

# NCA Safeguarding and Prevent Policy

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## NCA Safeguarding Policy

Nishkam Civic Association (NCA) is committed to the safety and protection of the vulnerable adults, young persons and children who directly receive a service or come into contact with our services. We also recognise our responsibility in the work we do within the interagency partnership framework to safeguard our clients. This policy will provide guidance and support for employees and volunteers to deal with situations in a recognised and safe manner.

### 1. Vision Statement

The board of trustees and Nishkam Education Training Apprenticeship Committee (NETAC) are a governance group of volunteers and have set their expectations for the Nishkam Apprenticeship programme, to be a centre for excellence through the delivery of values led qualifications that support and uplift individuals, organisations, and communities to thrive by co-designing programmes to meet their current and future needs. Nishkam Apprenticeships will contribute to the Nishkam overarching vision by providing paid work based vocational training and education. Offering education and training programmes of the highest quality and standards to promote equality and diversity to be accessible to all.

### 2. Aims

The aims of the Nishkam Apprenticeships are to provide delivery of apprenticeships, training and education programmes that are of the highest quality, promote equality and diversity to be accessible to all, in order to:

- Unlock the potential of individuals to secure well paid and fulfilling jobs, succeed and thrive, promote self-esteem, practice virtues, and make a positive contribution to society.
- Support businesses and organisations to thrive and be a positive force in their community. Ensuring their workforce have the right knowledge, skills, and behaviours.
- Make a positive contribution to the economic, social, cultural, and moral development of individuals, families, and society.

### 3. Scope

This policy applies to all employees, volunteers, external suppliers, agencies, and partners, apprentices, learners, and expectation to safeguard clients and promote the welfare of customers as far as possible, to minimise the opportunities for abuse.

### 3..1 Key Principles and Actions

Central to our approach is:

- Prevention of abuse
- Promotion of safeguarding
- Protecting our vulnerable individuals and communities

Early intervention is key to ensuring better outcomes. In order to achieve that, we need to identify vulnerable and potentially vulnerable customers at an early stage and offer appropriate advice and support to help them stay safe in the community of their choice, and to maintain their tenancy.

If abuse is suspected, appropriate action will be taken as a matter of urgency with the rights, needs and wishes of the victim of the utmost importance. It is the duty of all NCA employees, volunteers, and contractors to contribute to the prevention of abuse and report any abuse discovered or suspected.

The first step in managing abuse is to recognise abuse and where it may occur. All staff will receive training in abuse awareness as part of the organisation's training plan. The training will also advise staff what they need to do when they have a suspicion of abuse.

Support can be provided to vulnerable persons by the NCA staff through:

- Signposting to external support services
- Multi-agency work through engagement with Locality Social Services, Local Council Safeguarding Teams Police, NSPCC, and other voluntary sector groups
- Referral to Adult Protection teams

NCA will undertake the following:

- Safeguarding and protecting customers through vigilant staff recruitment and supervision procedures
- Raising awareness of our staff's responsibilities and the importance of the protection of vulnerable adults, young persons, and children
- Establishing and maintaining clear, timely and effective procedures for dealing with suspicions or allegations of abuse
- Engaging in a multi-agency approach to safeguarding vulnerable adults, young persons, and children
- Monitoring and reviewing our procedures on a regular basis
- Maintaining a secure system where confidential information relating to allegations of abuse can be kept
- Providing induction and training targeted at appropriate levels for all staff in identifying abuse and whistle blowing procedures, and ensuring they understand and are able to communicate concerns

- Ensuring that our customers understand what abuse is, and how and to whom they can report concerns

Actions taken can:

- Promote and empower individuals to understand their rights and responsibilities
- Minimise escalation of a situation
- Ensure that customers are supported and that we take action against perpetrators
- Help to build a trusting relationship between ourselves and our customers
- Ensure we meet our statutory duty for safeguarding
- Ensure that information is shared as part of an inter-agency framework with the appropriate locality services and partnerships
- Ensure that staff and customers are aware of safeguarding procedures

