



## Staff Code of Conduct

This Policy applies to all current Employees of Super Stars Pre-school. This Code of Conduct is deemed to have been accepted as soon as a member staff commences employment. A copy will be issued as part of the induction process for new employees.

This Policy should also be adhered to by all volunteers / supply and agency workers engaged by the Pre-school.

### Part A: Policy

#### 1. Policy Statement

Super Stars Pre-school expects the highest standards of personal and professional conduct from all Employees.

As such the pre-school requires all Employees to act in a manner which reflects the value and ethos of the School.

Employees must ensure that their behaviour and actions are consistent with their position as a role model to children and other colleagues.

Employees must act with integrity, honesty and demonstrate ethical and respectful working practices towards children, colleagues, parents/carers and other members of the pre-school community.

All Employees have a responsibility to observe appropriate professional boundaries and act at all times in a manner which safeguards and promotes the welfare of the children.

Employees must disclose any relevant information which may impact on their job role or suitability to work with children or in a pre-school setting.

The pre-school requires Employees to adhere to all policies and observe the highest standards of business/financial practice.

Each Employee has an individual responsibility to act in a manner which upholds the pre-school's interests and protects its reputation.

Employees are accountable for their actions and conduct and should seek advice from the Manager/Owner if they are not sure of the appropriate action to take.

Employees should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action including dismissal.

This policy explains the pre-school's expectations with regards to the conduct of Employees in the following areas:

- Professional conduct
- Safeguarding
- Use of ICT & Social Media
- Business conduct

#### 2. Responsibilities of the Pre-school

- Explain the provisions of the Code of Conduct to Employees and signpost Employees to other relevant policies, document and guidelines
- Provide additional advice and guidance to Employees in relation to queries they may have regarding the application of the Code of Conduct
- Coach, support and provide feedback to Employees on their performance in relation to the required standards of conduct

- Take appropriate action at the earliest opportunity to address breaches of the expected standards of conduct

### **3. Responsibilities of the Employee**

- To read, understand and comply with the Code of Conduct at all times
- To use this code of conduct, alongside other relevant policies and procedures, to guide them in their role
- To seek guidance from the Manager (or Owner in the case of the Manager) if they are unclear about the conduct or actions expected of them
- To alert the Manager (or Owner in the case of the Manager) at the earliest opportunity if they are aware that they have conducted themselves in a way which may have breached the expected standards of conduct

### **4. Reference to Other Sources of Information**

This Code of Conduct is not exhaustive and does not replace the general requirements of the law, common sense and good conduct.

All employees must also ensure they have read, understood and comply with Part 1 of Keeping Children Safe in Education (2022).

Staff must also have due regard to other professional codes, policies and guidance which may be relevant to their specific role.

## **Part B: Professional Conduct**

### **5. General**

Employees are expected to demonstrate consistently high standards of personal and professional conduct.

Employees are required to work in a diligent and conscientious manner.

Employees are expected to work to the requirements of their job and are required to respect managerial authority and follow reasonable instructions.

Employees must conduct themselves in a manner which reflects the ethos and values of the Pre-school and adhere to Pre-school policies and procedures at all times.

Employees should ensure they work their contracted hours and are expected to maintain a high level of attendance and punctuality.

It is appreciated that it is sometimes difficult to make appointments such as with Doctors or Dentists at a time that is convenient for both the employee and the setting. In most cases the pre-school requires you to make appointments in your own time, however, in cases where this is not possible, appointments must be scheduled (as far as possible) at the beginning or end of a shift and agreed with the manager.

### **6. Honesty and Integrity**

Employees must maintain high standards of honesty and integrity in their work.

Employees should not behave in a manner which would call into question their motivation or intentions.

During the course of their work Employees should ensure they do not:

- Willfully provide false / misleading information
- Destroy or alter information / records without proper authorisation
- Withhold information or conceal matters which they could reasonably be expected to have disclosed

- Misrepresent the School or their position
- Accept or offer any form of bribe / inducement or engage in any other corrupt working practice

Should an Employee become aware of any conduct on the part of a colleague which raises concerns regarding health and safety, safeguarding or criminal activity – they have a duty to disclose this.

Allegations concerning fraudulent, dishonest or corrupt practices or the falsification or withholding of information may be addressed as a disciplinary matter.

