



## **Plymouth Safeguarding Adults Board**

### **PARTNERSHIP AGREEMENT**

(The Agreement)

1. This Agreement is made on the .....

**2. The following are parties to this Agreement and each a 'Member' and together the 'Members' of the Plymouth Safeguarding Adults Board 'the Board'**

#### **Statutory Members:**

2.1 Plymouth City Council

2.2 NEW Devon CCG

2.3 Devon and Cornwall Police

#### **Associate Members:**

2.4. Healthwatch

2.5 Voluntary and Community Sector representatives – to be confirmed

2.6 Local Area Team, NHS England

2.7. Plymouth Community Healthcare

2.8 Plymouth Hospitals NHS Trust

2.9 National Probation Service

2.10 Dorset, Devon and Cornwall Community Rehabilitation Company – to be confirmed

2.11 Devon and Somerset Fire Service – to be confirmed

2.12 Care Quality Commission

2.13 South Western Ambulance Services NHS Foundation Trust (SWASFT) – to be confirmed

2.14 Plymouth Safeguarding Childrens Board

2.15 Plymouth City College

### **3. Background**

3.1 In 2000 the Department of Health and the Home Office published joint guidance under Section 7 of the Local Authority Social Services Act 1970 entitled "No Secrets". Its focus was on keeping adults safe and statutory agencies role in that agenda

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3.2 In 2005, the Association of Directors of Adult Social Services published Safeguarding Adults a National Framework of Standards of Good Practice and Outcomes in Adult Protection Work

3.3 Since 2010, the Local Government Association national programme Making Safeguarding Personal has aimed to promote a shift in culture and practice in response to what we know about what makes safeguarding more or less effective from the perspective of the person being safeguarded.

3.4 The Care Act 2014 put adult safeguarding on a statutory footing from April 2015. Core functions of SABs are detailed as:

- It must publish a strategic plan for each financial year that sets how it will meet its main objective and what the members will do to achieve this. The plan must be developed with local community involvement, and the SAB must consult the local Healthwatch organisation. The plan should be evidence based and make use of all available evidence and intelligence from partners to form and develop its plan.
- It must publish an annual report detailing what the SAB has done during the year to achieve its main objective and implement its strategic plan, and what each member has done to implement the strategy as well as detailing the findings of any Safeguarding Adults Reviews and subsequent action.
- It must conduct any Safeguarding Adults Review in accordance with Section 44 of the Act.

3.5 The Safeguarding Adults Board is the key multi-agency forum for ensuring organisations cooperate in safeguarding adults matters in their locality

3.6 This is an Agreement between statutory agencies, independent providers and the voluntary and community sector, who are required under the Care Act to work together in partnership for the purpose of safeguarding adults with care and support needs.

3.7 The role of the Board is to ensure statutory bodies, independent providers and the voluntary and community sector work together to safeguard adults at risk across Plymouth.

The aims of the Board are:

3.7.1 To minimise the risk of abuse to adults at risk and to ensure that they are effectively protected where abuse has occurred, may have occurred or is at risk of occurring

3.7.2 To ensure multi-agency partners work effectively together to develop and implement Safeguarding Adults strategies, policies and procedures

#### **4. Members**

4.1 Each agency or their statutory successor must nominate an appropriate representative or representatives to act as their 'Member Representative' on the Board

4.1.1 Member Representatives, save for those Member Agencies identified in paragraph 4.1.3, shall have the delegated authority from their respective Agency to speak for and to make decisions on behalf of the Agency they represent, and commit them to policy, practice and financial matters agreed at the Board

4.1.2 Member Representatives, save for those Member Agencies identified in paragraph 4.1.3, shall have the authority to be able to hold the Agency they represent to account at all levels of management

