Behaviour Policy

Hampton Gardens

Policy last reviewed:	March 2026
Next review due:	March 2027
Member of staff responsible:	Mr Atul Karia
Ratified by:	Hampton Gardens Local Governing Body

HAMPTON GARDENS SCHOOL: BEHAVIOUR POLICY

1. RATIONALE (from the school's statement of Vision and Values)

Our vision is to be an excellent school and we will promote and expect, the highest standards of student behaviour, so that high quality learning can take place and so that all students can feel happy to come to school.

Hampton Gardens School will have a positive ethos which empathises respect, responsibility and participation; we will place a high emphasis on establishing positive relationships with students, based on honesty and fairness; everyone will be expected to behave with courtesy and good manners.

This Policy should be read alongside the Student Code of Conduct and the Home School Agreement.

We will employ a range of Rewards and Sanctions in the management of student behaviour; these will be reviewed regularly and published to students and parents. Reasonable adjustments are made in liaison with the SENDCO for students with SEN.

Bullying will not be tolerated and we will make this clear to all students each year. We will use a number of strategies to combat bullying, including the use of peer mentors, contracts of behaviour and the use of 'restorative justice' (enabling those exhibiting bullying behaviours to understand why the behaviour was so serious and to enable him/her to try to make amends to the victim).

2. CONSULTATION

This policy will be reviewed by the Local Governing Body.

3. ROLES AND RESPONSIBILITIES

3.1 The Head of School will have responsibility for ensuring this policy is implemented and for reporting to governors on its impact. The Deputy Head of School and Assistant Head of School will have responsibility for ensuring that the policy is implemented with relevant teams.

The Head of School is responsible for any exclusions from school and for informing parents, the local authority and governors in accordance with DFE regulations.

3.2 Staff, parents and students all have a role to play in ensuring positive behaviour at Hampton Gardens School. By sending your child to Hampton Gardens there is an acceptance of all policies around the behaviour of your child.

3.2.1 Staff have a responsibility to:

- Model the attendance, punctuality and behaviour expected from students;
- Treat students and parents/carers with respect;
- Ensure good quality teaching and to promote an enjoyable, engaging and stimulating classroom experience;
- Keep students safe from bullying or harassment in any form;
- Help ensure a quiet, calm atmosphere in the classroom and around the school;
- Support the provision of a clean, safe and pleasant working environment;

- Apply rewards and sanctions in a prompt, fair, transparent and consistent manner, without discrimination;
- Take responsibility for developing their skills in managing behaviour.

3.2.2 Students have a responsibility to:

- Treat all members of the school and the wider community with respect;
- Take responsibility for their own learning in school and at home and to aspire to reach their potential;
- Behave in a considerate and thoughtful way in lessons, around school and in the wider community, at all times;
- Maintain high standards of appearance, in accordance with the School's Uniform Policy;
- Attend school regularly and punctually;
- Respect the school environment.

3.2.3 Parents have a responsibility to:

- Ensure their child attends regularly, punctually equipped for school and in accordance with the school's Uniform Policy;
- Reinforce messages regarding expectations of good behaviour, conduct and discipline and to support the school in preventing repetition of unwanted behaviours;
- Reward personal achievement and good behaviour;
- Attend meetings and events at the school that support learning and ethos.

3.2.4 Governors have a responsibility to:

- Ensure that the school's Behaviour Policy (and related policies) are not discriminatory, are communicated to all relevant stakeholders and are effective in supporting good teaching and learning;
- Listen to the views of students, parents and staff in keeping the policy under review and when making amendments;
- Set the ethos, aims and values of the school.

4. REWARDS AND SANCTIONS

4.1 Equality

The law expects schools to take into account a student's individual circumstances and to avoid discrimination on any grounds. For example, the Disability Discrimination Act 1995 and the Equality Act 2010 create a duty to take reasonable steps to ensure that disabled students are not placed at a substantial disadvantage in comparison with students who are not disabled; this imposes a duty to make 'reasonable adjustments'.

