



Newly Qualified Nanny (NQN)/Norlander Disciplinary Procedure

1. Introduction

Norland College (Norland) is committed to supporting its students and graduates to succeed by entering into a partnership with them whereby we work together for academic and professional success. The NQN/Norlander Cause for Action and Disciplinary Procedure (Procedure) sets out a framework to address non-academic issues which may prevent an NQN or Norlander from meeting the expectations of the Norland Code of Professional Responsibilities and/or regarding alleged misconduct.

Full time students at Norland will be subject to the Student Cause for Action and Disciplinary Procedure. When they progress to the NQN year, they are no longer students because they are employed as a professional nanny, having completed their degree. They become graduate professionals who are undergoing a professional competence assessment in order to complete their Norland Diploma. Thus, they become subject to this NQN/Norlander Cause for Action and Disciplinary Procedure.

1.1 Purpose

It has been written to comply with the UK Quality Code, the Universities UK Guidance for HEIs 'How to handle alleged student misconduct', the Good Practice Guidance published by the Office for the Independent Adjudicator (OIA) and the Norland Code of Professional Responsibilities.

1.2 Scope

Full time students at Norland will be subject to the Student Cause for Action and Disciplinary Procedure. When they progress to the NQN year, they are no longer students because they are employed as a professional nanny, having completed their degree. They become graduate professionals who are undergoing a professional competence assessment in order to complete their Norland Diploma. Thus, they become subject to this NQN/Norlander Cause for Action and Disciplinary Procedure.

2. POLICY

Application

Usually, all concerns raised about an NQN or Norlander are first considered under the [Cause for Action procedure](#) which aims to take swift and appropriate action to resolve minor concerns, and triage concerns so that they are dealt with under the most appropriate policy or procedure. Referrals from the Cause for Action procedure will trigger this policy, although we reserve the right to move straight to this policy if deemed appropriate.

This Procedure will be triggered after notification of an allegation of misconduct regarding an NQN/Norlander as defined below and, usually, on referral from the Cause for Action policy. The notification may come from a member of staff, a peer, an employer or family or a member of the public. The notification may be in the form of a complaint or a concern. The purpose of this Procedure is to conduct a fair investigation into whether there has been a breach of the Norland Code of Professional



Responsibilities (**the Norland Code / Code**) by the NQN/Norlander or whether the NQN/Norlander has behaved in such a way as to impact upon themselves, their employers, their charge or the reputation of Norland and, if so, to determine the appropriate reparation and/or sanction (if any) that should be applied.

Allegations of bullying, harassment or sexual misconduct are likely to bypass the Cause for Action procedure and are likely to be investigated under this policy. Any matter related to safeguarding of children will automatically trigger [the Safeguarding policy](#) and, if upheld, is likely to proceed to a Formal Investigation and Disciplinary Panel.

The Norland Code

The Norland Code sets the professional standards of practice and personal attributes expected of students, NQNs and Norlanders. Whilst students, they receive lectures on the [Student Charter](#) and they sign the Norland Code to ensure that they fully understand and commit to what conduct is required of them both during their training and after leaving Norland whilst working as an early years professional. The Code is signed each year that they are students, before they go out into their NQN position, and again on completion of the Norland Diploma.

By signing the Code and/or working under the Norland brand as an NQN, Norland Nanny or



early years professional, they are agreeing to comply with the Code and any alleged breaches may trigger this Procedure. Norland will take any alleged misconduct or breach as a Cause for Action which may lead to action being taken or lead to full disciplinary proceedings. The Code is also available through the website.

Misconduct that may also be a criminal offence

The OIA good practice framework states that behaviour that may amount to a criminal offence is usually best dealt with by the police, the Crown Prosecution Service and the criminal courts in the first instance. See [here](#) for further details. Criminal behaviour is likely to also breach the Norland Code and Norland therefore reserves the right to take action against an NQN or Norlander whether or not they have been subject to any criminal proceedings and irrespective of the outcome of the criminal process. Should the misconduct result in an investigation by the Police or other external agency, Norland may have to stay this process until any such enquiries and/or legal proceedings have been completed.

Norland will ensure that NQNs/Norlanders who wish to report an offence understand their options when they report behaviour that may amount to a criminal offence and will support the NQN/Norlander whatever action they choose to take.

The NQN's/Norlander's options may include reporting the matter to the police, asking Norland to report it on their behalf, asking Norland to take disciplinary action, or taking no further action. If the NQN/Norlander decides to report the matter to the police, Norland will help and support them to do so. Should the NQN/Norlander decide not to report the offence to the police but Norland deems it to be necessary, we reserves the right to refer the matter to the police. Any decision to refer will be made by the Head of Agency and Alumni (HAA) in consultation with the Principal and/or Executive and/or Norland Board on a case by case basis. Such decisions will depend on the nature and seriousness of the case and whether there is any risk to the health, safety and well-being to children and families, staff, the Norland community or other stakeholders.

Any matter related to safeguarding of children will automatically trigger [the Safeguarding policy](#) and, if upheld, is likely to proceed to a Formal Investigation and Disciplinary Panel.

Information Sharing and Security

All records relating to any procedures within this policy will be stored on password protected, cloud-based drives and will only be accessible to the personnel involved in the investigation. They will only be kept for the timeframes indicated in section 12 below.

It is not appropriate for parents/carers/partners of NQNs/Norlanders, or other interested parties, to communicate with Norland staff in relation to any disciplinary proceedings. Therefore, all communications will be between the NQN/Norlander concerned and Norland.

Outcome

At the conclusion of the Cause for Action and/or Disciplinary process, the stakeholder who made the complaint should be given some resolution to their complaint, within the boundaries of confidentiality. For example, they may be told that appropriate action has been taken, but not the details of what that action is. If they have experienced an adverse impact as a result of the behaviour of the NQN/Norlander under investigation, an appropriate remedy may be offered, such as an apology, counselling or mediation, depending on the circumstances and outcome of any formal or informal investigation and/or panel. If no further action is taken (and the reason for this may or may not be given) and the complainant/notifier is unsatisfied, they may make a formal complaint to Norland following



the [Complaints Procedure for External Stakeholders](#).

If the NQN/Norlander under investigation makes a complaint or raises concerns about the disciplinary process at any stage outlined in this policy, this matter will be acknowledged but addressed separately following the conclusion of the proceedings.

