

Title:	Policy for the Safeguarding of Adults at Risk of Harm, 18-25
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1.0 Introduction.

- 1.1 This policy has been drawn from the Manchester City Council Multi Agency Policy for the Safeguarding of 'Adults at Risk of Harm' Government guidance. (2014 Care Act)
- 1.2 42nd Street works with young people between the ages of 11 to 25 years experiencing mental ill health or under stress. For young people under the age of 18 years old, the Youth (Child) Safeguarding Policy is relevant. Hence this policy covers young people between **18 to 25 years of age** (referred to as Young Adults) accessing services at 42nd Street living across Greater Manchester. 42nd Street predominantly works with young adults in Manchester, Salford, Trafford and Tameside & Glossop however as we also support young adults across Greater Manchester, we shall refer to the area we cover as **Greater Manchester**.
- 1.3 42nd Street takes seriously its responsibility to ensure that all young adults accessing our services are supported and protected. Failure to take reasonable action to safeguard, report and respond to potentially abusive situations can be considered as culpable negligence on our behalf as we are entrusted with supporting the safeguarding and well-being of vulnerable young people.
- 1.4 We are committed to working with the Commissioners of our services at all levels in order to ensure a proactive position on the safeguarding of vulnerable young adults.
- 1.5 The Board of Trustees and Management Team recognise and acknowledge their obligation to ensure that all staff at 42nd Street are fully aware of the systems which are in place to support the effective operation of this policy.
- 1.6 The basic foundation of the policy is the respect for the rights and dignity of all young adults taking positive account of their age, gender, ethnic origin, faith, ability, or sexuality.
- 1.7 **Core Principles:**
- *Empowerment*
 - *Prevention*
 - *Proportionality*
 - *Protection*
 - *Partnership*
 - *Accountability*
- 1.8 In accordance with MSAB guidance, organisations supporting adults at risk should:
- Explicitly include adults with care and support needs as key partners in all aspects of safeguarding work – this includes building service user participation into the monitoring, development, training strategies and implementation of its work.

- Develop a culture that does not tolerate abuse, neglect and exploitation
- Raise awareness about adult safeguarding.
- Strive to reduce avoidable risk and harm where possible in order to prevent abuse, neglect and exploitation from happening wherever possible.

2.0 Who is an Adult at Risk of Harm?

2.1 An adult at risk of harm is:

**Any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care or support. Where someone is over 18 but still receiving children’s services and a safeguarding issue is raised, the matter should be dealt with as matter of course by the adult safeguarding team.*

**NHS England*

- Are, or may be, in need of Community Care Services because of learning or physical disability, or physical or mental ill health.
- Are, or may be, unable to take care of themselves, or unable to protect themselves from harm or exploitation by others.

3.0 Definition and forms of Abuse.

- 3.1 Abuse is the violation of an individual's human and civil rights by any other person/s. This occurs in many forms and may consist of a single act or repeated acts. It may also be shown by failure to act in order to protect vulnerable young adults. Abuse may, or may not, result in the young person being physically injured or ill.
- 3.2 **Physical Abuse** includes for e.g.: hitting, slapping, pushing, kicking, squeezing, shaking, pinching, misuse of any medication, undue restraint, force-feeding.
- 3.3 **Sexual Abuse** includes for e.g.: sexual assault, rape or other sexual acts, the inappropriate touching of the individual’s sexual areas, or coercion into the viewing of pornographic materials.
- 3.4 **Domestic Abuse** is a serious crime and a safeguarding concern for children and young people. Domestic Abuse is persistent and intentional abuse of any kind - physical, sexual, financial, emotional - within the ‘family’/domestic situation. The perpetrator can be a partner or a family member. It is not necessary that the perpetrator needs to live within the same household as the person on the receiving end of the abuse.