Hampton Gardens School strives to apply rewards and sanctions fairly and consistently, believing that this approach reflects true equality. However, adjustments may be made if a student's disability limits their understanding of the consequence of his or her actions or if staff feel that the student's safety may be compromised.

4.2 **Rewards**

4.2.1 Fundamental to the maintenance of a positive ethos at Hampton Gardens School is the consistent use of a rewards system, which identifies and celebrates a wide range of achievement, including contribution to school life. Research has demonstrated that sanctions and punishment alone will not have the desired effect of promoting good behaviour and conduct.

Through verbal acknowledgement of success, weekly praise and recognition in form time, post cards, Head of School's commendations, celebration assemblies and other rewards, such as Breakfast of Champions, the school will seek to include all those deserving of praise and so improve their motivation and engagement.

Rewards achieved by students contribute to the ASPIRE colours and awards programme.

4.2.2 Students who persistently misbehave:

- A period of behaviour monitoring on a report will occur. The student will be expected to get their report signed each day for each lesson and to report to the member of staff monitoring the report each day as per the instructions on the front of the report. Parents will be expected to engage with the report each day and sign to say this has been discussed their child. Failure of this report should result in escalation through the behaviour wave of interventions.
- A period of time at a partner school may be arranged for students who persistently misbehave to reflect on their behaviour. This may be up to 4 weeks. Parents should be informed that this process will be taking place.
- A Behaviour contract may be put in place to remind the student about expectations in the school.
- If all of the above interactions do not change the behaviour of the student then a referral to the school **Internal Disciplinary Panel** will be made
- If all of the above interventions do not change the behaviour of the student then a referral will be made to the **Behaviour Panel** to look at all options that may include a managed move.

4.2.3 **Antibullying sanctions**

- Students who bully other students will be sanctioned using a staged approach. Parents will be informed at each stage
- The school reserve the right to adapt the approach followed depending on the severity and circumstances of the incidents.
- Incidents could be:
  - sanctioned by a warning and education
  - sanctioned by a detention afterschool and education
  - sanctioned an Internal exclusion and education
  - sanctioned with a Fixed Term suspension and education
- The school reserves the right to suspend or permanently exclude any student given a serious incident.

4.2.4 **Joint Enterprise**

Gangs are not permitted at Hampton Gardens. If a group of students demonstrates anti-social behaviour around the school then the students will be considered to be a gang and split up at breaks and lunchtimes until the Anti-social behaviour improves. Jointly working with the

safer school's officer students will be supported to improve their behaviour and attitude until the school considers improvements are sufficient.

4.2.5 **Joint Enterprise and bullying**

- On occasions, groups of students can be involved in bullying a student. This may be as a group at one time or in separate incidents. Using Anti bullying monitoring documents all incidents can be tracked and connected. If students from one group are connected to incidents of bullying then all students involved will be treated with the same sanctions.
- The school reserves the right to permanently exclude students if they persistently misbehave and bully another student in whatever form that bullying takes place
- Safeguarding is high priority at Hampton Gardens. The most recent guidance from the DfE has clear guidelines for how staff and students are expected to behave. Child on child abuse is covered within the guidance. Students are educated on how to behave towards each other through education in form time, assemblies, PD lessons and other curriculum time. The school will use the guidance to sanction students who behave inappropriately towards another student or group whether this is online or in person.
- Harmful Sexual Behaviours guidance within the KCSIE from the DFe will be followed in terms of sanctioning inappropriately sexually related behaviours.
- Students are advised that they should keep hands to themselves and respect personal space of staff and students.
- More than one student should never be in a toilet cubicle. Any students found to be in this situation will be searched and sanctioned

4.3 **Sanctions**

The school will seek to modify behaviour through a variety of means, such as praise and celebration and communication of its values. However, there will be occasions when the school will be required to apply sanctions to improve behaviour and reinforce with students the importance of their own good conduct, the right of other students to learn and the right of teachers to teach.

