Mercy Education

Policy #G10.0

Child Safety and Wellbeing Policy

1.0 Introduction

In 1831, Catherine McAuley opened the doors of the House of Mercy in Dublin to those who were poor, vulnerable, and without voice. She acted from a conviction that every person carries inherent dignity, and that those with capacity to help bear a responsibility to do so.

On 2 February 1846, under the leadership of Mother Ursula Frayne (1817- 1885), the first Mercy school in Perth was established, continuing this tradition in a new context.

Mercy Education Limited (**MEL**) exists to continue that work. Our schools express the same founding conviction that education is an act of care, and that care requires safety.

MEL's commitment to child safety and wellbeing is fundamental and non-negotiable. MEL has zero tolerance for Child Abuse in any form, in any context, at any time. This commitment is the foundation on which this Policy rests.

This Policy gives effect to MEL's Commitment to Child Safety as set out in the MEL Board Charter, ensuring that the safety, wellbeing, and dignity of children and young people guide all decision-making and actions of the Board and the organisation.

This commitment is both a moral imperative and a legislated obligation. MEL's approach to child safety and wellbeing operates within a comprehensive framework of regulated responsibilities, actions, and responses under applicable Commonwealth, state, and Catholic Church legislation and standards. Moral conviction and legal compliance are mutually reinforcing.

This Policy gives operational effect to that commitment. It establishes the governance framework, standards, and accountabilities through which MEL fulfils its obligations to protect every child in its care. This Policy prevails over all other MEL safeguarding supporting documents. Where any inconsistency exists between this Policy and any supporting document, this Policy prevails. This Policy must be read in conjunction with applicable legislation. Where inconsistencies arise with applicable legislation, applicable legislation prevails.

A note on vulnerable children: MEL recognises that some children face an increased risk of harm due to personal, social, or systemic factors. This may include children from culturally and linguistically diverse backgrounds, children with disability, Aboriginal and Torres Strait Islander children, children in out-of-home care, and children and young people who may experience marginalisation or exclusion. This Policy requires that appropriate child centred, and culturally responsive safeguards are applied to support the safety and wellbeing of all children, in accordance with their best interests. MEL will apply equity-based and individualised safeguards to address the specific needs and risks experienced by these children.

2.0 Purpose

This Policy:

- establishes MEL's overarching governance and risk management framework for child safety and wellbeing across all schools, jurisdictions, and environments;
- articulates the mandatory standards and commitments that apply to all persons within MEL's community;
- provides the primary policy authority for the development and application of supporting policies, codes of conduct, procedures, and implementation guides;
- ensures MEL meets its obligations under applicable Commonwealth, state, and Catholic Church legislation, regulations, and standards; and
- integrates safeguarding into MEL's governance, leadership, and operational decision making.

Supporting documents, including jurisdictional Child Safety and Wellbeing Implementation Guides for Victoria (G10.0V), South Australia (G10.0SA), and Western Australia (G10.0WA), give effect to this Policy through state specific operational procedures. In the event of any inconsistency, this Policy prevails.

3.0 Policy Application

This Policy applies to MEL and to all persons who, in connection with MEL schools or MEL approved activities, interact with students, children, and young people within MEL's care or authority, including:

- MEL Board Directors and Board Committee members
- MEL Executive Team and all employees
- School Principals and all school-based staff
- Volunteers, contractors, and third-party service providers
- Parents and guardians, to the extent of their engagement with MEL schools and school related activities
- Clergy and religious personnel engaged in MEL school or school related activities

This Policy applies across all environments in which students engage with MEL through school or school related activities, including, but not limited to, school premises, off-campus activities, online environments, residential programs, extracurricular activities, and MEL approved overseas trips.

While "Child" is defined in accordance with applicable legislation as a person under 18 years of age, this Policy applies to all students, including those aged 18 years and over, and requires that consistent safeguarding standards and expectations of conduct are maintained.

Obligations under this Policy apply regardless of role, seniority, or employment status.

4.0 Principles

MEL's child safeguarding framework is grounded in MEL's values of ***Compassion***, ***Justice***, ***Respect***, ***Hospitality***, ***Service***, and ***Courage***. These values inform MEL's approach to child safety and wellbeing and guide safeguarding decisions across governance, leadership, and operational practice.

Each value animates one of MEL's six Safeguarding Pillars. Together, the Pillars provide a coherent framework that integrates MEL values with the Child Safe Standards applicable across MEL's three operating jurisdictions and the National Catholic Safeguarding Standards (**NCSS**).