The Manchester Crime and Disorder Partnership defines domestic abuse as; “Any incident or pattern of incidents of controlling, coercive or threatening behaviours, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

42nd Street works in compliance with the “working together to safeguard adults and children from domestic abuse protocol”
https://www.manchester.gov.uk/download/downloads/id/20227/working_together_to_safeguard_adults_and_children_from_domestic_abuse_protocol.pdf

- 3.5 **Psychological Abuse** includes for e.g.: threats of harm, abandonment or withdrawal of social contact, humiliation, shouting, bullying, name calling, intimidation, harassment, or the denial of or withdrawal from required services, contacts and social or family networks.
- 3.6 **Financial or Material Abuse** includes for e.g.: the withholding of money or possessions, intentional mismanagement of the person’s finances or property, theft, fraud, embezzlement, misappropriation of finances or exploitation.
- 3.7 **Neglect and Acts of Omission** include for e.g.: the failure to access appropriate services for recognised needs, avoidance of required health care, ignoring physical care needs, withholding of adequate nutrition, clothing or warmth, exposing the person to unacceptable risk, omitting to provide or ensure adequate supervision.
- 3.7 **Discriminatory Abuse** includes for e.g.: any acts that use hurtful language, cause harassment or similar treatment of the individual because of their race, sex, age, disability, faith, culture or sexual orientation.
- 3.8 **Institutional Abuse** includes for e.g.: the use of systems, routines, practice or care that neglect individual needs and create an imbalance and control within a managed setting such as care, day services etc.
- 3.9 **Abuse of Civil Rights** includes for e.g.: trafficking, the denial of, or coercive influence on, an individual’s rights to be registered and to vote, the right to be treated as an equal with dignity and respect, the right of freedom of speech or movement.
- 3.10 This is not an exhaustive list of examples, but merely a guide to the most regular forms of abuse. Any doubts on whether or not an act or omission is abusive should be checked with the designated person who could be your line manager, duty manager, Head of Services or Chief Executive.

4.0 Definition and issues related to Consent.

- 4.1 Consent is defined as a voluntary, uncoerced decision, made by a sufficiently competent or autonomous young adult. This decision is based on adequate information and deliberation, to **accept** rather than reject a proposed course of action that will affect him or her.
- 4.2 Consent requires a process of ensuring that the young adult receives sufficient information in such a manner that he or she is able to understand the risks, benefits and likely consequences. The young adult should also be afforded sufficient time to make a full consideration of the proposal and to consult with others where possible.
- 4.3 In the case of vulnerable young adults, the young adult may be unable to give informed consent because of the severity of their disability, living situation or health status. This

can significantly undermine their understanding of the basic elements of another person's behaviour or communication.

4.4 Consent is crucial in determining whether a particular act, relationship or situation is abusive of the person concerned. It is always necessary to determine whether the person **could and did give informed consent** to whatever took place.

4.5 There is a range of policies regarding the issue of consent e.g. **legal consent**, or **medical consent** and where such policies exist they should always be referred to, as there are some key differences in permitted actions.

5.0 Power and Unequal Situations.

5.1 Even if a young adult can make judgements about another person's behaviour, they may be in a situation, or relationship, where they cannot give meaningful consent. Such situations are essentially those where power and inequality are involved. The following considerations may be useful in judging whether or not any form of abuse has taken place:

- Parental or familial relationships where one person has the physical or emotional control of others.
- College/educational/vocational settings where adults might have significant power over the young adult being trained or learning in the setting.
- A custodial or care taking relationship on which the young adult relies.
- The use of threat or reprimand by another person in a position of authority.
- Where a young adult relies on another person for their communication to others.

6.0 Designated person/s and systems to ensure the effective operation of this policy.

6.1 The designated person/s will be **Chief Executive, Simone Spray** with delegated authority to the **Head of Service, Chris Jacob**. At all points of alleged abuse and/or an investigation, the CEO/Head of Service must be kept informed of key decisions and outcomes. The designated person on 42nd Street's Board of Trustees is **Kevin Jones**, who will also be kept informed of any high level incidents or investigations.

6.2 All allegations and incidents of abuse will be recorded in the young adult's case file and any additional appropriate recording systems, such as 42nd Street's Serious Untoward Incident Reporting procedure (SUI) .

