

Safeguarding People Policy

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Safeguarding People Policy

1. Introduction

The company fully recognises its legal and moral duty to ensure that the company functions with a view to safeguarding and promoting the health and welfare of students receiving education and training at with the company.

The company also believes it can and should play a positive role in safeguarding the wider community, particularly in workplace learning where our staff may see vulnerable adults or children whom we can help to protect by being aware of the safeguarding duty of our learners and employers towards these individuals and to support them in meeting this duty.

This policy applies to all staff including part time, full time, permanent, temporary or agency, whether teaching, administrative, management or support, as well as volunteers and visitors. The word “staff” is throughout this policy used for ease of description.

This policy covers all members of the college community but highlights specific reference to safeguarding children and vulnerable adults. Definitions of these categories are as follows:

1.1. Definitions

Our broad definition of a child is:

“Anyone who has not reached their 18th birthday”

‘Children’ therefore means ‘children and young people’. The fact that a child has reached 16 years of age, is living independently or is in further education does not change his or her status.

Our broad definition of a vulnerable adult is:

“Anyone aged 18 years and over who are dependent on family members, their social network, professionals or volunteers, as a result of a special need arising from the ageing process, physical or mental ill-health, learning disability or physical or sensory impairment.”

It is the level of dependency in respect of the meeting of basic needs that renders these adults particularly vulnerable. Vulnerable adults may be victims and/or abusers and they may themselves be in a caring role.

2. Principles

The company fully recognises the responsibility it has regarding safeguarding and promoting the welfare of children, young people and vulnerable adult students.

This policy is designed to provide guidance for members of staff in dealing with suspicions of, and incidents of abuse. Whilst any member of staff can make a referral to Social Care, any final decisions in relation to referral to appropriate agencies will be made by the designated safeguarding lead.

It is the responsibility of all members of staff to record and report concerns under this policy.

This policy makes the company's protection responsibilities clear and gives the authority to dismiss or otherwise discipline employees who fail in this duty.

The company's priorities with regard to Safeguarding are to:

- Establish and maintain an environment where learners are safe, feel secure, are encouraged to talk and are listened to
- Take appropriate action to see that individuals are kept safe at work, in training and at home or within the wider community.
- Ensure learners know that there are adults in the Company whom they can approach if they are worried
- Seek to include appropriate opportunities in the curriculum for learners to develop the skills they need to recognise and stay safe from abuse
- Ensure it has a designated senior manager to oversee the safeguarding of children and vulnerable adults
- Ensure that all members of staff have knowledge and training to enable them to identify Safeguarding concerns at the earliest opportunities
- Identify concerns regarding people who may be being subject to radicalisation.
- Ensure that safe recruitment practices are always followed including carrying out checks on new staff and volunteers.

The company will also have regard to the procedures and guidance issued by Local Safeguarding Children Boards, Local Safeguarding Adults Boards, and the Department for Children, Schools and Families when implementing this policy and in training our staff.

3. Types of Abuse

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or in an institutional or community setting, by those known to them, or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children. In most cases, multiple issues will overlap with one another.

3.1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a person. Physical harm may also be caused when a parent or carer feigns the

symptoms of, or deliberately causes ill health to a young person who they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen's syndrome by proxy'. This may also include inappropriate restraint or sanction or the misuse of medication.

3.2. Abuse of Trust

All staff need to know that inappropriate behaviour with or towards children, young people or vulnerable adults is unacceptable. In particular, under the Sexual Offences Act 2003 it is an offence for a person of any age who is in a position of trust (e.g. teacher, youth worker) to have a sexual relationship with a child or young person (under the age of 18) or with a vulnerable adult, even if the relationship is consensual. This applies where the child, young person or vulnerable adult is in fulltime education and the person works in the same establishment as the child, young person or vulnerable adult, even if he/she does not teach them

3.3. Emotional Abuse

Emotional Abuse is the persistent emotional ill-treatment of a person such as to cause severe and persistent effects on the person's emotional development. It may involve conveying to the person that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed in young people.

It may include not giving the opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include interactions that are beyond the individual's development capability, as well as overprotection and limitation of exploration and learning, or preventing the participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, serious bullying (including cyber bullying), causing an individual frequently to feel frightened or in danger, or the exploitation or corruption of an individual.

Some level of emotional abuse is involved in an all types of maltreatment of an individual, though it may occur alone.

