

Child Protection, Environment and Safety Policy

1. Statement of commitment to child safety

The Geelong College is a Child Safe School. We have a zero-tolerance stance on child abuse and are committed to the protection of all children from all forms of abuse. The Geelong College recognises that in order to achieve a child safe environment at the College which meets students' intellectual, physical, social, emotional and moral needs, students need to be involved in the creation and maintenance of such an environment.

We are committed to taking a preventative and proactive approach to providing a child safe environment where children and young people are safe and feel safe; they are empowered to use their voices when decisions are being made that affect their safety. We are also committed to providing simple and accessible processes to assist all children to identify and communicate when they do not feel safe. Particularly, this includes those who are Aboriginal and Torres Strait Islander, from culturally diverse backgrounds and those with a disability.

We are clear about our behavioral expectations of every person in our community and are committed to having a shared understanding of and responsibility for child safety. All staff are expected to uphold a culture that protects children from all forms of harm.

2. Purpose

The College has developed the following Child Protection Environment and Safety Policy. This policy is an overarching document that provides key elements of our approach to protecting children from abuse.

The policy forms the foundation of the College's procedures, practices, decision-making processes and ultimately the College's culture with respect to child safety.

This policy provides a clear set of guidelines and procedures for The College:

- a. providing a safe environment for all children which ensures their safety, health, and wellbeing promoting the cultural safety of all children
- b. identifying, reducing, and removing risks of child abuse
- c. intervening when a child may be at risk of abuse or neglect
- d. involving children in child safety including listening to children and incorporating their views about how to provide a safe environment
- e. making staff aware of their legal and duty of care obligations to report child abuse and neglect
- f. responding to requests, sharing, and requesting information to promote child wellbeing or safety and/or manage risk of family violence.

The policy has been designed to be published on our public website as well as communicated through other mediums such as newsletters, our annual report and in induction/welcome packs for College Council members, staff and volunteers

The College's Child Protection and Safety Policy is approved and endorsed by the College's School Council and is annually reviewed.

3. Scope

This policy applies to:

The College staff (including early childhood teachers and educators), Day Students- Domestic and International Boarding, volunteers, approved providers/contractors, parents/guardians, children and others attending the programs and activities of The College, including offsite excursions and activities.

Together referred to as "The Geelong College Community" for the purpose of the Child Protection, Environment and Safety Policy.

The Child Protection, Environment and Safety Policy applies in all College Boarding House (Mackie & Mossgiel) environments. The College and Boarding House environments include the physical, virtual and online places used by a student or a boarding student at any time.

4. Policy Detail

4.1 Roles and Responsibilities

Child safety and wellbeing is everyone's responsibility. All adults in The College and Boarding House community have a shared responsibility for contributing to the safety, wellbeing and protection of students:

4.1.1 College Council

- a. Championing and promoting a child safe culture within The College
- b. Approving our Child Protection Program, including this Child Protection, Environment and Safety Policy and the [Child Safety Code of Conduct](#)

The College Council is also responsible for ensuring that the College has appropriate resources to effectively implement the Victorian Child Safe Standards and Ministerial Order 1359 and our Child Protection Program.

4.1.2 The Principal

The Principal is responsible, and will be accountable, for the operational management of The College, and the implementation of the Child Protection Program.

The Principal is responsible for:

- a. taking all practical measures to ensure that this Child Protection and Safety Policy and The College's Child Protection Program is implemented effectively and followed
- b. ensuring that a strong and sustainable child safe culture is maintained within The College, including by:
 - i. modelling the [Child Safety Code of Conduct](#), and reinforcing high standards of child safe behaviours between adults and students and between students
 - ii. facilitating the participation of students, families, Staff and other members of The College community in promoting and improving child safety and wellbeing at The College
 - iii. promoting regular and open discussion of child safety and wellbeing issues within The College community
 - iv. facilitating regular professional learning for Staff and relevant Volunteers and Contractors about child safety, cultural safety, student wellbeing and preventing and responding to child safety incidents and concerns
 - v. creating an environment where child safety incidents, concerns and complaints are readily raised with The College and where no one is discouraged from reporting child safety incidents or concerns to relevant external authorities.

The Principal is the "Head" of The College for the purposes of the Reportable Conduct Scheme.

