



The Old Lodge, 50 Queensbridge Road, Birmingham, B13 8QY
Tel: 0121 449 7117 Email: info@womenandtheatre.co.uk

Policy for Safeguarding Children & Adults at risk

General Statement of Policy

- Women & Theatre is committed to safeguarding the welfare of children and adults at risk and recognises that it has a duty of care for the children and adults at risk that it works with.
- The Company complies with existing legislation and national guidance including The Police Act 1997, Children Act 1989, The Protection of Children Act 1999, Criminal Justice and Court Services Act 2000, The Children Act 2004, Safeguarding Vulnerable Groups Act (SVGA) 2006, Working Together to Safeguard Children 2018, Data Protection Act 2018, The Equality Act 2010, UN Convention of the Rights of the Child 1991, Human Rights Act 1998, Sexual Offences Act 2003, Safeguarding Vulnerable Groups Act 2006, The Children and Families Act 2014, the Care Act 2014 and the Children and Social Work Act 2017.

This policy should be read in line with our other policies: Anti Bullying & Harassment; Grievance & Disciplinary; Equal Opportunities & Diversity, and Data Management & Media Use Policies.

- As outlined in this policy, W&T takes every reasonable step to ensure that children and adults at risk are protected and that we create safe environments for children, adults at risk and our staff, freelancers and volunteers to engage in our work.
- W&T believes that all children and adults at risk have the same right to protection regardless of their age, disability, gender, nationality, race, marital status, maternity or pregnancy status, immigration status, religious belief, sexual orientation or identity.
- The term children applies to 0-17 yr. olds, and the term adults at risk is defined as someone over the age of 18 who has needs for care and support, is experiencing, or is at risk of abuse or neglect, and as a result of those needs is unable to protect him or herself against the abuse or risk of it.
- This policy applies to children and adults at risk, although the values that underpin it apply to everyone we work with.
- Responsibility for monitoring this policy lies with W&T's Board of Directors.

Designated Safeguarding Officer

W&T's Designated Safeguarding Officer (DSO) is the General Manager. They are responsible for dealing with any concerns about the protection of an individual that have been raised. If they are unavailable, concerns are raised to the Artistic Director, who as acting DSO, is empowered to take any necessary action. The responsibilities of the DSO or Acting DSO are to:

- Review the Safeguarding policy & procedure (minimum annually) and disseminate within the organisation.
- Receive information from staff and others who have concerns about safeguarding issues.
- Assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate.
- Inform and consult with the NSPCC, Birmingham Safeguarding Children Partnership or Birmingham Safeguarding Adults Board or other local authorities' Safeguarding Boards or Multi-

Agency Safeguarding Hubs when appropriate; discussing concerns or testing out doubts or uncertainty as soon as possible after an allegation is reported.

- Ensure that the Safeguarding policy and procedures are followed & accurate information recorded in password-protected formats.
- Keep relevant people in the organisation informed about action taken, further action required, for example disciplinary action against a member of staff.
- Ensure appropriate support and advice is given to members of staff who have been disclosed to, or involved with a particular matter.

Women & Theatre Staff

- All W&T core staff have Enhanced DBS Disclosures (up to 3 years old).
- All freelancers working with children or adults at risk have Enhanced DBS Disclosures (up to 3 years old).
- All volunteers are closely supervised and where appropriate require Enhanced DBS Disclosures (up to 3 years old).
- All artists and volunteers working with children or adults at risk are given this policy & safeguarding procedures and relevant project checklists.
- At the start of each project, a core staff member talks through the procedures with freelancers and volunteers ensuring the project team understand how to facilitate a safe working environment (including where working online), they are aware of what constitutes appropriate and inappropriate behaviour with and towards children and adults at risk, and they know what to do in the event that they suspect abuse or have it disclosed to them.
- W&T provide additional information to staff on safeguarding adults at risk or children, such as W&T template risk assessments and checklists, and referencing Birmingham Safeguarding Adult's Board's Blue Booklet (<https://www.bsab.org/downloads/file/90/safeguarding-adults-blue-booklet>) and Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children' was published on 1 July 2018.
- All staff, freelancers and volunteers must adhere to W&T's **Project Delivery – Good Practice Guidance** and **E-Safety Policy** as outlined within this policy.
- All staff, freelancers and volunteers are familiar with our **Complaints Procedure** and **Whistle-blowing Policy** which is included with new contracts and Volunteer Agreements. Core staff are recruited and selected by formal application process that includes two referees, a declaration of any criminal convictions, ID checks and Enhanced DBS checks. Freelancers and volunteers are selected by a publicised call out or recommendation followed by an interview or open audition.
- All W&T core staff will undertake Safeguarding Training minimum 2-yearly. Board members will also be invited to attend or offered alternative online training, 3-yearly. Project staff & volunteers will have access to training before project delivery starts; either attending W&T annual bespoke training or accessing an online course.