6.3 All workers will be aware of this policy and will know how to access it. The policy will be located in the virtual Staff noticeboard.

6.4 42nd Street is committed in ensuring that all workers in the organisation have access to appropriate training and development opportunities in the context of Abuse, Risk and Safeguarding.

6.5 This policy will be applied in conjunction with any policies and procedures around the protection of Vulnerable Adults operative in Greater Manchester.

7.0 Procedure for Reporting and Responding to Allegations of Abuse – General Public.

- 7.1 It is recognised that it is often very difficult for members of the general public to raise concerns around possible abuse. With this in mind, a one step procedure should be followed.
- 7.2 The concerned member of the public should report their concerns to one of the following:
- CEO or Head of Service of 42nd Street.
 - Duty Manager of 42nd Street.
 - Local Authority Vulnerable Adults, Children, Families and Social Care with responsibility for safeguarding issues in Greater Manchester (see specific local area Safeguarding Board for further guidance)
 - Local Health Centre / GP.
 - Local Police Station
- 7.3 If the matter is reported directly to 42nd Street, internal procedures related to reporting by staff will be followed.

8.0 Procedure for Reporting and Responding to Allegations of Abuse – 42nd Street staff.

- 8.1 All staff have a duty to report **immediately** concerns or allegations of abuse. Reporting these details, even when a 42nd Street colleague or the staff of another organisation may be involved, is essential.
- 8.2 The Chief Executive and Management Team have a duty to respond and provide effective support to staff at such times. They must also refer to the relevant statutory guidance ALSO for managing allegations against people working with CYP. Staff must ensure that the alleged victim is safe and supported in the most appropriate way. It is extremely important that the worker does not have discussions about the alleged abuse with the individuals involved or other staff members.
- 8.3 The worker must speak to the duty or their line manager in the first instance – if necessary the matter can be also considered by the Head of Service and/or the Chief Executive (referred to as relevant manager for the purposes of this policy).
- 8.4 In the extremely unlikely situation where there is no relevant manager present or where the manager present and available is the alleged perpetrator, the worker should try and make phone contact with another of the relevant managers. If this is problematic then the worker should contact the relevant local Safeguarding office and alert the Chair of the Board of Trustees of this.
- 8.5 Workers must record in the relevant case notes/client case file their exact concerns and the reasons for these concerns. It may be necessary to record as part of a risk assessment. It is important to be clear, factual and concise. The recording must be dated and signed by the worker and countersigned by the relevant manager.
- 8.6 Should the alleged perpetrator be in the vicinity, the worker should not confront them about the incident.
- 8.7 If there is evidence or the worker suspects that physical or sexual abuse has just/recently taken place, DO NOT assist the alleged victim to wash, bathe, change

clothing or access food or drink. To do so could contaminate any evidence that the police would require. Greater Manchester Police must be contacted at the earliest possible moment in such instances and the relevant manager including the Chief Executive will advise on this.

8.8 Depending on the circumstances it might be necessary to complete a risk assessment. This will be done with support and advice from the relevant manager.

8.9 It is important that 42nd Street's confidentiality policy is discussed with the young adult alleging or reporting an incident and that there are boundaries and limitations to confidentiality. This discussion should be had with the young adult at initial meeting and/or the early stages of the relationship.

