



# Barrow AFC

## Safer Recruitment Policy

Last updated: 20/09/2023

## **Contents:**

Statement of intent

1. Legal Framework and Definitions
2. Roles and responsibilities
3. Equal opportunities
4. Planning, advertising and shortlisting
5. Invitation to interview
6. Pre-interview checks
7. Digital footprints
8. The interview
9. After the interview
10. Remote recruitment
  - Pre-appointment checks
11. After the pre-appointment checks
12. Single central record (SCR)
13. Safer recruitment training
14. Monitoring and review

## Statement of intent

Barrow AFC has implemented this policy to assist with recruitment and employee selection. It outlines the club's recruitment procedure and how the club ensures safer recruitment is considered at all levels of the recruitment process.

The safety and protection of the club's staff is always at the forefront of the club's concerns, which is why this policy aims to embed a robust safeguarding culture into the recruitment practices of the club.

Barrow A.F.C are back in the Football League after many long years. After our enforced exile and the hard work of everyone on and off the pitch, we have returned to where we deserve to be.

Ray Wilkie said, "no one deserves it more than them" when talking of supporters after the Wembley win in 1990. We believe that should be the case for everyone involved in Barrow A.F.C when we work here- we deserve the best.

This document outlines clearly what we all expect and deserve as colleagues, when working for Barrow A.F.C:

- Barrow A.F.C expects all employees to work in positive and respectful manner with colleagues, stakeholders and the wider public at all times.
- Everyone who works at Barrow A.F.C should understand that their own behaviour, and the manner in which they conduct themselves, sets an example and reflects on the club
- Barrow A.F.C expects that all employees present themselves at work in a manner that reflects well on the club and creates a positive and professional impression
- Employees are expected to act outside work in a manner that reflects well on Barrow AFC and does not bring the club into disrepute, including use of social media
- All employees can expect and deserve proper support to fulfil these responsibilities to the best of their ability through positive support and professional development
- Barrow A.F.C expects all colleagues to work together as a team, sharing information so everyone can do the best job they can
- Everyone who works at Barrow A.F.C will be treated with equal respect and kindness, regardless of race, religious beliefs, gender or sexuality
- All employees can expect and deserve to have their overall performance measured against clear expectations outlined within their roles and responsibilities
- Everyone who works at Barrow A.F.C should understand their own responsibilities with regard to the Health, Safety and Safeguarding at work
- Barrow A.F.C undertakes to ensure if employees have a grievance there is a process to follow, which will be conducted in a fair and transparent manner
- Barrow A.F.C employees are bound by confidentiality and will have made a legal commitment not to disclose private business information regarding Barrow A.F.C to others

Signed by:

C.O.O

Date:

\_\_\_\_\_

\_\_\_\_\_

Chairman

Date:

\_\_\_\_\_

\_\_\_\_\_

## 1. Legal framework and Definitions

1.1. This policy has due regard to all relevant legislation including, but not limited to, the following:

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Rehabilitation of Offenders Act 1974
- Education and Skills Act 2008
- Data Protection Act 2018
- The General Data Protection Regulation (GDPR)
- Education Act 2002
- Equality Act 2010

### Definitions

**Standard DBS** – this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether or not they are spent under the Rehabilitation of Offenders Act 1974.

**Enhanced DBS** – this provides the same information as the standard DBS, plus any additional information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

**Enhanced DBS with barred list check** – this check is required for when people are working or seeking to work in regulated activity with children. This check allows for additional checks to be made as to whether the person appears on the children's barred list.

**Children's barred list** – the DBS maintains a 'barred list' of individuals who are unsuitable to work with children and vulnerable adults. In addition, where an enhanced DBS including a barred list check is obtained, the certificate will also detail whether the applicant is subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002.

**Safer recruitment** – this is the safeguarding and protection of staff during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children

## 2. Roles and responsibilities

## 2.1. **The Board of Directors are responsible for:**

- Agreeing and monitoring effective policies to ensure recruitment at the club is in accordance with the legislation outlined in section 1.
- Ensuring that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.
- Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the club.
- Ensuring that all **interview panel** members have undertaken unconscious bias training before the selection process begins.
- Appointing an appropriate **interview panel**.
- Ensuring that at least one member of the **interview panel** has undergone safer recruitment training.
- Ensuring that all members of the **interview panel** understand their role, i.e. advisory or decision making.
- Monitoring the advertising of vacancies, assessing how they are being advertised and whether the adverts are maximising all of the opportunities to attract the appropriate candidates.
- Benchmarking the success of any advertising methods used, as well as the overall success of the recruitment process.
- Ensuring a member of the board is on the **interview panel** for a new **manager**
- Ensuring that all members of the **interview panel** are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.
- Monitoring the club's SCR to ensure that the necessary vetting checks for employees are carried out.
- Ensuring that equal opportunities are established and implemented throughout the recruitment process.
- Ensuring that the salary of the successful candidate is determined.
- Accommodating the needs of new employees and making reasonable adjustments when necessary.

