



## **The Robert Carre Trust Anti-Harassment and Bullying Policy (Students)**

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## Statement of intent

**The Robert Carre Trust** believes that all students are entitled to learn in a safe and supportive environment; this means being free from all forms of bullying behaviour. This policy outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying.

These strategies, such as learning about tolerance and difference as part of each school's curriculum, aim to promote an inclusive, tolerant and supportive ethos across the Trust.

The Education and Inspections Act 2006 outlines several legal obligations regarding the Trust's response to bullying. Under section 89, schools must have measures in place to encourage good behaviour and prevent all forms of bullying amongst students. These measures are part of the schools' Behaviour Policies, which are communicated to all students, school staff and parents.

All staff, parents and students work together to prevent and reduce any instances of bullying at the schools. There is a zero-tolerance policy for bullying in the Trust.

### 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) 'Preventing and tackling bullying'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2024) 'Keeping children safe in education 2024'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following Trust/ School policies:

- Behaviour Policy
- Safeguarding Policy
- PSHE Policy
- Relationships and Sex Education (RSE) Policy
- Disciplinary Policies

### 2. Definitions

For the purpose of this policy, "bullying" is defined as persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group. Bullying is generally characterised by:

- **Repetition:** Incidents are not one-offs; they are frequent and happen over an extended period of time.
- **Intent:** The perpetrator means to cause verbal, physical or emotional harm; it is not accidental.
- **Targeting:** Bullying is generally targeted at a specific individual or group.
- **Power imbalance:** Whether real or perceived, bullying is generally based on unequal power relations.

Vulnerable students are more likely to be the targets of bullying due to the attitudes and behaviours some young people have towards those who are different from themselves. Vulnerable students may include, but are not limited to:

- Students who are adopted.
- Students suffering from a health problem.
- Students with caring responsibilities.
- Students from socioeconomically disadvantaged backgrounds.

Students with certain characteristics are also more likely to be targets of bullying, including, but not limited to:

- Students who are LGBTQ+ or perceived to be LGBTQ+.
- Black, Asian and minority ethnic (BAME) students.
- Students with SEND.

### 3. Types of bullying

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another student because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, or SEND are some of the types of bullying that can occur.

Bullying is acted out through the following mediums:

- Verbal
- Physical
- Emotional
- Online (cyberbullying)

**Racist bullying:** Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

**Homophobic and Biphobic bullying:** Bullying another person because of their actual or perceived sexual orientation.

**Transphobic bullying:** Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.

**Sexist bullying:** Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender including misogyny/misandry. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

**Sexual bullying:** Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

**Ableist bullying:** Bullying behaviour that focusses on another person's disability or support needs; this can include mocking the individual's disability or their needs, using derogatory

words or slurs in relation to an individual's disability, or deliberately excluding an individual because of their disability.

**Prejudicial bullying:** Bullying based on prejudices directed towards specific characteristics or experiences, e.g., religion or mental health issues.

**Relational bullying:** Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

**Socioeconomic bullying:** Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents' occupations, their health or nutrition level, or the perceived "quality" of their clothing or belongings.

#### 4. Roles and responsibilities

The Trust is responsible for:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any students based on their protected characteristics or backgrounds.
- The overall implementation and monitoring of this policy.
- Ensuring that all Trustees and Governors are appropriately trained regarding safeguarding and child protection at induction.
- Ensuring that the Trust adopts a tolerant and open-minded policy towards difference.
- Ensuring the Trust is inclusive.
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.
- Ensuring the DSLs have the appropriate status and authority within the schools to carry out the duties of the role.
- Appointing a Safeguarding Link Trustee and Governor who will work with the DSL to ensure the policies and practices relating to safeguarding, including the prevention of cyberbullying, are being implemented effectively.
- Ensuring that students are taught how to keep themselves and others safe, including online.

The Executive Headteacher/ Head of School is responsible for:

- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff experience of dealing with bullying incidents in previous years to improve procedures.

The DSLs are responsible for

- Keeping a log of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected, and recorded on Bromcom appropriately.
- Analysing the data in the bullying record at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented.
- Arranging appropriate training for staff members.
- Corresponding and meeting with parents where necessary.
- Providing a point of contact for students and parents when more serious bullying incidents occur.