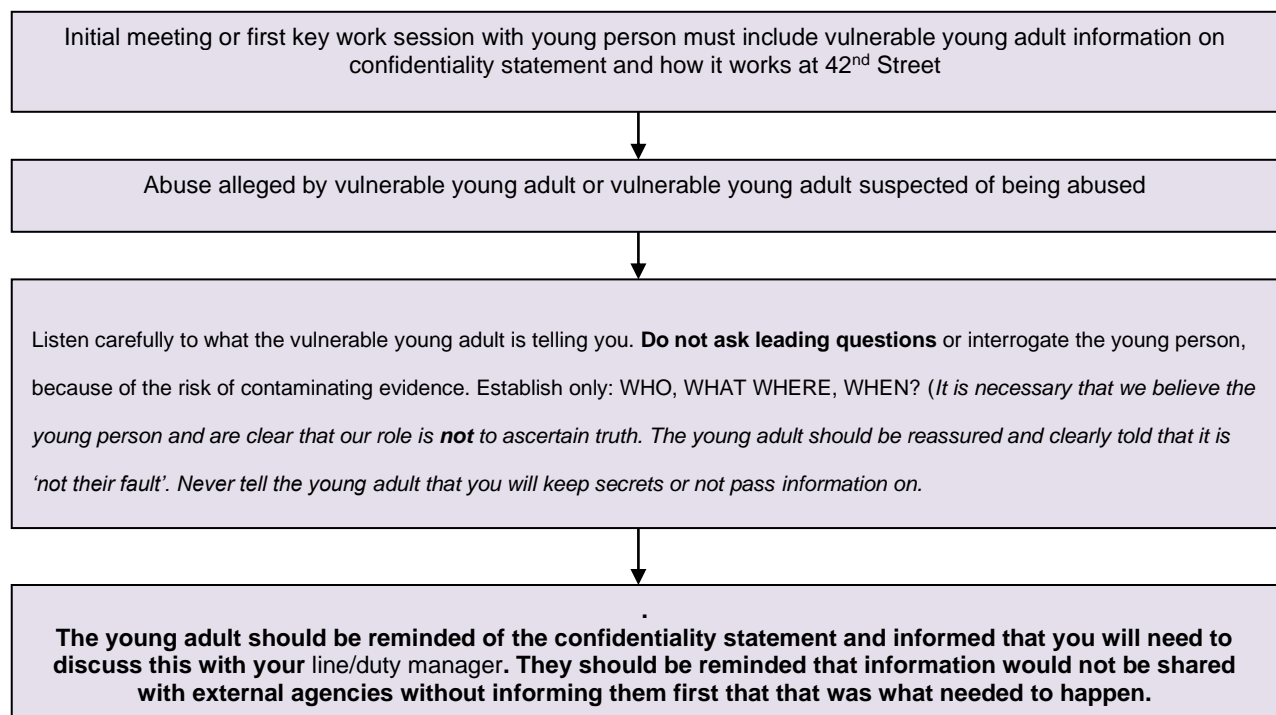
8.10 Workers must never intimate to a young adult that they will keep secrets and will not share information with management or external agencies.