Project Planning

- All projects with children or adults at risk – both in-person and online – have a minimum of 2 adults working together at any time. In most cases there are a minimum of two W&T artists, in some cases where there is a small group there might be one artist plus a host member of staff.
- At all schools, centres and residential settings, at least one member of their staff must be present at all times during our visit. On these occasions, it is the responsibility of the setting to monitor attendance.

- With out-of-hours or holiday projects where schools and centres cannot provide staff, or that have been set up independently by the company, W&T will increase its staff ratios and have a staff member with a designated 'pastoral' role. On these occasions, W&T will maintain a record of all participants, their names, contact details for parents/carers including their consent and any additional relevant information.
- From the outset of partnership projects, it will be agreed which organisation is the Safeguarding Lead and therefore which DSO is the first point of contact for raising concerns. This will be fully communicated to the project team and contact details shared.
- Projects and activities will undergo a risk assessment following W&T's **Risk Assessment** procedure
- Any accidents and injuries will be recorded in the accident book, whether it occurred during a project or a participant arrived injured. Accidents occurring at external venues are recorded in the venue's accident book, and W&T make a note for its records.
- All project participants are requested to provide information relating to any additional requirements, allergies and emergency contacts. Depending on the nature of the project we may also require participants to advise W&T of specified risks. All information is retained & stored in line with **W&T's Data Management Policy** compliant with GDPR.
- Formal permission will be obtained for the photographing or filming or audio recording of a child from a parent or guardian, and the specific use of the images/ footage explained. Permission for the photographing or filming or audio recording of an adult at risk will be sought from the adult in question, where appropriate, or -from a guardian or link worker.

Project Delivery – Good Practice Guidance

W&T staff, artists, freelancers and volunteers will at all times show respect and understanding for the rights, safety and welfare of the children or adults at risk they are working with. They will ensure that they:

- Recognise that all children and adults at risk, regardless of their age, disability, gender, nationality, race, marital status, maternity or pregnancy status, immigration status, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- Treat all children and adults at risk equally, and with respect and dignity.
- Recognise that some children and adults at risk are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues, avoiding triggering material.
- At the start of the project, work with the group to establish a code of conduct / group contract, which reflects, embeds, and communicates Safeguarding principles.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Make our activities fun and promote equality.
- Are a good role model for participants.
- Maintain a safe and appropriate distance from participants, only touching participants when it is absolutely necessary in relation to the particular activity and seeking agreement of participants prior to any physical contact. Where a participant initiates physical contact, staff will respond appropriately for example, responding to a physically affectionate participant in a friendly way yet maintaining appropriate boundaries and ensuring other staff members are present.
- Establish an atmosphere where children and adults at risk feel comfortable and caring enough to point out attitudes and behaviours they do not like.
- Remember that actions can be misinterpreted, no matter how well intended.

- Recognise that sensitivity is required when dealing with bullying, bereavement or abuse.
- Always work with at least one other artist, plus a member of staff for projects in schools etc.
- Ensuring safe physical environments for children and adults at risk by applying measures in accordance with the **W&T Health and Safety Policy**.
- Ensure safe online environments for children and adults at risk by applying measures in accordance with the **W&T E-Safety Policy**. In the event of an incident or any concerns, follow all procedures outlined in the Safeguarding Procedures.

