

# Christchurch Tramping Club Brian Dougan Youth Programme

## Policies

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<sup>1</sup> Final version 25 August 2024

## 1 Introduction

Tramping contributes to social, mental and physical health and skills. Research by Sport NZ has shown decreasing levels of involvement in physical activity by young New Zealanders. Countering this, the Christchurch Tramping Club (CTC) promotes tramping, recruits new members, and therefore makes a positive difference to community health and well-being.<sup>2</sup>

There are groups within New Zealand's society, notably Māori, Pasifika, ethnic minorities and people in adverse socio-economic circumstances, which on average don't have the same opportunities to go tramping as others, thereby being directly disadvantaged due to missing out on its many benefits. This has also led to the tramping community not being a good reflection of the diversity of New Zealand's society as a whole.

The Brian Dougan Youth Programme (BDYP) as an initiative of the CTC will contribute to rectifying these imbalances by introducing tramping to high school students who otherwise experience barriers to such activities. The BDYP takes these young people on easy and easy-moderate tramps to provide outdoor experience and develop fitness and risk awareness. The BDYP also aims to provide a pathway to longer-term involvement in tramping for the students through its affiliation with the CTC. Developing appreciation of backcountry New Zealand and the need to look after it will be an additional long-term benefit provided by the BDYP.

BDYP activities provide students with opportunities to:

- develop and test communication and teamwork skills;
- increase initiative, self-reliance, self-confidence and trust in others;
- obtain a sense of individual and group achievement;
- improve interpersonal relationships and decision-making about such relationships;
- learn the importance of considerate behaviour, leadership, decision-making and respect for others;
- increase resilience;
- improve ability to assess and mitigate risks;
- increase environmental awareness;
- have fun and excitement through activity outdoors in awesome places.

Affiliation with the CTC requires provision of governance by the CTC Committee, who provide this function for the club. Importantly, the BDYP must manage a number of risks to prevent any significant issues and incidents. Safety is top priority, and thorough preparation and competent execution according to well-prepared systems is required to minimise such risks, and to ensure the good name and reputation of the Club is maintained.

The overarching policies for the BYDP documented here have been endorsed by the CTC Committee, and the BDYP operates auditable systems to meet these. These policies together with the BDYP's systems and regular reporting to the Committee provide assurance that the programme is in good hands. In addition, should further assurance be required, a solid foundation enabling detailed programme review and/or audit is provided.

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<sup>2</sup> Espiner *et al.* (LEAP Research Report No. 56, March 2021) report the benefits of outdoor experiences for young people to include personal and social development, improved health and wellbeing and better educational outcomes.

## Document and Version Control

This document:

- is the property of the CTC;
- is kept in hard copy by the BDYP Coordinator (Programme Coordinator);
- is kept in electronic form in the archives of the CTC and the BDYP.
- is publicly accessible via CTC Website URL: <https://ctc.org.nz/index.php/about-the-ctc/youth-programme>
- and Youth Programme Facebook page: <https://www.facebook.com/BrianDouganYP>

Obsolete versions of this Policy document are to be clearly marked as such, archived by the BDYP Coordinator and kept for a minimum of seven years.

### CTC Committee Approval

The CTC Committee approves the policies in this document, and the BDYP Coordinator and it's volunteers are expected to conform to these requirements. Documented systems and procedures are required, .

These Policies were ratified at the Committee meeting held on Monday 12 Sept. 2022. Note that the signed copy is stored in the programme files.

2022.

Signature	Name	Date	Position
	Natasha Sydorenko		President
	Michal Klajban		Club Captain

### Document amendment history

Version	Amendments Made	Approved / Date
1.0	Commencement	Liz Wightwick/ Barney Stephenson / 7 April 2022
1.1	Version 1 Approval	CTC Committee 12 Sept 2022
1.2	Minor adjustments by Chris McHarg and Bryce Williamson	25 Oct 2022
1.3	Emergency contact section	10 Feb 2023
1.4	Volunteer to Student Ratio change to 1:5 from 1:4	24 Aug 2024

## Programme Objectives

The BDYP's goal is to broaden tramping participation by Kiwis from lower socio-economic groups, with a focus on Māori, Pasifika and other non-Pakeha ethnicities.