3.4. Sexual Abuse

Sexual Abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the person is aware of what is happening. The activities may involve physical contact, including assault by penetration (eg rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may include non-contact activities, such as involving individuals in looking at, or in the production of, sexual images, watching sexual activities, encouraging an individual to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children.

3.5. Neglect

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of material substance abuse.

Neglect may involve a parent or carer failing to:

- provide adequate food, shelter and clothing,
- protect a person from physical and emotional harm or danger,
- ensure adequate supervision (including use of inadequate care-givers),
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

3.6. Significant Harm

Some people may be in need because they are suffering or likely to suffer significant harm. Significant harm is the threshold that justifies compulsory intervention in family life in the best interest of the person.

Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development.

3.7. Psychological Abuse

Psychological abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, harassment, isolation and or withdrawal of services or supportive networks. This can also include cyberbullying through platforms on the internet such as social networking sites.

3.8. Discriminatory Abuse

Discriminatory abuse includes racist and sexual abuse that is based upon the individual's disability, belief or culture.

3.9. Financial Abuse

Financial abuse relates to the unauthorised and improper use of funds, money or resources belonging to the individual.

3.10. Institutional Abuse

Institutional abuse includes the practice of an abusive regime or culture which destroys the dignity and respect to which every person is entitled. It is the mistreatment of people brought about by poor or inadequate care or support, and poor practice that affects the whole setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

4. Designated Staff

The Board of Directors will nominate a Safeguarding Officer to have overall responsibility for safeguarding / child protection issues. The Safeguarding Officer will in turn appoint a Deputy Safeguarding Officer to assist and ensure, as far as possible, that a safeguarding lead is available at all times.

The Safeguarding Officer may appoint other members of staff to assist them, where required, to take responsibility for safeguarding issues for a particular geographical area or element of the procedure. Such staff will be known as Designated Staff Members.

The Safeguarding Officer is ultimately responsible for co-ordinating action within the company and liaising with other agencies.

To accompany this policy there is a separate annex document which details all staff with responsibility for Safeguarding.

The Safeguarding Officer will:

- know how to identify the signs and symptoms of abuse and when to make a referral
- know the Local Child Protection Boards child protection procedures and the Safeguarding Officer's role within them
- know the local Safeguarding Adults Boards procedures for protecting vulnerable adults the role and responsibilities of the investigating agencies and how to liaise with them
- know the requirements of record keeping
- know the content of the training given to staff and how other members of staff can make an appropriate contribution to it
- take responsibility for promoting positive safeguarding procedures and practice within the organisation
- assess the safeguarding development needs of all staff and volunteers and co-ordinate the training

- keep staff and volunteers informed of good practice and new legislation and guidance

5. Reports of Abuse

5.1. From Employees

It is the responsibility of all staff working within the company to record and report safeguarding concerns, i.e. where they believe a young person or vulnerable adult has been or is at risk of abuse listed above, neglect or significant harm.

If you suspect, or have had reported to you, any form of abuse of a vulnerable person, or of a vulnerable person being put at risk you must act immediately. This can include any of the above

For the purposes of this procedure the relevant Designated Person (where applicable), the company's Safeguarding Officer or their Deputy will be collectively referred to as the 'Safeguarding Official'.

1. As soon as you suspect or know of any abuse of any young person or vulnerable adult, you should immediately inform the Safeguarding Official in person or by telephone.

Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact the Safeguarding Officer to discuss your concerns.

If none of the Safeguarding Officials are immediately available you should contact a member of the Board of Directors.

Note: You should also contact the Safeguarding Official if you know or suspect that a member of staff or student has a previous history of abuse of young people or vulnerable adults so that appropriate action can be taken.

Warning: You must not try to investigate the matter on your own. Generally speaking, staff are not equipped or qualified to do so.

2. The Safeguarding Official will immediately decide whether an investigation is required. Where they are not the Safeguarding Officer and require further clarification they should contact the Safeguarding Officer immediately. If it is still unclear whether further investigation should occur, then an investigation should be started.

Such a decision should take place within 1 working hour and at any case no more than 4 working hours. Normally the decision is expected to be made during the initial conversation with the person reporting it.