## 2.2. The **interview panel** is responsible for:

- Creating the advert and ensuring it meets all the necessary requirements.
- Shortlisting the potential candidates with the aim of reducing the application field and identifying those with the potential to effectively undertake the role.
- Appropriately delegating responsibility for recruitment to **the appropriate member of staff**
- Ensuring that the interview addresses leadership ability, team working skills, reasons for interest in joining the club, integrity, understanding of the club's ethos and vision, and why the candidate believes they would be a good fit for Barrow AFC
- Ensuring that the interview addresses safeguarding practices.
- Appointing an appointing officer who will be responsible for the entire management of the recruitment process.

- Agreeing with the successful candidate when other members of the club community will be informed about their appointment, including staff members and parents.
- 2.3. The C.O.O is responsible for:
- Ensuring appropriate checks have been carried out on prospective staff, volunteers, contractors and agency workers working within the club.
  - Ensuring that appropriate supervision of employees/volunteers is organised, and for promoting the safety and wellbeing of staff generally and throughout the recruitment process.
  - Leading the interview when the candidate is at a lower level than the COO.
- 2.4. During the recruitment process, and especially during the initial stages, the interview panel and the COO will be watchful of candidates displaying the following characteristics:
- No understanding or appreciation of children's needs
  - Expressing that they want the role to meet their needs at the expense of children
  - Using inappropriate language in relation to children
  - Expressing extreme views or views that do not support safeguarding practices
  - Displaying unclear boundaries with children
  - Providing vague answers when asked about their experience and being unable to explain gaps in their employment

### 3. Equal opportunities

- 3.1. When recruiting, the club will adhere to its Equal Opportunities Policy.
- 3.2. The club will not discriminate against any protected characteristics, such as disability or gender, and will always promote difference and inclusion throughout the club.
- 3.3. The club will, where necessary, make reasonable adjustments to ensure the interview is accessible to all candidates. Candidates should inform the club of any reasonable adjustments that they need when they receive the invitation for an interview.
- 3.4. The **board of directors** will review recruitment procedures **annually** to ensure they are accessible and do not directly or indirectly discriminate against candidates.
- 3.5. Candidates will not be asked about their health or any disabilities before a job offer is made, unless one of the following exemptions applies:
- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments)
  - Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment

- Positive action to recruit people with disabilities
- Equal opportunities monitoring (which will not form part of the decision-making process)

## 4. Planning, advertising and shortlisting

- 4.1. Once a vacancy has been identified, the club will allow an appropriate amount of time for **planning and structuring the recruitment process**.
- 4.2. **The board of directors and COO will:**
  - Decide on the recruitment timeframe.
  - Decide who will be involved in the process and what their roles will be, e.g. who forms the **interview panel** and who will lead interviewing.
  - Prepare the documents that will be provided to applicants, including the job description, person specification and application form – ensuring that these documents contain a clear message about safeguarding, the checks that will be carried out and that references will be sought.
  - Ensure that application packs, where relevant, state that applicants must be willing to sign the staff disqualification declaration.
- 4.3. The job information and associated documents will be published online.
- 4.4. The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.
- 4.5. The **interview panel** will comprise the COO or a club director who is responsible for the management of the entire recruitment process, and at least two other member of staff, whether paid or unpaid.
- 4.6. The **interview panel** will be an odd number so majority votes can be cast.
- 4.7. At least one member of the **interview panel** will have successfully completed up-to-date safer recruitment training.
- 4.8. The **interview panel** will create the advertisement.
- 4.9. The **interview panel** will ensure the advertisement includes the following requirements:
  - Information specific to the role on offer and the club as a whole
  - The benefits of the role are highlighted
  - The advertisement is relevant to the target audience
  - The advertisement is communicated directly and concisely, and includes a clear call to action
  - Applications can be submitted electronically
- 4.10. Requests for further information from applicants will be replied to promptly.
- 4.11. All applications will be replied to by e-mail.