## **7. Setting an Example**

Pre-school Employees are role models and must adhere to behaviour that sets a good example to all the children and work colleagues within the Pre-school and is appropriate in a pre-school setting.

This includes:

- Refraining from abusive or potentially offensive / discriminatory language or actions
- Demonstrating tolerance and respects towards others
- Observing boundaries appropriate to their role and a pre-school setting
- Ensuring any topics of conversation with children and work colleagues are suitable to the pre-school setting / curriculum
- Not undermining fundamental British values and refraining from allowing personal / political opinions to impact on the discharge of duties and/or unduly influence children
- Maintaining high standards of personal presentation, attendance and punctuality

Should Employees be in doubt about the appropriateness of their behaviour they should seek guidance from the Manager (or Owner in the case of the Manager). Breaches of expected behaviour may be considered under the disciplinary procedure.

## **8. Confidentiality**

Employees may have access to confidential or sensitive information about the children, parents, colleagues or the business and operation of the Pre-school as part of their job role.

Such information must not be disclosed to any person who is not entitled to have access to this or legitimately needs it for work purposes.

Specifically, all Employees must:

- Work in accordance with the requirements of the General Data Protection Regulation (2018) and associated legislation
- Observe the Pre-school's procedures for the release of information to other agencies and members of the public
- Not use or share confidential information inappropriately or for personal gain
- Not speak inappropriately about the pre-school community, the children, parents, staff or owner including discussing incidents, operational or employment matters with parents / members of the public
- Ensure all confidential data is kept secure and password protected

Should Employees be in doubt about the appropriateness of sharing information they should seek guidance from the Manager.

*Policies to refer to: Confidentiality Recording & Sharing Information, Children's Records and Data Protection, Client Access to Records*

## **9. Working Relationships & Relationships with other Stakeholders / Community**

The Pre-school expects Employees to maintain positive and professional working relationships. Colleagues, the children, parents and other stakeholders should be treated with dignity and respect.

Employees should be polite and courteous in their interactions with the children, parents and other stakeholders or members of the Pre-school community.

Behaviour which constitutes bullying and harassment, intimidation, victimisation, discrimination or abuse of authority will not be tolerated and may be addressed via the Pre-school's disciplinary policy. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour with colleagues, the children and parents.

Employees should treat all stakeholders in a fair and equitable way and not behave in a manner which may demean, distress, offend or discriminate against others.

Employees should ensure that policies relating to equality issues are complied with.

Employees should be aware of the Pre-school's Complaint Procedure and address any concerns from parents, colleagues and other stakeholders in accordance with this document.

*Policies to refer to: Making a Complaint Policy*

## **10. Conduct Outside of the Workplace**

Employees must not engage in conduct outside of work which has the potential to:

- Affect or is likely to affect the suitability of the Employee to undertake their job role or work with children or in a Pre-school setting
- Impact on the operation or reputation or standing of the Pre-school
- Impact on the operation or reputation of the Pre-school's staff, parents, children, or other stakeholders
- Seriously undermine the trust and confidence that the Pre-school has in the Employee to undertake their job role or work with children or in a Pre-school setting

The above actions may be the subject of disciplinary action which could lead to dismissal.

## **11. Duty to Disclose**

All Employees have a duty to immediately disclose to the Manager (or Owner in the case of the Manager) prior to the start of their employment, at the start of their employment or during the course of their employment, any change in their circumstances or any information which may affect or is likely to affect the suitability of the Employee to undertake their job role or work with children or in a Pre-school setting.

This includes, but is not restricted to:

- the Employee being subject to any police investigation / enquiry, arrest, ban, charge, caution, reprimand, warning, fine or pending prosecution or criminal conviction. This includes any actions committed overseas which would be subject to a police investigation or formal action if such actions had been committed in any part of the United Kingdom
- the Employee being subject to the inclusion on the DBS Children's Barred List and any change in DBS status during employment, or any referral, made to, or any, investigation or proceedings being undertaken by the DBS
- the Employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by any other regulatory or professional authorities or actions of other agencies relating to child protection and/or safeguarding concerns
- the Employee being subject to any orders made in relation to the care of children, the refusal or cancellation of registration relating to childcare, or children's homes, or being prohibited from private fostering
- the Employee being subject to any 'live' disciplinary process, formal sanction or any other relevant information arising from a previous or current secondary employment / voluntary work which may impact on the Employee's suitability to undertake their role or work with children/young people or in a Pre-school setting. This includes substantiated safeguarding allegations
- the Employee's close personal relationships outside of the workplace presenting a 'risk by association' to the safeguarding of children.