E-Safety Policy

The use of information technology is an essential part of all our lives; it is involved in how we gather and store information, as well as how we communicate with each other. It is also an intrinsic part of the experience of children and adults, and is greatly beneficial to all. However, it can present challenges in terms of how we use it responsibly and, if misused either by an adult or a child, can be actually or potentially harmful to them.

This policy aims to ensure that W&T staff, artists, freelancers and volunteers operate in line with our values and within the law in terms of how we use information technology.

W&T seek to promote e-safety by:

- Appointing an e-safety coordinator to projects with significant use of ICT from amongst the project team.
- Risk Assessing in advance, the use of ICT (such as Zoom, mobile phones, games consoles and the Internet) in any aspect of project delivery involving children or adults at risk.
- Developing clear and specific directions to staff and volunteers on the appropriate use of ICT on different projects (see online delivery guidance).
- Encouraging children & adults at risk to use mobile phone technology and the internet in a way that keeps themselves safe and shows respect for others.
- Incorporating statements about safe and appropriate ICT use into the codes of conduct for staff, volunteers and participants.
- Dealing firmly, fairly and decisively with any examples of inappropriate ICT use, complaints or allegations, whether by an adult or a child (these may include breaches of filtering, illegal use, cyber-bullying, or use of ICT to groom a child or to perpetrate abuse);
- Reviewing and updating the security of our information systems regularly and providing adequate physical security for ICT equipment.
- Using only official email accounts and W&T mobile phones (with password pins) provided via the organisation, and monitoring these as necessary. All of which are accessed regularly by different members of staff to monitor activity.
- Ensuring wherever possible, staff use their W&T laptops for online delivery and when home working. Where using personal computers, no child or adult at risk's details or images will be downloaded or saved onto personal computers. Staff will access details and documents on W&T's shared G drive – which is accessible via password protected Gmail accounts.
- Ensuring staff log out of W&T Gmail accounts when away from their computers, do not share their accounts or log-ins with anyone else and only log into their own accounts.
- In the Office or elsewhere, ensuring staff always lock computers or close documents with sensitive information when they are away from their laptops / computers.
- Ensuring that if children or adults at risk's images need to be downloaded for photo or video editing by a staff member or freelancer, then they will be deleted once the edit has taken place and the edited film is uploaded to the W&T's server. Other artists who need access to creative

content including videos are given links which enable them to watch videos online but not download. Ensuring that the personal information of participants are not published on our website.

- Ensuring that images of children, adults at risk and their families are used only after their written permission has been obtained, and only for the purpose for which consent has been given;
- Providing effective management for staff and volunteers on ICT issues, through supervision, support and training;
- Examining and risk assessing any emerging new technologies before they are used within the organisation.

Online Delivery

W&T sometimes delivers online participatory projects using online meeting platforms such as Zoom. W&T recognises that this context requires particular guidelines and considerations:

- W&T will ensure that all sessions take place using one of W&T's licenced Zoom Accounts.
- All sessions will be password protected, with links never shared in public spaces and the waiting room function always enabled – meaning the host lets individuals in. We will disable 'join before host', screen sharing, streaming, recording for participants and private chat functions during sessions.
- Children attending sessions must use a parent/ carer's account (16+ requirement on Zoom) and parents/carers must agree to relevant Terms & Conditions.
- We will encourage all staff, freelancers, volunteers and participants to just have their first name on their screens, and to consider in advance what can be seen in their backgrounds.
- We will treat the main Zoom room and any breakout room as we would a physical room, requiring minimum 2 members of the project team (e.g. 1 staff & 1 volunteer) to be in a room with any group or individual.
- We will ensure we have emergency contact details for all participants and will contact individuals if they lose connection/ go missing mid-session.
- Where we want to view films on YouTube, these will be shared by the host using 'screen-sharing' rather than requiring participants to go onto YouTube themselves.
- We will share a **Code of conduct for Zoom sessions** which all workers and participants will adhere to; this will include practical rules and also rules against the taking of photos/ films and any offline communications via text/snapchat/ other means between participants.
- Children will require parental/guardian permission to take part in Zoom sessions. As part of risk assessments, we will explicitly ask about online risks. In order to maximise opportunity for freedom of expression, we will recommend that participants are not supervised during sessions unless there is a safeguarding concern.