- 4.12. Interviews will be arranged for the shortlisted candidates.
- 4.13. Vacancies will be advertised with due consideration to the club's Equal Opportunities Policy and Equality Protocol, ensuring that the advertisement reaches a wide range of groups.
- 4.14. Advertisements will contain a statement of commitment to ensuring equal rights.
- 4.15. Advertisements will include a job description, person specification and detail the closing date.
- 4.16. The contact numbers of the appointing officer and details of the application process will be clearly outlined.
- 4.17. Application forms will be accessible on the club's website.
- 4.18. The club may utilise social media for recruitment, and if doing so, will create a social media recruitment strategy to ensure that the advertisement is reaching the right people and is communicating the ethos of the club effectively.
- 4.19. When an advert receives a response, the interview panel will ensure that candidates receive the application pack.
- 4.20. At least two members of the interview panel will be involved in the shortlisting process.
- 4.21. Candidates who are shortlisted will meet all the essential aspects of the person specification requirements.
- 4.22. The club will ensure that the shortlisting process is as systematic as possible, and that the interview panel reads through all applications. Each member of the interview panel will create their own shortlist which will then be collated and discussed.
- 4.23. Applicants will be assessed against the same shortlisting criteria to ensure a fair process.

## **5. Invitation to interview**

- 5.1. Before interview invitations are sent, the interview panel will ensure that candidate has access to the following:
  - A copy of the advertisement
  - A job description
  - A comprehensive person specification
  - Any equal rights material, e.g. an equal opportunities statement
  - A brief outline of the club, its values and aims, from Page 1 of the Staff Handbook



- 5.2. Once a shortlist has been confirmed, the applicants to be invited for interviews will be contacted by the appointing officer and suitable interview times will be decided.
- 5.3. The interview panel will ensure that all shortlisted candidates receive information about the interview arrangements, how they will be conducted, the areas that will be explored and what documents they should bring.
- 5.4. The interview panel will send shortlisted candidates the self-declaration of criminal record form, alongside a copy of the club's disqualification form, where appropriate.
- 5.5. Upon inviting candidates to interview, the interview panel will state that the successful candidate's identity will be checked and, where appropriate, the necessary pre-appointment checks will be carried out.
- 5.6. Where possible, the interview panel will obtain **two** references before interviewing candidates to allow for any concerns to be explored with the referee and discussed with the candidate.
- 5.7. One of the references will be from the candidate's most recent employer.
- 5.8. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving will be obtained from the employer.
- 5.9. References will be from a senior member of staff and not a colleague.
- 5.10. Open testimonials will not be relied upon, nor will information that has been provided by the candidate without verifying the information.
- 5.11. Electronic references will be vetted to ensure they originate from a credible source.
- 5.12. References from internal candidates will also always be scrutinised before interview.
- 5.13. Permission will be sought from the candidates before the **interview panel** contacts referees.
- 5.14. Structured questionnaires will be used to question referees and the **interview panel** will determine the questions on a case-by-case basis.
- 5.15. Information about past disciplinary action or allegations that are disclosed will be considered carefully when assessing the applicant's suitability for the post.
- 5.16. The candidate's current employer will be asked for details of any capability history in the previous two years, including the reasoning.

## **6. Pre-interview checks**

- 6.1. The interview panel will complete the necessary pre-interview checks.

6.2. Pre-interview checks will include the following:

- Requesting two references from each shortlisted candidate directly from the referees – where possible, one reference will be obtained relating to the role in which the candidate worked with children
- Verifying that the candidate has qualifications or experience relevant to the post
- Checking references against application forms and noting down discrepancies or concerns, and following up these concerns with referees
- Checking and, where necessary, following up candidates' self-declaration forms

## 7. Digital footprints

7.1. The club is committed to ensuring that safeguarding is a top priority; therefore, where appropriate, the club may check candidates' social media or other online activity prior to interview.

7.2. This process may include a search for the candidate via:

- **Google**
- **Facebook**
- **LinkedIn**
- **Instagram**
- **Twitter**

7.3. Any concerns will be addressed during the interview process.

## 8. The interview

8.1. During the interview process, candidates will be asked standard questions and their responses will be recorded for ease of comparison.

8.2. Any concerns raised through contact with referees will be discussed with the candidate at this stage.

8.3. The interview panel will ask open questions to assess the candidate's experience and suitability for the post, and to explore the candidate's motivation towards safeguarding and their suitability to work with children.

8.4. Candidates shortlisted for interview will be given the opportunity to complete a self-disclosure form upon arrival for their interview.