4.2 The Member Representatives on the Board are as follows:-

4.2.1 Plymouth City Council

4.2.1.1 Strategic Director of People

4.2.1.2 Director of Public Health

4.2.1.3 Assistant Director of Education, Learning & Families

4.2.1.4 Head of Strategic Co-operative Commissioning

4.2.1.5 Head of Housing Services

4.2.1.6 Adult Safeguarding Manager

4.2.1.7 Safeguarding Independent Chair

4.2.2 NEW Devon CCG

4.2.2.1 Director for Nursing

4.2.3 Devon and Cornwall Police

4.2.3.1 Head of Public Protection Unit

4.2.4 Healthwatch Plymouth

4.2.4.1 Manager

4.2.5 Voluntary and Community Sector - tbc

4.2.5.1 Plymouth Octopus Project - tbc

4.2.6 NHS England Local Area Team

4.2.6.1 Assistant Director of Nursing and Patient Experience

4.2.7 Plymouth Community Healthcare

4.2.7.1 Director of Professional Practice, Quality and Safety

4.2.5.2 Associate Director for Adult Social Care

4.2.8 Plymouth Hospitals NHS Trust

4.2.8.1 Director of Nursing

4.2.9 National Probation Service

4.2.9.1 Head of Plymouth, Cornwall & Isles of Scilly Local Delivery Unit

4.2.10 Community Rehabilitation Company - tbc

4.2.10.1 Assistant Chief Executive - tbc

4.2.11 Devon and Somerset Fire and Rescue Service - tbc

4.2.11.1 - tbc

4.2.12 Care Quality Commission

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4.2.12.1 Area Inspection Manager

4.2.13 South Western Ambulance Services NHS Foundation Trust (SWASFT) – tbc

4.2.13.1 - tbc

4.2.14 Plymouth Safeguarding Childrens Board

4.2.14.1 Child Protection Manager

4.2.15 City College Plymouth

4.2.15.1 Safeguarding Co-ordinator

4.3 The Chair will have the power to invite as participating observers –

4.3.1 Plymouth Council's Cabinet Member and Portfolio Holder for Health and Adult Social Care

4.4 The Chair may invite specialist advisors and other attendees to attend Board meetings

4.5 The Board has the power to invite additional Members to the Board or if appropriate and in accordance with statutory guidance and regulations to remove Members from the Board

4.6 Should a Member Agency cease to exist any statutory successor will be the appropriate partner agency and will nominate an appropriate Member Representative. The register of Members of the Board 'the Board Register' will be amended accordingly

4.7 Members will be required to 'declare an Interest'

## **5. Aims and Objectives**

5.1 The core objectives of the Board are to:-

5.1.1 promote and lead the safeguarding objective contained in clause 3.5

5.1.2 co-ordinate multi-agency working at a strategic level for the purposes of safeguarding and promoting the welfare of adults at risk in Plymouth City.

## **6. Functions**

6.1 The core functions of the Board are to:-

6.1.1 Successfully delivery the stated actions contained within the annual SAB Strategic Plan

6.1.2 Oversee the development of and approval of policies and procedures in respect of safeguarding adults

6.1.3 communicate and raise awareness to persons or bodies within the area of the need to safeguard adults at risk

6.1.4 monitor and evaluate the effectiveness of what is done by the Members individually and collectively

6.1.5 ensure the production, publication and distribution of documentation to support the 'PSAB Strategic Plan' and to increase public awareness of abuse and neglect of adults, as detailed in the DH Care and Support Statutory Guidance issues under the Care Act 2014 .

6.1.6 ensure that policies and procedures reflect the needs of all communities in Plymouth

6.1.7 ensure links with other areas of policy and good practice guidance both nationally and locally

6.1.8 ensure the development and implementation of the 'Training Strategy'

6.1.9 Oversee and be informed by the monitoring of referrals and outcomes of allegations of abuse. To ensure that this information is used to promote good practice and respond to Government and other body requests for reports on activities

6.1.10 Undertake Safeguarding Adult Reviews and to advise parties and agencies accordingly

6.1.11 Produce an annual report on safeguarding adults work in Plymouth.

6.1.12 Scrutinise safeguarding activities within Plymouth

6.1.13 Promote to the public the clear statement that every person has a right to live a life free from abuse and neglect

6.1.14 Ensure that all persons can access information about how adults at risk gain safety from abuse and violence, including information about safeguarding adults procedures

6.1.15 Undertake any other activities that facilitate or are conducive to the achievement of the Board's objectives

6.1.16 The Board may by resolution adopt any additional function that it considers to be appropriate

6.2 Nothing under this Agreement shall affect the liabilities of each Member Agency to each other or to any third parties for the exercise of their respective functions and responsibilities

## **7. Relationships between Members**

7.1 The Members will in relation to this Agreement take all reasonable steps to cooperate with the Board and with the Chair in relation to their responsibilities under this Agreement in order to secure the achievement of the objectives and facilitate the performance of the functions of the Board