The BDYP objectives are to:

- Engage with high equity index (lower decile) schools and arrange tramping events for interested students;
- Develop a core of suitability experienced volunteers within the CTC who can assist with running trips;
- Balance delivery of the BDYP with available resources, and explore how to expand to other schools given initiation with Hagley High School;
- Provide a positive and safe experience for all participants which develops their interest and enthusiasm to go tramping.

## Programme Entry Criteria

Students over 15 years old are eligible to participate.

Ethnic minority students have first priority.

As students self-select into the programme, no one will be excluded from their first trip but after participating in two or three trips, will be encouraged to join the CTC as members.

## Informed Consent

Parents/caregivers must authorise participation by signing an informed consent form and an enrolment form providing birthdate and age and any safety, fitness, disability, nutritional and other concerns etc.

The BDYP will provide all participants and their family/ whanau/caregivers with the information they need to provide their consent.

Informed consent means that relevant information is provided and understood to enable reasoned decisions to be made.

A detailed description of the trip and what it entails, its benefits and its risks and their management will be provided to the parents/caregivers and they will have opportunity to raise questions and concerns.

## Health and Safety

While the Health and Safety in Employment Act 2015 does not apply to volunteers participating in sports and recreation, the Committee has agreed to implement a health and safety policy which aligns with the Act to prevent harm to BDYP participants and volunteers.

Safety is top priority, and these requirements cover everyone who is involved in the BDYP.

Safety provisions are a key element of BDYP input on trips. A ratio of one Volunteer leader to five students but two leaders per trip (ratio 2:10). For safety reasons there will be no alcohol or recreational drugs on trips. Provision will be made for all the known risks associated with tramping. Each trip will be reviewed on completion to identify any issues that emerge, and these will be recorded and reported to the BDYP Coordinator, together with recommendations for resolution. This may include new and unforeseen concerns. The BDYP Coordinator will ensure procedures are appropriately amended and that all volunteers are notified and made aware. The BDYP Coordinator will advise the CTC President/Captain if Policy revision is warranted. Well known tramping hazards include river crossings, rock fall, falling (particularly on steep ground), hypo- and hyperthermia, getting lost, inadequate nutrition, dehydration, injury and sickness.

The programme is required to comply with Government's provisions for managing the Covid-19 pandemic and any other current health regulatory concerns that maybe in force at the time e.g.

<https://covid19.govt.nz/about-our-covid-19-response/legislation-and-key-documents/> .

A Health and Safety Checklist will be prepared for each trip to cover:

- Locality and destination (e.g. Lewis Pass, Magdalene Hut via Boyle River);
- Start and end dates;
- Names and contact details for emergency contacts;
- Names and contact details for parent/caregiver/next of kin of all people on the trip (volunteers and students);
- Covid-19 vaccination/other required health status of all participants;
- Itinerary, including all huts and places where intentions will be recorded;
- Hazards, including river crossings and if the trip might be held up somewhere owing to e.g. heavy rain and flooding;
- Details of PLBs and the Garmin InReach carried by the party;
- Names of people with current Outdoor First Aid training;
- Vehicle registrations and where parked.
- All above information will be emailed to the CTC BYYP CHCH-based Emergency Contacts as well as President, Vice President, Club Captain and Secretary, along with attached documents -Safety Plan, Spreadsheets of participant info, Spreadsheet of volunteer information plus a list of procedures to carry out for any incident or emergency.

The CTC President, Vice-President, Captain, Secretary, BDYP Coordinator and delegated volunteers covering the CTC Christchurch-based Emergency Procedure will have access to this information and know where to find it if required.

A, easy to read reference guide to the Health and Safety in Employment Act 2015 can be found at: <https://worksafe.govt.nz/dmsdocument/809-health-and-safety-at-work-quick-reference-guide>

Worksafe NZ provides details of all the health and safety policies an organisation must have by law at: <http://www.worksafe.govt.nz/worksafe/>

## Interpersonal Behaviour

Respectful behaviour and people enjoying each other's company without feeling threatened makes a substantial contribution to enjoyable and safe tramping.

All contact with BDYP participants and their families will be culturally appropriate and positive. Ethnicity, culture, spiritual values and beliefs will be respected.

## Cultural Responsiveness

In light of the core goals of BDYP, cultural responsiveness will be of significant importance to the program's success. This requires sensitivity and care. As with any other part of an individual's background, one key to achieving this is being open to and embracing of the participant's cultural uniqueness in a way and to the extent that the participant desires. This is best done with tact and initiated by the participant where possible, as unexpected focus on their background (especially in a group situation) may not necessarily be welcome or be comfortable for the participant.

