

Health & Safety at Work Policy

2	Rationale
2	Policy Statement
2	Policy Guidelines
2	<i>Who is responsible for what</i>
4	<i>Safe Operating Procedures</i>
5	<i>Health & safety induction</i>
5	<i>Workers to be deemed competent</i>
6	<i>Hazards & risks management</i>
7	<i>Safe work planning</i>
8	<i>Incident reporting & investigation</i>
10	<i>First aid</i>
10	<i>Emergency response</i>
12	<i>Injury & illness management</i>
12	<i>Contractor management</i>
13	<i>Provision of information, instruction, training & supervision</i>
13	<i>Safety inspections</i>
13	<i>Worker engagement, participation, and representation</i>
15	<i>Health and Safety Committee</i>
15	<i>Drugs & alcohol</i>
15	<i>Personal protective equipment</i>
16	<i>Health & safety at work reporting to officers of a PCBU</i>
16	Policy Review

Rationale

Our vision is a world where 360 Degrees Security & Investigations Limited is recognised as a standout provider of modern, responsive, and affordable security services.

Our human resources strategy is to create a sustainable competitive advantage by aligning our people to our vision, by building a skilled, safe, and motivated workforce, while driving a work culture of professionalism and continuous improvement.

We recognise that effective systematic hazards and risks management, as required by New Zealand health and safety at work legislation, is essential to building a safe workforce and securing the health and safety of our workers and workplaces.

Our approach to strategy execution is to adopt the EZHR System and its policy framework to achieve our strategic HR objectives. The EZHR System is a documented people management and workplace safety system that incorporates an effective health and safety at work sub-system designed to secure the health and safety of workers and workplaces through effective systematic hazards and risks management.

Policy Statement

360 Degrees Security & Investigations Limited (hereafter referred to as “the employer PCBU”) shall operate an effective health and safety at work system to secure the health and safety of its workers and workplaces through effective systematic hazards and risks management.

Policy Guidelines

Who is responsible for what

1. Consistent with their legal duties under the Health and Safety at Work Act 2015 (“HSWA”) as officers of a person conducting a business or undertaking (“PCBU”) the Directors (or persons holding a comparable position) and the CEO (or person holding a comparable position) shall be responsible for:
 - a. exercising due diligence to ensure the employer PCBU is complying with this policy; and
 - b. taking reasonable steps:
 - (i) to acquire, and keep up to date, knowledge of work health and safety matters; and
 - (ii) to gain an understanding of the nature of the employer PCBU's operations and generally of the hazards and risks associated with those operations; and

- (iii) to ensure the employer PCBU has available for use, and uses, appropriate resources to enable the employer PCBU to comply with this policy.

2. The **HR Manager** shall be responsible for:

- a. co-ordinating all the activities necessary to ensure adherence with this policy; and
- b. ensuring:
 - (i) health and safety data capture and recording on the HR1D Database; and
 - (ii) health and safety data analysis; and
 - (iii) health and safety data reporting and relaying of key information to the employer PCBU's officers of a PCBU to enable them to perform their responsibilities under this policy; and
- c. supporting line managers perform their responsibilities under this policy.

3. **Line managers** shall be responsible for:

- a. securing the health and safety of their direct report workers, as well as workplaces falling within their span of control, through adherence with this policy; and
- b. managing their operations in a way that enables workers within the line manager's span of control:
 - (i) to complete health and safety training; and
 - (ii) to engage meaningfully and participate in health and safety matters (for example, by including 'health and safety' as a standard agenda item for discussion at regular team meetings).

4. **Workers** (which also includes, the CEO, HR Manager, and line managers) shall be responsible for complying with their worker duties under the HSWA which requires that every worker:

- a. must take reasonable care for his or her own health and safety; and
- b. must take reasonable care that his or her acts or omissions do not adversely affect the health and safety of others; and
- c. must comply, as far as the worker is reasonably able, with any reasonable instruction given by management (as the employer PCBU's representative) to allow the employer PCBU to comply with the HSWA (such as the reasonable instruction by management to workers to identify and report hazards, report incidents, or complete health and safety training); and
- d. must co-operate with any reasonable health and safety policy (such as this policy) that has been notified to workers.

