PALMERA

Our Approach to Development

SEPTEMBER 2021, VERSION 1



Table of Contents

Introduction	2
Definitions and Terms	2
Status of Policy	4
Scope of Policy	4
Foundations of our work	5
Guiding principles A. We work at a systems-level B. We localise our work and are accountable to the communities in which we work C. We build capacity D. We prioritise gender equality and inclusion E. We are agile to achieve greater impact	7 9 10
Types of Palmera Activities A. Livelihood initiatives B. Humanitarian response C. Non-development activities	10 11
Cross-cutting issues	13
Reviewing this Policy	14



Introduction

Palmera Projects (**Palmera**) aims to create a world where no one is left out. We do this by supporting vulnerable families to secure a sustainable living income and break free from the hunger, poverty and aid cycle. Palmera does this by economically empowering the poor, and seeking out and promoting the participation of the most vulnerable groups in the communities in which we work—primarily women and girls, and people with disabilities. And because local challenges require local solutions, we work with and support grassroots Palmera Partners and local leaders who have the commitment and resilience to creating long-lasting change. Our work is grounded in human rights, and the respect for each individual's freedom, rights, dignity and agency.

Our Approach to Development (this **Policy**) set out Palmera's overarching philosophy and guiding principles that apply to Palmera's development activities. We apply these principles to ensure that our work complies with best practice, that it achieves a lasting positive impact on the lives of the primary stakeholders with which we work, and that we remain transparent and accountable to our donors and supporters.

This Policy complements our **Programme Manual**, which sets out practical guidance and procedures for implementing this Policy in all Palmera Activities.

Definitions and Terms

Term	Definition			
Aid and development activities	Activities undertaken in order to reduce poverty through a range of activities in cooperation with the primary stakeholder community. Development activities include community projects, emergency management, community education, advocacy, volunteer deployment, the provision of technical and professional services and resources, environmental protection and restoration and the promotion and protection of human rights.			
Capacity	The ability or power of an individual, organisation or community to apply its skills, assets and resources to achieve its vision, mission, goals and objectives.			
Capacity building	An ongoing evidence driven process that improves the ability of an individual, organisation or community to create measurable and sustainable results.			
Humanitarian response	The provision of material and logistical aid (including food, medical care and personnel), finance and advice in response to humanitarian crises including natural and man-made disaster and food scarcity arising from crop failures, to: a. Save lives, alleviate human suffering and support the right to life with dignity during emergency situations and in the immediate post-emergency rehabilitation phase;			
	 b. Cope with short- and longer-term population displacements arising out of emergencies; and 			



c. Strengthen preparedness for the occurrence of such situation and undertaking prevention activities.

Livelihood initiatives	Initiatives that provide a way of creating an income to meet the basic necessities of life that:			
	a. Are not reliant on handouts;			
	 Are built on an individual's own skill base, leverage their own resources, utilise their own entrepreneurial spirit and preserve or enhance social and environmental capital; 			
	c. Generate a regular stream of income sufficient to lift an individual, their family and ultimately their community of the cycle of reliance.			
Localisation	Recognising, respecting and strengthening leadership and decision-making by national and local actors in humanitarian action, in order to better address the needs of affected populations. ¹			
Non-development activities	Activities that are not development activities. Non-development activities include the provision of financial or welfare handouts, which is defined by AusAID's NGO Cooperation Program Guidelines as follows:			
	Welfare is designed as 'care and maintenance, other than refugee and emergency situations, which aims to maintain people in a particular condition on a longer-term basis. Substantial and broad impact on social and economic conditions in the community is not normally expected from welfare programs. Welfare is typically provided on an individual or family basis including home-based and institutional care programs, such as those provided by orphanages, homes for the elderly, hospices, support to the disabled, and the provision of food for destitute.'			
Palmera Activity	Any proposed or actual programme or project to which Palmera contributes funds.			
Palmera Partner	Any implementing partner organisation engaged by Palmera in the delivery of a Palmera Activity.			
Palmera Staff	All employees, volunteers, contractors, consultants, officers and directors of Palmera.			
Partner Staff	All employees, volunteers, contractors, consultants, officers and directors of a Palmera Partner.			
Primary stakeholder	The individuals whom we seek to support, work with and directly benefit through our Palmera Activities. The women and men, girls and boys who are participants			

¹ Australian Department of Foreign Affairs and Trade, *Localisation and the Australian NGO Cooperation Program* (ANCP) 2019-20; Annex 1: Humanitarian, NGOs and Partnerships Division Localisation Policy Note, April 2021, available at https://www.dfat.gov.au/sites/default/files/localisation-and-the-ancp-2019-20.pdf.



in, and are directly affected by, Palmera Activities. They may also be referred to
as beneficiaries or local people.