## Offensive Behaviour

The Youth Programme will not tolerate offensive behaviour. This applies to all CTC members who contribute to the Youth Programme and includes all contact with families/caregivers.

Racism, bigotry, sexism, gender discrimination and criticism of religious or political beliefs are unacceptable.

Offensive behaviour is used here to cover a broad range of concerns and includes bullying, verbal abuse and demeaning minorities, sexual harassment and violation, recklessness, and breaching trust or authority:

- Bullying covers verbal or physical behaviour, which is aggressive, intimidating and threatening, either directly person to person or indirectly by electronic or other means (e.g. spreading false and derogatory rumours about people);
- Verbal abuse which is personal and demeaning and may include derogatory comments about culture, ethnicity, race, religion, gender, sexuality, age, handicaps and physical disabilities;
- Physical assault -from relatively minor pushing and prodding to serious physical harm;
- Sexual harassment and violation, covering unsolicited and unwelcome sexual advances, causing discomfort and distress, whether in person or by electronic or other means.
- Behaviour or leadership which places group members in unnecessary danger through either recklessness or deliberate disregard for others' personal safety (e.g. taking people outside their comfort zone and beyond their level of skill).
- Behaviour by a person in a position of trust or authority which is outside the bounds of their mandate and particularly if it is beyond the bounds of informed consent.
- Some forms of offensive behaviour can consist of a pattern of episodes which when taken in isolation are not offensive, but over time and in their totality are, whether carried out by an individual or group of individuals. This includes being overly familiar with people which if persistent can become objectionable to those who receive it.

There are now expectations that offensive behaviour will be reported to those who are equipped to deal with it and particularly those instances where the law has been broken. All of the above can be the subject of official inquiry by the Police and other Government bodies. The CTC has developed an excellent reputation as a great club to go tramping with and looks after its members. Given the CTC has no tolerance for unacceptable behaviour, particularly as negative events are remembered and

reputation is jeopardised, the BDYP will seek feedback on negative interactions that might be experienced and will seek prompt resolution based on well-established facts.

## Trip Leader/Trip Volunteer Role

Volunteers contributing to the CTC Youth Programme will have a worthwhile role that makes a significant contribution. The CTC welcomes and thoroughly appreciates this input and encourages suitably qualified members to participate.

Trip Leader/ Trip Volunteers will be:

- Experienced trampers, with a minimum of one year involvement (for trip assistants) and three years involvement (for trip leaders) including undertaking overnight Moderate trips, and be able to provide sound advice including on safety, managing terrain, river crossing, nutrition and fit for purpose equipment;
- Able to provide clear and easily understood briefings in an engaging way;
- Well versed in acceptable behaviour that is sensitive to cultural norms, and able to meet requirements for cultural sensitivity and interpersonal behaviour;
- Able to maintain and enhance the good name of the Club and its reputation.

Trip Leader/ Trip Volunteers will undergo Police vetting and will follow the policy on Cultural Responsiveness and Interpersonal Behaviour.

## Volunteer Police Vetting

All CTC Members volunteering to assist students under this programme will undergo Police vetting. The BDYP is partnering with secondary schools and must meet the Ministry of Education's best-practice guidelines, which require Police vetting.

The New Zealand Police Vetting Service ("**Vetting Service**") undertakes criminal history checks to provide assurance about people providing care to children and vulnerable members of society.

The results from vetting are strictly confidential.

The BDYP Co-ordinator will advise the Applicant if any concerns arise, and may decide to either:

1. Decline the application; or
2. Request the Applicant's permission to hold a meeting of a Vetting Panel (see below.)

A Vetting Panel will be convened and chaired by the CTC President, and will comprise the President, the CTC Captain and the BDYP Co-ordinator. The Panel will consider the vetting report and any other relevant factors, and can approve involvement in the BDYP if they are satisfied that safety and wellbeing of participants will not be compromised. The Panel will also specify any mitigating actions that are required. The Panel must reach unanimous agreement if such an application is to be approved. There are no appeals, and the Panel is not required to justify a decision to the Applicant.

The Panel may convene in person or by electronic means, including by email correspondence. The Panel will have access to the Vetting Report and may ask for further information from the Applicant or conduct an interview.