Safe Operating Procedures

5. Safe operating procedures (“SOPs”) is a written set of step-by-step instructions to help workers undertake complex routine operations to ensure work is performed to a high standard and:
 - a. safely
 - b. efficiently
 - c. consistently
 - d. responsibly, and
 - e. legally.
6. Not all work requires SOPs.
7. It is the employer PCBU’s policy that as a minimum, operations managers shall develop and implement SOPs for hazardous work that falls within the scope of operations under their control.
8. For the purposes of this policy, **hazardous work** means work involving the foreseeable exposure of workers and other persons to a hazard at the work site or created by doing the work, where exposure to the hazard gives rise to a risk of death or serious injury.
9. When developing SOPs for hazardous work operations managers shall have regard to:
 - a. relevant regulatory requirements; and
 - b. relevant industry standards and good practice guidelines; and
 - c. relevant WorkSafe NZ guidance, including the [Writing for health and safety: Good Practice Guidelines](#) (note in particular Appendix 1: Guidelines for Instruction Documents); and
 - d. WorkSafe ACT guidance on [how to develop written safe work procedures](#); and
 - e. relevant hazards and their risk controls admitted to the HR8D Hazards & Risks Register; and
 - f. whether to incorporate periodic documented safety meetings as a safe operating procedure for specified work groups.
10. SOPs:
 - a. shall be written in a concise, logical, step-by-step, easy-to-read format providing sufficient detail to ensure workers with limited experience or knowledge of the procedure can successfully carry out the procedure safely unsupervised; and
 - b. shall tell workers performing the work:
 - (i) about the hazards they will be exposed to while doing the work and the risks to health and safety associated with that exposure; and

- (ii) what to do to manage those risks; and
- c. shall be approved jointly by the HR Manager and a director (or person holding a comparable position); and
- d. shall be implemented and monitored by the responsible operations manager by way of periodic review; and
- e. shall be modified to have regard to relevant new hazards and their risk controls admitted to the HR8D Hazards and Risks Register; and
- f. shall be indexed and stored by the HR Manager in the Safe Operating Procedures folder on the document filing system; and
- g. shall be used as a training resource when implementing the HR5 Training and Supervision Policy; and
- h. shall be periodically communicated to the workers who will be performing the hazardous work: and
- i. where reasonably practicable, shall be readily accessible at the work site by workers who will be performing the hazardous work.

Health and safety induction

11. The employer PCBU shall operate an effective new employee induction sub-system to support new employees transition successfully into their new roles.
12. The induction sub-system shall include a focus on health and safety knowledge in the following areas:
 - a. the employer PCBU's health and safety responsibilities as a PCBU; and
 - b. the employee's health and safety responsibilities, including the following responsibilities:
 - (i) to comply with their duties as a worker under the HSWA; and
 - (ii) to participate in health and safety meetings; and
 - (iii) to report hazards to their line manager; and
 - (iv) to report incidents to their line manager; and
 - c. emergency response procedures; and
 - d. the work hazards and risks that the new employee is likely to encounter in his or her new role; and
 - e. the employer PCBU's General Workplace Safety Rules outlined in the HR4D Worker's Health & Safety Handbook.
13. The effective new employee induction sub-system shall be that set out in the HR4 New Employee Induction Policy.

Workers to be deemed competent

14. The employer PCBU's workers shall be either under documented training and competent supervision or deemed competent to role.
15. Competent to role means the worker is able to demonstrate the skill and knowledge required derived from experience and / or training to perform their role effectively and safely without supervision.
16. To give effect to this requirement the employer PCBU shall operate an effective training and supervision sub-system.
17. The effective training and supervision sub-system shall be that set out in the HR5 Training and Supervision Policy.

Hazards & risks management

18. The common denominator in every workplace fatality and serious harm occurrence is the failure to effectively manage the risks to health and safety associated with exposure to a hazard. It follows that the best way to prevent harm in the workplace is to ensure that the ones exposed to workplace hazards have the health and safety competences (what a worker knows about effective systematic hazards and risks management) required to keep themselves and others safe.
19. Our intent is to:
 - a. operate an effective sub-system of hazards and risks management that is consistent with the requirements of the law; and
 - b. ensure that all workers are adequately trained in the proper use of that sub-system.
20. For the purposes of this policy:
 - a. a **hazard** means anything that has the potential to cause harm to any person, and includes but is not limited to:
 - (i) a situation; or
 - (ii) a circumstance; or
 - (iii) a phenomenon; or
 - (iv) behaviour such as bullying and harassment; or
 - (v) psychological hazards such as stress, anxiety, and depression.
 - b. a **risk** means the potential for harm when exposure to a hazard is possible.
 - c. risk **elimination** means a state where either:
 - (i) exposure to the hazard is impossible; or
 - (ii) no harm can result from exposure to the hazard.
 - d. risk **minimisation** means a state where either:

- (i) the likelihood of exposure to the hazard is minimised; or
- (ii) the degree of harm that might result from exposure to the hazard is minimised; or
- (iii) both.