Sustainable development

The development of a resource in a manner that meets the needs of the community but does not compromise the ability of future generations to meet their own needs.

Status of Policy

This Policy consolidates and replaces previous versions of Palmera's Policies on:

- Sustainability;
- Non-development;
- · Community Partnership;
- · Capacity Building; and
- Humanitarian Relief;

(each a Prior Policy).

Any reference to a Prior Policy in any document, policy, guidance of Palmera or any agreement entered into by Palmera (including agreements with Palmera Partners) will be taken as a reference to this Policy.

Scope of Policy

This Policy applies to all of Palmera Activities. All Palmera Staff, and Partner Staff are required to read and familiarise with this Policy.



Foundations of our work

Palmera's approach to development is built on three foundations: sustainability, human rights and inclusion.

Figure 1: Foundations of our work

Sustainability

We engage in sustainable development, not charity, so that communities can continue to help themselves long after we have gone. Our projects incorporate strategies to promote self-reliance, ownership and autonomy of the communities in which we work, applying local solutions to local problems. We balance the community's economic needs with the need to responsibly manage its natural resources. We work with trusted local partners and support them and our primary stakeholders with capacity-building initiatives.

Inclusion

We strive to create a wold in which no one is left out. This requires us to understand and help challenge existing structures within communities to remove barriers that exclude the most vulnerable groups. Meaningful economic development requires transformative change. To achieve this, we centre our work on the most vulnerable groups in communities (such as women and people with disabilities) by developing initiatives to support them in participating in economic activities.

Human rights

Upholding the basic human rights of all individuals is paramount in our work. By conducting our work through a human rights lens, we ensure that our work helps vulnerable families achieve economic empowerment, while also respecting and promoting their freedom, dignity and agency, and helping them meet the necessary conditions for achieving the Sustainable Development Goals (SDGs). Moreover, economic empowerment is a vital means to achieving stable, peaceful and resilient communities.



Guiding principles

Building on the foundations of sustainability, human rights and inclusion, Palmera prioritises five **guiding principles** in our approach to development so that we can achieve greater impact.

Figure 2: Guiding principles to achieve impact

We work at a systems-level

- We understand and holistically address the multi-dimensional challenges that primary stakeholders face in order to identify and remove the barriers that stand in their way to economic development and transformative change.
- We scale our work at all levels: scaling deep (building community relationships to change culture), scaling out (to reach a greater number of families), and scaling up (to influence rules and policies).

We localise our work and are accountable to the communities in which we work

- Local problems need local solutions, tailored and owned by the community. In all aspects of our programming - from design to implementation - we partner with local NGOs to leverage their relationships and knowledge of the community, and we encourage and facilitate the participation of primary stakeholders.
- We build trust and deep connections within the communities we work by holding ourselves accountable to our primary stakeholders, their communities and to Palmera Partners.

We build the capacity of our partners and target communities

- We intentionally and actively seek to complement the local expertise of our Palmera Partners and build their capacity to deliver effective programmes, by providing the knowledge, technology, partnerships and other resoruces that we can bring to the development process.
- We consider ways to build capacity of our primary stakeholders in our programmes through consultation, collaboration and shared ownership of the process.

We prioritise gender equality and the inclusion of marginalised groups We focus on the people and communities that are most excluded from economic development. We take special efforts through all stages of our programming, from design, to implementation and monitoring, to include women and girls, people with disabilities and other marginalised groups in our programmes.

We are agile to achieve greater impact

 We continually measure and reflect upon the impact of our work and are agile in adapting our programs in response to new information and changes in context so as to improve the impact of our programs.



A. We work at a systems-level

Our work seeks to address the complex, multi-dimensional challenges faced by communities living in areas traditionally excluded or neglected from economic development. Our approach, which has evolved over several years of experience in sustainable development, not only incorporates livelihood initiatives for primary stakeholders, but more holistically builds in activities that help to address the market and non-market challenges that have kept them excluded from economic development for so long.