Teachers are responsible for:

- Being alert to social dynamics in their class.
- Being available for students who wish to report bullying.

- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the student's heads of year of such observations.
- Refraining from stereotyping when dealing with bullying.
- Understanding the composition of student groups, showing sensitivity to those who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a student for support.

Parents are responsible for:

- Informing the DSL or their child's head of year or form tutor if they have any concerns that their child is the victim of bullying or involving in bullying in anyway.
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes.

Students are responsible for:

- Informing a member of staff if they witness bullying or are a victim of bullying so that staff are able to support and intervene as appropriate.
- Not making counter-threats if they are victims of bullying.
- Walking away from dangerous situations and avoiding involving other students in incidents.
- Keeping evidence of cyberbullying and informing a member of staff should they fall victim to cyberbullying.

## **5. Statutory implications**

The Trust understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, including sexual harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

The Trust understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of students to be breached by failing to take bullying seriously. The headteacher will ensure that this policy complies with the HRA; the headteacher understands that they cannot do this without fully involving their teaching staff.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.

- Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes.

## **6. Prevention**

The Trust will clearly communicate a whole-Trust commitment to addressing bullying and have a clear set of values and standards which will be regularly promoted across the whole Trust.

All members of the Trust will be made aware of this policy and their responsibilities in relation to it. All staff members will receive training on identifying and dealing with the different types of bullying.

All types of bullying will be discussed as part of the RSE, PSHE and PD curriculum, in line with the relevant Policies.

This curriculum will explore and discuss issues at age-appropriate stages such as:

- Healthy and respectful relationships.
- Boundaries and consent.
- Stereotyping, prejudice and equality.
- Body confidence and self-esteem.
- How to recognise abusive relationships and coercive control.
- Harmful sexual behaviour, the concepts involved and why they are always unacceptable, and the laws relating to it.

Staff will encourage student cooperation and the development of interpersonal skills using group and pair work. Diversity, difference and respect for others will be promoted and celebrated through various lessons. Opportunities to extend friendship groups and interactive skills will be provided through participation in special events, e.g., drama productions, sporting activities and cultural groups.

Seating plans will be organised and altered in a way that prevents instances of bullying. Potential victims of bullying will be placed in working groups with other students who do not abuse or take advantage of others.

A safe place, supervised by a teacher, will be available for students to go to during free time if they feel threatened or wish to be alone. The teacher supervising the area will speak to students to find out the cause of any problems and, ultimately, stop any form of bullying taking place.

Students deemed vulnerable, as defined in section two, will be supported by their tutor or another trusted adult in the Trust so that any problems can be actioned quickly

New students will meet with their Head of Year and parents will be encouraged to make the school aware of any previous issues regarding bullying so that support and interventions can be put in place promptly. The school will be alert to, and address, any mental health and wellbeing issues amongst students, as these can be a cause, or a result, of bullying behaviour.

The Trust will ensure potential perpetrators are given support as required, so their educational, emotional and social development is not negatively influenced by outside factors, e.g., mental health issues.

## **7. Signs of bullying**

Staff will be alert to the following signs that may indicate a student is a victim of bullying:

- Being frightened to travel to or from school
- Unwillingness to attend school
- Repeated or persistent absence from school
- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly
- Decreased involvement in school work
- Leaving school with torn clothes or damaged possessions
- Missing possessions
- Asking for extra money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices
- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude at home

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. Students who display a significant number of these signs will be approached by a member of staff to determine the underlying issues causing this behaviour.

Staff will be aware of the potential factors that may indicate a student is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated,
- They have been the victim of abuse,
- Their academic performance has started to fall and they are showing signs of stress.

If staff become aware of any factors that could lead to bullying behaviours, they will notify the student's form tutor, who will investigate the matter and monitor the situation.

## **8. Staff principles**

The Trust will ensure that prevention is a prominent aspect of its anti-bullying vision.

Staff will treat reports of bullying seriously and will not ignore signs of suspected bullying. Staff will act immediately when they become aware of a bullying incident. Unpleasantness from one student towards another will always be challenged and will never be ignored.