21. All workers must proactively identify hazards in the workplace.

22. When a worker identifies a hazard in the workplace, unless the context otherwise requires, he or she must:

- a. if it is safe and reasonably practicable to do so, take immediate action to eliminate or minimise the risk that a person might be harmed if exposed to the hazard; and
- b. report the hazard to his or her line manager as soon as is reasonably practicable.

23. Line Managers shall ensure that risks to health and safety associated with reported hazards are managed in a manner consistent with the regulations.

24. To ensure adherence with the above policy requirements the hazards and risks management system to be followed shall be that set out in the HR8A EZHR Guide to Hazards and Risks Management.

25. All workers must complete hazards and risks management training and refresher training that shall include a reference to:

- a. these policy requirements; and
- b. the HR8A EZHR Guide to Hazards and Risks Management.

26. The undertaking and completion by a worker of hazards and risks management training and refresher training shall be evidenced through the completion by the worker of a HR8-TRAIN-2A Hazards and Risks Management Training Quiz which shall form part of the worker's training records.

27. The HR Manager shall be responsible for managing compliance with the training requirements stipulated in above paragraphs 25 and 26.

Safe work planning

28. Safe work planning is a pre-start procedure that considers potential hazards that workers, and others, might be exposed to while undertaking planned work. The risks associated with people exposure to potential hazards identified in the safe work planning process will be managed through the implementation of risk control measures.

29. Safe work planning shall apply:

- a. to work that is inherently dangerous including, but not limited to:

- (i) hazardous work to be performed at a customer's site; and
 - (ii) work in a confined space or at height; and
 - (iii) remote & isolated work; and
 - (iv) electrical work; and
- b. before a change at the workplace, or to work systems, that is likely to give rise to new hazards and risks.

30. **Line Managers** are responsible for:

- a. safe work planning for work coming within their span of operational responsibility; and
- b. ensuring that the workers who will be carrying out the work are included in the safe work planning process.

31. The safe work planning procedure, including the procedure for managing hazards identified in the safe work planning process, shall be that outlined in the HR8A EZHR Guide to Hazards & Risks Management.

32. A Safe Work Plan shall be:

- a. developed using the HR8E Safe Work Plan template; and
- b. signed off by the responsible line manager; and
- c. copied to the HR Manager who shall:
 - (i) correct any irregularities in the safe work planning process; and
 - (ii) update the HR1D Database; and
 - (iii) admit any new hazards (or new controls for existing hazards) to the HR8D Hazards & Risks Register; and
 - (iv) inform workers of any new hazards (or new controls for existing hazards) admitted to the HR8D Hazards & Risks Register and the control measures to be implemented; and
 - (v) revise relevant Safe Operating Procedures and communicate any changes to workers.

Incident reporting & investigation

33. For the purposes of this policy an **incident** means a planned or unplanned work event or situation that was an actual or potential cause of harm to any person and includes:

- a. an accident, or non-accidental event or situation:

- (i) resulting in harm; or
- (ii) could have resulted in harm (i.e., a near miss).

34. The purpose of reporting and investigating incidents is to prevent recurrence by establishing the facts of what happened in order to:

- a. understand the root causes and lessons learned; and
- b. identify any hazards involved requiring further action.

35. A worker who is involved in or who witnesses an incident:

- a. where the incident is an emergency, shall follow the employer PCBU's emergency procedures outlined in the HR8i Emergency Plan; and
- b. where the incident is a non-emergency, shall as soon as is reasonably practicable, report the incident to their line manager either:
 - (i) verbally (e.g., in person or over the phone); or
 - (ii) electronically (e.g., by email or text).

36. Line managers that receive a report of an incident shall, as soon as is reasonably practicable:

- a. conduct a preliminary inquiry to determine what happened; and
- b. report the incident and a summary of facts by email to the HR Manager.