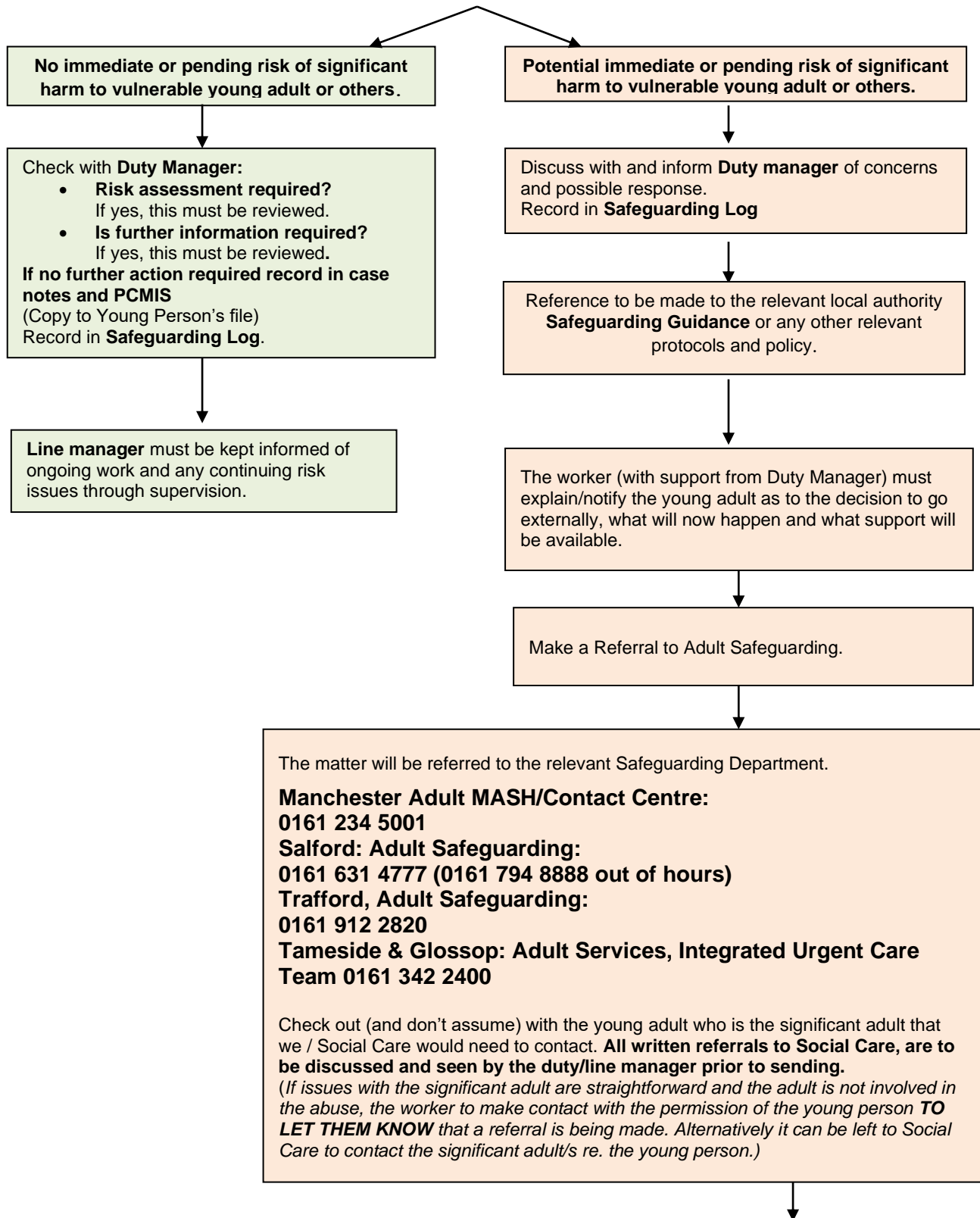
8.11 The relevant manager will have responsibility to oversee the reporting and responding process and will inform the worker of any further requirements regarding the allegation or any further actions that will be required of the worker. All matters must be reported to the Chief Executive.

8.12 Workers must ensure that they seek effective support from the relevant manager at the time of responding and reporting abuse and from their relevant line manager at a later point accessed via supervision.

9.0 Practice Guidelines.

9.1 Procedures for alleged/suspected Vulnerable Adult Abuse: Physical, Emotional, Sexual, Psychological and Economic.







LADO – Local Authority Designated Officer
 The role of the LADO is set out in the HM Government guidance **Working Together to Safeguard Children (2015)**.
 LADOs are involved in the management and oversight of individual cases where it is alleged that a person working with children has caused harm or has behaved inappropriately towards a child/young person.

LADO contact details for Manchester, Salford, Trafford and Tameside & Glossop.
 *Please refer to individual local safeguarding boards for contact details

Once the matter is reported to Social Services and subject to the wishes of the young person and in agreement with the duty/line manager, the worker will continue supporting the young adult in the most appropriate way.

ALL ACTIONS TO BE DOCUMENTED IN YOUNG PERSON’S CASE FILE.

9.2 Best Practice - for best practice please refer also to the following 42nd Street policies:

- Volunteer Policy
- Recruitment & Selection Policy
- Compliments & Complaints Policy
- Confidentiality Policy
- E-Safety Policy

- # The worker with the designated person must ensure that they record in the most appropriate place the actions and outcomes regarding the allegation.
- # At all points the designated person must be consulted and the Chief Executive kept informed of decisions and outcomes.
- # If youth abuse is suspected and the young person hasn’t disclosed this, the worker should carefully monitor behaviour and this should be raised and discussed in supervision with the relevant line manager.