Social media

W&T recognises that social media provides opportunities to effectively engage with a wide range of audiences, particularly children. Social media refers to Twitter, Facebook, YouTube, Instagram and Tik Tok. There are a wide range of platforms but these are the ones currently adopted by W&T.

W&T also recognises the potential risks associated with social media usage, e.g. bullying by peers, posting personal information that can identify children and adults at risk offline, sexual grooming and exposure to inappropriate material, and exposure to racist or hate material.

W&T will seek to promote safe and appropriate use of social media by ensuring:

- Any social media engagement with individuals occurs via W&T profiles.
- Staff should not interact with any participant on their private social media profiles – including accepting friend or follower requests, ensuring profiles are private where possible and for staff to be conscious of their own personal information accessible online. W&T recognises that by its nature Twitter is a more public platform, in which any user can follow another, however staff understand they should only engage with participants through W&T profiles.
- Where photographs are taken for use on social media by staff appropriate permissions must be obtained and where possible images captured on the W&T phone or tablet. If on rare occasions staff use their personal phone to take photographs, these must be uploaded at the earliest possible opportunity and deleted immediately.



Safeguarding Procedure

All employees, freelancers and volunteers working with children or adults at risk are required to familiarise themselves with these procedures.

These procedures are to support staff in the process of raising a concern about suspected abuse. In all cases, any suspicion, allegation, incidents of abuse or actions taken must be reported to the designated member of staff responsible for safeguarding children and adults at risk (General Manager) as soon as possible.

Context

W&T deliver a range of participatory workshops and projects in different contexts and with diverse target groups. These include one off sessions, short courses and longer-term projects. Some projects are delivered in partnership with organisations who lead on the safeguarding of participants such as schools, residential homes and mental health settings. Other projects may involve W&T leading on the safeguarding of vulnerable participants – in these cases the Lead Artist will be responsible for ensuring safeguarding practices and policies are adhered to, in consultation with W&T's General Manager (designated member of staff).

1. What is Abuse?

Different categories of abuse apply to children and adults at risk – as identified by the Working Together to Protect Children 2018, and The Care Act 2014 respectively. Categories which apply to both groups include:

Physical abuse can involve hitting, shaking, throwing, poisoning or misuse of medications, burning or scalding, drowning, suffocating or otherwise causing physical harm, including fabricating the symptoms of, or deliberately causing, ill health, and so called 'honour' based violence. It may also be caused through an omission or the failure to act to protect.

Psychological / Emotional abuse is the persistent emotional ill-treatment of a child or adult at risk such as to cause severe and persistent adverse effects on that person's emotional development. It may involve making the individual feel that they are worthless or inadequate. It may feature age or developmentally inappropriate expectations being imposed on children, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve causing the person to feel often frightened or may involve exploitation or corruption.

Sexual Abuse involves forcing a child or adult at risk to take part in sexual activities including prostitution, whether or not they are aware of it or consent to what is happening. This refers to both physical acts and non-contact activities such as looking at or being involved in the production of pornographic materials or being encouraged to act in sexually inappropriate ways.

Neglect is the persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, likely to result in the severe impairment of the person's health or development. It may involve a parent or carer failing to provide adequate food, clothing or shelter, or failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of their basic emotional needs.

The NSPCC notes that there are other sources of stress for children and families such as, domestic violence, the mental illness of a parent or carer, or drug or alcohol misuse may have a negative impact

on a child's health. If it is felt that a child's wellbeing is being damaged by any of these areas, the same procedures as for abuse should be followed.