This list is not exhaustive. Should an employee be unclear about whether it is appropriate to disclose a matter they are encouraged to seek guidance from the Manager (or Owner in the case of the manager) at the earliest opportunity.

Employees must also report any current or historical information in the public domain or which is likely to come into the public domain which may be of relevance to their job role or their suitability to work with children or in a Pre-school setting or matters which may be subject to adverse media attention or have a detrimental impact on the reputation of the School.

### ***How the school will respond to Employee disclosures***

Disclosures will be handled sensitively and discretely, and with regard to data protection considerations.

The Manager will consider carefully any disclosure which is made and the appropriate response.

This may result in a suspension from duties while an investigation / risk assessment takes place or Ofsted waiver application made (where applicable).

In instances where the information disclosed constitutes a risk to the safeguarding of the children or is incompatible with an Employee's job role or their suitability to work with children in a Pre-school setting, termination of employment may be considered.

Any failure to disclose any information required in the course of employment or any other information that may have a bearing on an individual's suitability to carry out their job role or work with children or in a Pre-school setting may be the subject of disciplinary action which could lead to dismissal.

## **12. Secondary Employment**

Employees should ensure that any external paid or unpaid work does not conflict with their duty to the Pre-school.

Employees must discuss with the Manager and obtain their consent before taking up additional paid / unpaid employment or engaging in any other business. If babysitting/childminding for parents out of pre-school hours it is understood it is a private arrangement between you and the parent, is undertaken at your own risk and has absolutely no bearing on or connection to Super Stars Pre-school.

Requests will not be unreasonably refused providing that:

- It does not affect or is unlikely to affect the suitability of the Employee to undertake their job role or work with children or in a Pre-school setting
- It does not conflict with the interests of the Pre-school or have the potential to bring the Pre-school into disrepute.
- There is no detrimental impact on an Employee's work performance or their own or others health and safety.
- Privileged or confidential information is not shared
- Work is undertaken outside of the Pre-school and of contracted hours of work
- The activity is not in direct competition with those of the Pre-school

It is an Employee's responsibility to monitor the hours they work and ensure they are rested and refreshed to be able to carry out their role. An average working week of 48 hours across all employments should not normally be exceeded unless the Employee has elected to opt out of the Working Time Regulations.

### **13. Dress and Presentation**

All Employees must ensure their dress, personal appearance and standard of personal hygiene is appropriate to the nature of their role in the Pre-school and promotes a professional image.

Dress should be appropriate to the activities an Employee is engaged in and any related health and safety requirements.

Suitable protective equipment must be worn where provided and appropriate.

Uniforms should be worn where provided. Clothes that reflect the uniform colour scheme of navy blue and grey can also be worn.

Clothes that expose areas of the body normally covered in the workplace are not allowed e.g. miniskirts, shorts, low cut tops and transparent clothing. Clothing with offensive or inappropriate designs, slogans or symbols are not allowed. Jeans can be worn provided they are not ripped or tatty

Footwear should be practical and suitable for safe movement around the pre-school;

Long hair should be tied back and jewellery and make up to be kept to a minimum.

Wherever possible, tattoos should not be exposed. An Employee may be asked to cover a visible tattoo where it is deemed inappropriate / offensive for a school setting. Body piercings, except earrings, should not be exposed.

The Pre-school recognises the diversity of cultures and religions of its Employees and will take a sensitive approach where this affects dress and uniform requirements.

### **14. Smoking and the use of drugs and alcohol**

The Pre-school is a non- smoking environment. Smoking and the use of e-cigarettes or “vaping” is not allowed on Pre-school premises or during working time. Staff should also refrain from smoking immediately outside of the pre-school entrance.

Employees must not consume alcohol or use illegal drugs in the workplace or be under the influence of such substances whilst at work. This includes the use of ‘legal highs’ or psychoactive substances.