This requires working at a *systems-level*, and requires us to understand factors such as how the community, private sector and public sector interact and work together; influential external factors such as government policies and institutions; the coordination of and access to information in these communities; and issues of financial, technological, socio-cultural and environmental sustainability.

Through our systems-level approach, we incorporate initiatives into Palmera Activities in areas such as:

- Strengthening the market and financial services available to primary stakeholders and promoting their access to buyers;
- Improving the productive capacity of primary stakeholders to engage in profitable sectors;
- Promoting mechanisms to ensure social protection for the most vulnerable households in target communities;
- Designing interventions to assist primary stakeholders facing extreme poverty, so as to enable them to participate along with the rest of their community in productive and profitable work;
- Improving social inclusivity and integration of the primary stakeholder community (including women, girls and minority groups) in markets and the community.

To achieve the greatest impact, we scale our work at all levels: scaling deep (building community relationships to change culture), scaling out (to reach a greater number of families), and scaling up (to influence rules and policies).

B. We localise our work and are accountable to the communities in which we work

We believe that local challenges require local solutions. That is why Palmera undertakes its development work through community partnerships and participation.

Localisation through community partnerships

We establish long-term, sustainable partnerships with Palmera Partners who have local expertise and presence, demonstrate effectiveness; understand the culture and context in the regions that we operate in; share our values, respect diversity and do not discriminate against people on the grounds of ethnic, cultural, religious, political or gender grounds, or any other impermissible grounds; and are receptive to feedback and strive for continual improvement.

The following **principles** guide Palmera's commitment and approach to partnerships:

- We work with Palmera Partners with whom we have a shared vision and values, particularly regarding our three core foundational concepts of sustainability, inclusion and human rights.
- We work in mutually respectful ways with Palmera Partners and primary stakeholders.



- We aim to **add value** to the partnership by sharing and incorporating lessons learned and providing our Partner with capacity building initiatives (see Section C: Capacity Building).
- We respect the autonomy and independence of Palmera Partners and value their experience and expertise
 in addressing the challenges of poverty in their specific context, and seek to empower them to do this work.
 We value the capacities and strengths of Partner Staff.
- We are committed to transparency and mutual accountability in our relationships with our partners and primary stakeholders, and the community at large. We do this through the commitments we agree in our Memoranda of Understanding with Palmera Partners, by encouraging open dialogue, sharing and feedback, and through formal and informal avenues we provide for any person to raise issues or complaints with Palmera (such as through our Complaints Handling and Whistleblowing Policy² and Safeguarding Policy³).
- We **complement** the work of our Partner, recognising their skills and capacity and having in place a clear **delineation** of each of our **roles and responsibilities**.

Localisation through community participation

Palmera recognises that the participation of the community through all stages of a development project is critical for sustainability, as it gives communities the tools to drive their own development and manage their own resources.

To this end, Palmera is committed to advancing the participation and contribution of primary stakeholders in our development work by encouraging and facilitating their participation at all stages of the project cycle.

Participation involves a variety of approaches that include:

- Disseminating information amongst the community in the local language regarding our work and the opportunities for primary stakeholders to engage;
- Carrying out proper consultation with community members in designing projects, such as by conducting
 workshops, focus groups, meetings, interviews, participatory rural appraisals, etc. Such approaches must be
 relevant and appropriate to the context in which the project operates;
- In particular, identifying the most vulnerable members of communities and supporting them in participating in our programmes. Our Gender Equality, Disability and Social Inclusion (GEDSI) Policy⁴ sets out our guiding principles and approach to achieving this in our work;
- Involving primary stakeholders in monitoring and evaluation processes, whether it be in data collection or reflection processes.
- Inviting primary stakeholders to reflect on Palmera's performance and that of the Palmera Partner, so as to improve our impact, strengthen relationships with the community and build trust and understanding.

² Complaints Handling and Whistleblowing Policy, April 2021.

³ Safeguarding Policy, April 2021.

⁴ Gender Equality, Disability & Social Inclusion Policy, April 2021



C. We build capacity

Capacity building is designed to bring about systematic, self-managed, self-generating change. Palmera recognises capacity building as an important aspect of its work, as it ensures that the benefits of Palmera Activities will outlast their implementation. We therefore incorporate initiatives into Palmera Activities that empower and build the capacity of our **primary stakeholders**, and **Palmera Partners**.