37. On receiving a line manager's report of an incident, the HR Manager shall, as soon as is reasonably practicable:

- a. admit the incident to the HR1D Database; and
- b. write up a HR8F Incident Report; and
- c. where the HR Manager deems it necessary (due to the complexity or seriousness of the incident), report findings using a HR8G Incident Investigation Findings Report template; and
- d. where a new hazard is identified in the incident reporting and investigation process:
 - (i) manage the risks using a HR8B Hazard ID & Risk Management form; and
 - (ii) admit the hazard to the HR8D Hazards & Risks Register; and
- e. inform the following persons of the results of the incident and investigation process, including any hazards identified and their risk control measures:
 - (i) the employer PCBU's workers; and
 - (ii) the employer PCBU's officers of a PCBU; and

- (iii) appropriate persons representing other PCBU's involved in, or affected by, the incident; and
- f. revise relevant Safe Operating Procedures and communicate any changes to workers.

First aid

- 38. The HR Manager shall ensure that the provision of first aid kits, facilities, first aiders, and information for workers is managed in accordance with the [First aid at work: Quick Guide \(February 2020\)](#) published by WorkSafe.
- 39. A First Aid Kit that contains, as a minimum, the items recommended in the Guide is to be provided:
 - a. at each office location; and
 - b. in every work vehicle.
- 40. First Aid Kits are to be checked regularly as part of the employer PCBU's workplace safety inspection procedure to ensure they remain fully stocked.
- 41. To assist with both restocking and incident reporting, a HR8H First Aid Kit Record Sheet shall be kept with each First Aid Kit to record:
 - a. the name of the worker requiring first aid; and
 - b. the date first aid was administered; and
 - c. the first aid item(s) used; and
 - d. the reason why first aid treatment was required; and
 - e. confirmation as to whether or not the incident giving rise to the need for first aid treatment has been reported.
- 42. Every office site of the employer PCBU must have at least one first aider (a worker that holds a current First Aid Certificate).
- 43. Lone workers performing work at remote or isolated locations shall hold a current First Aid Certificate.
- 44. Every worker who requires first aid treatment shall seek treatment from a first aider in the first instance.
- 45. Where a first aider is unavailable to provide immediate first aid to a worker requiring first aid, the worker requiring first aid may access items from the first aid kit.
- 46. A first aider giving first aid, or the worker accessing first aid items from the first aid kit where no first aider is available, shall complete the HR8H First Aid Kit Record Sheet.

Emergency response

47. The HR Manager shall ensure that the employer PCBU has an HR8i Emergency Plan that:

- a. is consistent with the requirements set out [reg.14 Health and Safety at Work \(General Risk and Workplace Management\) Regulations 2016](#); and
- b. includes reasonably foreseeable emergency situations having regard to the nature of the employer PCBU's operations; and
- c. is displayed in a prominent place (e.g., on the staff notice board); and
- d. has been reviewed either:
 - (i) within the last 12 months; or
 - (ii) when there has been a significant change to the layout of the working environment; and
- e. has been made known to all workers through formal training.

48. The procedure for reviewing the HR8i Emergency Plan shall:

- a. involve workers; and
- b. entail, as a minimum, either:
 - (i) thinking of a scenario (e.g., fire or earthquake) and working it through the plan; or
 - (ii) staging a mock emergency (such as a fire drill) to test how well the plan works; or
 - (iii) both.

49. The HR Manager shall ensure that the following roles are assigned for each office workplace:

- a. Emergency Warden; and
- b. Deputy Emergency Warden who shall assume the role of Emergency Warden when the Emergency Warden is:
 - (i) absent from the workplace; or
 - (ii) unable to perform the role of Emergency Warden due to incapacitation or some other reason.

50. The general responsibilities of an Emergency Warden during an emergency are to:

- a. take charge; and
- b. ensure the safety of workers and others; and
- c. Lead, co-ordinate, and communicate the appropriate emergency response action outlined in the HR8i Emergency Plan; and

- d. liaise with emergency services.
51. The names of the Emergency Wardens shall be displayed on the HR8i Emergency Plan.
52. As soon as is reasonably practicable after an emergency drill or an actual emergency the HR Manager shall initiate and complete a review of the emergency response to determine:
- a. what was done well; and
 - b. what was not done well; and
 - c. what needs to change to improve the employer PCBU's emergency preparedness and response performance.
53. The results of a review of an emergency response shall be:
- a. documented using a HR8iA Post-Emergency Review form; and
 - b. recorded on the HR1D Database; and
 - c. sent to:
 - (i) workers; and
 - (ii) the employer PCBU's officers of a PCBU.