Additional Considerations for Children:

Bullying: Under the Children's Act 1989, a bullying incident should be addressed as a child protection concern when there is "reasonable cause to suspect that a child is suffering or is likely to suffer significant harm"

Child Criminal Exploitation: This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity; even if the activity appears consensual.

Child Sexual Exploitation: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity; even if the sexual activity appears consensual.

Positions of Trust and Grooming: A position of trust is when someone has a position that holds authority within an organisation. It is legally applied to those who are in specific settings such as education, hospitals and clinics, care settings, children's homes, residential family centres and justice settings and who are carrying out regulated activity. Grooming is when someone male or female builds an emotional connection with a young person or vulnerable person in order to gain their trust in preparation for sexual abuse. grooming can be done face to face or through technology.

Female Genital Mutilation:

Female genital mutilation (FGM), sometimes known as 'female circumcision' or 'female genital cutting', is illegal in the UK. It's also illegal to take a British national or permanent resident abroad for FGM, or to help someone trying to do this.

Additional categories of abuse identified by The Care Act 2014, applying to adults at risk:

Financial abuse such as theft, fraud, coercion over wills, misusing someone's money, property or other belongings without their agreement.

Discriminatory abuse such as ill-treatment or harassment based on a person's age, gender, sexuality or sexual orientation, disability, religious or ethnic group.

Organisational or Institutional abuse through rigid regimes, systemic poor care, poor organisational culture, lack of resources, denial of choice lack of dignity for service users.

Modern slavery such as human trafficking, forces labour and domestic servitude.

Self-neglect: This covers a wide range of behaviour and can include poor personal hygiene; not taking care of own health; Hoarding. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour.

Domestic Violence: The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

2. How might you recognise or become aware of Abuse?

Recognising abuse is not easy, and it not your responsibility to decide whether abuse has taken place or if an individual is at significant risk. You do have the responsibility however to raise any concerns you

may have and all complaints, allegations, or suspicions must be taken seriously. You may become aware of abuse by:

- A child or adult at risk telling you, directly or inadvertently – in person, over the phone, or via email
- Someone else reporting that a child or adult at risk has told them or that they strongly believe that a child or adult at risk has been abused
- An individual might show some signs of physical injury or neglect for which there appears to be no satisfactory explanation
- An individual's behaviour may indicate that it is likely that she or he is being abused. E.g risk taking behaviour, withdrawn, sudden change in temperament
- Observing one child or adult at risk abuse another

3. Responding to Suspicions of Abuse

If you suspect abuse:

You should notify the Designated Safeguarding Officer of the host organisation if working in a hospital, residential setting or school; or with W&T-led activity, you should contact W&T's General Manager (W&T's DSO). If you suspect that this individual is actually the source of the problem, you should make your concerns known to another member of staff (in line with the Lead organisation's safeguarding procedures). Should the designated member of staff be under suspicion, please refer to section 5 in this policy: Responding to Allegations of Abuse against a Member of Staff.

- You could raise relevant concerns or test out doubts by contacting the relevant safeguarding board (adults or children):

Birmingham Safeguarding Children's Partnership

If you have any concerns about the safety or welfare of a young person telephone the Children's Advice & Support Service (CASS) on 0121 303 1888 or e-mail: cass@birmingham.gov.uk. Outside of normal office hours please call 0121 675 4806 for the Emergency Duty Team.

Birmingham Safeguarding Adults Board

If you suspect abuse, call Birmingham City Council on 0121 303 1234 or email: ACAP@birmingham.gov.uk Outside of normal office hours please call 0121 675 4806 for the Emergency Duty Team.

Details of other local authorities can be found here: <https://www.gov.uk/find-local-council>

- **If you think someone is in immediate danger, phone the police on 999.**
- Make a note for your own records of what you witnessed as well as your response.
- Report to Women & Theatre General Manager (designated member of staff) what has happened and any action has been taken.

4. Responding to a Child or Adult at risk disclosing to you

It is possible that a child or adult at risk who is or has suffered abuse will confide in you. This is something you should be prepared for and must handle carefully. The following action should be:

- Stay calm, and not look shocked or disturbed.
- Make sure someone is aware of where you are and can see you or where possible another responsible adult is present.
- Listen carefully to what is said and allow the person to tell you at their own pace.
- Ask questions only for clarification for example if you don't understand a specific word or they are speaking quietly. Don't ask questions that suggest a particular answer.