Palmera's capacity building is underpinned by the **principles** of community ownership and participation; sensitivity to gender equity and inclusion; tailoring activities to the community context; designing evidence-based and results-oriented practices, and sharing lessons learned.

Palmera delivers capacity building initiatives in accordance with the following guidelines:

- **Delivered in local language**: Initiatives should be delivered in the local language (e.g., Tamil), unless English is the subject being taught, in which case it is best to have a bilingual trainer.
- Delivered in a local location: Initiatives should be located close to the primary stakeholders' homes so that
 they can easily reach training. These initiatives will require primary stakeholders to spend time away from their
 work, household and/or childcare duties. If possible, activities should be scheduled to fit around these
 commitments. For Partner Staff who attend capacity building initiatives, they should be compensated for
 transport and food that day.
- **Delivered by a local person**: Ideally the initiatives should be delivered by members of the local community, so that they also gain from the teaching experience. If the trainer is an external person, look for opportunities to mentor a local person at the same time.
- Pre-work and post-work should be undertaken for the training: For maximum effectiveness, attendees of training activities should be asked to do pre-work that requires them to think about the topic to be discussed and come prepared. For example, if the training is in relation to book-keeping and accounting, attendees could be asked to "document how you currently do this and write down what is good and bad about it". Post-work should also be given to reinforce the training.
- **Feedback built into the training**: Feedback should be collected on the capacity building initiative and this should be incorporated into the design of future initiatives.
- Promoting collaboration: Primary stakeholder capacity building should encourage collaboration between
 primary stakeholders to enhance training outcomes and community cohesion where possible. For
 organisational capacity building, this should be considered an opportunity to bring together local NGOs and
 encourage coordination.

These guidelines are applied in the design and processes of capacity building activities. For primary stakeholders, such activities may include providing technical training in areas such as business management and improved agricultural practices, mentoring and support, and grants and loans to invest to support the stakeholder improve their skills and capabilities. For our Palmera Partners, capacity building activities may include providing technical assistance to the Partner in key technical areas, organisational support to help it improve its organisational operation, and more in-depth organisational development. The design and processes of these capacity building initiatives are set out in detail in our **Programme Manual**.



D. We prioritise gender equality and inclusion

Palmera recognises that women and girls bear a disproportionate burden of poverty and face many barriers to participating in income-generating activities. These barriers may be intentional or unintentional, but overcoming them requires a deliberate effort to analyse gender dynamics in the target community, mainstream gender considerations into our main activities, and develop targeted activities where relevant to address specific needs of women, girls and other marginalised groups to help level the playing field and address structural and historical disadvantage.

It is not only women and girls who may be particularly vulnerable and excluded, but also people with disabilities, and internally displaced persons. Moreover, individuals may face intersecting drivers of marginalisation and exclusion.

In this context, Palmera applies its GEDSI Policy⁵ to recognise and support every individual's right to equality and inclusion, address the root causes of inequality and marginalisation, include the voiced of marginalised groups and help them to achieve transformative change by implementing mainstreamed and targeted activities in its programmes. Consult the GEDSI Policy for further detail as to Palmera's principles and approach.

E. We are agile to achieve greater impact

We implement Palmera Activities being ready and willing to adjust our programs in response to new information and changes in context so that we can achieve greater impact. This is an intentional approach to being agile and adaptive in our work, and is critical to ensuring our work achieves greater impact.

Our agility relies on our ability to regularly measure and assess the effectiveness of our programs at every stage, from project/program design and implementation to strategic reviews and evaluations. We invest in staff whose role it is to help develop effective and efficient means of collecting and reviewing data on Palmera Activities. We engage Partner Staff and primary stakeholders in collecting impact data, and consider this data to reflect on how the Palmera Activity is tracking, any design implications, risks, budget considerations, Palmera Partner capacity and other wider programme considerations. Our approach to collecting impact data and the ways in which that data may be utilised to adapt and improve Palmera Activities is set out in our **Programme Manual**.

Types of Palmera Activities

Palmera undertakes projects within the framework of sustainable development, by seeking to improve the conditions of communities in a sustainable way, and working *with* communities, rather than *for* or *on behalf of* communities. Palmera Activities are therefore **aid and development activities**, which fall within two main streams: primarily, **livelihood initiatives**; and to a far lesser extent, **humanitarian response**.