3. If, following initial contact with the relevant Safeguarding Official, it is decided that the matter should be taken further the Safeguarding Official will immediately allocate someone to lead the investigation.
4. As soon as further investigation is confirmed the staff member raising the concern must prepare a written report on the appropriate form. This is essential to prevent any misrepresentation of your findings and must be sent to the person leading the investigation within 1 working day of the suspicion arising.

This report must be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to the suspicions, or the account given of abuse by the person concerned as accurately as possible. The Safeguarding Official(s) can give support and advice in completing this report if required.

5. The report should be signed, dated and a copy stored in a secure place by the person raising the concern(s).

The Safeguarding Officer will keep the member(s) of staff who raised the concerns informed as the progress/outcome of the case.

5.2. From External Sources

The company cannot necessarily prescribe the format in which company receives concerns from external sources and therefore does not attempt to.

1. Where the concern is received in writing then it should be passed immediately to the relevant Safeguarding Official. However, if the concern is made in person or by phone then the staff member receiving the concern should write it on the appropriate form using as far as possible the wording used by the person raising the complaint and immediately pass it to the relevant Safeguarding Official.

If none of the Safeguarding Officials are immediately available you should contact a member of the Board of Directors.

Warning: You must not try to investigate the matter on your own. Generally speaking, staff are not equipped or qualified to do so.

2. The Safeguarding Official will immediately decide whether an investigation is required. Where they are not the Safeguarding Officer and require further clarification they should contact the Safeguarding Officer immediately. If it is still unclear whether further investigation should occur, then an investigation should be started.

Such a decision should take place within 1 working hour and at any case no more than 4 working hours.

3. If it is decided that the matter should be taken further the Safeguarding Official will immediately allocate someone to lead the investigation.

5.3. Receiving reports directly from vulnerable people

If a child, young person or vulnerable adult comes to you with a report of apparent abuse, you should listen carefully to the person, using the following guidelines.

When listening to a vulnerable person staff must:

- allow the person to speak without interruption
- never trivialise or exaggerate the issue
- never make suggestions
- never coach or lead the young person in any way
- reassure the person, let them know you are glad they have spoken up and that they are right to do so
- always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the person – spare them having to repeat themselves over and over
- be honest – let them know that you cannot keep this a secret, you will need to tell someone else
- try to remain calm – remember this is not an easy thing for them to do
- do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them
- let the person know that you are taking the matter very seriously
- make the person feel secure and safe without causing them any further anxiety

The relevant Safeguarding Official will be responsible for recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be confined to the Safeguarding Official(s), the Board of Directors and (if not involved in the allegations) the parents / guardians / carers.

5.4. Allegations against Staff

The primary concern of the Company is to ensure the safety of the child or vulnerable adult. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally whatever the validity.

There are occasions where a member of staff is accused of abuse and the allegation is may be false or unfounded. However in some cases the allegations may be true. The company must assume any allegation to be genuine until it is fully investigated and proven to be false.

Any instance of a child / vulnerable adult being abused by a member of staff is particularly serious. On the other hand for an innocent person to be accused of such an act is a serious ordeal which can result in long term damage to their health and career.

Following any allegation the member of staff must be informed and if necessary to ensure children or vulnerable adults are protected the staff member may be suspended or restricted to duties where people are not put at risk.

It is also important, in order to minimise the impact of false allegations, that such cases are investigated swiftly, and that the confidentiality of both the potential victim and the staff member(s) are maintained.

1. In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the relevant Safeguarding Official.

If the allegation concerns the relevant Safeguarding Official the matter should be taken to an alternate Safeguarding Official or if none are available it should be taken to a member of the Board of Directors who will follow the normal procedure in place of the Safeguarding Officer.

2. The member of staff reporting the allegation will be asked to complete the relevant form and it is advised that they keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.
3. If a decision is made to pursue an allegation of abuse against a member of staff then this will be dealt with under the company Disciplinary Procedure.

5.5. Investigating Concerns

The person allocated to lead the Investigation will be referred to as the Investigator for the purposes of this procedure.

1. Taking into account all the information available the Investigator will decide on the next steps which may include taking no further action.
2. The Investigator must decide whether further investigation is required. This may include speaking to potential victim, the employer, the person raising the concern or other staff, or indeed reviewing other evidence such as CCTV footage etc.

Such investigation is not intended to replace the role of the police or other professionals and should only be conducted to the extent of confirming concerns where the initial report is vague or uncertain.