DEFINITIONS

In the context of this procedure:

- the **'NQN/Norlander'** is a graduate of Norland, currently working as a Newly Qualified Nanny (NQN), Norland Nanny or early years professional.
- **'Complainant' or 'Notifier'** means the person from whom the complaint or notification has been received. This may be a member of staff at Norland, a fellow NQN/Norlander, an employer or any other person, including members of the public or the Norlander stakeholder community.
- **Burden of Proof** determines whose responsibility it is to prove an issue. In a disciplinary case, the burden of proof is on Norland. That is, Norland must prove that the NQN/Norlander has done what they are accused of doing. The NQN/Norlander should not have to disprove the allegation.
- **Standard of Proof** is the level of proof required. Norland will use the standard applied to civil cases, normally 'the balance of probabilities', that is, something is more likely than not to have happened. Decisions must still be supported by evidence as the standard is higher than simply believing something is likely to have happened.
- **Misconduct**
 - **Behaviour that is unwelcome, uninvited and causes a detrimental effect on the NQN/Norlander or others, including bullying and harassment or disruption of or improper interference with the proper functioning of Norland whether on Norland premises or elsewhere.**
 - **Bullying** is defined as offensive, intimidating, malicious or insulting behaviour, and/or abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end, for example, verbal or physical aggression or sending abusive or threatening messages on social media.
 - **Harassment** is usually sexual or racial although it may also be related to disability, age, sexuality or religion. An essential characteristic of harassment is that it is unwanted by the recipient and/or any witness to it. It is up to each individual to decide what behaviour is acceptable to him or her. Behaviour which one person may accept may be regarded by another as harassment. It may include the use of discriminatory language or sexual or physical abuse or assault. Harassment makes a person feel offended, humiliated, compromised or threatened. It is legally defined as conduct that:
 - Has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
 - Is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct.

The following examples illustrate other conduct which may be deemed to be a disciplinary concern. This list is not exhaustive.



- **Breaches of the Norland Code**, including failure to treat people with kindness, respect and compassion and/or failure to uphold the human rights (dignity, fairness, equality, respect and independence) of all those with whom you live, work and study.
- **Breaches of Norland's Regulations** [including where this relates to attempts to deceive or gain unfair advantage], including any threats to the Norland Brand which may damage its reputation. For example, professional misconduct, failure to comply with Norland rules and procedures, breach of Norland's data protection rules, incapability through alcohol, negligence which causes unacceptable loss, damage or injury, act of insubordination, disclosure of confidential information, misconduct within the wider community, or any other acts that are deemed to be a threat to the Norland brand and damage its reputation.
- **Inappropriate behaviour**, including bullying, cyber-bullying, harassment and unprofessional conduct. This may include behaviour intended to be a prank but not perceived as such by the victim.
- **Anti-social behaviour**, including damage to employer's property or abuse of facilities.
- **The following types of behaviour, particularly directed towards an individual repeatedly, may amount to bullying** (whether in person, online or other means): demeaning language; threats; verbal abuse; outbursts or anger or aggression; physical or verbal intimidation; excluding or isolating; and ganging up. This may be in person or online.
- **The following types of behaviour may amount to harassment**: Unwanted physical contact, ranging from touching to serious assault; offensive jokes, banter, language, gossip, slander, racist or sexist songs; offensive posters, pictures, written material, graffiti, obscene gestures, flags or emblems; pressure for sexual favours or pressure to participate in political, religious or social groups; isolating, excluding or not co-operating with individual/s; unjustified pestering; unjustified intimidation in meetings, in writing, over the telephone, via e-mail or other electronic means.
- **Unauthorised absence and poor time-keeping** in employment
- **Inappropriate use of the computer or other devices** in employment e.g. e-mail, internet, breach of data protection or computer security rule, visiting inappropriate sites, uploading/downloading inappropriate content, propagation of computer viruses.
- **Compromising the safety of and/or wellbeing of children and families, staff or visitors.**
- **Sexual misconduct.**
- **Behaviour likely to bring Norland into disrepute**, such as disruptive behaviour in the community.
- **Failure to declare a Criminal Conviction/ caution.**
- **Criminal activity and/or an on-going or pending criminal investigation.** For example, use of and/or being under the influence of illegal drugs theft, fraud, deliberate falsification of records, fighting, assault on another person, deliberate damage to Norland or employer property.
- **Conduct contrary to professional regulatory body guidance.**
- **Conduct contrary to a work based code of conduct, policies and/or procedures.**



STAGE 1: CAUSE FOR ACTION

Stage 1 of this procedure is outlined in the [Cause for Action procedure](#), which describes the steps that will be taken whenever a Cause for Action is reported and/or observed.

STAGE 2: FORMAL INVESTIGATION

An Investigating Officer (**IO**) will be appointed by the HAA (or nominee) to establish the facts of the case for the Cause for Action. The HAA will provide the IO with the Cause for Action Notification Report which will become an Appendix to the Investigation Report. The IO will be a manager or senior member of staff.

The IO will have no prior knowledge of or involvement in the circumstances leading to the complaint or concern – this may mean appointing an IO from outside the NQN/Agency departments. If the matter is related to early years practice, the IO will have the relevant occupational knowledge to be able to assess the allegations made.

The investigation will follow the Formal Investigation procedure and a report written using the Investigation Report template ([Appendix 3](#)). The Principal will not be involved at this stage as she leads the formal Disciplinary Procedure (Stage 3) and beyond.

The HAA will notify the NQN/Norlander that a Formal Investigation will be carried out clarifying the process, timeframes and details of the appointed IO.

The purpose of the investigation is to establish the facts of the case in an objective and non- judgmental manner.

The IO will carry out the necessary investigations of the Cause for Action and potential disciplinary matter without unreasonable delay in order to establish the facts of the case. This will require the holding of an investigatory meeting (in person or online or by telephone) with the NQN/Norlander, the complainant and any witnesses, where the facts of the case will be gathered. In most cases, the investigatory process will be the collation of evidence by the IO for use of the report. At least one week before any such meeting, a summary of the complaint and any relevant documents will be sent to the NQN/Norlander.

The NQN/Norlander is permitted to be accompanied at an investigatory meeting by a friend or relative should they wish to be. They will answer questions from the IO in order to provide the context needed for the Investigation Report. At this stage, the IO is gathering information without judgement and the NQN/Norlander will be able to respond to the allegations made in this meeting. The NQN's/Norlander's comment will be part of the report.