Strategies used by staff at Hampton Gardens School include: verbal reprimand and discussion; phone call home; detention (in school hours); detention (afterschool); removal from lessons; discussions with parents; internal exclusion; tuition; fixed-term and permanent exclusion.

The Rewards and Sanctions Document provides more detail on how rewards and sanctions are applied. This document is updated annually and will be regularly discussed with staff, students and parents.

4.3.1 **Detentions**

- Detentions can be set by any member of staff, with responsibility for supervising students;
- Whole-class detentions are rarely considered appropriate;
- Although parental consent is not required for detentions; Hampton Gardens School seeks to work with parents to bring about a change in behaviour and would hope that any sanction put in place is supported at home;

- A student in lunchtime detention must have reasonable time to eat, drink and go to the toilet;
- The school will ensure that an after-school detention is reasonable and that student safety is not compromised. Parents will be informed on the same day if their child is to be placed in after school detention and a student will not be kept for any longer than a few minutes (without parents being notified) at the end of the day.
- Failure to attend a detention will result in an escalation. If students have a prior engagement that is acceptable then the detention may be moved under the discretion of the Head of Year, Student Support Officer or Senior Leader
- Parents will be advised by automated SMS the day before if their child is due to sit a Senior Leader lunch 20 minute or Senior Leader lunch 30 minute detention the next day. It is expected that the parent will inform their child of this detention and that the child will attend on time from 1.30pm. Failure to attend or late arrival will result in an escalated behaviour sanction.

4. RESTORATIVE PRACTICE

4.3.2 Restorative practice

The school facilitates a restorative approach for child/child and child/ adult relationship breakdowns. In the event a child is removed from a lesson they will be expected to complete a restorative conversation with their class teacher after school during their detention. In the event of a successful restorative being completed they will be permitted to leave their detention early.

4.3.3 Confiscations

Confiscation of banned items could lead to an education discussion with the Safer School's Officer.

Under the terms of the school's Code of Conduct and the law, students are prohibited from bringing onto the school site, or having in their possession when in school uniform or an organised school visits (residential/non-residential) various items and goods.

Legally prohibited items are as follows: vapes; cigarettes; illegal drugs; alcohol; weapons; knives; aerosols; other dangerous items inappropriate for school and likely to cause harm to others; stolen items.

Other items which are not conducive for learning are also prohibited such as fizzy drinks or energy drinks and confectionary items such as sharing bags (large bags of crisps or sweets)

In addition, the school does not allow the following items as they are not considered to be conducive to effective teaching and learning and the maintenance of good discipline: quantities of food and drink for distribution and self-profit; material of a racist, sexist/sexual or homophobic nature; aerosols and inappropriate clothing or jewellery. Any items confiscated by staff need to be collected by the student at the end of the term or parents/carers may contact the school to arrange collection. Any items brought in are at the risk of students and the school does not take any responsibility for these.

Unless there has been a specific agreement with a member of staff teaching a student, mobile phones, smart devices, iPods, MP3 players, cameras and other electrical equipment

should not be used or seen in school. These items will be confiscated if they are seen and parents will be asked to pick these up after meeting with a senior member of staff or Head of Year. Students must keep their phones in their school bags switched off at all times Phones seen in pockets will also be confiscated and parents will be asked to collect following a meeting. Smart watches are allowed however inappropriate use will result in a confiscation.

Other confiscated items are usually returned to the student unless they are a banned item where they will be disposed of or given to the police; parents will be asked to collect electrical equipment.