### **Approved List, access and data**

A list of approved Applicants ("**Volunteers**") will be maintained by the Co-ordinator ("**Approved List**"). The Approved List shall record names, contact information, date of birth and date of approval.

The Approved List shall be available to the following Club officers:

- President
- Vice President
- Captain
- Secretary
- BDYP Co-ordinator

At the discretion of the BDYP Co-ordinator, information in the Approved List shall also be made available to relevant external organisations where reasonably required. Such organisations might include schools, youth organisations, the Police, Oranga Tamariki or similar bodies. Information sharing may be required to facilitate trips or be legally required.

The BDYP Co-ordinator shall maintain an electronic copy of the Report for each Volunteer for as long as that person remains on the Approved List. Volunteers remain on the approved list indefinitely, except:

- They may request to be removed from the Approved List at any time. On such a request, the relevant entry in the Approved List will be permanently deleted, along with the associated Report, and that person will no longer be permitted to contribute to the Youth Programme.
- The BDYP Co-ordinator, Captain or President may remove a Volunteer for any reason, which might include setting a time limit by which that Volunteer will need to provide a new Police Vetting Report to remain on the list.

If new information about an existing Volunteer confirms a child welfare concern, this Volunteer shall be removed from the Approved List. At the request of a removed Volunteer, a Panel may be convened to consider whether that person should be reinstated to the Approved List. New information can include a Volunteer's conduct.

### **Declined list**

A list of declined Applicants ("**Declined List**") shall be maintained by the BDYP Co-ordinator. The Declined List will contain only the name of Applicants, dates of birth, and dates of declinature. No record of the reason for declinature shall be retained. The list is strictly confidential and shall only be available to:

- President
- Vice President
- Captain
- Secretary
- Youth Programme Co-ordinator

Reports for declined Applicants or withdrawn applications are to be permanently destroyed. The Declined List will not be made available to any other organisations or individuals, including other members of the CTC.



No applications from persons on the Declined List shall be considered. Entries on the Declined List shall be retained for at least five years. Declined Applicants are not entitled to have their entry removed.

## Trip Planning and Management

Trips will usually be run during late spring, summer and early to mid-autumn (October to April).

A planned schedule of events will be prepared to meet the available budget and estimated number of students who will participate.

Trips will be classed as Easy and with time, Easy-moderate, and they will be held in suitable places where travel and time costs can be managed. Venues might include Port Hills and Banks Peninsula close to Christchurch, The Craigieburn Range, Arthurs Pass, Lewis Pass and Hakatere. While all these localities have trips meeting the criteria, they all have terrain which can be hard with injury risk, and exposure to dangerous weather.

The BDYP Coordinator will ensure a plan is prepared for each trip covering:

- route information, including maps and terrain descriptions;
- clothing and gear needs, including a list of items available for loan (for no cost)
- travel arrangements, departure venue and time, means of transport etc.;
- food and cooking arrangements;
- overnight arrangements (huts (at no cost to students or volunteers as covered by the programme) tents, bivouacs and sleeping groups);
- the Safety Plan;
- the BDYP complaints policy and procedures;
- any questions from Participants or their parents/guardians.

## Gear and Clothing

All trip participants will be equipped so that they have a safe and enjoyable experience. Top priority is to keep warm in the rain and cold, and cool and sunburn-free on sunny days. They will have a comfortable and warm night's rest on overnight trips, and footwear will be adequate but not necessarily perfect (students provide their own boots or runners). Participants might experience blisters, but footwear must not contribute to increased injury risk. Most trampers experience getting wet in the rain in their parkas, and wet weather gear will be adequate to keep out the wind and manage moisture and warmth.

Prevention of hypothermia, hyperthermia and sunburn are essential, and clothing and equipment must be carried to ensure these are prevented for the whole of a trip. Standard practice is for each person to carry at least three upper body layers of either polyester/polypropylene or wool, a pair of long johns, a beanie or balaclava, a waterproof/windproof parka and a sun hat. Additional leg protection (e.g. over-trousers) may also be needed according to expected weather and individuals. Each person will carry a change of dry and warm clothing in a waterproof bag. As well as dry clothing, emergency shelter may be needed and must be provided for. Emergency shelter must enable the party to keep dry and adequately protected from the wind.