Injury & illness management

54. The HR Manager shall ensure, so far as is reasonably practicable, that employees who are unable to perform their normal work duties due to injury or illness are supported in their safe and timely return to normal work duties.
55. In supporting injured employees in their safe and timely return to normal work duties, the HR Manager shall have regard to the guidance published on ACC's website [Supporting your injured employee to recover at work](#).
56. Where the circumstances warrant it, the HR Manager shall:
- a. facilitate the completion of a HR8J Injury Recovery Plan; or
 - b. where ACC is involved, facilitate the completion of [ACC's Recovery at Work Plan](#).
57. Where an employee is absent due to illness or injury, the employee must keep the following persons informed of their medical status and rehabilitation progress:
- a. the employee's line manager; and
 - b. the HR Manager.

58. Notwithstanding anything else in this policy, the employee retains overall responsibility for their rehabilitation and fitness for work.

Contractor management

59. This section applies only to contractor PCBU's engaged by the employer PCBU to perform work involving any of the below work tasks:
- a. electrical work
 - b. hot work (involving grinding, welding, or gas-cutting)
 - c. work at heights
 - d. work in confined spaces
 - e. building, demolition, or construction work of any kind
 - f. any other work that could potentially result in death or serious injury.
60. The HR Manager shall ensure, so far as is reasonably practicable, that before a contractor commences work that the following documents are completed:
- a. HR8K Contractor Health & Safety Declaration; and
 - b. HR8L Record of Contractor Induction.

Provision of information, instruction, training & supervision

61. Every new worker shall be provided with health and safety information and instruction at the time of their induction (see HR4 New Employee Induction Policy).
62. Every worker shall be either under documented training and competent supervision or deemed competent to role and able to perform their work effectively and safely without supervision (see HR5 Training & Supervision Policy)
63. Every worker shall be required to undergo emergency response training and refresher training which shall include, as a minimum, the requirement to complete the HR8-TRAIN-1A Emergency Response Training Quiz at least once every 6 months.
64. Every worker shall be required to undergo hazards and risks management training and refresher training which shall include, as a minimum, the requirement to complete the HR8-TRAIN-2A Hazards & Risks Management Training Quiz at least once every 12 months.

Safety inspections

65. The HR Manager shall co-ordinate the completion of workplace safety inspections.
66. Co-ordination includes assigning responsibility for carrying out the inspection, in whole or in part, to the appropriate person or persons.
67. Safety inspections are to be conducted at least once every quarter.

68. Follow-up actions to remedy any issues arising from an inspection shall be documented by the person responsible for carrying out the inspection in an action plan.
69. To ensure compliance with the above requirements, inspections shall be documented on a form HR8N Quarterly Workplace Inspection form.

Worker engagement, participation, and representation

70. The employer PCBU shall comply with [Part 3 HSWA](#).
71. The primary means by which the employer PCBU will engage with workers regarding health and safety matters is through effective systematic hazards and risks management that requires:
 - a. all workers to complete hazards and risks management training and refresher training; and
 - b. all workers to proactively identify and report hazards; and
 - c. all workers to be advised of every new hazard and risk controls admitted to the HR8D Hazards & Risks Register; and
 - d. workers likely to be exposed to identified hazards to be consulted when:
 - (i) controlling risks; and
 - (ii) reviewing risk controls for “critical” and “high” risks; and
 - (iii) developing a HR8E Safe Work Plan; and
 - (iv) developing a HR8J Injury Recovery Plan.
72. A secondary means by which the employer PCBU will engage with workers is through the convening of regular meetings of operational teams whereby health and safety shall be a standard meeting agenda item.
73. Workers shall be consulted when making decisions about the adequacy of facilities for the welfare of workers.
74. The employer PCBU shall not initiate the following procedures on the employer PCBU's own motion on the basis that the employer PCBU is satisfied that existing worker participation practices at the workplace sufficiently meet the employer PCBU's duty under [section 61 HSWA](#) to have worker participation practices:
 - a. the election of a health and safety representative under [section 62 HSWA](#); and
 - b. the establishment of a health and safety committee under [section 66 HSWA](#).
75. Where the employer PCBU is obligated to initiate the election of a health and safety representative in accordance with the provisions of [section 62 HSWA](#), the election and appointment process shall be conducted and documented by the HR Manager using the following forms:
 - a. HR8o Health and Safety Representative Nomination form

- b. HR8P Health and Safety Representative Election Voting Form
- c. HR8Q Result of Election of Health and Safety Representative form.