4.3.4 **Confiscations of prohibited items – key points**

There are legal provisions which enable school staff to confiscate items from students:

- The **general power to discipline** enables a member of staff to confiscate, retain or dispose of a student's property as a punishment and protects them from liability for damage to, or loss of, any confiscated items.
- **Power to search without consent** for weapons, knives, alcohol, illegal drugs, tobacco, cigarettes, vapes, pornographic images and stolen items. The legislation sets out what must be done with prohibited items found as a result of a search. Weapons and knives must always be handed over to the Police.
- Where the person conducting the search finds an electronic device that is prohibited by the school rules or that they reasonably suspect has been, or is likely to be, used to commit an offence or cause personal injury or damage to property, they may examine any data or files on the device where there is a good reason to do so. They may also delete data or files if they think there is a good reason to do so, unless they are going to give the device to the police. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone if it has been seized in a lawful 'without consent' search and is prohibited by the school rules or is reasonably suspected of being, or being likely to be, used to commit an offence or cause personal injury or damage to property. This is Department for Education Statutory Guidance for dealing with electronic devices.
- If a mobile phone is used, seen or heard, then it will be confiscated by a member of staff. If a student is using a phone inappropriately for example to video/photograph other students or members of staff, then the phone will be confiscated and will only be returned once videos/other information is deleted off. Depending on the nature of the videos/images the phone will be handed to the police should further investigation be required.
- Hampton Gardens follows the *Department for Education Searching, Screening and Confiscation Advice for Schools*. All searches conducted will be logged on the school safeguarding system and carried out with a member of SLT present. There MUST be two members of staff present to witness the search. If an exception to this rule is made the member of staff will report this to the Head of School and ensure a record of the search is kept.

5. MALICIOUS ACCUSATIONS AGAINST SCHOOL STAFF

Hampton Gardens School will investigate any accusation, made by a student, against a member of staff. Where the accusation is found to be malicious, the student will receive a very serious sanction.

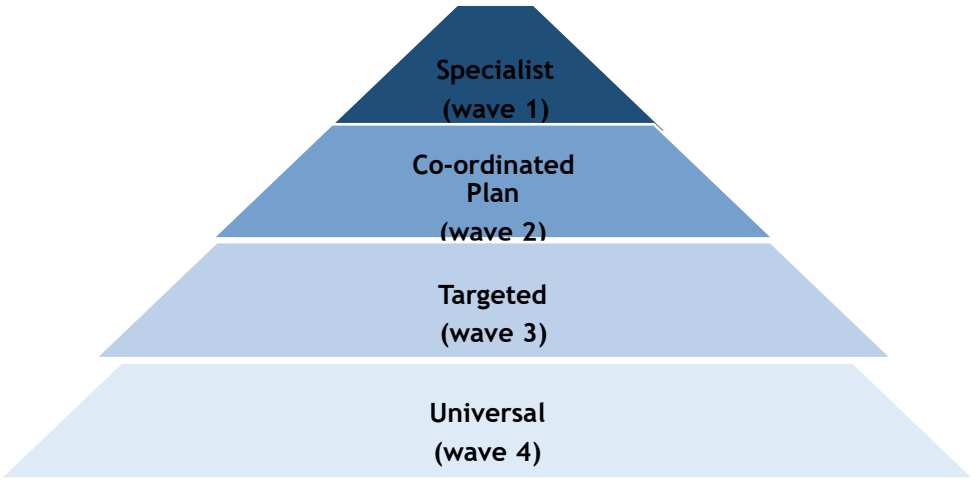
6. SUPPORT FOR BEHAVIOUR IMPROVEMENT

Whilst the behaviour of the vast majority of students is excellent, there are some students, who for various reasons, disrupt learning and can be challenging around school. By sending your child to Hampton Gardens as a parent, you and your child automatically agree to support the school Behaviour Policy. Hampton Gardens School is committed to trying to modify this poor behaviour and to enable students to make positive choices in terms of their conduct and learning. Where the behaviour of students gives rise to concern, students may be placed on various types of report to help support improvement and to enable effective monitoring. Details of the types of report used by Hampton Gardens School can be found in the Rewards and Sanctions document. If a student has special educational needs the pastoral team will liaise and collaborate with the achievement support team when managing and supporting a student with behaviour. An alternate approach may be taken when implementing our behaviour policy and Wave of interventions and school sanctions.