Norland will endeavour to complete its investigation within **one month** of the receipt of the Cause for Action. Where it is not possible to operate to this timeline, a new date for completion of the investigation will be provided.

In all cases, a record will be made of the process. This may include notes made of the initial complaint/notification of the Cause for Action, notes of the initial meeting between the HAA (or nominee) and the NQN/Norlander regarding the Cause for Action, all of which are likely to be included in the Cause for Action Notification Report. These notes can be used as evidence at any stage of the proceedings. These notes will be in addition to any correspondence between the relevant parties such as emails, and any relevant documentation such as the Cause for Action Notification Report.



Any complaints or concerns regarding the conduct of the investigation can only be made after the investigation has concluded. The NQN/Norlander will be given the opportunity to provide their own evidence and view regarding the allegations against them during the course of the investigation. This may require the IO to have further meetings and gather further evidence. However, the IO reserves the right to draw a halt to enabling the NQN/Norlander to provide further evidence. They will be given an opportunity to raise additional evidence during the course of the Disciplinary Panel should this be the outcome, ensuring their opportunity for 'right of reply'.

Once complete, the Investigation Report (see Appendix 3) will be forwarded to the HAA (or nominee), along with any evidence gathered. The HAA will ensure they make suitable recommendations based on the Standard of Proof and will provide a rationale for the decision made. The recommendations will be one of the following options:

- a) No further action** - If the IO believes that there is no case to answer due to, for example, an inability to uncover sufficient evidence to meet the Standard of Proof, a recommendation of no further action will be made and a record will be made of the complaint/concern for internal records only and for a period of one year. An example of this would be where two people give different accounts of a minor incident and it remains impossible to corroborate either account through witnesses or other evidence. The Investigation Report will outline the rationale for the recommendation based on the Standard of Proof.
- b) Informal Resolution with an Informal Warning and/or other action** – if the IO has sufficient evidence against the Standard of Proof to merit further action but the evidence reveals the Cause for Action does not merit moving to a Formal Warning or Disciplinary stage, the recommendation can be an informal resolution with an informal warning and/or action. For example, if the investigation process reveals the NQN/Norlander concerned acted unintentionally or a misunderstanding occurred and/or the matter has since been resolved amicably, but was sufficiently serious in nature and a breach of the Code and thus merits some kind of informal outcome. Recommendations made regarding the sufficiency or nature of the evidence and misdemeanour will be conducted in an objective and non-judgemental manner. Recommendations regarding other actions might include an apology or reparation of some kind. The Investigation Report will outline the rationale for the recommendation based on the Standard of Proof.
- c) Formal Resolution with a Formal Warning and/or other action** – if the IO has sufficient evidence against the Standard of Proof to merit further action and the Cause for Action is deemed to be of sufficient merit to require further action and to merit a Formal Warning and/or other action, but does not merit proceeding to the Disciplinary stage, the IO may recommend a Formal Warning and/or other action. For example, if the misdemeanour was acknowledged, intentional and a breach of the Code, but the perpetrator has admitted their guilt and the matter has been resolved amicably and/or the misdemeanour was acknowledged and a breach of the Code has occurred but the perpetrator's conduct is otherwise exemplary and there is evidence that the misdemeanour has not been repeated, and/or the misdemeanour was historical. Recommendations made regarding the sufficiency or nature of the evidence and misdemeanour will be conducted in an objective and non-judgemental manner. Recommendations regarding other actions might include an apology, reparation of some kind and/or a time-bound action plan. The Investigation Report will outline the rationale for the recommendation based on the Standard of Proof.



d) Proceed to Disciplinary Panel - if the IO has sufficient evidence against the Standard of Proof to merit further action and/or the Cause for Action is deemed to be sufficiently serious to merit further action, and/or there are conflicting accounts given by the parties concerned and/or the perpetrator denies culpability despite the evidence to the contrary, and/or where the Cause for Action has also resulted in a police investigation, the IO may recommend proceeding to the Disciplinary stage. Recommendations made regarding the sufficiency or nature of the evidence and misdemeanour will be conducted in an objective and non-judgemental manner. The Investigation Report will outline the rationale for the recommendation based on the Standard of Proof.

The HAA (or nominee) will then decide what action will be taken and will usually take action based on the recommendations made by the IO. If necessary, the HAA will consult with a relevant senior member of staff to decide on the next course of action. If the course of action goes against the recommendation by the IO, the HAA will need to include her own rationale for the decision based on the available evidence against the Standard of Proof. The decision will be one of the following options:

A) No further action – If the HAA agrees with the recommendation by the IO of ‘No further action’, the HAA will ensure the Investigation Report is kept on file as an internal record. No record will be made in the NQN’s/Norlander’s file. If appropriate, the HAA will offer support to the NQN/Norlander in order to resolve any outstanding difficulties. However, should a similar Cause for Action be investigated again, the HAA may take into account the previous record when deciding which option for next steps to pursue.

B) Informal Resolution with an Informal Warning and/or other action – If the HAA agrees with the recommendation by the IO of an ‘Informal Resolution with an Informal Warning and/or other action’, the HAA will, in consultation with relevant Senior Staff member/s if necessary, implement an Informal Warning and/or other action such as generating a ‘Notice for Improvement’ ([Appendix 2](#)). A Notice for Improvement will require the NQN/Norlander to show demonstrable improvement in the area of concern over a suitable period of time and will normally be outlined via an Action Plan. Normally this Action Plan will be overseen by a member of the NQN or Agency teams. When complete, it will be signed off by the HAA. The Action Plan will be reviewed regularly and, if unsatisfactory progress has been made, the HAA will decide whether to extend the time period and/or amend the Notice for Improvement or may escalate the matter to a ‘Formal Resolution with a Formal Warning and/or other action’. The HAA may also refer the matter directly to the Principal and recommend a Disciplinary Panel hearing commence. An internal record will be kept of the Informal Resolution process on the Investigation Report. The Informal Warning and Notice for Improvement will be put on the NQN’s/Norlander’s online record and removed once the HAA (or nominee) is satisfied the NQN/Norlander has met the conditions of the Notice for Improvement. Thereafter, the Informal Warning and any Notice for Improvement will be removed from the NQN’s Norlander’s file.

c) Formal Resolution with a Formal Warning and/or other action – If the HAA agrees with the recommendation by the IO of an ‘Formal Resolution with an Formal Warning and/or other action’, the HAA will, in consultation with relevant Senior Staff member/s if necessary, implement an Formal Warning and/or other action such as generating a ‘Notice for



Improvement' (Appendix 2). A Notice for Improvement will require the NQN/Norlander to show demonstrable improvement in the area of concern over a suitable period of time and will normally be outlined via an Action Plan. Normally this Action Plan will be overseen by a member of the NQN or Agency teams. When complete, it will be signed off by the HAA. The Action Plan will be reviewed regularly and, if unsatisfactory progress has been made, the HAA will decide whether to extend the time period and/or amend the Notice for Improvement or may escalate the matter to Disciplinary proceedings.