This alignment ensures that MEL's safeguarding approach is values informed, governance led, and compliant with relevant child safety and wellbeing standards.

These principles are operationalised through the mandatory requirements set out in Section 5 of this Policy.

MEL Value	Safeguarding Pillar	What this means in practice	*Applicable Standards (Primary Alignment)	
Compassion	**Compassionate Leadership and Culture**	Leaders at every level visibly champion child safety and wellbeing. Safeguarding is embedded in organisational culture and leadership practice. Complaints and concerns processes are child-focused, supportive and accessible.	SA	1,6,9
			Vic	1,2,6,7
			WA	1,6,9
			NCSS	1,6,9
Justice	**Justice in Governance and Empowerment**	Children and young people are recognised as rights holders. Their voices are sought and listened to in design and decision-making. Governance structures ensure accountability, fair and transparent decision making, effective oversight, and continuous improvement in safeguarding practice.	SA	2,9
			Vic	2,9,10
			WA	2,9
			NCSS	1,2,9
Respect	**Respectful Engagement with Families and Communities**	Families and communities are partners in safeguarding. Engagement is transparent, culturally responsive, and inclusive, with particular attention to Aboriginal and Torres Strait Islander children and families.	SA	3,4
			Vic	1,3,4,5
			WA	3,4
			NCSS	3,4
Hospitality	**Hospitality in Safe Environments and Personnel Systems**	Physical and online environments are designed to promote safety and wellbeing. Recruitment, screening, induction, and supervision practices ensure that only safe and suitable people work with children.	SA	4,5,8
			Vic	4,5,6
			WA	4,5,8
			NCSS	4,5,8
Service	**Service through Training and Continuous Improvement**	Board members, staff, volunteers, and relevant stakeholders are equipped through training, guidance, and supervision to meet their safeguarding responsibilities. Policies and procedures are reviewed and strengthened on an ongoing basis.	SA	5,7,9,10
			Vic	5,8,10,11
			WA	5,7,9,10
			NCSS	5,7,9,10
Courage	**Courageous Advocacy and Child-Focused Complaints**[1]	Children and young people are supported to speak up and be heard. Concerns and complaints are taken seriously, responded to promptly, and managed in ways that prioritise safety, dignity, and the best interests of the child.	SA	6
			Vic	1,6,7
			WA	6
			NCSS	6

*The Applicable Standards listed above indicate primary areas of alignment. In practice, multiple standards may be engaged across Pillars.

5.0 Policy Requirements

5.1 Compassionate Leadership and Culture

MEL's Board, Executive Team, and School Leaders must actively create and sustain a child-safe culture in which the safety and wellbeing of children and students are prioritised above all other organisational considerations.

MEL will:

5.1.1 demonstrate visible and consistent leadership in child safety and wellbeing through words, decisions, and actions

[1] *Note: Standard 6 (complaints and concerns processes) is addressed primarily through Pillar 6. It is also reinforced through Pillar 1, as child-focused complaints culture is inseparable from leadership and organisational culture.*

5.1.2 embed child safety and wellbeing into strategic planning, risk management, and school improvement frameworks

5.1.3 ensure child safety and wellbeing is a standing agenda item at Board meetings

5.1.4 promote a culture in which all persons feel safe and supported to raise concerns without fear of reprisal

5.1.5 ensure complaints and concerns processes are accessible, child-focused, culturally safe, and responsive

MEL's Board, Executive Team, and School Leaders are accountable for demonstrating compliance with these requirements through documented evidence, including performance objectives, reporting artefacts, and safeguarding culture indicators. They must ensure that failures in safeguarding are addressed promptly and result in appropriate corrective action.

5.2 Justice in Governance and Empowerment

MEL recognises children, students and young people as rights holders and will ensure that governance systems support their safety, participation, and empowerment.

MEL will:

5.2.1 maintain a clear governance framework that allocates responsibility and accountability for safeguarding at Board, Executive Team, and school levels

5.2.2 ensure children and young people are informed of their rights, including their right to safety and to raise concerns

5.2.3 provide safe, accessible, and developmentally appropriate mechanisms for children and young people to express their views

5.2.4 support the involvement of children and young people in the design and review of safeguarding practices, where developmentally appropriate and safe to do so

5.2.5 ensure decisions affecting children are fair, transparent, and made in the best interests of the child

5.2.6 maintain an enterprise-wide safeguarding risk framework, with regular review of risks and controls to ensure that risks to child safety are identified, assessed, and effectively managed and escalated to the Board where they are material or systemic

5.2.7 conduct at least annual Board-level reviews of safeguarding performance, including trends, risks, incidents, and improvement opportunities

5.2.8 embed continuous improvement in safeguarding as a core governance obligation

5.3 Respectful Engagement with Families and Communities

MEL recognises families and communities as critical partners in child safeguarding.