A. Livelihood initiatives

We design our livelihood initiatives to support vulnerable families in participating in economic activities through measures such as:

- Community livelihood initiatives: adopting a systems-based approach, we equip and support rural entrepreneurs to develop their produce/products and gain greater access to markets;
- Tailored initiatives for the most vulnerable: identifying and supporting the most vulnerable members of communities who are food insecure, we develop tailored initiatives to support them in graduating out of

⁵ Gender Equality, Disability & Social Inclusion Policy, April 2021.



extreme vulnerability and equipping them to participate in the livelihood initiatives available to the rest of the community.

Palmera's approach for undertaking livelihood initiatives, and its systems and processes for doing so are comprehensively set out in the **Programme Manual**.

B. Humanitarian response

Palmera focuses on achieving sustainable development through livelihood initiatives. As a result, Palmera does not routinely or frequently undertake humanitarian response projects.

However, we recognise that the communities we work with may be affected by natural and man-made disasters, and these disproportionately affect the most vulnerable members of the affected communities and disrupt livelihoods, destroy infrastructure and can drastically delay development. In this context, Palmera may provide a humanitarian assistance role in response to humanitarian emergencies where appropriate.

Country context: In Sri Lanka where we primarily work, the most common natural disasters include flooding and landslides due to monsoonal rain and droughts due to lack of rain. In these communities, rural farmers who rely on agriculture for their livelihoods suffer loss and damage to their crops, livestock and farming equipment. Vulnerable members of the community are also more likely to live in temporary housing which is easily destroyed during severe flooding, and live on less valuable land which is relatively more disaster-prone. These vulnerable groups suffer most from displacement in the aftermath of a natural or man-made disaster as they lack the means to move back and rebuild, might be less able to access assistance as they did not own their house or land in the first place, or may be unaware of the type of aid available to them.

In providing a humanitarian response, Palmera will be guided by the following principles:

- We recognise that humanitarian emergencies require collective action. To that end, we share information
 and knowledge with other stakeholders, participate in joint planning and integrated activities wherever
 possible, including with local and national authorities, without compromising humanitarian principles.
- We recognise that local communities and organisations are the first and better positioned to respond and
 often the last to leave following humanitarian emergencies. We therefore commit to working with these local
 communities and organisations wherever possible.



- We apply the principles of **humanity**, ⁶ **impartiality**, ⁷ **independence** ⁸ and **neutrality**, ⁹ as defined in the Core Humanitarian Standard on Quality and Accountability (CHS). ¹⁰
- When designing, implementing, monitoring and evaluating humanitarian response activities, we recognise the CHS as best practice and strive to incorporate its nine commitments and quality criteria for the design and management of our humanitarian response projects.¹¹

Palmera will undertake any humanitarian response activity in accordance with our formal processes for undertaking Palmera Activities, however these processes may be expedited if necessary in light of the time-sensitivity of humanitarian emergencies. Accordingly:

- We will only engage in partnerships with local organisations who share our humanitarian response principles, an recognise that humanitarian responses must incorporate ethical standards and international humanitarian standards. We will assess this, and the organisation's capacity to respond to humanitarian emergencies, through the Organisational Due Diligence process.
- Prior to approving any humanitarian response activity, we will review the project appraisal for emergency
 projects. This is similar to the procedure for development projects, but will ensure that the appraisal can be
 completed in a timely manner and that Palmera Partners are not overburdened.
- Monitoring processes will be similar to those for development projects, but appropriately streamlined so that
 Palmera Partners can focus on the task at hand. Monitoring will include examining progress of the project and
 assessment of key risks. When problems are detected, Palmera will agree upon strategies with the Palmera
 Partner and other relevant stakeholders to mitigate them.
- After the completion of the humanitarian response activity, Palmera and the Palmera Partner will undertake a project completion report, and assess the need for a more detailed evaluation. At minimum, the project completion report will include reflection on the progress and outcomes of the humanitarian response project, as well as any potentially negative impacts that may arise. A range of data will be collected and a financial acquittal prepared. The findings of this report will be shared with Palmera and Partner Staff and relevant stakeholders, and lessons learned incorporated into future humanitarian response activities.

C. Non-development activities

Palmera does not undertake any **non-development activities**.