If there is any concern that any investigation could cause further harm or prejudice any future investigation by the police (or other government body), then any such investigation should be ceased immediately and the relevant agency informed.

3. Where the Investigator decides that the concern is valid (or where they cannot decisively dismiss any concern) then they should take further action which should be one or more of the following:
 - Seek further advice from Children and Families First Response Service or Social Services
 - Make a referral to Children and Families First Response Service or Social Services
 - Report the incident to a designated Social Worker
 - Report the matter to the police if a crime is suspected
 - Report the matter to the relevant employer for them to handle under their own Safeguarding procedure
4. If a referral is made this must be confirmed in writing to the appropriate body within 1 working day.
5. Once an investigation is completed it should be sealed and stored securely by the Safeguarding Officer. These records should not be stored with learner files or staff files.
6. If a member of staff does not agree with a decision of the Investigator that no further action was necessary the member of staff should refer these concerns in the first instance to a member of the Board of Directors.
7. If the Director does not recommend further action and the member of staff still has concerns then the member of staff has the right to refer the case directly to relevant Social Services and should at the same time alert the Board of Directors under the Company's Public Interest Disclosure Procedure (the 'Whistleblowing' procedure).

When in doubt, it is always best practise to speak to the relevant body. This may be the police or Social Services. They can then advice whether further investigation or a referral is appropriate.

5.6. Monitoring Referrals

If a referral is made the Safeguarding Official must follow up the referral to ensure it has been progressed. This is particularly important when referring the concern to an employer to deal with.

When referrals have been made to government bodies they may not be allowed to discuss the ongoing investigation. In these cases the Safeguarding Official should ensure they have a reference number or other evidence that the relevant body have receive the complaint.

Where it appears that a referral is not being followed up (for example an employer is brushing the incident under the carpet) then the Safeguarding Official should make a further referral to another body, for example the police.

6. Staff Training

All staff working with students will receive training adequate to familiarise themselves with safeguarding issues and their responsibilities relating to the company's policies and procedures, with regular refresher training at least every 3 years which is in line with LSCB and covers:

- their personal responsibility,
- the company procedures,
- the need to be vigilant in identifying cases of abuse or neglect,
- how to support and to respond to a student who tells of abuse or neglect.

The designated safeguarding lead and other designated staff for safeguarding will undertake refresher training at least every 2 years and will attend further training as and when required to enhance their knowledge and function in this specialist capacity. In addition to their formal training, their knowledge and skills should be updated for all staff, (for example via e-bulletins, meetings other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any development relevant to their role.

Specific Safeguarding Issues

There are specific issues that have become critical issues in Safeguarding, and these are included in teaching and awareness raising activities. All issues will be given training on and the Board of Directors ensure that Staff and Volunteers are familiar with having processes in place to identify, report, and monitor any concerns linked to the following issues:

- Bullying including cyberbullying
- Children missing education
- Child sexual exploitation
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults
- Private fostering (*a 'Privately Fostered' child is a child under the age of 16 (18 if disabled) who is cared for and accommodated by someone other than a parent or close relative* for more than 28 days. *close relatives are step parents, grandparents, brothers/sisters or aunts/uncles*)
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking

7. Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the child or vulnerable adult is the overriding concern. The degree of confidentiality will be governed by the need to protect the child or vulnerable adult who should be informed at the earliest possible stage of the disclosure that the information will be passed on. All conversations regarding a child / vulnerable adult should always be held in private.

The Company complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of a child or vulnerable adult.

Whatever happens, you should always be open and honest with the child or vulnerable adult if you intend to take the case further.

Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the Safeguarding Officer.

Where necessary it is permissible for the Safeguarding Officer to seek advice from other staff or external sources where particular circumstances are outside their knowledge and training. In doing so the identity of the potential victim should be kept confidential wherever possible.

7.1. False allegations from learners

In the event that a learner makes an allegation against a member of staff which is found to be false then all future contact with this learner must be supervised by a second member of staff. This is to enable the learner to continue on the course whilst protecting the relevant staff member.

If the staff member feels unable to continue to work with the learner, then an alternate tutor will be allocated, however the contact will continue to be supervised.

8. Recruitment and Selection

For details of our recruitment and selection process and the steps taken to ensure the safety of vulnerable people please see the Staff Recruitment Policy.