10.0 Base-line Procedures for Relevant Manager

- 10.1 The Management Team **must** respond to all reported allegations of abuse. This response will be in the capacity of the relevant manager – duty / line manager or Head of Services.
- 10.2 The Relevant Manager must **NOT** investigate/interview staff or the young adult, but ensure that all details are recorded in a clear and concise manner. This record will be retained in the Incident book/Incident file or in the Case Records of the Young Adult.
- 10.3 The Relevant Manager must ensure that the alleged victim is safe and supported if they are present on 42nd Street premises.

- 10.4 If the alleged perpetrator is another service user, ensure that they are also supported so that neither they nor anyone else is at risk.
- 10.5 The Relevant Manager has a responsibility to guide and instruct the reporting staff member, and others on duty, of their responsibilities.
- 10.6 If the alleged victim requires urgent medical attention it is necessary to make arrangements with an explanation to health professional that abuse is suspected. In the context of Salford/Trafford/Tameside & Glossop, there will be a need to identify the most appropriate health professional. In Manchester in cases of suspected sexual abuse, medical examination should be referred to the Crisis Centre at St Mary's Hospital.
- 10.7 Depending on the circumstances i.e. **if threshold criteria reached (see appendix 1)**, the Relevant Manager might have to contact the relevant safeguarding service/department. If this is the case, make it clear that this is an allegation of abuse referral and there might be an expectation that joint decisions will need to be made on:
- Medical examination / treatment.
 - Police consultation.
 - Investigation team members
 - Informing any relevant personnel, agencies, commissioners etc.
- 10.8 It will be necessary to ensure that the reporting staff member/s is in a position to be able to continue with their duties. Where this is not possible, make arrangements for cover and ensure that the reporting staff member is supported until they are able to go home. If the alleged perpetrator is a staff member, invoke the organisations procedures for staff investigation with possible suspension or removal from regular service user contact duties.
- 10.9 At the conclusion of the investigation, the Relevant Manager must record all relevant management decisions and make this available to the Chief Executive for e.g.:
- Review of care need and/or any relevant plans of intervention.
 - Disciplinary action
 - Change of staffing support
 - Environmental alterations
 - Re-writing of policies and procedures
 - Staff training
- 10.10 The Relevant Manager with the reporting worker should jointly attend any meetings or planning around the alleged abuse.
- 10.11 Once the matter is resolved or brought to a conclusion, relevant manager, Head of Service, Chief Executive must hold a debriefing meeting that will focus on lessons learned, training and development required within 42nd Street.

11.0 Risk/Protection:

- 11.1 If at any stage in the safeguarding process it becomes evident that vulnerable adult(s) may be exposed to significant risk, immediate protective measures should be considered. These might include:

- Informing relevant professional(s) already known to the vulnerable adult
- Moving the person to a place of safety and care (e.g. an appropriate family member, residential care, hospital/A&E etc);
- Consider the safety of any children/young people who may be at risk of harm, e.g. siblings/other family members of the vulnerable adult
- Appointment of an independent advocate

12.0 Working with young adults at risk who deliberately self-harm.

- 12.1 Research around deliberate self-harm overwhelmingly identifies self-harm as being a coping mechanism for many young people surviving trauma and abuse, though there may be a number of reasons behind a young person's self-harm.
- 12.2 42nd Street in working with young adults between 18 to 25 years who deliberately self-harm holds onto the above premise that acts of self-harm are a coping mechanism for many young people and needs to be engaged with sensitively and respectfully. However we equally recognise our responsibility to ensure vulnerable young adults are safeguarded and protected.
- 12.3 Self-harm can take many forms from cutting and burning to solvent abuse and to the unnecessary taking of medication. 42nd Street holds the view there is **never safe overdosing behaviour per se**. If a young adult discloses self-harm or there is apparent physical evidence of this the worker will complete a risk assessment and will consult with the Duty Manager and plan immediate action e.g. Medical attention.
- 12.4 The Duty Manager will ensure that any response/action taken reflects the relevant local authorities '**Safeguarding of Adults at Risk of Harm**' policies.
- 12.5 If confidentiality is to be breached, the worker will inform the young adult about the exact reasons for this and will continue to support the young adult in the best and most appropriate way. At all times the Duty Manager will consult with Social Services in the relevant local authority and the Safeguarding Lead and/or Chief Executive of 42nd Street will be kept fully informed of any actions.
- 12.6 It is important that there is recognition that 42nd Street has a positive reputation of working proactively with young people deliberately self-harming and hence any risk assessments conducted are done so with specific knowledge and skills. We are committed to working with the issues in a way that is in the best interests of the young adult and in conjunction with all relevant professionals.
- 12.7 As far as is reasonable and practical the principles of self-determination and self-empowerment will influence any responses to the vulnerability of young people who self-harm.