#### 4. Recognising Abuse

Abuse is a violation of an individual's human and civil rights by any other person or persons. Therefore, NCA will ensure the rights of the customers are recognised and will actively promote:

- Privacy
- Personal choice
- Rights to self- determination
- Independence
- Dignity and respect at all times, whilst valuing diversity of race, gender, sexuality, religion, culture, or disability
- Individual fulfilment
- Sexting is when people share a sexual message and / or a naked or semi-naked image, video or text message with another person

Abuse may take place in a family, in an institutional or community setting, by those known to the victim or, more rarely, by a stranger. The abuser in any case may be an adult or adults, or a child or children. People who behave abusively come from all backgrounds and walks of life. They may be professional people; doctors, nurses, social workers, advocates, councillors, staff members or could be volunteers or others deemed to be in community or family positions of trust. They may also be relatives, friends, neighbours, or people who use the same services as the person experiencing abuse.

Abusive situations are often quite subtle and far from clear cut. Abuse can be physical, sexual, psychological, financial, discriminatory, honor based, or by acts of omission or neglect. Modern slavery encompasses human trafficking, domestic servitude and forced labour.

The policy defines vulnerability in terms of the Department of Health's 'No Secrets' guidance. However, it also identifies that anyone can experience a period of vulnerability which may arise at a particular period in time, and in response to a specific life event such as bereavement (which can be temporary, periodic, or recurring).

#### 4.1 The Multi-Agency Safeguarding Hub (MASH) Approach

In the 'No Secrets' guidance, the Department of Health sets out requirements for Social Services to work with health, police, and the independent and voluntary sectors to develop local policies and procedures to protect vulnerable adults, young persons and children from abuse.

All NCA staff are expected to be aware of and recognise signs and symptoms presented by a customer who is being abused or who is at risk of abuse. Where there is a suspicion of abuse, NCA employees will follow the Safeguarding procedure which identifies reporting, actions to take and what not to do. Staff will support vulnerable adults, young persons, and children where there is suspicion of abuse, or evidence of abuse, ensuring that they are made aware of the organisation's responsibility to act in their best interests.

Where the vulnerable adult refuses permission, every support will be given. However, risk will override confidentiality in terms of disclosure.

Where a vulnerable adult is incapable of giving permission, support will be given by staff to access independent advocacy services. We have a duty under the Children and Social Act 2017 to safeguard and promote the well-being of children.

#### 4.2 Vetting and Barring Scheme

The Vetting and Barring Scheme was established as a result of the Bichard Inquiry following the Soham murders. It requires that all those who work with vulnerable groups are registered. It was introduced in October 2009 by the Independent Safeguarding Authority. On December 2012 the Criminal Records (CRB) merged to become the Disclosure and Barring Service (DBS).

It replaced the POVA scheme 2004, to act as a workforce ban on individuals who have harmed vulnerable adults, young persons, or children in their care. It adds an extra layer of protection to the pre-employment process, including Criminal Records Bureau checks, which already take place and stop abusers from entering the workforce.

It is illegal for individuals who are barred to apply for positions with vulnerable individuals, and for employers to recruit them to such posts. NCA will also ensure that any individual who carried out such acts during their reemployment with the organisation will be referred to the DBS.

### 4.3 Identifying Vulnerability

We aim to ensure that vulnerable and potentially vulnerable customers are identified at an early stage and receive appropriate advice and support as required to help them stay safe in the community and maintain their tenancy.