4.1.3 The Heads of Boarding

The Heads of Boarding are responsible, and will be accountable, for the operational management of the Boarding Houses Mackie (Male) & Mossgiel (Female). They are responsible for taking all practical measures to ensure that this Child Protection and Safety Policy and The College's Child Protection Program is implemented effectively at the Boarding Houses and that a strong and sustainable child safe culture is maintained within the Boarding Houses.

4.1.4 The College's [Child Safety and Wellbeing Officers](#)

A number of senior staff members are nominated as the College's Child Protection Officers. They are responsible for championing child protection within the College and assisting in coordinating responses to child protection incidents. Our Child Protection Officers receive additional specialised training with respect to child protection issues. They are the first point of contact for raising child protection concerns within the College.

These specific responsibilities at The College are allocated to:

Dr Peter Miller, Principal

+61 3 5226 3107

Peter.Miller@tgc.vic.edu.au.

Simon Young, Deputy Principal

+61 3 5226 3122

Simon.Young@tgc.vic.edu.au

Nat Coull, Head of Senior School

+61 3 5226 3112

Nat.Coull@tgc.vic.edu.au

Leanne Russell, Head of Middle School

+61 3 5226 3460

Leanne.Russell@tgc.vic.edu.au

Sondra Wolfenden, Head of Junior School

+61 3 5226 3430

Sondra.Wolfenden@tgc.vic.edu.au

4.1.5 Staff Members

All Staff are "school staff" or "school boarding premises staff" for the purposes of Ministerial Order 1359.

All Staff are required to comply with our Child Protection and Safety Policy and [Child safety Code of Conduct](#), be familiar with our Child Protection Program and understand their legal obligations with respect to the reporting of child abuse and other harm, and WWC Checks.

It is each individual's responsibility to be aware of key indicators of child abuse and other harm, to be observant, and to raise all child safety incidents and concerns with one of The College's [Child Safety and Wellbeing Officers](#).

To meet these obligations, all Staff must:

- i. participate in child safety and wellbeing induction and ongoing training provided by The College
- ii. always follow The College's child safety and wellbeing policies and procedures in the Child Protection Program

- iii. act in accordance with the [Child safety Code of Conduct](#)
- iv. identify and raise child safety incidents and concerns in accordance with our [Responding to and Reporting Child Safety Incident Concerns](#), and follow the PROTECT Four Critical Actions and [Four Critical Actions: Student Sexual Offending](#)
- v. ensure students views are taken seriously and their voices are heard when making decisions that affect them
- vi. implement inclusive practices that respond to the diverse needs of students.

4.1.6 Volunteers

A Volunteer is a someone who performs work for The College during College activities on/off campus, including Boarding House environments without remuneration or reward.

Volunteers may be family members of students, or from the wider College or local community. Volunteers are not "school staff" or "school boarding premises staff" for the purposes of Ministerial Order 1359.

- a. all Volunteers must comply with our Child Protection and Safety Policy and [Child safety Code of Conduct](#)
- b. all Volunteers required by The College must:
 - i. participate in child safety and wellbeing induction and ongoing training provided by the The College
 - ii. be aware of key indicators of child abuse and other harm
 - iii. understand their legal obligations with respect to the reporting of child abuse and other harm
 - iv. raise all child safety concerns with one of The College's [Child Safety and Wellbeing Officers](#).

4.1.7 Contractors

A Contractor is someone engaged by The College to perform specific tasks. Contractors are not employees of The College. However, Contractors who have direct contact with children are "school staff" or "school boarding premises staff" for the purposes of Ministerial Order 1359.

All Contractors are responsible for contributing to the safety and protection of students in the The College and Boarding House environments.

All Contractors must comply with our Child Protection and Safety Policy and [Child safety Code of Conduct](#)

Direct Contact Contractors (and, if required by The College, other Contractors such as Regular Contractors who are engaged in "child-connected work") must:

- i. participate in child safety and wellbeing induction and ongoing training provided by The Geelong College
- ii. be aware of key indicators of child abuse and other harm
- iii. understand their legal obligations with respect to the reporting of child abuse and other harm
- iv. raise all child safety concerns with one of The College's Child Protection Officers. [Child Safety and Wellbeing Officers](#). The College may include these requirements in the written agreement between it and the Contractor.