Staff will always respect students' privacy, and information about specific instances of bullying is not discussed with others, unless the student has given consent, or there is a safeguarding concern. If a member of staff believes a student is in danger, e.g., of being hurt, they will inform the DSL immediately.

Follow-up support will be given to both the victim and perpetrator in the months following an incident to ensure that the interventions have the best chance of stopping the bullying.

## **9. Child-on-child abuse**

The Trust has a zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment and sexual violence.

To prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms, and the importance of

discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons, in line with the Prevention section of this policy.

All staff will:

- Be aware that students of any age and gender are capable of abusing their peers.
- Be aware that abuse can occur inside and outside of school settings.
- Be aware of the scale of harassment or abuse, and that just because it is not being reported does not mean it is not happening.
- Take all instances of child-on-child abuse equally seriously regardless of the characteristics of the perpetrators or victims.
- Never tolerate abuse as “banter” or “part of growing up”, and will never justify sexual harassment, e.g., as “boys being boys”, as this can foster a culture of unacceptable behaviours and one that risks normalising abuse.
- Be aware that child-on-child abuse can be manifested in many ways, including sexting, sexual harassment and assault, and hazing or initiation-type violence.
- Always challenge any harmful physical behaviour that is sexual in nature, such as inappropriate touching. Dismissing or tolerating such behaviours risks normalising them.

Sexual harassment can take many forms, including but not limited to:

- Telling sexual stories, making sexual remarks, or calling someone sexualised names.
- Sexual “jokes” or taunting.
- Deliberately brushing against someone.
- Displaying images or video of a sexual nature.
- Upskirting (this is a criminal offence).
- Online sexual harassment, e.g., creating or sharing sexual imagery, sexual comments on social media, or sexual coercion or threats.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers. If a student has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children’s social care services (CSCS) and potentially the police, where the DSL deems this appropriate in the circumstances.

All staff will be aware and sensitive towards the fact that students may not be ready or know how to tell someone that they are being abused. Students being abused may feel embarrassed, humiliated, scared, or threatened.

The Trust’s Child-on-child Abuse Policy outlines the Trust’s stance on addressing child-on-child abuse, including sexual abuse, and the procedures in place will be adhered to if any instances are uncovered or disclosed. More information on the school’s approach to preventing and managing instances of child-on-child abuse can be found in the Safeguarding Policy.

## **10. Cyberbullying**

Cyberbullying can take many forms and can go even further than face-to-face bullying by invading personal space and home life, and can target more than one person. It can also take place across age groups and target students, staff and others, and may take place inside school, within the wider community, at home or when travelling. It can sometimes draw bystanders into being accessories.

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages,
- Threatening or embarrassing pictures and video clips,
- Disclosure of private sexual photographs or videos with the intent to cause distress,
- Silent or abusive phone calls,
- Using the victim's phone to harass others, to make them think the victim is responsible,
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name,
- Menacing or upsetting responses to someone in a chatroom,
- Unpleasant messages sent via instant messaging,
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g., Facebook,

**NB.** The above list is not exhaustive, and cyberbullying may take other forms.

The Trust has a zero-tolerance approach to cyberbullying. The Trust views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in section 12 this policy if they become aware of any incidents.

All members of staff will receive training on an **annual** basis on the signs of cyberbullying, in order to identify students who may be experiencing issues and intervene effectively.

Many of the signs of cyberbullying will be similar to those found in the 'Signs of bullying' section of this policy; however, staff will be alert to the following signs that may indicate a student is being cyberbullied:

- Avoiding use of the computer,
- Being on their phone routinely,
- Becoming agitated when receiving calls or text messages.

Staff will also be alert to the following signs which may indicate that a student is cyberbullying others:

- Avoiding using the computer or turning off the screen when someone is near,
- Acting in a secretive manner when using the computer or mobile phone,
- Spending excessive amounts of time on the computer or mobile phone,
- Becoming upset or angry when the computer or mobile phone is taken away.