## Food

As this programme targets ethnic minority and lower socioeconomic students over 15 years, the CTC Committee have agreed to waive food costs if this trip leader agrees, for the students and the

evening meal for volunteers, provided grant funding fully covers this cost. Students and Trip Leader/ Trip Volunteers may be instructed to bring breakfasts, lunch, and snacks if grant funding is tight. Evening meals will be provided free of charge to all if this trip leader prefers.

Students will receive clear instructions on nutrition and hydration before they go on trips and will have gained a good background knowledge by participating in the programme. The BDYP Coordinator will ensure that adequate nutrition is carried for all participants, to cover breakfast, lunch, dinner and snacks. Main meals will consist of sufficient protein, carbohydrate, fat and bulk/fibre to cover nutritional needs, and high energy snacks of carbohydrate and fat to sustain effort while walking. Maintaining hydration is essential and provision of safe drinking water is required. Water from mountain fed streams and rivers is usually ok, but contamination from stock, high use huts and tracks and current rainfall must be taken into account, and boiling or filtering might be required. Participants must not get water-borne sickness.

## Transport

Transport is provided free of charge to participants and volunteers.

One of the riskiest elements of tramping is travel to and from the track. The return has the added risk of tiredness after walking and of the driver going to sleep at the wheel.

Safe transport will be provided for each trip.

Vehicles may be hired or privately owned and must be well maintained showing evidence of being serviced according to manufacturer's schedules, have sound tyres with regulation tread depth, and a current Warrant of Fitness.

Drivers must have a current driver's licence a copy of which will be stored on YP files. They must be experienced and either hold an Advanced Drivers licence or known to be reliable/competent. A back up driver on each trip is recommended, who can take over if/when tiredness occurs.

Drivers will not drink alcohol or be under the influence of drugs (including prescription medications that cause drowsiness or impaired judgement).

A back-up plan is required to manage tiredness, firstly to identify when the driver is tired and drowsy, and secondly to either change with someone else who is qualified to drive or to take re-energising action (e.g. stopping for a rest and food and drink (coffee), playing energising music etc.).

All vehicles will be covered by comprehensive insurance to minimise liabilities.

## Evaluation, Reporting and Celebration

The success of the Youth Programme will be evaluated against "the goal is to broaden tramping participation by young Kiwis facing barriers to participation due to socio-economic factors, with a focus on Māori, Pasifika and other non-Pakeha ethnic groups" and the underlying objectives. To support this, the Programme will report routinely to the CTC Committee. In addition, periodic reporting to the wider tramping community will occur, with an aim of raising awareness, exploring options for further development and procuring funding to sustain on-going continuation and growth if appropriate. Reports to external parties will be subject to peer review and approved by the CTC President and Captain.

A report will be prepared for the BDYP Coordinator for each trip covering goals/objectives, trip plan, student participation and any issues that arose, student feedback and results/outcomes. These reports must cover concerns that arose and actions that resulted as well as the positive outcomes.

Summary reports (max half a page) covering activities and main points will be provided to the CTC Committee every month, detailing number of trips completed, number of participants, major issues that must be reported, and a brief evaluation of success. The Committee members will be notified of trip reports for further reference if needed.

Reports listing trips completed, students partaking and numbers of trips per student, achievements and issues and their resolution will be prepared as required by funders, the school and parents/caregivers. Anything compromising safety or programme delivery must be covered, and minor issues by discretion but not too overload with superfluous detail. Discretion must prevent any surprising revelations surfacing at a later date i.e. nothing that will cause concern and imply there was a cover up.

At the end of each year a get-together will be held which will include funding representatives, where participant achievements (most improved, demonstrated persistence over calamities etc) will be recognised together with outstanding contributions from volunteers. As appropriate, articles on the programme can be contributed to Wilderness Magazine, FMC Backcountry Bulletin, and newspaper/TV/radio press releases. Articles will be approved by the CTC President and Captain, representing the CTC Committee.

## Privacy

Respecting privacy and confidentiality is essential to avoid issues and retain trust and goodwill from all involved. To assist managing trips and to minimise the occurrence of conflict, health and safety issues, personal information is required from volunteers and participants to ensure people are well suited and sufficiently fit, and the right decisions are made about involvement. Secure storage and management of this information is required, and anyone with access (includes direct access and inclusion in the communication chain) must be trusted to maintain confidentiality. Any breach of confidentiality may compromise the programme and its success.