An internal record will be kept of the Formal Resolution process on the Investigation Report. The Formal Warning and Notice for Improvement will be put on the NQN's/Norlander's online record and removed once the HAA (or nominee) is satisfied the NQN/Norlander has met the conditions of the Notice for Improvement. Thereafter, the formal Warning and any Notice for Improvement will be removed from the NQN's/Norlander's file.

d) Proceed to Disciplinary Panel - If the HAA agrees with the recommendation by the IO of proceeding to the Disciplinary stage, the HAA will refer the matter to the Principal to hold a panel hearing.

The HAA will inform the NQN/Norlander within 5 working days of receiving the report about what the next steps will be and who, if anyone, will be in touch with the NQN/Norlander to make the necessary arrangements for the implementation of the decision. The NQN/Norlander will be sent a copy of the final disciplinary report and evidence but evidence may be redacted depending on the circumstances. For example, if a witness is a whistleblower and their identity needs to be withheld.

STAGE 3: DISCIPLINARY PANEL HEARING

The Principal (or nominee) will convene a Disciplinary Panel to hear the details of the alleged misconduct and decide the outcome. Guidance notes on conducting a formal meeting are included in **Annex 2**.

The Disciplinary Panel will be composed of at least two members of the Senior Leadership Team, one of whom must be the Principal as Chair, or her nominee, and include an NQN/Norlander Representative. No-one who has previously been involved in the allegations or investigation will be included on the Panel, so the IO and HAA (or nominee) will not be part of the Disciplinary Panel, although they may be required to provide any necessary clarification of the evidence.

The meeting should be held without unreasonable delay whilst allowing the NQN/Norlander reasonable time to prepare their case. Usually this will mean giving the NQN/Norlander 10 working days' notice.

The NQN/Norlander is entitled to be accompanied at the hearing by a parent or friend of their choice. The NQN/Norlander should inform the Principal of the name of their companion at the earliest opportunity and no later than 24 hours before the hearing is due to take place. It is not normally necessary for the NQN/Norlander or Norland to have legal representation at the hearing.

The NQN/Norlander is entitled to call witnesses to support their case. The NQN/Norlander should inform the Principal of the name/s of their witness/es at the earliest opportunity and no later than 24 hours before the hearing is due to take place. Witnesses may attend in person or via video call.



The NQN/Norlander (and their companion) should make every effort to attend the meeting. At the meeting the Chair should explain the Cause for Action accusation against the NQN/Norlander and go through the evidence that has been gathered.

The Chair of the Panel may invite the IO to present the case against the NQN/Norlander, giving the NQN/Norlander the opportunity to ask questions of the IO as part of the hearing. The Chair will consider the evidence contained within the report, whether the allegations are contested and whether the NQN/Norlander has requested the attendance of the IO, when deciding whether it is appropriate to ask the IO to attend.

If the NQN/Norlander wishes to ask questions of the IO, they should inform the Chair prior to the panel hearing so that arrangements can be made to ensure attendance.

If the NQN/Norlander decides during the panel hearing that they would like to ask questions of the IO, and the IO is not present, the Chair will adjourn the hearing until such time that the IO is available to attend.

The NQN/Norlander should be allowed to set out their case and answer any allegations that have been made. The NQN/Norlander should also be given a reasonable opportunity to ask questions, present evidence and, if appropriate, call relevant witnesses. They should also be given an opportunity to raise points about any information provided by any witnesses. Where a NQN/Norlander intends to call one or more witnesses he/she must give advance notice that they intend to do this. See 1.5.

The companion to the NQN/Norlander may be allowed to address the hearing to put and sum up the NQN's/Norlander's case, respond on their behalf to any views expressed at the meeting and confer with them during the hearing. The companion will not, however, have the right to answer or ask questions on the NQN's/Norlander's behalf, address the hearing if the NQN/Norlander does not wish it or prevent the NQN/Norlander from explaining their case.

Where necessary, the Chair may decide to suspend the deliberations of the Panel and reconvene pending further information or in order to access legal advice.

STAGE 4: DECIDE ON APPROPRIATE DISCIPLINARY ACTION

Judgements and any sanctions will be made based on the Balance of Probability Standard of Proof; that is, whether the events in questions were more likely than not to have happened, based on the evidence presented in the form of the Investigation Report and any evidence presented at the hearing. The NQN's/Norlander's response and conduct during the investigation and hearing, and any admission or remorse shown will also be taken into consideration.

Where concerns have previously been raised by stakeholders who request that Norland do not raise them with the NQN/Norlander but they are deemed relevant to the case presented to the Disciplinary Panel, Norland reserves the right to take these into account when deciding upon appropriate disciplinary action.

There may be an immediate, verbal notification of any judgements and any sanctions to be applied which will be followed up in writing, or a written notification normally within 10 working days of the Disciplinary hearing in the form of a Disciplinary Report (see [Appendix5](#)).

Where the Disciplinary Panel finds that there is insufficient evidence to uphold the complaint, the Panel may dismiss the case or refer it back to one of the Informal Resolution options outlined in 15.13B above.



Where misconduct is confirmed, the Disciplinary Panel will decide whether **level 1** or **level 2** (see [Appendix 5](#)) sanctions will be applied.

If a NQN's/Norlander's first misconduct is sufficiently serious, **level 2** sanctions may be applied. This might occur where their actions have had, or are liable to have, a serious or harmful impact on Norland, other NQNs/Norlanders, staff or the children or families with whom they work. The Child Protection and Safeguarding Policy process may also need to be invoked.

The sanction(s) applied will be communicated to the NQN/Norlander in writing via the Disciplinary Report which will set out the outcome of the formal stage and give a clear explanation of, and setting out the reasons for, each decision and any penalty in straightforward language. It will also outline the change in behaviour or improvement in performance required (with timescale) such as suggesting a Notice of Improvement.