13.0 Working with adults at risk who attempt suicide.

- 13.1 42nd Street identifies the attempting of suicide as being different to deliberate self-harm from the context of intention. Attempting suicide might be based on the individual's intention and strong feelings to end their life and could suggest 'termination' rather than survival. In addition, 42nd Street recognises that there is a spectrum of experience: young

people may have experienced or expressed suicidal thoughts/feelings; they may have made previous suicide attempts also, but when asked they may report that they did NOT intend to, or wish to end their life. 42nd Street recognises the complexities involved in suicidal ideation, thoughts & feelings whilst also remaining committed to supporting young people to stay safe from harm.

- 13.2 No assumptions will be made about what a young person's intentions are regarding suicidal thoughts, feelings/suicidal ideation. A **risk assessment** must be completed to ascertain as far as possible what the level of risk is, by talking to the young person and other agencies/professionals as appropriate.
- 13.2 If a young adult between the ages of 18 – 25 years is known to have attempted suicide in the past and is accessing individual support at 42nd Street, the summary of assessment will include a risk assessment with the principles of self-determination and self-empowerment in focus.
- 13.3 The young person will be informed of 42nd Street's obligation to adhere to the relevant local authority policy on the Safeguarding of Adults at Risk of Harm and a discussion around the boundaries of confidentiality will take place.
- 13.4 The Duty Manager involved will ensure that the Safeguarding Lead and the relevant line manager will be kept informed at all stages of involvement of any pertinent developments.
- 13.5 If a young adult presents as having attempted suicide e.g. taken an overdose, arrangements will be made to get them to the a nearby A&E Department. These arrangements will be made by the relevant worker in consultation with the Duty Manager. Every effort will be made to ensure someone is with the young adult (friend, family member) in the event of attending A&E. If such a person is not available, a member of staff from 42nd Street will attend via prior agreement with the Duty Manager. This will be the most appropriate person available, i.e. someone from the Duty team, the young person's worker.
- 13.6 The Chief Executive must be kept informed of any action taken by worker/s in consultation with the Duty Manager and Safeguarding Lead/Head of Service.

14.0 Work with a person identified as presenting a risk, or potential risk to children (Schedule One Offender) who is a young adult.

- 14.1 This section outlines the service that 42nd Street is able to provide to a person identified as presenting a risk, or potential risk to children, (Schedule One Offenders) and other young adults (18 – 25 years) who have histories of significant violence or sexual violence. It also makes reference to young adults where the risk becomes apparent after work has commenced. Any work done will be risk assessed prior to support starting, and if appropriate will be generic mental health support as opposed to specific intervention around the abusive behaviour. 42nd Street reserves the right to not accept a referral if after screening for risk and appropriateness, it was decided that we were not the right service.
- 14.1 42nd Street is defining a person identified as presenting a risk, or potential risk to children (Schedule One Offences) as sexual offences and violent offences against children and sexual offences against adults as reflected in legislation.