However, if Palmera resolves to undertake any non-development activities in the future, it will: distinguish such activities from its usual aid and development program; ensure a clear separation of the activities both within Palmera and the implementing Palmera Partner; be transparent to donors and the public in its fundraising, advocacy campaigns, communications and choices given to donors; and comply with its reporting requirements. Further details of these commitments are set out as follows.

1. Separating aid and development activities from non-development activities

⁶ This principle recognises that we must address human suffering wherever it is found. The purpose of humanitarian action is to protect life and health and ensure respect for human beings.

⁷ Humanitarian action must be carried out on the basis of need alone, giving priority to the most urgent cases of distress and making no adverse distinction on the basis of nationality, race, gender, religious belief, class or political opinion.

⁸ Humanitarian action must be autonomous from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.

⁹ Humanitarian actors must not take sides in hostilities or engage in controversies of a political, racial, religious or ideological nature.

¹⁰ Core Humanitarian Standard, *Core Humanitarian Standard on Quality and Accountability*, 2014, p. 8.

¹¹ Core Humanitarian Standard, Core Humanitarian Standard on Quality and Accountability, 2014, p. 9.



Palmera acknowledges the difference between aid and development and evangelism and politics. Palmera is a non-partisan, non-religious organisation which works for the benefit of communities regardless of gender, ethnicity, religious or political affiliations.

We do not use funds for projects that:

- target groups on the basis of religious or political grounds, or which seek to achieve a religious or political outcome:
- promote a particular religious adherence or undertake activities with the intention of converting individuals or groups from one faith and/or denominational affiliation to another;
- seek to establish religious institutions or political structures;
- · are involved in party political activities; or
- support a political party, candidate or organisation affiliated to a political party in a local, regional or general/national election, or to gain power within a government or party-political structure.

These distinctions are clearly set out in our Organisational Due Diligence forms and Memoranda of Understanding (MOUs) with Palmera Partners.

To differentiate aid and development activities from non-development activities (which Palmera does not undertake), we ask ourselves the following questions, noting that aid and development activities will answer the questions in the affirmative:

- Is the project likely to lead towards some measure of independence for primary stakeholders?
- 2. Is there some degree of community ownership in the project?
- 3. Are the benefits of the project likely to outlast the period of support provided by Palmera?
- 4. Can the project lead to further livelihood initiatives within the community?

2. Palmera's obligations if undertaking non-development activities

If Palmera undertakes any non-development activities in the future, Palmera is committed to ensuring that funds and other resources designated for the purposes of aid and development activities are used only for those purposes. This separation between aid and development activities and non-development activities will be clear in all Palmera fundraising, Palmera Activities, in public communications and in all reporting including our annual reports.

Any fundraising solicitations that include references to both aid and development and non-development activities will provide donors with the choice of contributing to aid and development activities only.

3. Obligations of Palmera Partners

Palmera Partners who enter into MOUs with Palmera must review and acknowledge this Policy and confirm their understanding of Palmera's policy on non-development activities.

If Palmera Partners undertake both aid and development *and* non-development activities, they must be capable of separating the management of the different types of activities and account for the funding for the different types of activities. Palmera will assess this capacity in its organisational due diligence process.

Cross-cutting issues



In addition to the development approach outlined in this Policy, there are cross-cutting issues that traverse different areas of concern within the development context. Specifically, in a post-conflict development context, relevant cross-cutting issues are internal displacement, child protection, and the participation of women and girls.

It is important to ensure that all our work takes into account the relevant cross-cutting issues, as they may have the capacity to negatively affect the outcomes of our projects otherwise.

The following cross-cutting issues are most relevant to our work in Sri Lanka. Because of their importance, Palmera has developed specific policies and related processes and procedures for each of them. Some of these policies have already been discussed in the context of specific guiding principles above:

Safeguarding Policy¹²

- Child protection
- Prevention of abuse and exploitation

Gender Equality, Disability and Social Inclusion Policy¹³

- Women and gender equality
- Inclusion of people with disabilities
- Assistance to internally displaced persons

Environment Policy¹⁴

 Environmental management and sustainability

Reviewing this Policy

This policy is to be reviewed every three years, or earlier if appropriate, and lessons learned incorporated into subsequent versions.

Date	Version	Review Description	Reviewed By	Approved By
September 2021	1	Original	N/A	Board

¹² Safeguarding Policy, April 2021.

¹³ Gender Equality, Disability & Social Inclusion Policy, April 2021.

¹⁴ Environment Policy, June 2021.