



## Safeguarding policy

### 1. Purpose

The DMA is committed to safeguarding and promoting the welfare and safety of its employees, students, service users, young people and vulnerable adults.

The purpose of our Safeguarding Policy is to provide everyone with information about the Safeguarding Policy adopted at the DMA and, in particular, the regulated activities and work we provide. This includes:

- Preventing maltreatment and/or abuse.
- Preventing health or development being detrimentally impacted.
- Providing a safe work and effective learning environment.
- Ensuring all employees working or volunteering understand their responsibilities in relation to safeguarding.
- Implementing a code of conduct for all employees and Volunteers.
- Ensuring appropriate recruitment checks are conducted for employees and Volunteers.
- Ensuring key employees are fully trained on protection procedures (and training is repeated on a regular basis as required).
- Taking appropriate action to address safeguarding and welfare concerns within an appropriate timeframe.
- Working alongside relevant parties to agree safeguarding policies and procedures.
- Ensuring that employees, Volunteers, students, service users, young people and vulnerable adults are not photographed or filmed for any other purpose than to record their development or their participation in events organised by the DMA. In such instances prior written consent will be obtained, to include the holding of visual images.

The DMA complies with all legal obligations placed upon it by the Safeguarding Vulnerable Groups Act 2006 (England and Wales) and the Protection of Vulnerable Groups (Scotland) Act 2007 (Scotland).

We will seek to ensure that this policy is applied consistently to everyone, regardless of age, disability, gender identity and gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation or people with neurodevelopmental conditions.

This policy also covers the arrangements for safeguarding during our recruitment and selection process and safeguarding issues that arise during employment in circumstances where employees, Volunteers, young people, vulnerable adults, students or services users are placed at risk, or where

they could have been placed at risk and sets out the obligations for all employees and the procedure they should follow to report concerns.

A designated 'safeguarding lead' will be appointed to ensure the successful implementation of this policy including: monitoring compliance, maintaining communication, liaising with responsible parties and undertaking periodic annual reviews.

Any employee found to have committed an act relating to safeguarding, or to have breached this policy in any other way, will be subject to action under the Disciplinary Procedure, up to and including dismissal.

## **2. Employee Checks**

### **New Employees**

Advertisements for job roles will clearly specify if the work involves regulated activity/work. Offers of employment will be conditional upon the following:

- Obtaining satisfactory references from their two most recent employers.
- The production of original documentation to confirm legal status and right to work in the UK, under the Immigration, Asylum and Nationality Act 1999.
- Receipt of a satisfactory disclosure check (conducted by the Disclosure and Barring Service in England and Wales and Disclosure Scotland in Scotland) (where required for their job role).
- Providing original documentation supporting qualifications, certification or membership (where required).
- Successful completion of a probationary period.
- Attending our Company induction training, to include safeguarding awareness and/or training.

Should any of the above not be completed to our satisfaction the offer of employment will be withdrawn and employment terminated.

### **Existing Employees & Volunteers**

An existing employee or Volunteer may be required to provide a satisfactory disclosure check where their activity/work is either regulated or they move to a role that requires regulated activity/work. The DMA will ensure that no employee or Volunteer commences any such activity/work until they have obtained a satisfactory disclosure check (conducted by the Disclosure and Barring Service in England and Wales and Disclosure Scotland in Scotland).

If there is an occasion whereby an employee and/or Volunteer is:

- Unable to provide a satisfactory disclosure check.
- Refuses to undertake a check.
- Is added to the children and adults barred lists (by the disclosure body).

The DMA will consider redeployment options into available job roles that do not require regulated activity/work. Employees and Volunteers are required to inform their Line Manager of any changes immediately, failure to do so will be dealt with under the Company disciplinary procedure (or termination of the Volunteer agreement).

Where continued employment is conditional upon holding a satisfactory disclosure check and this is not maintained, continued employment will be reviewed by the Company and may result in termination of employment.

Where these conditions are not complied with in the case of Agency Staff or External Third-party Worker, the Service Provider will be notified immediately and the Service Agreement terminated.

### **Employees & Volunteers involved in regulated Activities/Work**

In addition to meeting the criteria above (for 'new' and 'existing' employees and Volunteers responsible for the delivery of regulated activities/work) the DMA will ensure that they:

- Hold (and continue to hold) the required level of disclosure check.
- Undertake safeguarding training.
- Attend regular team meetings to ensure safeguarding is at the forefront of everyone's minds, to include awareness of the main indicators and signs, our Company policy and reporting procedure.
- Are inducted prior to the commencement of DMA programmes.
- Understand their professional duty and responsibilities under this Policy (including raising safeguarding awareness and understanding).
- Remain aware of reporting requirements and who to contact with safeguarding concerns.
- Take timely action to report safeguarding concerns to the designated 'safeguarding lead'.