7.2 Each Member has a duty or duties to co-operate under the Care Act 2014

7.3 Members will treat each other with respect, dignity and equality.

7.4 Members will be open with information about their performance insofar as it relates to their functions and roles on the Board and provide the Board with early information about relevant problems

7.5 Members will cooperate to agree joint projects protocols and arrangements as may be required from time to time

7.6 Each Member will ensure accountability that safeguarding adults work is recognised by their respective Member Body

7.7 Each Member will have a clear and well publicised policy of zero tolerance of abuse within their organisation

7.8 Each Member will draw up a set of internal guidelines consistent with safeguarding adults policies and procedures which set out the responsibilities of all workers to operate within it

## **8. Duration of the Agreement**

This Agreement shall come into force on the date set out at Clause 1 of this Agreement and to remain in force unless as a result of any change in law and legislation it is unable to fulfil its obligations hereunder or its fulfilment would be ultra vires

8.1 Termination of Membership of the Board, the Board will terminate their membership on the Board pursuant to this Agreement if:-

8.1.1 As a result of any change in law or legislation it is unable to fulfil its obligations hereunder or

8.1.2 Its fulfilment of its obligations hereunder would be in contravention of any guidance from any secretary of state issued after the date hereof or

8.1.3 Its fulfilment would be ultra vires

## **8.2 Termination of the Board.**

8.2.1 The Board will terminate if:

8.2.2 As a result of any change in law or legislation it is unable to fulfil its obligations hereunder or

8.2.3 Its fulfilment of its obligations hereunder would be in contravention of any guidance from any Secretary of State issued after the date hereof or

8.2.4 Its fulfilment would be ultra vires

## **9. Structure of the Board**

9. The Board will be chaired by an Independent person and member of SAB, who will be able to make decision of behalf of their agencies.

9.1.1 The Sub Groups of the Board will produce an annual work plan which will derive from the Board work plan and will be provided for consultation and approval to the Board

9.1.2 The Board will be responsible for monitoring and reviewing the activities of the Sub-Groups

9.1.3 The Board will appoint Members of the Board to chair the Sub Groups

9.1.4. Changes to the structure of the Board and its Sub Groups will take place with the agreement of the Board.

## **10. Operational Arrangements for the Board**

10.1 Independent Chair

10.1.1 An Independent Chair will be appointed by the Board

10.1.2 The term of office will be for a period of three years from date of appointment, unless terminated in accordance with the Chair's Contract.

10.1.3 The role of the Chair is to chair meetings of the Board in accordance with this Agreement, to ensure the smooth running of the Board and to ensure that Members collaborate effectively to co-ordinate and promote safeguarding.

10.1.4 The Local Authority Chief Executive should co-ordinate an annual 360° appraisal of the performance of the Chair.

10.1.5 The Chair will communicate effectively and pro-actively with any Member where, it appears on objective evidence, that the Member is not performing effectively in the safeguarding of adults at risk or, performing effectively under this Agreement

10.1.6 The Chair may take such action as she or he considers to be, in the best interest of the Board, provided that before doing so, the Chair shall consult with Local Authority Chief Executive and if reasonably practicable, with the Board, specifically before -

(i) making a public or media statement within the objectives and functions of the Board. The Chair shall only make such a statement through and with the Council's public relations function

(ii) making representations to any Government Body or Department or any other organisation on behalf of the Board

10.1.7 Must undertake such or further alternative responsibilities as may be given by the Board from time to time, in which case, the Board must by unanimous agreement amend, delete, replace or resurrect any of the foregoing responsibilities. Any further alternative responsibilities shall be set down in the Minutes of the Board

10.1.8 Vice Chair

10.1.8.1 The Board may at any time or from time to time appoint a 'Vice Chair' of the Board to perform all or any of the functions of the Chair if the Chair is unable to do so and in which the Chair has a declared personal interest

10.3 Structure

10.3.1 The Board will be supported by a Strategic Group comprising the statutory members i.e: the local Authority, New Devon CCG and Devon & Cornwall Police. This group will be established to promote the work of the Board and ensure the delivery of the Business Plan. It will also direct the focus and requirements of the Board sub groups:

- i) Safeguarding Adult Review (SAR) group – to consider referrals, manage SARs and disseminate learning
- ii) Lead Officers Group - to provide an operational or procedural perspective, quality assurance, links to learning and development need across agencies
- iii) related task specific working groups

10.3.2 Additional sub groups can be established as required

10.3.3 Role of Elected Members

10.3.4 Local Elected Members through membership of governance bodies of Plymouth City Council are to provide the political accountability for their organisation and to be the champions for the safeguarding adults agenda and to attend the Board as participating observers

10.3.5 The Cabinet Member for Health and Adult Social Care will have a particular focus on promoting the wellbeing of, preventing social exclusion of and protecting adults at risk, and ensure that they will hold the Executive Group to account for the work of Board.

10.3.6 The Cabinet Member will have meetings with the Chair of the Board from time to time

## **11. Operational Matters**

11.1 Agenda items, with supporting documentation, as may be necessary to consider the item will be submitted in writing to the Safeguarding Adult Unit Administrator no later than 10 days prior to the Board meetings.

11.2 Board Members will receive copies of the agenda and supporting papers no later than 7 days prior to the meeting

11.3 The Minutes will be circulated no later than 28 days following the meeting

11.4 A list of pecuniary interests will be kept by the Safeguarding Adults Unit Administrator

11.5 the Sub-Groups will be expected to produce work plans and these will be submitted directly to the Board.

11.6 Frequency of Meetings

11.6.1 The Board will meet quarterly and meeting dates will be identified 6 months in advance. These meetings shall be known as 'Ordinary Meetings of the Board'

11.6.2 Meetings scheduled for all Sub-Groups will be agreed 6 months in advance.

11.9 The Chair may convene an 'Extraordinary Meeting' of the Board if at any time he or she considers it necessary for the purposes of transacting urgent business of the Board

11.1.0 Any Board Member may require the Chair to convene an Extraordinary Meeting. The Chair shall comply with such request provided sufficient information of the issues to be discussed and the decision required of the Board is supplied.

### **11.9 Quorum**

11.9.1 For a meeting to be quorate there must be at least 60% attendance of the total number of Members of the Board with at least one Member Representative or their Nominee from the following Members in attendance;

11.9.1.1 Plymouth City Council (at least two Member Representatives, one of which must be from the People Directorate)

11.9.1.2 New Devon CCG

11.9.1.3 Devon and Cornwall Constabulary

11.9.1.4 The Board will operate on a consensus basis

11.9.1.5 Only Member Representatives have voting rights on the Board

### **12. Conflict Resolution**

12.1 In the event of any dispute between Board Members, the Board will collectively take all reasonable steps within the powers available to its Members to resolve it. Where a matter cannot be resolved through the course of a Board Meeting, the matter shall be referred to the appropriate officers of the Members who shall meet with the Chair of the Board to resolve the matter, with referral to Chief Officers if the complaint is not resolved. In the event that the dispute cannot be resolved in accordance with the above procedures within a reasonable time, having regard to the nature of the dispute, the Members concerned may refer the matter to such a body or person to act as a mediator as they may agree, the costs of such mediation to be borne by the Members concerned

### **13. Duties of Board Member Representatives**

13.1 All Member Representatives both during Board meetings and when working on behalf of the Board are expected to contribute their experience and expertise to the Board directly and through the following;

13.1.1 attendance at all Board meetings and contribute fully and effectively to the work of the Board

13.1.2 whilst the Member Representative must give priority to Board meetings, in such circumstances where this is not possible, it is imperative that a Nominee is in attendance



13.1.3 contribute to developing and maintaining effective inter agency safeguarding adults procedures and protocols

13.1.4 ensure that safeguarding adult services are adequately resourced by the Member they represent and deliver effective safeguarding

13.1.5 approve the annual Board work plan and ensure that their organisation provides an annual report in relation to safeguarding adults to the Board

13.1.6 Member Representatives shall act as the strategic leads for safeguarding issues within the Member Agency they represent and be the identifiable individual whom the Board holds accountable for the safeguarding arrangements of the Member Agency they represent

13.1.7 the Member Representative shall have the authority delegated to them by the Member Agency they represent to agree proposals to commit resources, including personnel, in accordance with limits and instructions specified by their organisation in support of the work of the Board and its and Sub-Groups

13.1.8 positively contribute to the development of joint working across partner agencies as part of the work of the Board