The behaviour of individual students is monitored carefully (weekly monthly and termly) and students will be identified according to their level of need. Where necessary, support plans will be put in place to help students improve. Support may be given from curriculum, the pastoral team or achievement support.

Hampton Gardens Behaviour Wave Intervention

The following provides further detail of this graduated response:



Universal (Wave 4)

Students are monitored by form and subject teachers, under the guidance of Heads of Year and Heads of Department. They usually respond well to strategies used within the classroom: well-planned and differentiated lessons, modelling of good practice, praise and the warning system. Students may be placed on report to help improve focus or to monitor behaviour in a particular subject.

Targeted (Wave 3)

Students are managed by the Heads of Year. Individual meetings with Heads of Year will take place, students will be given targets and placed on report, there is likely to be an analysis of trigger points around school. Some specialist advice may be obtained.

Co-ordinated Plan (Wave 2)

Students will be managed by the Head of Year, with support from the SLT. Students at this level are those who have had a Fixed Term Exclusion, a large number of red cards or who have failed to respond to interventions at the Targeted (Wave 3) level. Students will have a four week cycle of targeted work (resulting from a stakeholder meeting; a pastoral support plan may be implemented and if so parents will be required to attend review meetings to support with their child's education and behaviour.).

It is likely that additional agencies will begin to be involved, observations in class, timetable review, possible EHA (Early Help Assessment). There will be significant parental contact.

Specialist (Wave 1)

As Wave 2, but students are at risk of a Managed Move to an alternative educational setting or Permanent Exclusion. Additional strategies that could be put in place are: involvement of outside agencies, EHA and TAC meetings, referral to the Local Authority behaviour panel and possible short term placement at another school.

7. BEHAVIOUR BEYOND THE SCHOOL GATES

Teachers have a statutory power to discipline students for misbehaving outside of the school premises. Section 90 of the Education and Inspections Act 2006 gives the Head Teacher a specific statutory power to regulate a student's behaviour in these circumstances 'to such extent as is reasonable'. The school will work closely with appropriate external agencies to support any investigation .

Any misbehaviour when the child is:

- Taking part in any school organised or school related activity;
- Travelling to or from school;
- Wearing school uniform;
- In some other way identifiable as a student at the school.

Or misbehaviour at any time, whether or not the conditions above apply, that:

- Could have repercussions for the orderly running of the school;
- Poses a threat to another student or member of the public;
- Undermines the authority and position of a member of staff.

8. MONITORING AND EVALUATION

The Governing Body will evaluate the impact of this policy by receiving data from the Head of School analysed by year group, ethnicity and gender on:

- Fixed term and permanent exclusions (including reasons);

- Trends in the numbers of identified rewards and sanctions.

9. EXCLUSIONS (SUSPENSIONS)

School policy is informed by *'Suspension and Permanent Exclusion from Maintained Schools, Academies and Pupil Referral Units in England, including Pupil Movement (DfE September 2023) (*"**DfE Guidance***").*

For serious incidents of poor behaviour (such as verbal or physical abuse to another member of the school community), the Head of School may resort to excluding pupils, either for a fixed term or permanently. Persistent lower level disruption may also result in fixed term exclusion. All exclusions are monitored by the governing body each term and the Executive Headteacher on a half-termly basis.

Where an excluded student is due to sit an external examination, suitable arrangements will be made to ensure the student can still sit the examination.

The school is fully aware of its duties not to discriminate against, harass or victimise pupils due to their sex, race, disability, religion or belief, sexual orientation or because of pregnancy or gender reassignment. For disabled pupils, the school will make reasonable adjustments to its policies and practices to ensure disabled pupils are not placed at a substantial disadvantage compared to their non-disabled peers.