- 14.2 We acknowledge that we may also receive referrals for young adults who have committed sexual offences or violent offences against adults and who are not perceived as a person identified as presenting a risk or potential risk to children (Schedule One offenders). Young adults who have committed such offences will be worked with in a similar way to a person identified as presenting a risk, or potential risk to children (Schedule One offenders), although the analysis and risk assessment will be based on different issues and criteria.
- 14.3 We may also become aware after a young adult has engaged at 42nd Street that they present a significant risk of violence or sexual violence towards other young people.
- 14.4 A young adult between the ages of 18 - 25 years known to have a Schedule One conviction or a conviction for other sexual or violent offences would not be able to access 42nd Street services if what is required is work around the offending behaviour. However we would ensure that a referral would be made to the most appropriate agencies depending on the focus of the work.
- 14.5 If a worker becomes concerned about the young adult's offending history or presenting behaviour after work has commenced, the young adult will be informed that a risk assessment must be completed before any services are made accessible to him/her. If the young adult is involved in drop ins or group work they will be asked to withdraw from the relevant group, while the process of risk assessment and discussion takes place. They will be linked to a key worker for a temporary period or until the investigation is completed.
- 14.6 Due to child safeguarding considerations of working with a person identified as presenting a risk, or potential risk to children (Schedule One offenders) within 42nd Street central base, individual work if necessary may be offered at another venue. Attention will also be paid to the safety of the worker in making a decision to offer a service. This offer can only be made in consultation with the relevant manager and the Chief Executive. Workers can make recommendations but the Chief Executive will make the final decision.
- 14.7 42nd Street reserves the right to decide as to whether we offer a service to young adults with Schedule One offences or other violent or sexual offences when at the point of first engagement this was not known. For example, 42nd Street may feel that it does not have the required knowledge and skills, or that the young adult concerned presents too great a risk to workers who would be undertaking the work. 42nd Street is committed to being clear in such instances that this is due to a clinical decision following assessment and discussion and not discrimination against young people with offending histories.

15.0 Co-ordination of the Reporting of Allegations of Abuse

- 15.1 It is clear that, for the effective audit of responses to allegations of abuse, all allegations should be recorded at a central point. At 42nd Street, the Head of Service on behalf of the Chief Executive will hold this information.
- 15.2 It will be important to ensure that:
- All information regarding alleged victims and perpetrators will be collated and stored in a confidential manner.
 - The outcomes of investigations are recorded and collated.

- All statistical data related to abuse will be collated and will be available to Board of Trustees
- Collation of data that will assist with the development of the local supporting strategy.

Appendix One

Threshold Criteria requiring referral to local authority safeguarding services:

(Taken from MSCB procedure for managing allegations against people who work with children/YP)

- A staff member or other service user has behaved in a way that has harmed, or may have harmed a child or young person.
- Possibly committed a criminal offence against, or related to a child/Young Person
- Behaved towards a child /Young Person in a way that indicates s/he is unsuitable to work with children.

Appendix Two

Online Safeguarding

42nd Street offers some of its services via support online, such as online counselling. It also reaches a wide range of people via its online presence and profile. In most instances, 42nd Street's approach to ensuring the safeguarding of young people online will reflect 42nd Street's face-to-face (offline) safeguarding policy. There should be very little distinction in terms of the following:

- Confidentiality policy
- Identifying and managing risk to young people
- Escalation procedures when managing risk
- Information sharing and record keeping pertaining to risks identified in connection to the safeguarding and well-being of young people*

Best practice dictates that young people should expect the same high quality service, whether on or offline. Where 42nd Street offers a service online, it has a duty of care to explain to a young person what they can expect in terms of the above* as part of accessing online support.

42nd Street will endeavour in all circumstances, to afford young people the equivalent response as if they were accessing the service face-to-face. This applies to the following:

1. Guidelines following a disclosure of abuse, bullying or imminent harm
2. 42nd Street's escalation procedures including Duty and designated Safeguarding leads as named in the policy.

42nd Street recognises that in some circumstances, due to the nature of offering a service online, that disclosures of risk such as self-harm, can be shared and without the true identification of that young person being known. As far as is possible, the same practice guidelines cited in the main Safeguarding Policy will apply to young people accessing online support.

All practitioners delivering online support and engagement will receive the appropriate level training.

Policy approved by

Signature

A handwritten signature in black ink on a white rectangular background.

Date: 12/03/2024

Chief Executive, 42nd Street