MEL will:

5.3.1 make this Policy, Codes of Conduct, and relevant safeguarding information publicly available and accessible

5.3.2 provide families and communities with clear information about child safety, expected behaviours, and how to raise concerns

5.3.3 ensure culturally safe, inclusive, and accessible engagement, particularly for Aboriginal and Torres Strait Islander children and families and culturally and linguistically diverse communities

5.3.4 provide clear, accessible pathways for families to make complaints or raise concerns, including information about relevant state-based external reporting bodies and oversight bodies

5.3.5 actively seek and consider feedback from families and communities in the development and review of safeguarding practices

5.3.6 ensure that no person is subject to victimisation or detriment for raising a concern in good faith

5.4 Hospitality in Safe Environments and Personnel Systems

MEL will implement systems to ensure that physical, online, and organisational environments are designed and maintained to minimise risks to child safety.

MEL will:

5.4.1 implement rigorous recruitment and screening processes, including Working With Children Checks or equivalent, reference checks and verification of qualifications

5.4.2 ensure that only suitable persons are engaged to work with children, and that suitability is subject to ongoing monitoring

5.4.3 maintain clear standards of behaviour through Codes of Conduct and ensure these are understood and enforced

5.4.4 implement supervision, performance management, and reporting processes to identify and respond to concerning behaviours, including boundary breaches and reportable conduct

5.4.5 ensure all contractors and third parties who engage with children comply with MEL's child safety requirements and MEL's screening standards

5.4.6 maintain documented risk assessments for physical and online environments, which are regularly reviewed and updated

5.4.7 ensure that child safety and accessibility are key considerations in the design of buildings, capital projects, facilities and programs

5.4.8 implement and enforce clear online safety and digital supervision practices

5.4.9 explicitly prohibit and respond to behaviours that may constitute grooming, boundary violations, or other inappropriate conduct, even where such behaviour does not meet the threshold of Child Abuse

5.5 Service through Training and Continuous Improvement

MEL will ensure that all persons within scope of this Policy are equipped to meet their safeguarding responsibilities.

MEL will:

5.5.1 require all staff and relevant volunteers to complete child safety induction prior to commencing duties

5.5.2 mandate annual refresher training on recognising and responding to Child Abuse, legal reporting obligations, and child-safe conduct

5.5.3 provide role-specific and risk-based training tailored to responsibilities and exposure to child safety risks

5.5.4 deliver practical, scenario-based training to build capability in identifying and responding to concerns

5.5.5 ensure training content aligns with jurisdictional legal obligations

5.5.6 maintain accurate and auditable records of training completion

5.5.7 monitor and report training compliance to the Board

5.5.8 regularly review and update safeguarding policies, procedures and training programs to ensure ongoing effectiveness

5.6 Courageous Advocacy and Child-focused Complaints

MEL will maintain systems that support the reporting, assessment, and management of concerns and complaints in a manner that prioritises the safety, dignity, and wellbeing of children.

MEL will:

5.6.1 provide multiple, accessible, and child-friendly pathways for reporting concerns and complaints

5.6.2 ensure all concerns, allegations, and complaints are taken seriously and responded to promptly and appropriately

5.6.3 clearly distinguish between internal complaints processes, Mandatory Reporting obligations, and reportable conduct obligations

5.6.4 comply with all applicable Reportable Conduct Scheme requirements, including, but not limited to, notification, investigation, and reporting to relevant oversight bodies, as relevant

5.6.5 ensure that all Mandatory Reporting obligations under applicable legislation are understood and met

5.6.6 require immediate escalation where a child is at risk of harm, including referral to emergency services where necessary

5.6.7 ensure procedural fairness in the management of allegations, while prioritising child safety

5.6.8 protect reporters from victimisation or detriment and provide appropriate support throughout the process

5.6.9 ensure that institutional reputation does not take precedence over child safety

6.0 Governance and Accountability

6.1 MEL Board

The MEL Board of Directors holds ultimate accountability for child safety and wellbeing across the organisation.