1. Vulnerable adults, children, families, and communities of interest can be identified through contact with customers at the NCA. Concerns can be relayed by individuals, families, or others in the community, by NCA staff and contractors, or by external professionals. A person can become vulnerable at any time during their relationship with NCA and all staff, volunteers and contractors have a responsibility to be aware of a potential vulnerability and to ensure that the correct process is followed. The purpose of identifying potential vulnerability is to ensure that the service provided is where possible tailored to meet the needs of the individual. We recognise that individual customers need different levels of support from a variety of agencies.
2. Services must have clear priorities for safeguarding and promoting the welfare of adults and children explicitly stated in strategic documents, policies, and procedures in place.
3. There is a clear commitment from Senior Management to the importance of safeguarding and promoting children's welfare. It is a corporate priority.
4. There is a clear line of accountability within the organisation for work on safeguarding. There are Organisational Leads and Advisors to support staff across the business, to ensure appropriate safeguarding actions are taken and referrals made.
5. Recruitment and human resources management procedures take account of the need to safeguard, including arrangements to make appropriate checks on staff and volunteers employed by the NCA. Those who provide services to potentially vulnerable adults and children will be required to have a DBS check. This includes a check to ensure that those recruited are not listed as an individual who has been known to have previously harmed a vulnerable adult or child in their care. As part of recruitment or the procurement process, suitable references will be sought. DBS checks to be reviewed every 3 years. Any staff member, volunteer or external contractor who works with vulnerable groups and does not have a valid DBS will not be permitted to Lone Work with vulnerable adults or children and will be supervised at all times.
6. A code of conduct to require staff to declare a conviction as it occurs.
7. Appropriate whistle blowing procedures and a culture that enables issues about safeguarding to be addressed.
8. Arrangements in place to work effectively with other agencies and organisations.

## 5. Legal Framework

<p><b>Mental Capacity Act 2005.</b></p> <p><b>Deprivation of Liberty safeguards</b></p>	<p>Identifies capacity, how this is assessed and issues of vulnerability.</p> <p>The process by which someone who does not have the mental capacity to agree arrangements for their accommodation, treatment and / or care can be deprived of their liberty for their own health and safety, in the least restrictive manner and in their best interests.</p> <p>Application is to prevent the individual from the likelihood and seriousness of harm. It determines how CQC will monitor the deprivation of liberty safeguards.</p>
<p><b>Mental Health Act 2007</b></p>	<p>Mental Health Act makes several key changes to the 1983 Mental Health Act, which laid down provision for the compulsory detention and treatment of people with mental health problems in England and Wales.</p> <p>The Act focuses on public protection and risk management. Legislation extends the powers of compulsion and introduces compulsory community treatment orders, making patients’ compliance with treatment a statutory requirement.</p> <p>The role of approved social worker is being replaced by ‘approved mental health professional.’</p>
<p><b>Safeguarding Vulnerable Groups Act 2006</b></p>	<p>The Safeguarding Vulnerable Groups Act 2006 was passed as a result of the Bichard Inquiry following the Soham murders in 2002.</p>



	<p>The Inquiry looked at the way employers recruit people to work with vulnerable groups and the way background checks are carried out.</p> <p>Recommendation 19 of the Inquiry Report highlighted the need for a single agency to vet all individuals, who want to work or volunteer with children or vulnerable adults, and to bar unsuitable people from doing so.</p> <p>The Act was created in response to recommendation 19 and the ISA was set up to fulfill this role.</p>
<b>Every Child Matters</b>	<p>Every child matters refers to the UK initiative launched in 2003, which subsequently led to the Children and Social Act 2017 and refers to those aged under 18yrs.</p>
<b>Common Assessment Framework</b>	<p>All children and young people are different and have different needs. Similarly, a family's ability to respond to and meet all their needs may also differ. In some circumstances, professional assessment may be required to identify strengths and needs, to ensure that all children, young people, and their families receive appropriate support.</p> <p>It provides a standardised assessment of children and young persons and their additional needs, and how best to meet them. It provides a holistic approach. Early and effective intervention and aims to improve inter agency working.</p>
<b>Children's and Social Work Act 2017</b>	<p>Under the Children and Social Act 2017, each children's services authority in England was required to establish a Local Safeguarding Children Board (LSCB) for the area. The aim was to improve the overall well-being of children in the context of the five outcomes, of which the wider agenda of Staying Safe is incorporated.</p> <p>The legislation places a duty on local authorities to make arrangements to promote cooperation</p>