5. The Geelong College's Policy

5.1 Child Protection Code of Conduct

Our [Child Safety Code of Conduct](#) include a [Staff Code of Conduct](#), and a [Staff and Student Professional Boundaries policy](#). Together, these documents set boundaries and expectations for appropriate behaviours between adults in The College community and students, including in physical, online and virtual environments.

The College has also embedded standards of behaviour for students relevant to child safety and wellbeing in the following documents; [Student Code of Conduct Guidelines](#), [Student Bullying Harassment Policy](#), [Equal Opportunity and Inclusivity Student Policy](#) and [Student Wellbeing Policy](#).

Our [Child Safety Code of Conduct](#) include clear processes to report inappropriate behaviour. We publish our [Child Safety Code of Conduct](#) on our public website so that everyone can easily access what behaviours are acceptable and unacceptable at The College.

5.2 Cultural Safety

At The College we are committed to establishing an inclusive and culturally safe College where the strengths of Aboriginal and Torres Strait Islanders Culture, values and practices are respected.

We think about how every student can have a positive experience in a safe environment. For Aboriginal and Torres Strait islander Students, we recognise the link between culture, identity and safety and actively create opportunities for Aboriginal and Torres Strait Islander students, their families, and their communities (including local Aboriginal communities relevant to the College) to have a voice and presence in our planning, policies and activities.

5.3 Student Empowerment and Participation

The College is a child safe and child-centred organisation, and we work to create an inclusive and supportive environment that encourages students and families to contribute to our approach to child safety and wellbeing.

We ensure that our physical, virtual and online environments are friendly and welcoming to all children and young people.

We actively seek to include students in decisions that affect them. This includes decisions about organisational planning, delivery services, management of facilities, and learning and assessment environments.

We ensure that students know about their rights to safety, information and participation. We actively seek to understand what makes students feel safe in our College and regularly communicate with students about what they can do if they feel unsafe. Students are encouraged to provide feedback about child safety and protection issues. The College also conducts student focus groups and organises student surveys about various safety issues at the College, including child protection. The College takes all student contributions seriously and actively looks for ways to implement improvements to its Child Protection Program to reflect these contributions.

We recognise the importance of friendships and encourage respectful relationships, strong friendships and support from peers.

To this end, the College has developed, and continues to develop, a comprehensive range of pastoral care policies and procedures that are designed to promote the social and emotional wellbeing of our students, and to deliver age-appropriate education to all students about:

- i. healthy and respectful relationships (including sexuality)
- ii. child abuse awareness and a child's right to be safe
- iii. a child's right to make decisions about their body and their privacy
- iv. how they can raise concerns about abuse
- v. resilience and coping with adversity

5.4 Culturally and Linguistically Diverse Students

Students from culturally and linguistically diverse backgrounds are those who identify as having cultural or linguistic affiliations by virtue of their place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home or because of their parents' identification on a similar basis. They include students of Aboriginal or Torres Strait Islander descent that identify as being Aboriginal or Torres Strait Islander.

The College values and respects the racial, cultural and linguistic diversity of our students and is committed to ensuring that the backgrounds of all students are sensitively recognised, catered for, celebrated and valued so that racial and cultural differences do not compromise a student's safety and wellbeing.

It is our policy that:

- i. we identify children from culturally and linguistically diverse backgrounds when they are enrolled in the College
- ii. we employ appropriate strategies to ensure the safety of these children as required
- iii. we encourage participation and empowerment of these children in the development of these strategies
- iv. we consider these children when developing and implementing policies and procedures related to child protection at the College
- v. we educate our staff about these cultural differences and the strategies and procedures we have employed.

When supporting students from culturally and linguistically diverse backgrounds, including Aboriginal or Torres Strait Islander students, or those who identify as Aboriginal or Torres Strait Islander, it is critical that the College provides culturally appropriate support. Where possible the College will work with relevant cultural support groups, ensure that confidentiality of the family is maintained and engage an interpreter when communicating with the student's family.

Similarly, when supporting students from culturally and linguistically diverse backgrounds who have been impacted by abuse, the College will consider appropriate measures to be taken for the welfare of the students, including additional support where appropriate given that the student's family may not be present to provide support within the home environment.

Students from refugee backgrounds who have been impacted by abuse may also be experiencing trauma, dislocation and loss. Sensitive consideration should be given when determining how to support the student, and their family.