Employees must ensure that any use of alcohol / illegal drugs outside of work does not adversely affect their work performance, attendance, conduct, working relationships, health and safety of themselves and others or damage the Pre-school’s image and reputation. If an Employee has a drug or alcohol dependency which is impacting on their work or has the potential to impact on their work, they should discuss this with the Manager.

### **15. Health and Safety at Work**

All Employees must, by law, take reasonable care for their own health and safety and that of others in the workplace.

Employees are required to comply with the Pre-school’s Health and Safety policy and agreed procedures at all times.

This includes:

- avoiding risk of injury or danger to yourself or others
- using any protective clothing and equipment supplied
- complying with hygiene requirements
- reporting, at the earliest opportunity, any hazards, defects, accidents or incidents to the Manager or other designated person
- not interfering with, or misusing, anything provided for health, safety or welfare
- informing the Pre-school of any medical condition or medication which has been prescribed which may have an impact on health and safety in the workplace

Employees with specific additional responsibilities and those in managerial roles should also be aware of and comply with any additional health and safety obligations associated with their role.

Employees should inform their manager if they have a medical condition or are taking prescription medication which may impair their work performance or affect their health and safety or that of others.

*Policy to refer to: Health & Safety*

## **16. Contact with the Media**

All enquiries from the media should be directed to the Manager.

Employees should not make contact with or comment to the media about matters relating to the Pre-school without the prior approval of the Manager.

Employees should speak to the Manager in the first instance about any concerns they have regarding their own employment or operation of the school and / or may refer to the Pre-school's Whistleblowing or Grievance policies if they wish to raise a formal complaint.

Should an Employee speak directly to the media about non pre-school matters care should be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of / representing the Pre-school.

Any contact with the media in a personal capacity should be compatible with the Employee's role and their position working with children or in a pre-school setting and must not negatively impact on the reputation of the school.

## **17. Whistleblowing**

Employees may raise concerns about any aspect of the operation of the Pre-school which is not directly related to their own employment through the Whistleblowing Policy.

Employees raising a concern with reasonable grounds for doing so will not be subject to discrimination, harassment or victimisation.

*Policy to refer to: Whistleblowing*

## **18. Misconduct**

Failure to follow the Code of Conduct, may be regarded as a breach of Pre-school rules. This may result, if proven, in disciplinary action, including dismissal.

Allegations of misconduct will be managed in accordance with our Disciplinary Procedures.

## **Part C: Safeguarding the children**

### **19. General Obligations**

All Employees have a responsibility to:

- Safeguard children from physical abuse, sexual abuse, emotional abuse and neglect
- Promote the welfare of children and provide a safe environment in which children can learn
- Identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm
- Report as soon as possible and without delay any concerns regarding child protection / safeguarding to the Manager / Designated Safeguarding Lead (or Owner where concerns relate to the Manager)

All Employees must ensure they have read, understood and comply with:

- Part 1 of Keeping Children Safe in Education (2022).
- Pre-school Child Protection Policy
- The Pre-School's Promoting Positive Behaviour Policy
- Additionally, Employees with managerial responsibilities must ensure they comply with the Pre-school's procedure for Managing Allegations Against Staff and Parts 2-4 of Keeping Children Safe in Education and Safeguarding Procedures for Managing Allegations Against Staff

Employees must attend and comply with any training as required by the Pre-school associated with the safeguarding of children.

## **20. Appropriate relationships with children**

Employees must maintain appropriate professional boundaries with the children.

Employees are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. In order to protect both children and themselves, Employees should also avoid behaviour that might be misinterpreted by others.

## **21. Allegations Against Members of Staff and Volunteers**

All Employees have a duty to report to the Manager / DSL at the earliest opportunity the conduct of a colleague which may place a child at risk.

Where the concerns relate to the Manager these should be reported to the Owner.

Failure to report such concerns may be regarded as a disciplinary matter.

## **22. Guidance for Safer Working Practice**

Employees are required to read, understand and comply with the Guidance for Safer Working Practice for those working with Children and Young People in Education Settings (October 2015).

This document explains the Pre-school's specific expectations with regard to safeguarding children and contains practical guidance on behaviours which constitute safe working practice.