Before taking an exclusion decision, the Head of School will also have due regard to the following (in accordance with the DfE Guidance):

- for groups with high exclusion rates (pupils with SEN, pupils eligible for Free School Meals, looked after children, pupils whose ethnicity is Gypsy, Roma, Travellers of Irish Heritage or Black Caribbean) any extra support required to identify and address the needs of the pupil;
- what additional support or alternative placement may be required for a pupil with a Statement of SEN/EHC Plan or a looked after child; and
- that the permanent exclusion of a pupil with a Statement of SEN/EHC Plan or a looked after child should, as far as reasonably possible, be avoided.

The decision to exclude will only be taken for a disciplinary reason and all exclusion decisions will be formally recorded.

9.1 Actions Taken Following a Serious Incident

- The pupil is kept under direct supervision during the investigation
- Written details of the incident are collected from those involved before any decision is made
- The parent/carer is telephoned by a senior member of staff or the pastoral team to outline the incident
- In the case of pupils with a statement of SEN their Local Authority SEN team will be informed.

9.2 Fixed Term Exclusions

If a decision is taken to exclude a pupil for a fixed term:

- The pupil takes a letter home (where possible), with another copy posted, outlining the incident and the length of the fixed term exclusion. The parents' right to make representations about the exclusion to the governing body is highlighted.
- A meeting is set up for the parent/carer and pupil to attend on return from exclusion, with a member of staff.

Following this meeting:

- The pupil is reinstated
- The pupil may be placed on report
- Behaviour support and 'reasonable adjustments' will be reviewed
- Where appropriate, an apology is given to the member or staff or other pupils involved
- A record of the exclusion and meeting is kept in the pupil's file.

In accordance with the requirements set out in the DfE Guidance, the governing body will meet to consider reinstatement of the pupil if the fixed term exclusion would bring the pupil's total number of school days of exclusion to more than fifteen (15) in a term.

If requested to do so by parents, the governing body must consider the reinstatement of an excluded pupil if that pupil would be excluded from school for more than five (5) school days but not more than fifteen (15) in a single term.

9.3 Decision to Permanently Exclude

Permanent exclusion should be a last resort and will usually be taken: in response to:

- a serious breach, or persistent breaches, of this policy; and
- Where allowing the pupil to remain in school would seriously harm the education or welfare of the pupil or others in the school.

The National Standard list of reasons for permanent exclusions is:

- Physical assault against a pupil
- Physical assault against an adult
- Verbal abuse/threatening behaviour against a pupil
- Verbal abuse/threatening behaviour against an adult
- Bullying
- Racist abuse
- Abuse against sexual orientation and gender identity
- Abuse relating to disability
- Sexual misconduct
- Drug and alcohol related incidents
- Damage
- Theft

- Persistent disruptive behaviour
- Inappropriate use of social media or online technology
- Wilful and repeated transgression of protective measures in place to protect public health
- Use or threat of use of an offensive weapon or prohibited item

9.3.1 **Permanent Exclusion Report**

When the Head of School decides to permanently exclude a pupil the Executive Headteacher must be informed and the governing body must set up a Disciplinary Committee to review the case. In advance of the Disciplinary Committee the Head of School will prepare an exclusion report which explains why the pupil was excluded.

The report will include:

- A profile sheet including basic information about the pupil
- An overview of the case including a detailed account of the reason(s) for the exclusion
- Confirmation that the current DfE exclusions guidance has been adhered to
- Where relevant, details of any behaviour modification strategies which have been used
- An indication of how the sanction applied is consistent with the school's Behaviour Policy
- Alternative sanctions that were considered (if applicable)
- In the case of a pupil with SEN, or a looked-after or disabled pupil, that the relevant DfE guidance was considered before the decision to exclude was taken
- That in reaching the decision, equal opportunity legislation was complied with.

9.3.2 **Permanent Exclusion Procedure**

DfE Guidance clearly explains the procedures to be followed if exclusion is applied. These procedures must be followed precisely. The services of a properly trained clerk are secured for exclusion hearings.