The sanction imposed must be reasonable and proportionate to the misconduct which is found to have occurred. In addition to clarifying the rationale behind the level of sanction imposed, the report must also state why other levels of sanctions have not been applied.

In the report, the Disciplinary Panel must set out the timeline for the sanctions and the circumstances under which the record can be removed from the NQN's/Norlander's file.

The NQN/Norlander will also be informed of the consequences of further misconduct within a set period, for instance that it may ultimately result in expulsion from the NQN and Norland Diploma assessment or the removal of Norlander status.

As well as making a judgment about the validity of the accusation, the Disciplinary Panel will also make the following decisions:

- If and how the outcome of the hearing is communicated to various stakeholders, including the complainant/s and the employer any NQN and/or Agency teams. Stakeholders will be told that 'appropriate action has been taken'. Details of the outcome or any sanction applied will not be disclosed to any of the stakeholders.
- Whether any sanctions should be applied and, if so, what they should be.
- Where necessary, for example for safeguarding purposes, the Panel reserves the right to inform the NQN's/Norlander's current or future employers of any details that they may need in order to support the NQN/Norlander further.

When the Disciplinary Panel sends the report to the NQN/Norlander, the communication will give information about the NQN's/Norlander's right to appeal, the grounds on which they can do so, the time limit for submitting an appeal, the appropriate procedure and where and how to access support. See section 10 Stage 6.

Some acts, termed gross misconduct, are so serious in themselves or have such serious consequences that they may call for expulsion from the NQN and Norland Diploma assessment immediately.

Gross misconduct includes but is not limited to actions which have, or are likely to have, caused harm or injury to a child or other person including sustained and serious bullying and/or harassment, serious breaches of confidentiality, serious insubordination, gross negligence, criminal offences which would prevent the NQN/Norlander working with children, actions which bring Norland into disrepute, theft or fraud.



Where the NQN/Norlander actions have had a detrimental effect on another party, the Disciplinary Panel will decide what reparation is required. This may include a detailed apology, participation in mediation where relationships have been damaged or any other action the panel deems necessary.

If a mediator is appointed in order to help resolve a particular matter between relevant parties, such as a matter related to employment or serious damage of relationships between the NQN/Norlander and another party, the cost of this may need to be met by the NQN/Norlander being disciplined and this will be decided by the Principal. Should a mediation process be deemed to be necessary in order to help resolve any discord, the NQN/Norlander will be obliged to participate and this may be a condition of the judgement made by the Disciplinary Panel.

STAGE 5: SANCTIONS

A NQN's/Norlander's previous disciplinary record will not normally be relevant to whether they have committed an offence. However, it is likely to be relevant to decisions about sanctions. The Disciplinary Panel may therefore ask for information from either the NQN/Norlander or the HAA related to previous offences after their decision about culpability has been made and prior to their decision about sanctions to be applied. If relevant to the case, where a first warning has been previously issued, it is likely that a final warning (**Level 2**) will be issued or where a final warning has been previously issued, it is likely that expulsion will occur.

Level 1 sanctions should be applied where the complaint has been upheld but, in the judgement of the Disciplinary Panel, the outcome of the misdemeanour has not led to any long-term consequences for anyone involved and/or it is the NQN's/Norlander's first offence and/or the NQN/Norlander has shown remorse and/or the offence is judged to be minor in nature and/or there are compelling personal circumstances that affected the NQN's/Norlander's judgement at the time of the offence and/or there has been no damage to the Norland brand.

Level 1 sanctions may include (but are not limited to): First Warning, appropriate reparation, apology, 1:1 support. It may also include a Notice for Improvement report ([Appendix 2](#)) which is likely to include a time-bound action plan to support improvement. The Level 1 sanction/s will be recorded on the online NQN's/Norlander's file for the duration of the Notice of Improvement.

Level 2 sanctions should be applied where the complaint has been upheld and, in the judgement of the Disciplinary Panel, the outcome of the misdemeanour has led to long-term consequences for anyone involved and/or it is not the NQN's/Norlander's first offence and/or the NQN/Norlander has not shown remorse and/or the offence is judged to be serious in nature and/or there has been damage to the Norland brand. Serious incidents of bullying and/or harassment are likely to attract level 2 sanctions.

Level 2 'serious' sanctions may include (but are not limited to): Final Warning, delay to the commencement of a new NQN post until further activities are undertaken to improve practice, delay to the Norlander's access to the Agency until further activities are undertaken to improve practice, a Notice for Improvement report ([Appendix 2](#)) which is likely to include a time-bound action plan to support improvement, suspension from studies, expulsion from Norland, permanent removal of Norlander status. In cases where the NQN/Norlander remains



part of Norland and the Disciplinary Panel issues a final written warning, the Final Warning will be held on the online NQN's/Norlander's file. The Disciplinary Panel will decide the duration for which the Warning and/or other outcomes such as a Notice for Improvement will remain in place, depending on the severity of the misdemeanour, but it will be for at least one year and will be considered in any further Disciplinary action during that time.

If a Notice for Improvement and time-bound action plan is imposed at either level, the Chair of the Disciplinary Panel will nominate a member of staff to oversee and develop the action plan in conjunction with the NQN/Norlander, taking into account any actions recommended by the Panel. The Chair will set a review date, at which point it is expected that appropriate improvement will have been demonstrated.

A decision to expel from Norland or to permanently remove Norlander privileges can only be taken by the Principal or nominee. The NQN/Norlander should be informed as soon as possible of the reasons for the expulsion and their right of appeal.

If the NQN/Norlander does not appeal within the time limit for doing so, the matter will be closed and a Completion of Procedures Letter will be issued (see **Appendix 6**).

FAILURE TO ACKNOWLEDGE NOTICE OF COMPLAINT AND FAILURE TO ATTEND.

If the NQN/Norlander fails to acknowledge notice of the complaint and subsequent invitation to help with the investigation, the Principal (or nominee) will write to the NQN/Norlander at their address as registered with Norland and at any other address known to Norland.