Employees should seek immediate guidance from the Manager if they are unclear about the conduct or actions expected of them.

## **23. Other Safeguarding Considerations**

### ***Prevent Duty***

Schools have a duty to protect children from radicalisation and extremism.

All Employees have a responsibility to report any concerns about children who may be 'at risk' to the Manager / designated staff member.

### ***Female Genital Mutilation***

Teachers have a legal duty to report to the police where they discover an act of Female Genital Mutilation appears to have been carried out on a child.

All Employees have a responsibility to discuss any concerns with the Manager / designated staff member

Please refer to Part 1 and Annex A of Keeping Children Safe in Education (September 2020) for further guidance.



## Part D: ICT and Social Media

*Policies to refer to: Acceptable Use Policy, Child Protection Policy, Social Media Policy, Mobile and Smart Technology Policy and Camera & Image Use Policy*

### 24. General Obligations

Employees should ensure that they have read, understand and comply with the Pre-schools's Acceptable Use Policy at all times.

Whilst at work or using a work device all Employees must:

- Ensure all electronic communication with children, parents / carers, colleagues and other stakeholders is compatible with their professional role, appropriate boundaries and in line with Pre-school policies.
- Not to use setting IT equipment to browse, create, transmit, display, publish or forward any material / images which is illegal, sexually explicit, obscene or could offend, harass or upset others or anything which could bring an Employee's professional role or the Pre-school into disrepute.
- Not to use personal IT equipment to browse, create, transmit, display, publish or forward any materials / images which are illegal or could offend or harass others or anything which could bring an Employee's professional role or the Pre-school into disrepute.
- Ensure that ICT system security is respected and password protocols are observed – including the use of strong passwords and encryption.
- Not install personal software on Pre-school equipment or make unauthorised copies of Pre-school registered software.

*Limited use of Pre-school internet, email and ICT equipment for personal purposes is permitted, provided this is within the scope of the Pre-school's Acceptable Use Policy and does not impact on an individual's job role.*

*Access to gaming, gambling, social networking sites or internet chatrooms from Pre-school devices is not permitted*

### 25. Use of Social Media

Employees must ensure that their online presence / profile is compatible with their professional role.

All Employees should:

- Ensure appropriate privacy settings are applied when using social media sites
- Refrain from sharing confidential / privileged information, discussing incidents, operational or employment matters or making critical / negative comments about the Pre-school / children / parents or colleagues on such forums
- Not browse, create, transmit, display, publish, comment on or forward any material / images which is illegal, could offend or harass or anything which could bring an Employee's professional role or the Pre-school into disrepute
- Never share / post images of the children
- Not post images of work colleagues without permission.
- Not access or update social media sites for personal use, using school devices / during working time

Employees should not make contact with the children or parents via social media accounts or have these individuals as social media 'friends' / 'contacts'. It is also recommended that Employees do not have children, who previously attended the Pre-school and their families as social media 'friends'.

Employees should seek guidance from the Manager if they are unclear about the conduct or actions expected of them.

### 26. Use of Personal Mobile Phones / Devices

Employees are not permitted to make / receive personal calls / texts, send / receive emails or access internet / social media during work time where children are present.

Employees should ensure that mobile devices are silent at all time whilst in the classroom or where children are present. Mobile devices should not be left on display.

Employees should not use their personal equipment (mobile phones / cameras / tablets) to take photos or make recordings of the children.

### **27. Monitoring of Usage**

Emails, documents or browsing history on Pre-school systems should not be considered to be private and may be monitored and recorded to ensure the safety of the children and ensure compliance with this policy. This monitoring will be proportionate and will take place in accordance with data protection / privacy legislation.

The Pre-school may address concerns regarding unauthorised, unacceptable or inappropriate use of ICT systems / devices or social media as a disciplinary matter.

## **Part E: Business Conduct**

### **28. Use of Financial Resources**

The Pre-school requires Employees to observe the highest standards of business / financial practice.

Employees should ensure that Pre-school / public funds with which they are entrusted are used in a responsible and lawful manner.

Employees must comply with the Pre-school's stipulated financial regulations and any other relevant policies / audit requirements.

Appropriate authorisation should be sought for any expenditure and audit trail / suitable records kept.