General Duties

1. The school shall act and shall ensure that the Head of School shall act in accordance with the law and the DfE Guidance.

2. Without limiting the generality of paragraph 1, the school shall ensure that the Local Authority is informed of an exclusion in the circumstances required by the DfE Guidance.

3. The school shall ensure that in carrying out their functions the Head of School, the Governing Body and any Independent Review Panel (established in accordance with paragraph 5) have regard to the DfE Guidance.

Independent Review Panels

4. In accordance with DfE Guidance, the school shall carry out its functions to establish and manage the appeal procedure for exclusions.

5. Independent Review Panels must be impartial and constituted in accordance with the detailed provisions of the DfE Guidance. The school shall arrange suitable training for appeal panel members and clerks. Where requested by the parent, an SEN expert will be appointed by the school to advise the Independent Review Panel.

6. The Independent Review Panel's decision is final and binding on the school. A parent may seek a judicial review of an Independent Review Panel's decision. A parent may not, however, appeal to the Commissioner for Local Administration (the Local Government Ombudsman) about maladministration as the Commissioner's remit is limited to considering the conduct of appeal panels constituted by Local Authorities.

Parents' Responsibilities

There is a duty on parents to ensure that an excluded pupil of compulsory school age is not in a public place during school hours without reasonable justification, or a fixed penalty could be imposed. Parents will also be warned in the exclusion letter that failing to comply with their duties in this regard may form part of a case for a parenting order to be issued by the magistrate's court.

9.3.4 **Continuing Education during the Exclusion Period**

For the first five days of a fixed term exclusion, the school will set work appropriate to the pupil's age and ability and make arrangements for this to be collected and returned for marking. Where a pupil is given a fixed exclusion of six days or longer the school has a duty to arrange suitable off-site full-time educational provision from and including the sixth day of exclusion as day one. With reference to permanent exclusions the school will set work as described above for the five days following a permanent exclusion.

The Head of School may impose a fixed-period exclusion which may lead to a permanent exclusion, depending on the outcome of an on-going investigation and/or further consideration of the case. If this is a possibility it will be mentioned in the letter to parents notifying them of the fixed-term exclusion. If a permanent exclusion is subsequently imposed, this is a separate exclusion event. Thus, if a permanent exclusion follows a five day fixed-term exclusion, the responsibility of the Academy for the first five days of the permanent exclusion would be to set and mark work as described above and not find suitable alternative provision.

9.3.5 **A Managed Move to another School**

Where a pupil is at serious, but not imminent risk of permanent exclusion a managed move to another school may be considered. If a managed move is rejected by the parents, the Head of School will put this is writing to them so that there is evidence that the strategy was suggested if a permanent exclusion is imposed at a future point.

9.3.6 **Non-compliance with the School Uniform Policy**

The law allows the school to send a pupil home to change his/her clothes to comply with uniform rules without exclusion, as long as parents are notified in advance. The time allowed will be no longer than is necessary for clothes to be changed and the absence from school recorded as authorised. However, if the pupil continues to breach uniform rules to avoid

school, the pupil's absence may be recorded as unauthorised. In addition, a persistent breach of uniform rules may give rise to disciplinary sanctions being imposed.

9.3.7 **Re-instatement**

If the pupil is to be re-instated, the process of re-integration will require careful planning. A re-integration plan may also involve carrying out a risk assessment and implementing measures to reduce identified risks. The school will formalise re-integration plans, where actions, expectations and consequences are made clear in writing and may include a parental contract. Should a further exclusion be necessary, this could be used to demonstrate that a sound integration plan was put in place and rigorously applied.

10. RELATED DOCUMENTATION

- School Code of Conduct
- School Classroom Code
- Anti-Bullying Policy
- Rewards and Sanctions
- Equal Opportunities Policy
- Drugs Policy
- Home School Agreement
- School Uniform Policy

APPROVED BY GOVERNORS:

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SIGNATURE **NAME** **DATE**: 11 March 2026