8.1. Criminal Record Checks (Disclosure and Barring Service)

The company will carry out Disclosure and Barring Service (DBS) checks on all staff that will or is likely to have contact with children or vulnerable adults to ensure that no member of staff is employed who has got a criminal conviction that would deem him or her to be a danger to young people or vulnerable adults.

This will include all tutors teaching to young people (for example young apprenticeship programmes) as well as staff who will conduct workplace assessments (such as those delivering childcare or health and social care courses). It also includes staff who may conduct learner interviews, teaching inspections and those who attend employer sites. As such it is likely to include the majority of the company's teaching staff, sales staff and quality staff.

In conducting these checks the company will follow the legislative requirements.

On employment with the company a DBS check will be applied for by Human Resources either prior to employment where this is feasible (i.e. once an offer has been accepted but before their start date) or within the first two weeks of employment.

Human Resources will track the DBS application process and will hold information on:

- Employee name
- Date of commencement of employment
- Date of DBS application
- Date of disclosure receipt
- DBS disclosure number
- Relevant criminal convictions

Receipt of the DBS will be taken by Human Resources. The Human Resources will inform the Board of Directors and relevant line manager if there is any matter within the DBS that causes concern that would affect the employment of an individual. Should this be the case employment will not be offered or be terminated if deemed appropriate.

The company does not currently maintain a definitive list of crimes which are acceptable or otherwise. Each disclosure is reviewed on a case by case basis and various factors taken into account such as the seriousness of the crime, the employee's part in it, how long ago the crime was committed and relevance of this to the role for which they have applied.

9. Prevent Strategy

The Government's Prevent Strategy was introduced in 2007, and re-launched in 2011 with an aim of stopping people becoming or supporting terrorists, and extremist ideology.

Events in the UK and around the world emphasize the need to raise awareness of the Prevent Strategy, particularly within the education sector. Schools, colleges, training providers and universities play a key role in identifying concerns around potential radicalisation.

Vulnerable young people in particular can be targets of radicalisation and extremist groups. Staff within education settings are well placed to observe concerns, and particularly changes in behaviour including, expressions of extremist views and beliefs, social isolation, and even significant changes in appearance. Young people needed to be safeguarded against such activity and any concerns should be reported immediately to the relevant Safeguarding Official.

The Safeguarding Official will know when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals if there are concerns that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

The Company actively supports the Government's Prevent Strategy and we include this in our training for staff.

10. Teaching and Assessing Practices

Teaching and assessing staff must be mind full of ensuring the safety and welfare of their learners and this should be at the forefront of the delivery of programmes, assessment practices, tutorials and on-the-job work placements.

While working with learners at work placements, assessors must be mindful of the safeguarding of vulnerable people; and sensitive to any vulnerable people that their learners are working with.

Identification should be shown by assessors before entering a workplace and appointments booked through the learner and if requested, their supervisor.

One to one tutorials need to be conducted in areas that the learner feels comfortable in, which should be in view of other tutors, assessors or staff members where possible.

The company will, on request, ensure that tutors and assessors who are working at assessments alone are provided with personal safety equipment (for example a panic alarm, mobile phone or are accompanied by another staff member).

11. Work Placements

For training programme where learners are required to gain a work placement, the company has a responsibility to ensure that these placements are safe for the learners and the young people or vulnerable adults that may use their services.

Whilst most organisations are run by well intentioned, honest and reliable people, it is known that the few who are determined to harm vulnerable groups of people deliberately seek out groups and organisations where they can meet those they target. A safeguarding culture will discourage them from becoming involved and make it harder for them to harm or abuse vulnerable people.

A copy of a current risk assessment will be requested for work placements. Where one is not available the company will ensure a risk assessment is carried out by a competent staff member before learners are placed there.

Each placement will be risk assessed on an annual basis or more regularly if deemed necessary. All employers and supervisors must inform the company of any issues such as accidents occurring immediately. The company will contact the relevant funder immediately where a learner has an accident during government funded provision.

12. Monitoring and Review

The Company will keep its policy and procedures on safeguarding children and vulnerable adults under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of young people and vulnerable adults.

Even when legislation has not changed, this policy will be reviewed annual to ensure it is up to date with best practice and any changes in the organisation.

Furthermore, the Board of Directors will examine quarterly reports on safeguarding, in particular to identify any trends or lessons which the company can learner and where required make improvement to process or training.