- Don't promise to 'keep it a secret'. Explain that you will need to share the information with others. Make it clear that you will only tell the people who need to know and who should be able to help.
- Reassure the individual that 'they did the right thing' in telling someone.
- Tell the individual what you are going to do next.
- Speak immediately to the person who has designated responsibility for safeguarding– which might be the DSO at host venue/organisation (e.g. Head teacher or Day Centre Manager) or W&T's DSO. It is that person's responsibility to liaise with relevant authorities, usually the local Adult or Children's Safeguarding Board. As soon as possible, make a note of what was said during the disclosing conversation, using the child or adult at risk's own words. Note the date, time, any names that were involved or mentioned, who you gave the information to. Make sure you sign and date your record.
- Report to Women & Theatre General Manager (designated member of staff) what has happened and what action has been taken.

5. Responding to Allegations of Abuse against a Member of Staff

Any suspicion, allegation or actual abuse of a child or adult at risk by a member of staff must be reported to the designated member of staff with responsibility for Safeguarding (General Manager) within 24 hours. If the designated member of staff cannot be contacted, or that member of staff is involved in the allegation, the report should be made to the Artistic Director, or if the Artistic Director or General Manager is involved in the allegation the report should be made to the Chair of the Board.

On being notified of any such matter the designated member of staff shall notify the Artistic Director & Chair and take such steps as she considers necessary to ensure the safety of the individual in question and any other individual who might be at risk

The allegation shall be dealt with under W&T disciplinary procedures.

6. Recording and Reporting Information

A full record should be made as soon as possible of the nature of the allegation and any other relevant information including:

- the date & the time
- the place where the alleged abuse happened
- the name of the complainant and, where different, the name of the individual who has allegedly been abused and any other names mentioned,
- the nature of the alleged abuse
- description of any injuries observed
- the account which has been given of the allegation
- making sure you sign and date it
- Following an allegation, all details of the report and actions taken after shall be made by the designated member of staff including the above plus:
 - Parties who were involved
 - Any action taken by the school or host organisation to investigate the matter further
 - Any further action e.g. suspension of a worker
 - Where relevant, reasons why there is no referral to a statutory agency
 - Names of persons reporting and to whom reported

The record should be clear and factual as it may be need as evidence in court. Copies of reports, notes etc. will be kept securely at all times and kept for a period of six years.

7. Confidentiality & Consent to Sharing of Information

The legal principle that 'the welfare of the child or adult at risk is paramount' means that the considerations of confidentiality which might apply to other situations in the organisation should not be allowed to over-ride the right of the child or adult at risk to be protected. However, every effort should be made to ensure confidentiality is maintained for all concerned when an allegation has been made and is being investigated. Promises of confidentiality should not be given as the matter may develop in such a way that these cannot be honoured. If a complaint or allegation is made against a member of staff, he or she will be made aware of his or her rights under both employment law and internal disciplinary procedures. Confidentiality will be maintained including safe handling, storage and disposal of any information provided on artists. (Data Protection Act 1998)

Consent

WORKING TOGETHER TO SAFEGUARD CHILDREN 2018 GUIDANCE

You do not need consent to share personal information or report concerns about a child. Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's safety at risk.

ADULTS AT RISK:

You must always seek consent and respect an individual's right to choice. However if you feel that any of the following are present then consent may not be needed. You should always give this careful consideration:

- other people are, or may be, at risk, including children
- sharing could prevent a crime
- the alleged abuser has care and support needs of their own and may also be at risk
- a serious crime has been committed
- members of staff are implicated
- the person may be being coerced
- the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral
- a court order or other legal authority has asked for information.

<https://www.scie.org.uk/safeguarding/adults/practice/sharing-information>

Reviewed and adopted by Women & Theatre Board on Wednesday 14 September 2022