Pre-school monies, credit / debit cards and accounts should not be used for personal purposes.

The use of personal credit cards / accounts to purchase goods and services on behalf of the Pre-school should be avoided unless prior agreement from the Manager is obtained.

All expense claims should be appropriately authorised and accompanied by receipts / proof of purchase.

### **29. Personal Use of Equipment and Resources**

Employees may not make personal use of the Pre-school's property, materials or facilities unless authorised to do so by the Manager.

### **30. Declaration of Interests**

The Pre-school recognises that Employees may wish to take an active role in the local community and undertake additional personal / business activities outside of work.

In the majority of instances such activities will have no impact on their role in the Pre-school. However, on occasion there may be a potential conflict of interest.

Employees should therefore declare annually to the Manager any financial or non financial interests which may conflict with those of the Pre-school. Employees should also declare membership of any professional bodies / organisations which may conflict with their Pre-school role.

Should Employees be in doubt about whether a conflict of interest may exist they should seek guidance from the Manager (or Owner in the case of the Manager).

### **31. Contracting out of Services**

Employees should follow agreed Pre-school protocols for the award of contracts to external providers.

Employees should adhere to Pre-school rules regarding the separation of roles in procurement / tendering process.

In particular care should be taken to ensure competition between prospective contractors is fair and open and that all competing parties are treated equally.

Employees should ensure that preferential treatment is not shown to current / former Employees or partners, close relatives or friends / associates in the award of contracts.

Employees must not accept any form of financial or other inducement which may be offered by a potential contractor. All such approaches should be reported to the Manager.

Confidential information relating to the tendering process, must not be disclosed to any unauthorised party or organisation.

### **32. Gifts and Hospitality**

Employees should not accept significant gifts from parents / carers, actual or potential contractors or outside suppliers which could compromise the individual or the Pre-school.

Employees should notify the Manager should they receive any unsolicited gifts and return the item with a polite refusal letter to the sender. A record should be kept of all gifts which are received.

Small tokens of appreciation which have no substantial financial value (less than £25) such as presents from the children, parents/carers at the end of term may be accepted and do not have to be declared.

Employees may only accept an offer of hospitality if there is a genuine need to do so in order to represent the Pre-school in the community. Employees should discuss any invitations with the Manager (or Owner in the case of the Manager).

Where the School receives sponsorship of a Pre-school activity / event, care should be taken to ensure that this does not infer that the sponsor will receive preferential treatment in any future contracting / tendering process. An Employee or their partner, family member or friend may not benefit from the sponsorship.

### **33. Personal Relationships at Work**

Employees must not allow a personal relationship with a colleague, parent, Owner or member of the wider Pre-school community to influence their conduct at work or have a detrimental impact on the operation of the school.

Employees who are in a personal relationship should behave in an appropriate and professional manner during working time. Preferential treatment or advantage of any kind must not be given.

A personal relationship may be defined as:

- A family relationship
- A romantic / sexual relationship
- A close personal friendship outside of work
- A business, commercial or financial relationship

Employees are expected to disclose to the Manager where a personal relationship exists or develops with a parent of a child attending the pre-school or where there is a pre-existing family connection or friendship with a pupil and / or their family. There will be no requirement to give a detail account of the involvement. Where an individual is employed in the Pre-school and their child / family member is attending, they should ensure that appropriate professional boundaries are maintained.

Employees are expected to disclose to the Manager any close personal relationship with a colleague / Owner. There will not be a requirement to give a detail account of the involvement.

Where a personal relationship exists or develops between members of staff where one party is in a supervisory relationship they must not be involved in the recruitment, appraisal, promotion, pay determination or any other management decision involving the other party.

In the case of the Manager any disclosures should be made to the Owner.

#### **34. Political Activity**

Employees may engage in political activity outside of work – however they should not allow personal / political views to interfere with their duties. Any activity should be compatible with the Employee's responsibility as a role model to the children.

Where an Employee is involved in political activity outside of work – care must be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of / representing the Pre-school.

#### **35. Intellectual Property**

Any intellectual property created by an Employee during the course of their employment will be considered the property of the Pre-school, unless specific permission is granted to the Employee to have ownership of such materials.

Reviewed 23<sup>rd</sup> July 2024  
To be reviewed annually