If, after all reasonable steps have been taken by the Principal, the NQN/Norlander fails to acknowledge the notice of the investigation or fails to attend any meeting arranged by Norland without proper and reasonable excuse, the Principal will write to the NQN/Norlander notifying him/her that as the matter has not been properly discussed the following result will ensue:

- A note of the NQN's/Norlander's failure to attend the meeting or acknowledge the investigation will be made on the NQN's/Norlander's file.
- The NQN/Norlander will be unable to continue with the NQN assessment or access the Norlander privileges until the matter has been fully investigated. The employer will be informed.
- The matter will be referred to the Disciplinary Panel who will decide what action to take in the NQN's/Norlander's absence. The Disciplinary Panel's decision will be final, subject to any Appeal lodged by the NQN/Norlander in accordance with the Appeals Procedure set out in this policy. This Appeal may not be on the basis of non-attendance if this was due to the NQN's/Norlander's failure to acknowledge or failure to attend unless there are mitigating circumstances for this failure.

STAGE 6: OPPORTUNITY TO APPEAL

Appeals against the sanction decision of the Disciplinary Panel Appeal

against suspension/expulsion:

- Where the recommendation of the Panel is that the NQN/Norlander should be suspended or expelled from the NQN process or temporarily or permanently lose



Norlander privileges, the NQN/Norlander has a right of appeal to the Board of Directors, once this recommendation has been confirmed by the Principal (or nominee).

- The request for such an appeal must be made in writing, providing full supporting evidence and grounds for appeal, to the Chair of the Board of Directors within 10 working days of receipt of the decision.

Appeal against other decisions of the Disciplinary Panel:

- The NQN/Norlander has the right to appeal against non-sanction elements of the decision of the Disciplinary Panel if he/she believes and can demonstrate that:
 - The process has not been conducted correctly, in accordance with the procedures
 - There has been a material administrative error
 - The decision of the Panel is unreasonable based on the evidence available to the panel and the Standard of Proof
 - There was evidence that was available at the time of the original hearing that was not considered by the Panel
 - New evidence has come to light that could not have been considered previously.

Appeals should be made in writing, with full supporting evidence, to the Chair of the Board of Directors within 10 working days of the receipt of the letter notifying the NQN/Norlander of the Disciplinary Panel decision.

The NQN/Norlander should be made aware that this is not a re-opening of the investigation and that they must provide reasonable evidence to substantiate their appeal. Disagreement with the decision of the Disciplinary Panel is not in itself sufficient reason to appeal.

The Appeals Panel will consist of three members of the Board of Directors and will convene to consider whether the documentation of the case suggests that the decision of the original Disciplinary Panel was reasonable and the procedure was followed correctly.

If the NQN/Norlander, having been given the opportunity to attend the hearing, fails to do so without reasonable explanation, the Appeals Panel may proceed in their absence.

The Appeals Panel may:

- Amend the decision of the original Disciplinary Panel
- Uphold the decision of the original Disciplinary Panel
- Refer the case back for reconsideration by the original Disciplinary Panel
- Defer the decision pending further information and advice
- Reject the Appeal.

The decision and any recommendations of the Appeals Panel will be notified to the NQN/Norlander and to the original Disciplinary Panel. There will be no further right of appeal.

If the appeal is rejected or is not permitted to proceed under the grounds of appeal, a Completion of Procedures Letter ([COPL - Appendix 6](#)) will be sent to the NQN/Norlander within 28 days. This will be accompanied by an explanation of the decision reached and the



reasons for it.

Where an appeal is upheld, a written statement will be provided to the NQN/Norlander that explains what action will be taken.



STAGE 7: MONITORING AND SIGN OFF

In all cases where a Notice of Improvement/action plan has been imposed, the issuing authority (Chair of the Disciplinary Panel, HAA or nominee) will appoint a member of staff, usually a member of the NQN or Agency teams, to work with the NQN/Norlander to meet the requirements of the Notice of Improvement.

Once the Notice of Improvement requirements have been met or at the review date set (whichever happens first), the person appointed to oversee the process will report progress to the issuing authority (Chair of the Disciplinary Panel, HAA or nominee).

If all requirements have been met, the Notice of Improvement and/or warning will be removed from the NQN's/Norlander's file

If all requirements have not been met by the review date, the issuing authority will extend the time or refer the matter for further disciplinary action.

RECORD KEEPING

Relevant records associated with Norland disciplinary proceedings will be stored within a restricted access folder on Norland's internal SharePoint hub. This is a password-protected, cloud-based document storage facility. Access permissions to specific folders are only given to the investigating officer and the members of the disciplinary panel (if required).

Reports will be kept on the NQN/Norlander and/ or the internal record as follows:

Report and/or record	Location	Timeframe
Cause of Action Notification report (stage 1)	Internal	6 years*
Cause for Action Notification report (stage 1) - Informal Resolution	Internal	6 years*
Informal Warning and Notice for Improvement (stage 1)	NQN/Norlander file	Once conditions have been met. No more than 12 months.
	Internal	6 years
Investigation Report (stage 2) – No further Action	NQN/Norlander file	12 months
	Internal	6 years
Investigation Report (stage 2) – Informal Resolution and Informal Warning	NQN/Norlander file	12 months
	Internal	6 years*
Investigation Report (stage 2) – Formal Resolution and Formal Warning	NQN/Norlander file	12 months
	Internal	6 years*
Investigation Report (stage 2) – Disciplinary Panel <ul style="list-style-type: none"> • No further action • Informal resolution and informal warning • Formal resolution and formal warning and notice for improvement 	All – internal	6 years*
	NQN/Norlander file	12 months
	NQN/Norlander file	Once conditions have been met. No more than 12 months.
	NQN/Norlander file	Once conditions have been met. No more than 12 months.
Disciplinary Panel Hearing (stage 3 – 4)	Internal	6 years*
	NQN/Norlander file	12 – 36 months
Disciplinary Panel Outcomes – Sanctions (stage 5)	All – internal	6 years*
	NQN/Norlander file	12 months
	NQN/Norlander file	12 – 36 months



* Records are retained and referred to by the Norland Agency for the purposes of its business.

Records will be kept according the Norland's [Data Protection policy](#), the [Student Privacy Notice](#) and the [Data Retention Schedule](#).

In order to ensure consistency of approach and procedural fairness, Norland records all disciplinary matters in an anonymised log which includes basic details such as:

- Date.
- The reason for disciplinary action.

- Stage 1 cause for action outcome i.e. no further action; informal resolution; formal investigation, including the reason as to why a specific outcome was reached.
- Stage 2 formal investigation outcome i.e. no further action; informal resolution; formal resolution; Disciplinary Panel, including the reason as to why a specific outcome was reached.
- Stage 3 Disciplinary Panel hearing outcome i.e. sanctions applied, including the reason as to why a specific outcome was reached.
 - Appeal outcome.
 - Completion of Procedure letter issued.