- Programme records will be kept secure and unauthorised people will not have access;
- Where personal information is discussed with leaders and others responsible for managing the BDYP, details will not be passed on to anyone else outside the BDYP management and leadership group;
- Generating rumours and gossip is not allowed, and will be regarded as serious misconduct, particularly if there are consequences for the BDYP;
- In event of significant incidents, information may be requested by officials. The BDYP Coordinator will consider implications and may need to consult with the CTC President, trip leaders and the school. Legal advice may be required.
- The programme will meet legal requirements, notably the Privacy Act 2020 and the privacy principles.

The Programme Coordinator will establish procedures that ensure privacy, confidentiality and associated legal obligations are met.

## Conflict of Interest

An extract from “Managing conflicts of interest: A guide for the public sector”

(<https://oag.parliament.nz/2020/conflicts/docs/conflicts-of-interest.pdf> ) follows:

“A conflict of interest is where the responsibilities you have as an employee or office holder in a public organisation are affected by some other interest you have in your private life. That other interest could be a relationship, a role in another organisation, or a business interest. Having a conflict of interest does not necessarily mean you have done anything wrong. If the conflict is handled well, it does not have to be a problem. Conflicts can arise in many situations. Some are serious, some less so, and some are unavoidable. But, in any situation where activities are carried out in the public interest or paid for out of public funds, the public needs to be confident that decisions:

- are made impartially and for the right reasons; and
- are not influenced by personal interests or ulterior motives.

That means, if you are working in the public sector, you need to be able to:

- identify the different interests you have;
- recognise if you might have a conflict;
- understand how serious it is and what risks it gives rise to, for both you and the organisation you work for; and
- understand what to do about it.”

And from Charities Services (<https://www.charities.govt.nz/im-a-registered-charity/running-your-charity/conflict-of-interestpanga-rongorua/>):

“A conflict of interest is any situation where a person’s personal interest or loyalties could affect their ability to make a decision in the best interest of the charity. A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

It is common for conflicts of interest to occur in charities of all types and sizes, particularly where people are related by blood, marriage, or domestic partnership. Conflicts of interest do not have to be a serious problem. However, if they’re not well managed, they could lead to decisions which are not in the best interests of the charity, create disputes, or damage a charity’s reputation. Even a perceived conflict of interest can damage a charity’s reputation.”

Conflicts of Interest must be identified, declared and managed appropriately to maintain the CTC’s and Programme’s reputation and minimise any consequential risks.

Risks include loss of trust and associated consequences, which might include impacts on funding and future funding opportunities, and the need to divert effort into addressing the questions that might arise. Significant conflicts might include funding arrangements or favouritism in regards people involved in the Programme and will at least impact reputation and in extreme cases might lead to legal challenge and financial cost.

Everyone involved in the programme will be informed about the CTC's requirement for a conflict of interest to be identified and declared, and will understand what must be covered and how and when to do this.

Conflicts of interest include financial, private/personal, or business interests which might unfairly influence Programme decision making. Situations where this might occur include:

- Advice provided, which must be impartial and objective;
- A decision where impartial advice has been deliberately overridden or has not been sought;
- A Programme representative whose actions enable them to derive benefit.

Declaration of a conflict is required because this enables the risk to be identified and taken into account even if it doesn't change the result:

- In some cases where a conflict would be hard to defend under public scrutiny, the person with the conflict must withdraw their input.
- In others their input may continue as declaration highlights the risk and the Programme then must be able to demonstrate the risk was managed without compromising integrity.

Transparency (openly disclosed information) and appropriate decision making in the public eye prevail.

## Complaints

Complaints may occur, and they must be managed to ensure:

- They are registered and acted on;
- Fair and transparent process is followed to establish the facts and demonstrate appropriate follow-up action.

There may be times when the cause of a complaint is outside the programme, and investigation showed that the programme conducted itself properly and did nothing wrong. If explanation fails to satisfy the complainant and there is further negativity for the CTC and the Programme, the BDYP Coordinator will work with the school to resolve things as much as possible and if necessary, will include the CTC President and Captain. Closing out may mean that the complainant is still dissatisfied, but that the facts have been recorded and demonstrate to an independent party that the Programme is without blame.

Documentation of complaints will be factual and inflammatory language will not be used.

Parents/caregivers will be notified of facility to make complaints, and policy and procedure will be available, including on the CTC and programme's website.

Effective management of complaints will demonstrate competent management and maintain and enhance the good reputation of the CTC and the Youth Programme.