5.5 Students with a Disability

The College has an obligation to students with a disability to ensure that they are afforded the same level of educational and pastoral care as any other student at the College and considers how each policy and procedure the College establishes and implements may affect students with a disability.

The College is committed to ensuring that we fulfil our legal obligations including those related to discrimination and disability standards.

Students with a disability will not only require additional assistance to participate and engage in college activities in a safe and supportive manner, but also that there are specific child protection risks that arise in relation to students with a disability. Managing these risks may include for example, stricter screening procedures and training for staff who assist students who require help with personal activities such as toileting or dressing.

Students with a disability may also require varied reporting avenues or systems to students without a disability, and the College has considered this when creating and implementing our [Responding to and Reporting Child Safety Incidents and Concerns](#)

When supporting a student with a disability who has been impacted by child abuse, it is critical that the College considers:

- i. the chronological age, developmental age and cognitive function of the student in order to tailor developmentally appropriate support strategies
- ii. the student's vulnerability to ongoing abuse when considering the need to make a further report and/or implement further risk mitigation strategies.

5.6 Parent/Carer, family, and Community Engagement at The College

The College recognises that parents and carers have the primary responsibility for the up bringing and development of their children. We ensure that they participate in decisions affecting their children.

We ensure that families and relevant communities (Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse communities, other communities that make up our Staff and Student Cohort, and the local community in which The College operates) know about The College operations and policies, including its Child Protection Environment and Safety Policy and the Child Protection Codes of Conduct, record keeping practices, risk management, and complaints and investigation processes.

We actively seek to include families and relevant communities in decisions about organisational planning, delivery of services, management of facilities, and learning and assessment environments.

We build cultural safety at The College through partnership with relevant communities.

The specific strategies that we have adopted to promote the engagement of parent/carers, families, and relevant communities in child safety and wellbeing at The College, to make information about child safety and wellbeing available and accessible, and to implement all of the above obligations, are set out in our Child Protection Program.

5.7 Suitable Staff, Volunteers and Contractors and Child safe Knowledge, Skills and Awareness (Child Protection Human Resources Management)

The specific human resources management strategies that we have adopted at The College to promote child safety and wellbeing are set out in *HR01 Recruitment Selection and Induction Policy*. They include reference to:

- a. Recruitment and Screening of staff, volunteers and contractors to engage the most suitable and appropriate people to work with our students
- b. Diversity and Equity. The College does not tolerate any discriminatory practices.
- c. Training on and Information About Child Protection for all staff, volunteers and contractors whom are required to complete induction training on our child protection policies, practices and procedures.
- d. Supervision and Support to ensure compliance with The College approach to child safety and wellbeing.

6. Complaints and Reporting Processes:

The College fosters a culture that encourages everyone in the College community to raise concerns and complaints about child safety and wellbeing. Our processes for raising complaints and concerns, and the procedures that all staff, Volunteers and Contractors must follow whenever they witness, suspect or receive a complaint about a child safety incident or concern involving a student, a staff member, a Volunteer, a Contractor or The College, are:

7. Reporting Child Safety Incidents or Concerns to The College

7.1 Community

Whenever there are concerns that a child or young person is in immediate danger the Police should be called on 000.

Any person, including all Staff, Volunteers, Contractors, parents/carers and students, can at any time report concerns about the wellbeing of a child aged under 17 to Child Protection by:

- i. during business hours (8:45am-5:00pm, Monday to Friday), contacting the Child Protection intake service for the local government area where the child resides, listed [here](#).
- ii. after hours, telephoning 13 12 78.

7.2 Staff

Reports can be made to a [Child Safety and Wellbeing Officers](#) including the Principal.

Where the incident or concerns involves the Principal, internal reports should instead be made to the Chair of The Geelong College Council.

Our Child Protection Program contains detailed guidance for Staff, Volunteers and Contractors about when and how to report child safety incidents or concerns to relevant external authorities.

We recognise that some individuals, particularly children, face additional vulnerabilities to child abuse and other harm, as well as additional barriers to disclosing child safety incidents or concerns. Our Child Protection Program provides guidance on identifying additional vulnerabilities and barriers and contains strategies for supporting these individuals to participate in The College community and enabling them to disclose child safety incidents or concerns to The College.