As this is an anonymised internal record, it will be kept for a minimum of 6 years. It will be stored within the restricted access folder for disciplinaries.

3. ROLES AND RESPONSIBILITIES

As above.

4. RELATED POLICIES, PROCEDURES AND GUIDANCE

- UK Quality Code
- Universities UK Guidance for HEIs 'How to handle alleged student misconduct'
- The Good Practice Guidance published by the Office for the Independent Adjudicator (OIA)
- The Norland Code of Professional Responsibilities.
- Cause for Action Procedure.
- Safeguarding Policy.
- Student Charter.

5. ANNEXES

Annex A – Cause for Action Notification Form

Date cause for action raised	
Name, status and contact details of Notifier	



Name, Set/Year If relevant and contact details of NQN/Norlander concerned		
Brief outline of cause for action		
Checklist	Record created in secure folder	Date:
	Date NQN/Norlander notified	Date:
Clarification meetings		
Date of meeting with Notifier		
Date of meeting/s with NQN/Norlander		
Details of Cause for Action established		
Does the Notifier wish to remain anonymous?	Yes/No	
If yes, is there the potential of sufficient evidence to justify further action?	Yes/No	
Does the concern involve bullying, harassment, criminal activity or behaviour likely to bring Norland into disrepute?	Yes/No If yes, proceed to Formal Disciplinary stage	
Date of initial decision by HAA		
Initial decision	No further action	<input type="checkbox"/>
	Informal resolution with an informal warning and/or other action	<input type="checkbox"/>



	Formal Resolution with a Formal Warning and/or other action	<input type="checkbox"/>
	Formal Investigation	<input type="checkbox"/>
Rationale for decision	<i>Include whether a misdemeanour has been admitted, the impact of the cause for action on others, the likelihood of sufficient evidence to meet the Standard of Proof, etc.</i>	
Informal resolution Details of actions to be taken	Informal Warning	Yes/No
	Notice of Improvement	Yes/No
	Date of review	
	Other (give details)	
Name of person overseeing Notice of Improvement		
Formal resolution Details of actions to be taken	Formal warning	Yes/No
	Notice of Improvement	Yes/No
	Date of review	
	Other (give details)	
Formal Investigation Name of Investigating Officer appointed		
Date investigation implemented		

Annex B – Notice for Improvement

NQN/Norlander Name	
Set	
Date	
Name of member of staff overseeing Notice for Improvement	



Completion Date	
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The purpose of this Notice for Improvement is to set out a framework in which the above-named NQN/Norlander can address areas of concern. These areas of concern are:

The following action plan has been agreed by the NQN/Norlander and will be monitored by the above-named member of staff, who will support the NQN/Norlander to meet the objectives *(please add or remove rows as required. The objectives and actions should fully address the areas of concern listed above).*

Objective	Actions to be taken	By when?	Progress

This Notice for Improvement should be reviewed and signed off by the Head of Agency and Alumni on or before the Completion Date. Failure to demonstrate the required improvements by this date may result in further disciplinary action.

Signed NQN/Norlander	
Signed Staff	
Notice signed off by HAA Date	

Annex C – Template for Investigation Report

Investigation report [This is a template investigation report that an investigator may adapt to suit the particular circumstances of their investigation]



	Name of NQN/Norlander under investigation	
Introduction	Investigation authorised by: [Name and role]	
	Investigating Officer: [Name and role]	
	Date investigation began:	
	Outline of Cause for Action (<i>note – Cause for Action Notification Form should be attached to this form as an appendix</i>)	
Process of investigation	The investigation process: [Explain how the investigation was authorised]	
	Evidence collected: [List all evidence collected]	

		<p>Evidence not collected: [List all evidence that could not be collected and why]</p>	
		<p>Persons interviewed: [List all people interviewed]</p>	
		<p>Persons not interviewed: [List any witnesses that could not be interviewed and why]</p>	
		<p>Anonymised statements: [If any, explain why and provide details of how this evidence has been assessed]</p>	
<p>The investigation findings</p>		<p>Summary of written and physical evidence: [name and summarise each document contained, set out how the evidence supported or did not support your findings and why]</p>	
		<p>Summary of witness evidence: [name and summarise each witness statement, quote from statement where relevant, set out how the witness statement supported or did not support your findings and why]</p>	



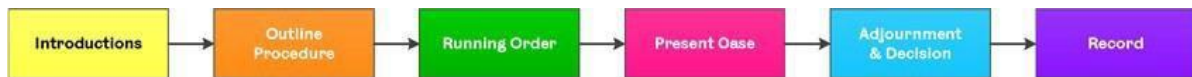
	<p>Facts established: [detail what the investigation has established. <i>Note that the facts need to meet the Standard of Proof</i>]</p>
	<p>Facts that could not be established: [detail any part of the investigation that was inconclusive and how this evidence has been assessed] AND SAY WHY</p>
	<p>Outline any areas of the Code of Professional Responsibilities which may have been breached, lining this to the facts established</p>
	<p>Mitigating factors: [detail if there were any mitigating factors uncovered that are relevant to the investigation]</p>
	<p>Other relevant information: [detail any other information that is relevant to the matter]</p>
<p>Conclusion [if required]</p>	<p>Recommendation:</p> <p>No further action/ Informal Resolution with an Informal Warning and/or other action/ Formal Resolution with a Formal Warning and/or other action/Proceed to Disciplinary Panel</p>
	<p>Rationale for recommendation: [<i>please outline the reasons for your recommendation, the evidence that supports it and how the Standard of Proof has been met</i>]</p>
	<p>Investigating Officer's signature:</p> <p>Date:</p>
<p>Head of Agency and Alumni decision</p>	<p>No further action/ Informal Resolution with an Informal Warning and/or other action/ Formal Resolution with a Formal Warning and/or other action/Proceed to Disciplinary Panel</p>

Rationale if decision is different to the IO's recommendation	
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Annex D – Guidance notes on Chairing Formal Disciplinary Proceedings

The below checklist is for guidance purposes only, as it is recognised that the Chair will need to determine how best to manage any hearing given the individual circumstances of the case.

Please ensure that all discussions during this process are fair, appropriate and above reproach.