8.5. The candidate will be given the opportunity to discuss any concerns or ask any questions.

8.6. The interview will always comprise a face-to-face interview; however, the interview panel may also request that candidates complete **one** of the following exercises:

[Schools should list here the activities they may request candidates to complete.]

## 9. After the interview

- 9.1. After the interview has been completed, Barrow AFC will:
  - Assess all candidates' performance using the same agreed criteria.
  - Ask the successful candidate to provide proof of identification and qualifications, and to complete the DBS check as soon as possible.
  - Contact and provide feedback to the unsuccessful candidates – feedback will be verbal and based on evidence of their performance against the person specification for the role.
- 9.2. Interview notes and assessment materials will be held securely for an appropriate amount of time after the interviews, in case any aspect of the recruitment process is challenged.
- 9.3. After choosing a successful candidate, the club will:
  - Make a conditional offer of employment to the candidate.
  - Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.
  - Complete the relevant pre-appointment checks.
- 9.4. Once an offer of employment has been made, the candidate's self-declaration form will be reviewed. If a conviction has been declared, and it is spent or filtered, the offer of employment will not be retracted based on this; however, the club will undertake the relevant assessments to determine whether the candidate is suitable to work in the club.

## 10. Remote recruitment

- 10.1. The club will follow all the requirements set out in this policy when recruiting remotely, changing only the in-person nature of the interview, and implementing the necessary additional steps to support this.
- 10.2. Barrow AFC will research and select a suitable online platform through which online interviews may take place, taking into account ease of use, privacy measures and suitability for the purposes of online interviews.
- 10.3. Online interviews will be conducted in line with the club's IT Acceptable Use Policy and Data Protection Policy at all times.
- 10.4. Staff members conducting an online interview will ensure they understand how to operate the various relevant functionalities of the online interview platform, e.g. how to share their screen, prior to the interview commencing.
- 10.5. Staff members conducting an online interview will ensure privacy settings are adjusted appropriately on the provider's site or application.

- 10.6. The club will be aware of, and have due regard for, the potential risks associated with online communication, e.g. ease of anonymity, and will ensure it takes suitable precautions, e.g. encrypting data where possible.
- 10.7. The club will ensure that any tasks set for candidates during the interview are compatible with the online nature of the interview, e.g. they do not require the exchange of physical paper resources.
- 10.8. The club will communicate its expectations to candidates regarding the use of the online platform in good time prior to the interview. These expectations will include, but will not be limited to, the following:
- The candidate will participate in the interview with both the video camera and microphone features enabled at all required times
  - The candidate will participate in the interview in a suitable setting – a quiet area with a neutral background
  - The candidate will keep personal information which is not relevant to the recruitment process private, e.g. their email password, and will not ask the staff members conducting the interview to share any such private information
  - Where necessary, the candidate will be aware that the club will record the online interview, and that they will be required to consent to this in order for the interview process to continue
- 10.9. When recording an online interview, prior permission will be acquired from the candidate in writing via email and all members of the interview will be notified before the interview commences via email, and again once they have joined the interview before recording commences.
- 10.10. If the candidate does not provide consent to recording the interview, the club will consider whether the online interview can still take place in line with club's safeguarding and records management responsibilities.
- 10.11. The club will not discriminate against candidates who are recruited remotely; they will be considered fairly alongside any candidates who are not recruited remotely.
- 10.12. If a candidate refuses to interview remotely, the club will consider whether alternative arrangements for an in-person interview are possible, having due regard to the club's equality duties at all times. If this is not possible, then the club will sensitively inform the candidate that the remote interview process is a requirement of the application process, and have a considerate and good-natured discussion with the candidate as to whether they can continue with the recruitment process at this time.
- 10.13. The club will direct candidates towards the DfE's advice on '[Attending your first remote interview](#)' prior to the interview.

## **11. Pre-appointment checks**

- 11.1. All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks.
- 11.2. When appointing new staff, the club will complete the following checks:
- Verify the candidate's identity
  - Obtain an enhanced DBS certificate (via the applicant) and, for candidates engaging in regulated activity, barred list information
  - Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
  - Verify a candidate's mental and physical fitness to carry out their role
  - Verify the person's right to work in the UK
  - Make further checks on any individual who has lived or worked outside the UK
  - Verify professional qualifications, as appropriate
  - For those in management, trustee or governor roles, a section 128 check will be carried out
- 11.3. The interview panel will ensure any candidate employed to carry out teaching work is not subject to a prohibition order or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.
- 11.4. If the club has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act (SVGA) 2006 for the club to allow the individual to carry out any form of regulated activity.
- 11.5. There is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked:
- In a club in England in a post which brought them into regular contact with children or young persons; or
  - In any post in a club since 12 May 2006 which did not bring the person into regular contact with children or young persons; or

## **Volunteers**

- 11.6. For volunteers, if they are not engaging in regulated activity, a DBS check will not be obtained
- 11.7. If volunteers are engaging in regulated activity and are new to the club, an enhanced DBS check with a barred list check will be required.