7.3 Students, Parents/Carers and Community Members

The College provides students at The College and boarding students at the Boarding Houses with information about and encourages them to use multiple pathways to raise child safety incidents or concerns about or at The College or the Boarding Houses. We explain these in our [Obligation to Act to Protect, Making Additional Reports and Mandatory Reporting](#) and [Community Grievance Policy](#) and they include informal and formal ways, an 'anonymous' way, and through external child advocacy or child safety organisations.

The College is committed to ensuring that child abuse reporting procedures are age-appropriate, simple, and accessible for all children including children from culturally diverse backgrounds and children with a disability.

Parents/carers, family members and other community members who have child safety concerns or who suspect that a child or young person associated with The College may be subject to abuse or other harm can contact the College's Principal, by phoning +61 3 5226 3107 or emailing Peter.Miller@tgc.vic.edu.au

Any person can also contact

- Simon Young, Deputy Principal
- Nat Coull, Head of Senior School
- Leanne Russell Head of Middle School
- Sondra Woods Head of Junior School

Communications will be treated confidentially on a 'need to know basis'.

7.4 The College Response

The College will take appropriate, prompt action in response to all child safety incidents or concerns, including all complaints, allegations or disclosures of abuse or other harm, when staff, Volunteers, Contractors, students, parents/carers or anyone else reports these to The College.

The College response will include:

- i. externally reporting all matters that meet the required relevant thresholds to Child Protection (Mandatory Reports), the Police (Mandatory Reporting of Child Sexual Abuse), the CCYP (Reportable Conduct), and/or the Victorian Institute of Teaching (Teacher Misconduct), depending on the issues raised and consistent with PROTECT Four Critical Actions and [Four Critical Actions: Student Sexual Offending](#)
- ii. fully cooperating with any resulting investigation by an external agency
- iii. protecting any student connected to the child safety incident or concern until it is resolved and providing ongoing support to those affected
- iv. taking particular measures in response to child safety incidents or concerns about an Aboriginal or Torres Strait Islander student, a student from a culturally and linguistically diverse background, a student with disability, and other vulnerable students (such as students who are unable to live at home or students who identify as lesbian gay, bisexual, transgender or intersex)
- v. sharing information with, or requesting information from, external people or agencies as permitted or required under the Child Information Sharing Scheme and/or the Family Violence Information Sharing Scheme
- vi. securing and retaining records of the child safety incident or concern and The College's response to it
- vii. taking broader actions to improve child safety at The College (including systemic reviews and resulting improvements).

8. Support for Students, Families and Staff Following Child Safety Incident or Disclosure

Child safety incidents or concerns can cause trauma and significantly impact on the mental health and wellbeing of children, as well as on their families. In addition to reporting and referral to the relevant authorities, The College plays a central role in addressing this trauma and has a duty of care to ensure that students feel safe and supported at The College.

The College employs a range of measures to support students affected by a child safety incident or concern depending on the particular circumstances of the matter and of the student and their family:

- i. [Child Safety and Wellbeing Officers](#) will work with the student and their family to develop a Student Support Plan
- ii. support strategies that could be considered for students and/or their families might include offering or organising referrals to internal or external support, such as The College Psychologist, Counsellors, or an external support agency and/or child advocacy organisation which specialises in supporting children and young people impacted by abuse or other harm.

The College offers former students who may disclose historical child safety incidents or concerns from their time at The College similar support.

Witnessing a child safety incident or receiving a disclosure of abuse or other harm can be a distressing experience for Staff, Volunteers and Contractors involved. The College assists impacted Staff, Volunteers and Contractors to access necessary support.

9. Embedding a Culture of Child Safety: Our Child Protection Program

Our Child Protection Program itself is one of the strategies employed by The College to embed a culture of child safety at The College.