Introductions

- Welcome attendees.
- Request that all attendees turn off any electronic devices to avoid unnecessary interruptions during the meeting.
- Introduce those present and their roles, (see guidance re: roles/responsibilities); this may include: Panel members, Investigating Officer, note-taker, NQN/Norlander and their representative etc.
- Discuss whether the meeting is to be recorded and, if this is necessary, gain recorded consent from all participants.
- Representation of NQN/Norlander – If accompanied confirm the role of the companion, i.e. that they will be able to address the hearing in order to: put the NQN's/Norlander's case forward; sum up the case; respond to any view expressed at the hearing; and confer with the NQN/Norlander. However, the representative will not usually answer questions on behalf of the NQN/Norlander, but may do so with the agreement of the Panel.
- If not accompanied note that the NQN/Norlander has been advised of their right to be accompanied but has chosen to attend unaccompanied.
- Ask the NQN/Norlander to introduce themselves and any companion they may have with them. Check whether the participants are happy with use of first names.
- Confirm with the NQN/Norlander that they have received the letter notifying them of the hearing and the associated documentation providing advanced disclosure of the case.
- Confirm with the NQN/Norlander that they understand that it is a formal disciplinary hearing which will be conducted in line with Norland's Cause for Action and Disciplinary procedure.
- Ask that all communications go through you as the Chair during the hearing.

Outline Procedure

- Advise of the procedure.
- Confirm Documentation provided – Identifying, if appropriate, any other documentation the panel has at their disposal for reference purposes. Also confirm if the Panel received any additional information/evidence from the NQN/Norlander.

- Adjournments - Advise that should any party consider an adjournment necessary requests should be made via the Chair. Identify the location of the rooms available.
- Taking of Notes – Advise that the note-taker will take summary notes to support the Panel’s consideration. Should the NQN/Norlander want a summary of these notes these can be provided on request. Advise that both the NQN/Norlander and their representative would be welcome to make their own notes.
- Respond to any procedural concerns/queries that may arise.

Running Order

1. The Investigating Officer may be invited in to present the case against the NQN/Norlander and the evidence upon which this is based, which may include calling witnesses.
2. If the Investigating Officer is in attendance, the NQN/Norlander , their representative if applicable and the panel will be given the opportunity to ask questions of the Investigating Officer and any witnesses, and to query the evidence provided.
3. If the Investigating Officer is not present, the Chair will outline the case against the NQN/Norlander, based on the Investigation Report.
4. The NQN/Norlander and their representative are then invited to present their case, which again may rely on witnesses.
5. The panel will correspondingly be allowed to ask questions of the NQN/Norlander and any witnesses, including to ask for clarification about any discrepancies in the evidence.
6. Both the NQN/Norlander and the Chair of the Panel will be invited to provide a brief concluding statement.
7. The Panel will adjourn to consider the case.

Present Case

- Hear case based on the above running order.

Adjournment & Decision

- Panel either adjourns or closes the hearing to consider the case.
- If the Panel is unable to make a decision as further information/time is required, inform the NQN/Norlander as to when they can expect written notification of the decision (or if further action was deemed necessary what this would entail).
- When closing the hearing, ensure that everyone understands what is going to happen.
- Panel makes a decision
- Advise that the outcome of the hearing should be confirmed to the NQN/Norlander in writing, usually within 7 days of the hearing. Include notification of their right to appeal and to whom any such appeal should be addressed. The NQN/Norlander may be informed, verbally, immediately following the Panel’s deliberations.

Record

- Record summary of the discussions, (including any agreed actions and timescales for improvement etc).
- Ensure that the records are factual, unambiguous and constructive (assume that the NQN/Norlander may see these).



- Write to NQN/Norlander summarising the outcome of hearing and any next steps.
- Store records securely, as these may be subsequently required within later procedural stages and shared with all relevant parties, including the NQN/Norlander.

Annex E – Template for Disciplinary Hearing Report

Disciplinary Hearing report [This is a template hearing report that a note taker may adapt to suit the particular circumstances of the hearing]

Introduction	Hearing panel and other attendees: [Name and role]
	Date of hearing:
	Reference (normally the investigation report):
Process of hearing	Presentation of case by Investigating Officer or Chair of the Panel: [Summary of investigation report by Investigating Officer which may include calling of witnesses]
	Response from NQN/Norlander: [May include clarification questions to Investigating Officer/witnesses]
	Response from panel: [May include clarification questions to Investigating Officer/witnesses]
	Presentation of case by NQN/Norlander: [May include witnesses and presentation of additional evidence]
	Response from panel: [May include clarification questions to NQN/Norlander and/or witnesses]
	Concluding statement by NQN/Norlander:



		<p>Concluding statement by the Chair:</p>
	<p>The hearing findings</p>	<p>Summary of panel’s decision regarding outcome and any conditions:</p> <p><i>[This should detail the following:</i></p> <ul style="list-style-type: none"> • <i>Whether the disciplinary is upheld and whether or not any disciplinary action will be taken and, if so, state nature of misconduct or poor performance, making links to the Code of Professional Responsibilities, which level of sanction will be applied, the nature of the sanction and the details of any conditions, such as participation in a Notice for Improvement including details of any requirements for the Notice for Improvement, such as a time-bound action plan with details, date of review and any reparation needed</i> • <i>State the strength of evidence, based on the Standard of Proof</i> • <i>State the rationale for the selection of the sanctions and/or conditions, including why other sanctions were not deemed to be appropriate</i> • <i>State how compliance with any conditions will be monitored</i> • <i>the duration of the warning/sanction/Notice of Improvement and how long this will be held on the NQN’s/Norlander’s online file</i> • <i>State how the decision will be communicated to any other party and to whom, for example any victims, placements (if relevant), staff and any other stakeholder]</i> <p>Other relevant information: [detail any other information that is relevant to the matter]</p>

Annex F – Completion of Procedures Letter Template

Please note - the format may be adjusted to meet the individual circumstances of a complaint provided that the key points below are included.

Dear *[Name of complainant]*,

Completion of Procedures Letter

This letter confirms that the internal procedures of Norland College in relation to your *complaint / appeal etc** regarding *[please describe]* have been completed.



The issues that you raised in your *complaint / appeal etc** were [details]

The issue(s) that were considered in relation to your *complaint / appeal etc* was / were*: [brief summary of the complaint etc].

The final decision of Norland College is* [detail] because [reasons].

Yours sincerely,

[Authorised signatory]



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