Parents will be offered advice to educate them on the signs and symptoms of cyberbullying via face-to-face sessions in school and as part of regular communications home e.g., the school newsletter' in order to educate them on the signs and symptoms of cyberbullying, and will be advised to report to the headteacher if their child displays any of the signs outlined in this section.

During times when remote education is being utilised, the school will frequently be in contact with parents to make them aware of their activities online, but also to reinforce the importance of students staying safe online and explaining how filtering and monitoring procedures work.

Staff will be aware that a cyberbullying incident might include features different to other forms of bullying, prompting a particular response. Significant differences may include the following:

- **Possible extensive scale and scope** – students may be bullied on multiple platforms and using multiple different methods that are made possible by virtue of the bullying taking place online,
- **The anytime and anywhere nature of cyberbullying** – students may not have an escape from the torment when they are at home due to the bullying continuing through technology at all times,

- **The person being bullied might not know who the perpetrator is** – it is easy for individuals to remain anonymous online and on social media, and students may be bullied by someone who is concealing their own identity,
- **The perpetrator might not realise that their actions are bullying** – sometimes, the culture of social media, and the inability to see the impact that words are having on someone, may lead to students crossing boundaries without realising,
- **The victim of the bullying may have evidence of what has happened** – students may have taken screenshots of bullying, or there may be a digital footprint that can identify the perpetrator.

The Trust will support students who have been victims of cyberbullying by holding formal and informal discussions with the student about their feelings and whether the bullying has stopped, in accordance with section 13 and section 14 of this policy.

In accordance with the Education Act 2011, the Trust has the right to examine and delete files from students' personal devices, e.g., mobiles phones, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone. In these cases, the school's Searching, Screening and Confiscation Policy will be followed at all times.

## 11. Procedures

Minor incidents will be reported to the victim's form tutor, who will investigate the incident, set appropriate sanctions for the perpetrator, and inform the head of year of the incident and outcome.

When investigating a bullying incident, the following procedures will be adopted:

- The victim, alleged perpetrator and witnesses are all interviewed separately,
- Members of staff ensure that there is no possibility of contact between the students being interviewed, including electronic communication,
- If a student is injured, members of staff take the student immediately to the school nurse for a medical opinion on the extent of their injuries,
- A room is used that allows for privacy during interviews,
- A witness is used for serious incidents,
- If appropriate, the alleged perpetrator, the victim and witnesses are asked to write down details of the incident; this may need prompting with questions from the member of staff to obtain the full picture,
- The headteacher will gather evidence of a cyberbullying incident; this may involve text messages, emails, photos, etc. provided by the victim,
- Premature assumptions are not made, as it is important not to be judgemental at this stage,
- Members of staff listen carefully to all accounts, being non-confrontational and not assigning blame until the investigation is complete,
- All students involved are informed that they must not discuss the interview with other students.

Due to the potential for some specific forms of bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented.

## 12. Sanctions

If staff are satisfied that bullying did take place, the perpetrator will be helped to understand the consequences of their actions and warned that there must be no further incidents.

If possible, staff will attempt reconciliation and to obtain an apology from the perpetrator. This will either be in writing to the victim, and/or witnesses if appropriate, or face-to-face, but only with the victim's full consent. Discretion will be used here; victims should not feel pressured into a face-to-face meeting with the perpetrator.

Parents are informed of bullying incidents and what action is being taken.

All staff involved in managing instances of bullying will be aware that taking disciplinary action and providing support are not mutually exclusive actions and should be conducted simultaneously to encourage more positive behaviour in future.

The Head of Year will informally monitor the students involved over the next **half-term**.

The school will remain cognisant of the fact that continued access to school can be important for rehabilitation of harmful behaviour and will not exclude students unless as a last resort – where there have been serious or consistent incidents of bullying, the school will act in line with the Suspension and Exclusion Policy.

### **13. Support**

In the event of bullying, victims will be offered the following support:

- Emotional support and reassurance from relevant staff,
- Reassurance that it was right to report the incident and that appropriate action will be taken,
- Liaison with their parents to ensure a continuous dialogue of support,
- Advice not to retaliate or reply, but to keep the evidence and show or give it to their parent and a member of staff,
- Advice on aspects of online safety, in the event of cyberbullying, to prevent re-occurrence, including, where appropriate, discussion with their parents to evaluate their online habits and age-appropriate advice on how the perpetrator might be blocked online,
- Discussion with their parent on whether police action is required (except in serious cases of child exploitation or abuse where the police may be contacted without discussion with parents).