Our Child Protection Program relates to all aspects of child safety and wellbeing and establishes work systems, practices, policies and procedures to create and maintain a child safe environment and culture at The College. It includes:

- i. the Child Protection Codes of Conduct
- ii. clear information about what is child abuse and other harm and key indicators of child abuse and other harm
- iii. clear procedures, that are consistent with PROTECT Four Critical Actions and [Four Critical Actions: Student Sexual Offending](#), for responding to and reporting child safety incidents or concerns internally to a [Child Safety and Wellbeing Officers](#), and for responding to incidents or allegations of child abuse or other harm
- iv. strategies to support, encourage and enable Staff, Volunteers, Contractors, parents/carers and students to understand, identify, discuss and report child safety matters
- v. procedures for recruiting and screening members of the Senior/Executive Management, Staff, Volunteers and Contractors
- vi. procedures for reporting to external agencies, that are consistent with PROTECT Four Critical Actions and [Four Critical Actions: Student Sexual Offending](#), including Mandatory Reporting to the Department of Families, Fairness and Housing (Child Protection), Reportable Conduct to the Commission for Children and Young People (CCYP) and Reporting Child Sexual Abuse to Police
- vii. pastoral care strategies designed to empower students and keep them safe
- viii. strategies to support and encourage the participation and inclusion of Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds and students with disability
- ix. child protection training
- x. information regarding the steps to take after a disclosure of abuse or other harm to protect, support and assist students
- xi. guidelines with respect to record keeping and confidentiality
- xii. policies to ensure compliance with all relevant laws, regulations and standards (including the Victorian Child Safe Standards, Ministerial Order 1359 and the National Principles)
- xiii. a system for continuous review and improvement.

9.1 Implementation and Communication

The Child Protection and Safety Policy is published on the College's public website.

It is provided to new Staff, Volunteers, and Direct Contact and Regular Contractors at their induction or prior to them commencing their work at The College.

9.2 Child Protection Risk Management

The College recognises the importance of a risk management approach to minimising the potential for child abuse or harm to occur and we use this information to inform our policies, procedures and activity planning. We have implemented a comprehensive Child Protection Risk Management Strategy to assist in the identification, assessment and management of child protection risks in all The College environments.

We identify, assess and manage child protection risks in all The College and Boarding House environments, based on a range of factors including the nature of our College's and Boarding House activities, their physical, virtual and online environments and the characteristics of our students and boarding students.

We record identified risks to child safety and wellbeing in our Child Protection Risk Register, along with the actions in place at The College to manage these risks. College Council, the Principal, the Heads of Boarding and/or the Senior/Executive Management monitor and evaluate the effectiveness of these actions at least annually.

9.3 Privacy and Information Sharing

The College collects, uses and discloses information about students and their families in accordance with Victorian privacy laws and other relevant laws, including laws that permit The College to disclose information about child safety and wellbeing to external people and agencies. For information about how The College collects, uses and discloses this information, refer to our [Privacy Policy](#).

9.4 Child Protection Record Keeping

The College is committed to best practice record keeping about child safety incidents and concerns.

The College records all internal and external reports of child safety incidents and concerns, as well as any other responses by The Geelong College using PROTECT: Recording your actions: Responding to suspected child abuse - A Template for Victorian Schools.

When keeping records of child safety incidents or concerns, The College maintains confidentiality and privacy for students and families in accordance with Federal and State privacy legislation.

9.5 Child Protection Program and Practice Review

The College is committed to the continuous improvement of the policies and procedures making up our entire Child Protection Program and child safety and wellbeing practices. The Program as a whole is reviewed Annually (or earlier if a significant child safety incident occurs at The College or legislation changes) for overall effectiveness and to ensure compliance with all child safety and wellbeing related laws, regulations and standards.

When undertaking these reviews, The College:

- i. actively seeks, actions, and incorporates feedback from students, families, the wider The College community, Staff, Volunteers and Contractors
- ii. analyses any complaints and child safety incidents that may have occurred
- iii. communicates any learnings, adjustments or amendments to policy and practice widely throughout The College community.

10. Breach of the Child Protection and Safety Policy

The College enforces this Child Protection and Safety Policy and our Child Protection Codes of Conduct. In the event of any non-compliance, we will instigate a review that may result in a range of measures including (depending on the severity of the breach):

- i. remedial education
- ii. counselling
- iii. increased supervision
- iv. the restriction of duties
- v. suspension
- vi. in the case of serious breaches, termination of employment, contract or engagement.

11. Policy Review

A review of the Child Protection and Safety Policy is conducted Annually or earlier if required, such as if a significant child safety incident occurs at The College or due to changes in legislation.

College Council is responsible for ensuring that this Policy is reviewed and updated as needed and for approving this Policy.