The Board will:

6.1.1 review, provide feedback and approve any amendments to this Policy in accordance with the Policy and Implementation Framework (see section 13.0 below)

6.1.2 ensure that a Board committee (currently RISKCOM) is formally designated to oversee child safety and wellbeing, including monitoring safeguarding risks, compliance, and performance, and receiving regular reporting on safeguarding matters

6.1.3 ensure that MEL complies with all applicable Child Safe Standards, National Principles, and Reportable Conduct Scheme obligations

6.1.4 ensure that child safety and wellbeing are considered in all major organisational decisions

6.1.5 ensure that safeguarding risks are integrated into the enterprise risk management framework and actively monitored

6.1.6 receive and consider regular reports on safeguarding performance, risks, incidents and compliance

6.1.7 satisfy itself that appropriate systems, resources, and culture exist to protect children

6.1.8 ensure appropriate oversight of reportable conduct matters and systemic safeguarding risks

6.1.9 ensure appropriate independent handling of allegations involving the CEO

6.2 Chief Executive Officer

The CEO is responsible for implementing this Policy and ensuring effective safeguarding systems across MEL.

The CEO will:

6.2.1 allocate appropriate resources to safeguarding functions

6.2.2 maintain oversight of safeguarding risks, including the enterprise-wide risk register

6.2.3 ensure systems are in place for receiving and managing internal notifications of child safety concerns

6.2.4 ensure systems and processes support compliance with Mandatory Reporting and Reportable Conduct Scheme obligations

6.2.5 ensure reports are regularly provided to the Board and RISKCOM on safeguarding performance, risks, and incidents

6.2.6 ensure appropriate escalation and management of allegations involving Principals

6.2.7 provide leadership in fostering a child-safe culture

6.3 School Principals

Principals are responsible for implementing this Policy at the school level.

Principals will:

6.3.1 ensure all staff, volunteers, contractors, students and families understand their obligations

6.3.2 implement and maintain school-level safeguarding plans, risk assessments, and procedures

6.3.3 ensure compliance with Mandatory Reporting obligations and Reportable Conduct Scheme requirements, where applicable

6.3.4 ensure local compliance with jurisdiction-specific legal obligations

6.3.5 respond to concerns promptly, appropriately, and in the best interests of the child

6.3.6 maintain accurate and complete records of all safeguarding matters

6.3.7 ensure staff and volunteers are appropriately trained and supervised

6.3.8 escalate allegations involving themselves directly to the CEO

6.4 All Staff and Volunteers

All staff and volunteers share responsibility for child safety.

They will:

6.4.1 comply with this Policy and the applicable Codes of Conduct

6.4.2 complete all required training in the specified timeframes

6.4.3 report any concern, suspicion, or allegation of Child Abuse or inappropriate conduct in accordance with this Policy and applicable law

6.4.4 act in the best interests of the child at all times

6.4.5 not ignore, minimise, or delay responding to a child safety concern

7.0 Reporting Obligations

MEL operates across multiple jurisdictions and will comply with all applicable child protection laws, including Mandatory Reporting obligations, information sharing requirements, and any applicable regulatory notification frameworks.

Reporting obligations vary by state and are set out in the relevant jurisdictional Implementation Guides (G10.0V, G10.0SA, G10.0WA), as amended from time to time.

7.1 General Reporting Principles

MEL requires that:

7.1.1 where a child is at immediate risk of harm, emergency services (000) must be contacted immediately. Notify MEL as soon as it is safe to do so

7.1.2 all staff and volunteers must report any concern, suspicion, or allegation that a child is at risk of harm or has been harmed, in accordance with this Policy, applicable law, and MEL procedures

7.1.3 staff who are designated as mandatory reporters under applicable legislation must comply with their legal reporting obligations to the relevant external authority

7.1.4 reports to external authorities must be made as soon as practicable, and within any applicable statutory timeframes

7.1.5 following any report to an external authority, an internal notification must be made in accordance with MEL procedures, unless prohibited by law

7.1.6 concerns must be reported based on a Reasonable Belief or Suspicion; certainty is not required

7.1.7 all concerns, including historical allegations, must be taken seriously and reported and managed in accordance with this Policy

7.1.8 all reports, decisions, and actions must be documented in accordance with Section 8.0 of this Policy

7.1.9 any failure to report a concern in accordance with this Policy may constitute a breach of this Policy and may result in disciplinary action

7.2 Internal Reporting and Escalation Pathways

MEL will maintain clear internal reporting and escalation pathways to ensure that concerns are appropriately managed at the correct level.