Health and Safety Committee

- 76. The employer PCBU shall comply with [section 66 HSWA](#).
- 77. A request to the employer PCBU to establish a health and safety committee made pursuant to section 66(1)(a) or (b) HSWA shall be in writing.

Drugs & alcohol

- 78. Being impaired by drugs and or alcohol while performing safety sensitive work is a hazard that gives rise to risks to health and safety. The following control measures are taken from the employer PCBU's HR8D Hazards & Risks Register. All workers must take note of the control measures and comply with them. The employer PCBU's drug and alcohol policy shall be notified to workers at the time of their induction (see HR4F Employer's HR Policies Booklet).

- Workers should manage their time and activities away from work so that they do not come to work impaired by drugs and / or alcohol.
- Adopt a drug and alcohol policy (see HR4F Employer's HR Policies Booklet)
- Ensure workers are aware of the drug and alcohol policy requirements as a worker has a duty under section 45(d) HSWA to co-operate with any reasonable policy or procedure of the PCBU relating to health or safety at the workplace that has been notified to workers.
- Ensure the drug and alcohol policy includes a discretionary procedure for reasonable cause and post incident testing (noting that WorkSafe does not require mandatory drug testing as it is not a prescribed legal requirement).
- Identify impairment by drugs and or alcohol at work and manage it in accordance with the drug and alcohol policy and in a manner proportionate to the task being undertaken and level of risk identified.

Personal Protective Equipment

- 79. Not using suitable PPE correctly when exposed to foreseeable hazards while performing hazardous work is itself a hazard. Exposure to the hazard gives rise to the risk that a worker might suffer harm that could have been avoided through the correct use of suitable PPE. The following control measures are taken from the employer PCBU's HR8D Hazards & Risks Register. All workers must take note of the control measures and comply with them. The control measures shall be notified to workers at the time of their health and safety induction (see HR4D Worker's Health & Safety Handbook).

- Workers shall be issued with suitable PPE to minimise risks to health and safety arising from exposure to foreseeable hazards they are likely to be exposed to while performing hazardous work.
- The issuing and receipt of PPE shall be documented on a HR4 Record of Receipt of Job Start Items & PPE form (to be updated as PPE items are issued to the worker from time to time).
- Workers shall receive training or instruction on the correct use of the PPE issued to them.
- Workers issued with PPE shall use the PPE correctly and for the purpose for which the PPE item has been issued.
- Workers shall NOT use worn, defective, or damaged PPE and shall immediately report instances of worn, defective, or damaged PPE to their line manager

Health & safety at work reporting to officers of a PCBU

80. To assist the employer PCBU's officers of a PCBU comply with their responsibilities under this policy (refer to paragraph 1 of this policy) the HR Manager shall ensure every officer of a PCBU is provided with the following completed documents in a timely manner:

- a. HR1E EZHR Quarterly KPI report
- b. HR8B Hazard ID & Risk Management forms
- c. HR8E Safe Work Plans
- d. HR8F Incident Reports
- e. HR8G Incident Investigation Findings Reports
- f. HR8iA Post Emergency Review forms
- g. HR8J Injury Recovery Plans
- h. HR8K Contractor Health & Safety Declaration forms
- i. HR8N Quarterly Workplace Inspection forms.

Policy review

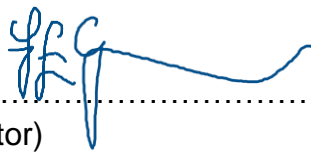
81. This policy shall take effect from the time it is signed and shall remain in force until it is subsequently:

- a. rescinded; or
- b. superseded by a new policy.

82. This policy may be amended on review.

83. This policy shall be reviewed from time to time:

- a. as the need arises; or
- b. at least once every 3 years.

Signature:  Date: 1 October 2023
(Fran Gibson, Director)

Next policy review due date: 1 October 2026