The Executive Headteacher/ Head of School, in conjunction with the DSL will carefully consider in each instance of bullying that is handled whether it is appropriate to split up the victim(s) and perpetrator(s), e.g., preventing them sharing classes or spaces where possible, and will split up other harmful group dynamics to prevent further occurrences where necessary. Victims will be encouraged to broaden their friendship groups e.g., by joining lunchtime or after-school clubs or activities.

Staff, including the tutor, Head of Year, member of the pastoral support team or DSL, will work with the victim to build resilience,

The school will acknowledge that bullying may be an indication of underlying mental health issues. The school will work with the perpetrator regarding any underlying mental health or emotional wellbeing problems.

### **14. Follow-up support**

The progress of both the perpetrator and the victim will be monitored by their form tutors. One-on-one sessions to discuss how the victim and perpetrator are progressing may be appropriate. If appropriate, follow-up correspondence will be arranged with parents.

Students who have been bullied will be offered support. The victim will be encouraged to tell a trusted adult in school if bullying is repeated.

Students who have bullied others will be supported in the following ways:

- Receiving a consequence for their actions,
- Being able to discuss what happened,
- Being helped to reflect on why they became involved,
- Being helped to understand what they did wrong and why they need to change their behaviour,
- Appropriate assistance from parents.

Students who have been bullied will be assessed on a case-by-case basis and the DSL will, if necessary, refer the victim of bullying to external support agencies.

In cases where the effects of bullying are so severe that the student cannot successfully reintegrate back into the school, the Executive Headteacher/ Head of School and DSL will consider the transfer of the student to another mainstream school with the consent and involvement of the student's parents.

Where a student who has been the victim of bullying has developed such complex needs that alternative provision is required, the student, their parents, the Executive Headteacher/ Head of School and DSL will meet to discuss the use of alternative strategies or provision.

## **15. Bullying outside of school**

Staff will remain aware that bullying can happen both in and outside of school and will ensure that they understand how to respond to reports of bullying that occurred outside school in line with the Child Protection and Safeguarding Policy and the Behaviour Policies.

The Executive Headteacher/ Head of School has a specific statutory power to discipline students for poor behaviour outside of the school premises. Section 89(5) of the Education and Inspections Act 2006 gives the Executive Headteacher/ Head of School the power to regulate students' conduct when they are not on school premises, and therefore, not under the lawful charge of a school staff member.

Teachers have the power to discipline students for misbehaving outside of the school premises. This can relate to any bullying incidents occurring off the school premises, e.g., on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it will be investigated and acted upon. In all cases of misbehaviour or bullying, members of staff can only discipline the student on school premises, or elsewhere when the student is under the lawful control of the member of staff, e.g., on a school trip.

The Executive Headteacher or Head of School is responsible for determining whether it is appropriate to notify the police of the action taken against a student. If the misbehaviour could be of a criminal nature or poses a serious threat to a member of the public, the police will be informed.

## **16. Record keeping**

The DSL along with the pastoral team will ensure that robust records are kept on Bromcom with regard to all reported or otherwise uncovered incidents of bullying – this includes recording where decisions have been made, e.g., sanctions, support, escalation of a situation and resolutions.

The headteacher and DSL will ensure that all decisions and actions recorded are reviewed on a regular basis for the purposes of:

- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain students that may need to be handled, e.g., with pastoral support.
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice.
- Considering whether there are wider cultural issues at play within the school, e.g., whether school culture facilitates discriminatory bullying by not adequately addressing instances, and planning to mitigate this.
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise.
- Responding to any complaints about how cases have been handled.

#### **17. Monitoring and review**

This policy is reviewed annually by Senior Leaders and the DSLs, for approval by the Board.

**Adopted by the Trustees 16 June 2025**

**Next Review Date: June 2027 (Two Years)**