	<p>between agencies and other appropriate bodies. It also places a duty on partners to take part in cooperative arrangements to safeguard and promote the welfare of children. It is recognised that this work has to be completed with regard to the National Service Framework, Integrated Children's System, and the Common Assessment Framework.</p> <p>The primary aims of Safeguarding Children Board (SCB) are to coordinate and monitor the effectiveness of local work to safeguard and promote the welfare of children, ensuring joint working across services and agencies</p>
<p><b>Domestic Abuse Act 2021</b></p>	<p>The Act not only focuses on substantive and procedural changes to the criminal law, but also includes provisions which are relevant to family proceedings. The key provisions contained in the Act are as follows.</p> <ul style="list-style-type: none"> <li>• The Act creates the first statutory definition of domestic abuse which includes not only physical violence but that of emotional, coercive, and controlling behaviour and economic abuse. This can be limited to a single event or a series of actions. Children will now be given statutory recognition as "victims" rather than "witnesses" if they see, hear or experience abuse in the home.</li> <li>• The Act has extended the scope of coercive and controlling behaviour to incorporate abuse post-separation. The offence, initially introduced by the Serious Crime Act 2015, has seen cases increase each year but now the definition will widen the parameters of "personally connected" to include ex-partners and family members who do not live together. This is likely to result in an increase in investigations and prosecutions for this offence.</li> </ul>
<p><b>Keep Children safe in education 2022</b></p>	<p>This guidance replaces Keeping children safe in education 2021 updated September 2022 The Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards)</p>

	<p>Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Education and Training (Welfare of Children) Act 2021. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.</p>
<p><b>Education and Training (Welfare of Children) Act 2021</b></p>	<p>The Education and Training (Welfare of Children) Act 2021 is an act of the Parliament of the United Kingdom. The act amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 to expand safeguarding requirements to providers of publicly funded post-16 education (namely, new “16-19 academies” and providers of T-Levels) and ensure that public funds are only provided to institutions which comply with the requirements. It closes the loophole which existed for independent education providers in relation to safeguarding law.</p>
<p><b>Working Together to Safeguard Children 2018</b></p>	<p>Working Together to Safeguard Children (usually referred to as just Working Together) is statutory guidance produced by the government which outlines how practitioners working with children, young people and families should work together in order to ensure that children and young people remain safe from harm. In this guidance, a child is defined as anybody under the age of eighteen; though the guidance does also apply to the safeguarding of unborn children.</p>

## 6. Definitions

### 6.2 Vulnerable persons

The Department of Health defines a vulnerable adult as someone who is 16 years of age or over. However, the Children Act 1989 defines a child up to the age of 18 years (16 if married) and:

- Is or may be in need of community care services by reason of mental or other disability, age, or illness
- Is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation (No Secrets, DH)
- Children by definition who are deemed to be vulnerable

An individual or household experiencing difficulty with everyday living due to financial, educational, health, employment, learning, language, behavioural, emotional, family, social, age or other circumstances or any combination of these can be vulnerable.

Anyone can experience a period of vulnerability which may arise at a particular period in time, and in response to a specific life event such as bereavement (this can be temporary, periodic, or recurring).