13.1.9 have responsibility for the dissemination of all information and communication on behalf of the Board to the Member Agency they represent

13.1.10 Have the authority to hold their organisation to account in terms of their safeguarding practise and to oversee the necessary changes in practice, reporting back to the Board accordingly

13.1.11 Undertake any tasks as agreed by the Board and as outlined in the work plan which are relevant to the Member Agency they represent and be an active participant on the Board

13.1.12 Have an overview of performance management and quality assurance regarding safeguarding undertaken by the Member they represent and provide information on safeguarding adults activity as required

13.1.13 Ensure that the Member Agency they represent makes resources available to Safeguarding Adults Reviews as required, including representatives for Panel and writing of agency management reports

#### **Training for the Board**

13.2 All new Members of the Board will attend any induction and regular training and development days as agreed by the Board

13.2.1 All Members will be expected to complete an annual audit report to the Board no later than the annual January Meeting of the Board setting out their current position in terms of the safeguarding adults agenda. Such reports will be submitted to the Board and will include details of the Member's internal audit on safeguarding adults arrangements and their action plan

#### **14. Quality Assurance and Monitoring Arrangements**

14.1 No later than April in each financial year, the Board shall agree an annual work plan setting out its planned activities for the year

14.2 The Board shall review performance against the annual plan regularly throughout the year and agree any necessary actions that may be required, and conduct an annual efficiency review

14.3 Each Member shall co-operate with the development of and implementation of the annual plan or any part thereof

14.4 The Board will be subject to periodic audit undertaken by the Devon Audit Partnership

#### **15. Disclosure and Barring Service (DBS) Checks**

15.1 All Members agree to ensure that all Member Representatives, their Nominees and all Sub-Group members undergo an enhanced DBS check and refer to the Chair any concerns that arise from such checks

#### **16. Relationship between the Board and the Health and Wellbeing Board. -**

16.1 The Board and its activities are part of the wider context of the health and wellbeing of adults. The work of the Board contributes to the wider goal of the health and wellbeing of adults at risk who have care and support needs and the wider issues of inclusion

#### **17. Conflicts of Interest**

17.1 Neither the Chair nor any Member Representative shall put themselves in a position whereby their duty and responsibility to the Board conflicts with prejudicial or private interests. If the Member Representative or Chair identifies such conflict, they must declare an interest. The Board will then consider their future role and involvement. The Chair will then use his or her judgment to decide the most appropriate action

17.2 Members and or their Member Representatives are required to provide information on the involvement in any organisation which may be in conflict with the interests of the Board

#### **18. Information Sharing**

18.1 The Member agencies will follow and ensure that the arrangements comply –

18.1.1 With all legislation, regulations and guidance on information sharing produced by the Government

18.1.2 With the information sharing protocol entered into by the Member agencies

#### **19. Dissolution**

19.1 If it becomes necessary to dissolve the Board, all the Members will be informed in writing by the chair. A final report will be submitted by the Board to Plymouth Council and this report and all relevant paperwork will be held by Plymouth Council for a period of 3 years.

#### **20. Reviewing this Agreement.**

20.1 This Agreement will be reviewed on an annual basis by the Safeguarding Adults Manager and the Chair of the Board seeking advice as necessary from those officers identified and Plymouth City Council departments.

20.2 If amendments to this Agreement are needed, they will need to be taken to the Board for approval.

20.3 The Board will hold an annual review of performance and produce an Annual Report

20.4 The Board will be subject to the Devon Audit Partnership auditing procedures. In addition to an audit of finances, this will include all governance arrangements for the Board

#### **21 Insurance**

2.1 The Chair will be insured under a insurance policy against all legal liability

## **1. Overall Statement**

The Safeguarding Adults Board exists to ensure that all agencies work together to minimise the risk of abuse to adults at risk and to protect adults at risk effectively when abuse has occurred or may have occurred. The Board is committed to learning from experience and to a process of continuous improvement.

The Safeguarding Adults Board will fulfil its duties under and comply with the statutory requirements of the Care Act 2014 and any subsequent guidance or legislation issued by central government.

