsible for supervising offenders. If they are concerned for the safety of a child living in the same house as the offender they can contact social services immediately. They also work in prisons, courts, hostels and day centres across the country. Their goal is to change the way the offender lives and challenge their behaviour, which may prevent them from re-offending. They also arrange counselling sessions for offenders suffering drug or alcohol addiction.

## Appendix 3: Legislation and Policies

### Legislation

- **The Public Interest Disclosure Act 1998:** As a whistleblower a person is protected by law; they should not be treated unfairly or lose their job because they have blown the whistle on another member of staff or external practitioner who may have abused an individual
- **Human Rights Act 1998:** gives effect to the human rights set out in the European Convention on Human Rights. These rights are called 'Convention' rights. Examples of Convention or human rights include: the right to life, the right to respect for private and family life, the right to freedom of religion and belief.
- **Care Act 2014:** The act helps to improve people's independence and wellbeing through limiting the impact and exposure to abuse and neglect. It makes clear that local authorities must provide or arrange services that help prevent people developing needs for care and support or delay people deteriorating such that they would need ongoing care and support. It replaced 'No Secrets' 2000.
- **Mental Capacity Act 2005:** The Mental Capacity Act (MCA) is designed to protect and empower people who may lack the mental capacity to make their own decisions about their care and treatment. It applies to people aged 16 and over.
- **Equality Act 2010:** The Act legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single act.
- **Sexual Offences Act 2003:** This act aimed to include more offenses described as sexual offenses and a greater focus on consent.
- **Modern Slavery Act 2015:** Consolidated all trafficking and slavery offences into one piece of legislation. It provides the tools to fight modern slavery and ensures perpetrators receive suitably severe punishments for their crimes, plus enhances support and protection for victims
- **Children and Families Act 2014:** This aims to ensure that children, young people, and their families are able to access the right support and provision to meet their needs.
- **Children's Act 1989/2004:** The act allocates duties to local authorities, courts, parents, and other agencies, to ensure children are safeguarded and their welfare is promoted. The Act is to promote (co-ordination) between multiple official entities to improve the overall well-being of children. The 2004 Act also specifically provided for further vulnerabilities, such as disabled children.

- **Criminal Justice and Immigration Act 2008:** Allows people who commit sex offences against Children abroad to face prosecution in the UK, even if that offence is not illegal in the foreign country in which it was committed.
- **Domestic Violence, Crime and Victims Act 2004 (as amended):** Closes a legal loophole, (whereby defendants in murder and manslaughter cases could escape conviction by claiming each other had killed the child), by creating a new offence of causing or allowing the death of a child or vulnerable adult. The offence establishes a new criminal responsibility for members of a household where they know that a child or vulnerable adult is at significant risk of serious harm.
- **Domestic Abuse Act 2021 :** Sets out to raise awareness and understanding of the devastating impact of domestic abuse and strengthens support from statutory agencies for victims of abuse. Please click on this link to see the full factsheet about [key components of the Domestic Abuse Act 2021](#).
- **Equality Act 2010:** The Act legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single act.
- **Female Genital Mutilation Act 2003 (as amended):** Extends the existing legislation criminalising female genital mutilation in the UK, by making it an offence for UK nationals or permanent UK residents to take a girl abroad, or to help others to take a girl abroad, to carry out female genital mutilation, even in countries where the practice is legal.
- **Forced Marriage Act (Civil Protection) 2007:** Gives courts the power to make orders to protect the victim or potential victim of a forced marriage and help remove them from that situation. Although this Act does not make forcing someone into marriage a crime, anyone found to be contravening a Forced Marriage Protection Order can be charged with a criminal offence.
- **Serious Organised Crime and Police Act 2005 (as amended)** Set up the framework for the UK-wide Child Exploitation and Online Protection (CEOP) Centre to be created. It also includes provisions for improving the vetting system to stop adults who pose a risk from working with children.

## Policies

- Equality and Diversity Policy
- Data Protection
- Incident and Accident Reporting
- Domestic Abuse
- Safeguarding Adults

## Document Information Sheet

<b>Policy or Procedure Title</b>	Safeguarding Children and Young People
<b>Version and Active Date</b>	Version: 01      Date: 03/03/2025
<b>Document Owner</b>	Hfh
<b>Consultation with Tenant Scrutiny Panel</b>	27/2/25
<b>Review Frequency</b>	At least every 2 Years
<b>Date of Last Review</b>	
<b>Date of Next Review</b>	03/03/2027