7.2.1 concerns or allegations involving a staff member, volunteer, or contractor must be reported in accordance with school and MEL procedures

7.2.2 allegations involving a Principal must be reported directly to the CEO

7.2.3 allegations involving the CEO must be reported to the Board Chair, ensuring independence and appropriate escalation

7.2.4 allegations involving a Board Director, including the Board Chair, must be reported to MMC through its Board Chair, ensuring independence and appropriate escalation

7.2.5 all persons must escalate concerns where they believe a matter has not been appropriately addressed

7.2.6 no person will be subject to victimisation or detriment for making a report in good faith

7.3 Management of Allegations and Concerning Conduct

MEL will ensure that all allegations of Child Abuse, harm, or inappropriate conduct involving staff, volunteers, or contractors are managed in a consistent, fair, and legally compliant manner.

MEL will:

7.3.1 assess and respond to all allegations promptly, with the safety and wellbeing of the child as the primary consideration

7.3.2 comply with any applicable legislative or regulatory requirements for notifying external oversight bodies in relevant jurisdictions

7.3.3 ensure that, where required, allegations are reported to external oversight bodies within prescribed statutory timeframes

7.3.4 manage allegations in accordance with principles of procedural fairness, while prioritising child safety

7.3.5 take immediate and proportionate risk management actions where required, including modifying duties or removing individuals from child-related work

7.3.6 ensure that investigations are conducted appropriately, which may include referral to external authorities or independent investigators

7.3.7 apply consistent internal standards for managing allegations of inappropriate conduct across all jurisdictions, regardless of differences in local regulatory frameworks

7.3.8 maintain appropriate records of all allegations, assessments, actions, and outcomes

8.0 Records and Privacy

MEL will ensure that all safeguarding records are created, maintained, and managed in accordance with legal and ethical requirements.

MEL requires that:

8.1 complete and accurate records of all concerns, reports, decisions, actions, and outcomes are created and maintained

8.2 records are stored securely and protected from unauthorised access, use, or disclosure

8.3 access to safeguarding records is restricted to authorised persons on a strict need-to-know basis

8.4 records are retained in accordance with applicable legislation, standards, and approved retention schedules

8.5 records must not be altered, concealed, or destroyed except in accordance with authorised retention and disposal processes

8.6 information is only shared with relevant authorities where required or permitted by law

8.7 requests for access to records are managed in accordance with legal obligations and MEL procedures

8.8 records relating to Child Abuse allegations must be retained in accordance with best practice and legal requirements, recognising the long-term nature of such matters

8.9 the privacy, dignity, and confidentiality of all persons involved are protected, consistent with the *Privacy Act 1988* (Cth) and applicable state laws

MEL will share information relating to child safety with relevant authorities and organisations where required or permitted by law to promote the safety and wellbeing of children.

9.0 Failure to Comply with this Policy

Breaches of this Policy may result in disciplinary action, up to and including termination of employment or contractual engagement.

Where required, breaches will be reported to relevant external authorities, including, but not limited to, Police, child protection agencies, and regulatory bodies.

Third parties who breach this Policy may have their engagement terminated and may be excluded from MEL sites.

10.0 Definitions

Term	Definition
CEO	MEL Chief Executive Officer
Child	A person under 18 years of age or as defined according to applicable legislation. Enrolled students over the age of 18 years are not included in the definition of a child.
Child Abuse	Any act or omission that results in, or is likely to result in, harm to a child's safety, wellbeing, or development. Child Abuse includes, but is not limited to: a) sexual abuse or exploitation b) physical abuse c) emotional or psychological abuse d) neglect e) exposure to family violence f) grooming Child Abuse may occur as a single incident or as a pattern of behaviour and includes other conduct that may place a child at risk of harm.
Child Safety	Matters related to protecting all children from Child Abuse, managing the risk of Child Abuse, providing support to a child or student at risk of Child Abuse and responding to incidents or allegations of Child Abuse
Code of Conduct	MEL's documented standards of behaviour that all persons within scope of this Policy must adhere to in their interactions with children and within the school community
Executive Team	Senior leadership team of MEL, including the CEO and other senior executives as per the MEL organisational chart
Mandatory Reporting	The legal obligation, under applicable state legislation, of certain designated persons to report to relevant government authorities a Reasonable Belief or Suspicion that a child has been, or is at risk of being, abused or neglected. The scope, thresholds, and persons to whom this obligation applies vary by jurisdiction.
MEL	Mercy Education Limited (ABN 69 154 531 870)
MMC	Mercy Ministry Companions Ltd (ABN 86 646 217 790)
Policy	G10.0: Child Safety and Wellbeing Policy (this document)
Principal	Principal of a MEL-governed College
Reasonable Belief or Suspicion	A belief or suspicion formed on reasonable grounds, based on facts, observations, or information, that would lead a reasonable person to conclude that a child may be at risk of harm