Those who might be potentially vulnerable include (but are not limited to):

- Elderly
- Homeless
- Leaving care
- Tenant under 18
- Ex-offender
- Tenant over 18 but under 25
- Domestic abuse
- Drug misuse
- Discriminatory
- Alcohol misuse
- Single parent families
- Chaotic lifestyle
- Unemployed
- Mental health issues
- Cultural/religious/sexual orientation
- Learning difficulties – including reading/writing
- Sensory impairment
- Physical impairment
- Neurological impairment
- Recently bereaved
- Self-neglect
- Institutional
- People who do not have English as a first language
- Involvement with Social Services
- Pregnant teenagers
- People in a position of trust

### 6.3 Abuse Definitions

Type of Abuse	Example
<b>Child-on-child Abuse</b>	Is most likely to include, but may not be limited to:  Bullying (including cyberbullying, prejudice-based and discriminatory bullying)

	<ul style="list-style-type: none"> <li>• abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)</li> <li>• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)</li> <li>• sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)</li> </ul>
<p><b>Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)</b></p>	<p>Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.</p> <p>The National Crime Agency (NCA) - CEOP (Child Exploitation and Online Protection) Education programme.</p> <p>CSE can affect any child who has been coerced into engaging in sexual activities. <b>This includes 16- and 17-year-olds who can legally consent to have sex.</b> Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship</p>
<p><b>Domestic Abuse</b></p>	<p>Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.</p> <p>Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).</p> <p>All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.</p>
<p><b>Physical Abuse</b></p>	<p>Involves physical injuries which are unsatisfactorily explained, or where there is a definite knowledge or reasonable suspicion that the injury was inflicted with intent or caused through deliberate neglect. This might include hitting, slapping, rough handling, kicking, misuse of medication, restraint, or inappropriate sanctions</p>
<p><b>Sexual Abuse</b></p>	<p>Might be identified by suspicion or disclosure that a person is involved in sexual activities that cause distress, are against the</p>

	<p>law, or that they have not or cannot consent to. This might include:</p> <ul style="list-style-type: none"> <li>• Non-contact abuse – Looking at, taking photographs of the person, indecent exposure, harassment, serious teasing, or innuendo, not allowing the person to express their sexuality</li> <li>• Contact abuse – Intimate touching masturbation of either/or both persons, penetration (or attempted)</li> <li>• The use of personal care tasks as an opportunity for sexual satisfaction</li> </ul>
<b>Psychological Abuse</b>	Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Use of threats, humiliation or name calling.
<b>Financial or Material Abuse</b>	Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions, or benefits.
<b>Neglect and acts of Omission</b>	Failure to meet basic needs (including ignoring medical or physical care needs), failure to provide access to appropriate health, social care or educational services or the withholding of the necessities of life such as medication, adequate nutrition, and heating.
<b>Discrimination Abuse</b>	Abuse based upon discrimination because of a person’s race, gender, age, disability, sexual orientation, etc., to include harassment, slurs, or similar treatment.
<b>Institutional Abuse</b>	Is about preventing people from exercising their rights and achieving their full potential. It may involve setting excessively rigid routines, lack possessions including clothing, lack of choice in everyday activities, change in accommodation without agreement, treating an adult as a child.
<b>Emotional Abuse</b>	the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate
<b>Female Genital Mutilation</b>	It is a criminal offence:

	<ul style="list-style-type: none"> <li>• To excise, infibulate or otherwise mutilate the whole or any part of a girl or woman’s labia majora, labia minora or clitoris (section 1 of the 2003 Act)</li> <li>• For a person to aid, abet, counsel, or procure a girl or woman to carry out FGM on her own genitalia (section 2)</li> <li>• To assist a non-UK person to mutilate a girl or woman’s genitalia outside the UK (section 3)</li> <li>• To fail to protect a girl under 16 from risk of genital mutilation while they have responsibility for her. This would apply to parents (section 3A)</li> <li>• For a UK national or resident to commit or allow any of the above offences to be committed outside the UK.</li> </ul>
<b>Vulnerable adults</b>	<p>Vulnerable adults Person who is or be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him – or herself, or unable to protect him – or herself against significant harm or exploitation (DH and Home Office, 2000 page 8)</p>

## 7. Monitoring and Review

Key Measures include:

- Number of new safeguarding cases
- Number of ongoing safeguarding cases
- Number of cases by customer grouping and type
- Number of closed resolved safeguarding cases (including time taken to resolve)
- Number of applicable staff / contractors who do not have a DBS check in place