- 11.8. Existing volunteers in regulated activity do not need to be re-checked if they have already had a DBS check
- 11.9. If a volunteer is not in regulated activity, the club will use its professional judgement, after conducting a risk assessment, to determine whether to seek a DBS check

### **Agency and third-party staff**

- 11.10. In the case of any employee working at the club who is sourced from an agency or third-party organisation, confirmation must be obtained from the organisation, in writing, that all necessary checks have been completed.
- 11.11. Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed. A copy of photographic identification will generally be kept where appropriate.

The club will obtain written confirmation from the agency that the checks have been carried out.

### **Existing staff**

- 11.12. If a member of staff moves from a post that was not regulated activity to one that is, the relevant checks will be carried out.
- 11.13. The interview panel will carry out further checks where there is a concern about a member of staff's suitability to work with children.
- 11.14. An investigation will be carried out to gather enough evidence to establish if an allegation has a foundation. The employer of the club will ensure they have sufficient information to meet the referral duty criteria in 12.23 of this policy.
- 11.15. The club will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
  - The harm test is satisfied in respect of that harm.
  - The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
  - The individual is deployed to another area of work not in regulated activity, or where they have been suspended.
- 11.16. Referrals to the DBS will be made on conclusion of an investigation where an individual has been removed from regulated activity.
- 11.17. Referrals to the DBS will be made as soon as possible after the resignation, removal or redeployment of the staff member.

### **Contractors**

- 11.18. The club will ensure that any contractor, or any employee of the contractor, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information).
- 11.19. For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required.
- 11.20. Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.
- 11.21. If a contractor is self-employed, the club will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.
- 11.22. The club will always check the identity of contractors and their staff on arrival.

### **Adults who supervise children on work experience**

- 11.23. If the club is organising work experience placements, the club will ensure that the placement provider has policies and procedures in place to protect children from harm.
- 11.24. Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. In such cases, the club will consider the specific circumstances of the work experience. Consideration will be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:
- Unsupervised themselves.
  - Providing the teaching/training/instruction/supervision frequently (more than three days in a 30-day period or overnight).
- 11.25. If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. In this case, the club will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.
- 11.26. If the activity undertaken by the child on work experience takes place in a 'specified place', such as the club, and gives the opportunity for contact with children, this may itself be considered regulated activity. In these cases, and where the child is 16 years of age or over, the work experience provider will consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

### **Children staying with host families**

11.27. The club may make arrangements for a child to have learning experiences where, for short periods, the child may be provided with care and accommodation by a host family to whom they are not related. In these circumstances, the LA will be consulted.

11.28. Once the pre-employment checks have been completed, the interview panel will:

- Agree a start date with the candidate.
- Destroy the completed self-declaration forms.
- Submit contractual paperwork, including the completed DBS check, copies of identification, references, proof of qualifications, pre-employment medical enquiry form, P45, application/equal opportunities and emergency contacts.
- Direct the Office Manager to place the required details of the checks carried out to the club's SCR.

## **12. Single central record (SCR)**

12.1. The club will maintain and regularly update the SCR.

12.2. All new employees will be added to the record, which will include:

- All staff who work at the club.
- All others who work in regular contact with children in the club, including volunteers.
- [The bullet points below set out the minimum information that must be recorded in respect of staff members. The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:
  - An identity check
  - An enhanced DBS check
  - A check of professional qualifications
  - A check to establish the person's right to work in the UK

12.3. For temporary staff, the club will include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

12.4. If checks are carried out on volunteers, this will be recorded in the SCR.

## **13. Safer recruitment training**

13.1. At least one member of the interview panel will have completed formal safer recruitment training.

13.2. As a measure of good practice, the club will ensure that this training is renewed every five years.



## **14. Monitoring and review**

- 14.1. This policy is reviewed annually by the board of directors and the COO
- 14.2. Any changes made to this policy will be communicated to all members of staff and relevant stakeholders.
- 14.3. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.
- 14.4. The next scheduled review date for this policy is 19.09.24