Reportable Conduct	Conduct by an employee, volunteer, or contractor that may involve harm to a child, including abuse, neglect, or other inappropriate behaviour, as defined under applicable legislation or regulatory frameworks in relevant jurisdictions
RISKCOM	Risk and Compliance Committee of the MEL Board
School Leader	Any person within a MEL school who holds a position of leadership or supervisory responsibility, including the Principal, Deputy Principals, Heads of Department, Managers and any staff member with designated responsibility for the management, supervision, or welfare of students or staff
Student	A person who is enrolled at or attends the school or a student at the school boarding premises. This may include a young person over the age of 18 years

11.0 Related Documents and Legislation

This Policy should be read in conjunction with the following:

MEL documents

- G10.0SA Child Safety Implementation Guide (South Australia)
- G10.0V Child Safety Implementation Guide (Victoria)
- G10.0WA Child Safety Implementation Guide (Western Australia)
- G8.0 Code of Conduct – Employees & Volunteers
- G8.2 Code of Conduct – Parents
- G1.1 Board Charter
- G1.6 Delegations of Authority Policy
- P5.0 Critical Incident Management Policy/Plan
- G12.0 Complaints Management Policy
- G7.0 Whistleblower Policy

Related legislation, regulations and standards

- South Australia
    - Child Safe Environments Program
    - Child Abuse Report Line South Australia
    - Children and Young People (Safety) Act 2017 (SA)
    - Child Safety (Prohibited Persons) Act 2016 (SA)
- Victoria
    - Child Safe Standards
    - Reportable Conduct Scheme
    - Education and Training Reform Act 2006 (Vic) - Ministerial Order 1359 (31/01/2022)
    - Children, Youth and Families Act 2005 (Vic)
    - Child Wellbeing and Safety Act 2005 (Vic)
- Western Australia
    - Child Safe Organisations Western Australia
    - Ombudsman Western Australia (Reportable Conduct Scheme)
    - Children and Community Services Act 2004 (WA)
    - Working with Children (Screening) Act 2004 (WA)
- National
    - National Principles for Child Safe Organisations (National Office for Child Safety)
    - National Catholic Safeguarding Standards (Australian Catholic Safeguarding Ltd)
    - Australian Human Rights Commission
    - Privacy Act 1988 (Cth)

12.0 Evaluating this Policy

Policy effectiveness will be measured through annual Board safeguarding reports, RISKCOM quarterly reporting, compliance audit outcomes, training completion data, incident reporting trends, and stakeholder feedback.

13.0 Policy Review History

Originally entitled "6.09 Child Safety and Wellbeing Policy" since its inception in 2016, this is the sixth version of this Policy, now entitled "G10.0 Child Safety and Wellbeing Policy'. All references in MEL and College-level documents to Policy 6.09 should be read as references to this Policy until those documents are updated.

This Policy was reviewed in consultation with the MEL Executive Team before being presented to RISKCOM for recommendation to the Board.

Substantial revisions bring the format of this Policy into alignment with the new MEL Policy and Implementation Framework developed in early 2026.

This Policy will be reviewed in accordance with the MEL Policy and Implementation Framework, at least every three years, or earlier if required to:

- ensure that it remains current with respect to legal and regulatory requirements;
- ensure reports or breaches are appropriately recorded, investigated and responded to;
- ensure that it operates effectively; and

  confirm whether any changes are required.

Any amendments to this Policy must be done in consultation with the Executive Team, endorsed by RISKCOM and approved by the Board.

Version	Date Released	Next Review	Executive Sponsor	Approved
1.0	March 2020	February 2023	Head of People and Culture	MEL Board
1.1	June 2020	February 2023	Head of People and Culture	MEL Board
2.0	June 2022	June 2023	Head of People and Culture	MEL Board
2.1	September 2023	July 2024	Head of People and Culture	MEL Board
2.2	March 2024	February 2025	Head of People and Culture	MEL Board
3.0	May 2026	May 2029	Head of Legal	MEL Board