## **2. Outcomes**

The outcomes of the SAB meeting will be:

- Leadership to fully embed safeguarding adults policies and procedures in the practice of front line staff.
- Consistent and robust outcomes for adults at risk, in line with the principles of Making Safeguarding Personal.
- The monitoring of performance against the Safeguarding Adults Board work plan.
- The sharing of application of learning and experience from practice in Plymouth including from safeguarding adults reviews
- The sharing and application of learning and experience from practice across the UK.
- Review of operational effectiveness of safeguarding adults policies and procedures and proposal of amendments for consideration by the SAB.
- The monitoring of consistency of threshold decisions.
- An annual report
- A working quality assurance framework for safeguarding in Plymouth.

## **3. Standing Agenda Items (subject to future review)**

- SAB work plan progress.
- Updates from partner agencies

## **4. Frequency of Meetings**

Quarterly

## **5. Venue & Administration**

Community based venues to be sought, in lieu of availability Windsor House, Plymouth Devon.

Administration will be provided by the safeguarding adults unit.

## **6. Membership**

Representatives of SAB partner agencies,

- Plymouth City Council
- NEW Devon CCG
- Devon and Cornwall Police
- Healthwatch

- VCS representatives
- NHS England Local Area Team
- Plymouth Community Healthcare
- Plymouth Hospitals NHS Trust
- National Probation Service
- Dorset, Devon and Cornwall Rehabilitation Company – tbc
- Devon and Somerset Fire Service - tbc
- Care Quality Commission
- South Western Ambulance Services NHS Foundation Trust - tbc
- Plymouth Safeguarding Childrens Board
- Plymouth City College

**Remit:**

- To ensure that strict confidentiality is maintained in relation to information relating to individual adults at risk. Although the notes of meetings will be available for access, a section of the notes relating to personal information will be defined as confidential and restricted to group members only.
- To receive and consider referrals of new cases against the criteria for holding a case review and make recommendations to the Chair of SAB.
- In individual cases, to advise on the constitution of panels, to set terms of reference and to monitor progress of the reviews, especially with regard to timescales. To receive the draft overview reports and discuss with panel chairs any suggested amendments. To present an executive summary report to SAB, together with a recommendation on action planning.
- To ensure that local procedures comply with any national guidance and to produce new guidelines and documents as required.
- To receive the overview report on completed reviews and to advise on its distribution.
- To monitor compliance with recommendations of completed reviews for a period of 12 months after publication of the overview report (or as agreed with SAB)
- Monitoring and auditing management action plans arising from the recommendations of Safeguarding Adults Reviews
- To read reports of reviews published nationally and make recommendations on lessons arising from these.
- Disseminating information and practice issues arising from Safeguarding Adults Reviews to agencies and informing the relevant Sub-Group of training needs.
- To provide a report to each meeting of SAB.
- To be accountable for the Safeguarding Adults Review budget
- Developing and monitoring the Business Plan

Terms of Reference to be reviewed by Date: 1<sup>st</sup> April 2016

## **Appendix 1**

Plymouth Safeguarding Adults Board

Complaints Procedure

### **1. Introduction and Context**

1.1 The aim of this policy is to clearly establish the criteria for complaints to be considered by the SAB, and describe how the SAB will deal with such complaints.

1.2 The SAB's role is to ensure that statutory bodies, independent providers, and the voluntary and community sector work together to safeguard vulnerable adults across Plymouth City. The SAB is not an operational body, nor one that delivers services directly to Adults at Risk. Therefore complaints about individual officers or specific service delivery are addressed by each Partner Agency's complaints procedure and do not come within the remit of the SAB.

### **2. Policy detail**

2.1 The SAB is only able to consider complaints which relate to actions that have been or should have been taken by the SAB in fulfilling its responsibilities as set out in the SAB Partnership Agreement.

2.2 Complaints should be made in writing to the SAB Independent Chair.

2.3 Complaints will in the first instance be considered by the SAB Independent Chair and/or the Safeguarding Adults Manager to both consider the appropriateness of the complaint and whether it can be resolved informally.

2.4 If a complaint is considered to be appropriate and cannot be resolved informally, the Safeguarding Adults Manager will discuss the process for investigating the complaint with the SAB Independent Chair. The agreed process for investigation will proceed in a timely manner, offering sufficient independence, scrutiny and governance to ensure the integrity of the process and any outcomes. The core principle of openness and transparency will be applied, in accordance with the role and functions of the Board and its constituent members.

2.5 The fact that any complaint has been made and the outcome of any such complaint will be reported to the SAB.