# NCA Policy for Preventing Extremism and Radicalisation

## 1. Our commitment

The government Counter-Terrorism and Security Act 2015, places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments, The United Kingdom's Strategy for Countering Terrorism (CONTEST) counter terrorism strategy:

- Prevent terrorism – stop people becoming terrorists
- Pursue terrorism – disrupt and stop terror attacks
- Protect against terrorism – strengthen UK protection
- Prepare to deal with terrorism – mitigate impact of attacks that can't be stopped

As a nation we continue to prioritise according to the threat posed to our national security; the allocation of resources will be proportionate to the threats we face. The

most significant of these threats is currently from terrorist organisations in this country from extreme Islamic terrorists from Syria and Iraq, and Al Qaida associated groups. Additionally, terrorists associated with the extreme right also pose a continued threat to our safety and security. There has been an increase in lone acts of terror opposed to mass organised terror activities, the government strategy now includes ways in which to identify risk of these instances.

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

### **The Prevent strategy has following specific strategic objectives:**

1. Respond to the ideological challenge of terrorism and the threat we face from those who promote it
2. Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support, this will be reviewed during the Risk review quarterly at the Board meeting
3. Protect apprentices and employees from radicalising influences
  - a. Ensure they are resilient to extreme narratives
  - b. Identify changes to behaviours of staff and apprentices
4. Work with sectors and institutions where there are risks of radicalisation that we need to address
5. Our IT policy provides employers, apprentices, learners/assessors who have access to our network with guideline on how to appropriately use company equipment and the internet will accessing our network



6. All employees, apprentices, learners/assessors will provided with the appropriate training during induction

## 2. NCA Objectives

NCA recognises that it has a legal duty to protect staff and apprentices by fulfilling the prevent duty statement. We aim to do that by:

- Promoting this policy to all staff, employers, and learners across the learner journey from recruitment to achievement by carrying out Prevent training led by the West Midlands Police all f2f and Zoom calls as appropriate

The Safeguarding and Prevent Lead (NCA Director) along with other department leads will promote these policies. This will be done by getting commitment by making sure that all staff undertake regular training and that Prevent and the promotion of British Values, democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs is integrated across the learning journey:

- This includes additional enrichment activities embedded across the learner journey from induction to achievement
- Annual training for all staff
- Liaison with regional prevent coordinators to learn about new risks and share updated practice
- Staff are encouraged to monitor and report any changes of behaviour of colleagues and apprentices and should be reported to the safeguarding lead using the reporting process
- Protect apprentices and staff from radicalising influences
- Ensure staff and learners are resilient to extreme narratives
- Any issues or concerns reported are recorded and monitored using the incident report form
- Staff are all aware of when it is appropriate to refer concerns about learners or colleagues to the provider's safeguarding and prevent officer or in an emergency to the police and the local authority, who will then consider the case for 'Channel'
- NCA will continually review its' own risk assessment plan which is checked by the Safeguard and Prevent Lead (NCA Director) with responsibility for Safeguarding and Prevent. These are reviewed quarterly at board meetings

## 3. Reporting and recording of concerns and incidents

- Staff and learners are provided with information on how to record any incidents or concerns. This information is provided within learner handbooks
- Instruction is provided to staff and learner inductions and regular training and briefing sessions on how to record any concerns.

## 4. Scope

This policy relates to all Trustees, staff, learners, and volunteers including those of our subcontracted provision.

<b>Version</b>	<b>V3.2</b>
<b>Issue date</b>	<b>June 2023</b>
<b>Review date</b>	<b>August 2023 (unless an earlier review is required by legislative changes)</b>
<b>Staff Affected</b>	<b>Staff, Apprentices and Learners</b>
<b>Lead Officer</b>	<b>NCA Director</b>
<b>Approved by Name</b>	<b>Board of Trustees</b>
<b>Signature</b>	<b>Professor Upkar Pardesi (OBE) (Chairman)</b>