Where these conditions are not complied with in the case of Agency Staff or External Third-party Worker, the Service Provider will be notified immediately and the Service Agreement terminated.

### **3. Safeguarding Principles**

Safeguarding is a generic term and encompasses a number of concerns and the perpetrator may or may not be known to the individual. These concerns can include serious physical and sexual assaults as well as cases where the standard of care does not adequately support the individual's health or development, this may include abuse or neglect, or failure to act to prevent harm and can occur in a family, institutional or community setting.

Abuse and safeguarding concerns may be single incidents or occur over a longer period of time and may come from employees, service users, Volunteers, relatives, neighbours, social workers, providers of support services etc.

All employees and Volunteers will be required to be alert at all times and educated and trained to identify the signs, for example:

- Inappropriate, threatening or offensive behaviour in a learning environment.
- Financial or material abuse.
- Physical abuse.
- Mental and emotional abuse.
- Neglect and failures to act.
- Sexual abuse.
- Threats of abuse or harm.

- Controlling or intimidating conduct.
- Radicalisation
- Neglect and self-neglect.
- Domestic abuse.
- Poor practices within an organisation providing care.
- Modern slavery.

These categories can overlap and an individual could frequently suffer more than one type of abuse.

### **Identifying Concerns & Recognising the Signs**

Inappropriate, threatening or offensive behaviour in a learning environment may involve: sharing harmful content, being abusive to fellow learners and bullying.

Financial or Material Abuse includes: theft, fraud, scamming and coercion in relation to an individual's financial affairs or arrangements e.g. financial transactions, misuse or misappropriation of property, possessions or benefits.

Recognising Financial or Material Abuse: Indicators can include: borrowing money and not giving it back, stealing money or belongings, scamming (e.g. postal, or internet), taking money as payment for someone coming to visit or spending time together, changing living conditions, lack of heating, clothing or food, inability to pay bills, unexplained shortage of money, forcing someone to sell property or assets without consent, tricking someone into bad investments, unexplained withdrawals from financial accounts, unexplained loss/misplacement of financial documentation.

Physical Abuse may involve: hitting, or the outline of an object used e.g. belt marks, handprints or a hair brush, shaking, throwing, fractures, poisoning, bruising, drowning and suffocating.

Recognising Physical Abuse: Bite marks can leave clear impressions of the teeth, human bite marks are oval or crescent shaped and those over 3cm in diameter are more likely to have been caused by an adult or older child.

Burns and scalds can sometimes be difficult to distinguish between accidental and non-accidental and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, scalds that have a line indicating immersion or poured liquid.

Mental & Emotional Abuse involves: persistent emotional maltreatment such as to cause severe and persistent adverse effects on emotional development.

Examples include: conveying that the individual is worthless, unloved, inadequate, not giving the individual an opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate or preventing them from participating in normal social interaction. It can also involve serious bullying (including cyber bullying) causing the individual to frequently feel frightened, in danger and can involve exploitation or corruption.

Recognising Mental & Emotional Abuse: Emotional abuse can be difficult to recognise as the signs are often behavioural rather than physical and the indicators are often associated with other forms of abuse.

Some indicators may include: developmental challenges or delay, abnormal interactions, aggressive behaviour towards others, being withdrawn or seen as the 'loner', difficulty relating to others, low self-esteem, lack of confidence.

Sexual Abuse involves: forcing or enticing a person to take part in sexual activities (whether or not they are aware of what is happening) and does not necessarily involve high levels of violence.

Activities may involve: physical contact (including assault by penetration, for example: rape or oral sex) or non-penetrative acts such as masturbation, kissing rubbing and touching outside of clothing. They can also include 'non-contact' activities such as looking at and/or involved in sexual images, watching sexual activities, encouraging the individual to behave in a sexually inappropriate way, grooming or preparing for abuse (including via the internet).

Recognising Sexual Abuse: Individuals are often scared to say anything due to guilt and/or fear and frequently there are no physical signs, with indicators often being emotional/behavioural.

Some indicators may be: inappropriate sexual conduct, sexually explicit behaviour or conversation, self-harm (including eating disorders), self-mutilation and suicide attempts, indiscriminate choice of sexual partners, an anxious unwillingness to remove clothes (although this may be related to cultural norms or physical difficulties).

Neglect: Is the persistent failure to meet an individuals' basic physical and/or psychological needs and may involve the person responsible for the individuals care failing to: meet basic essential needs such as providing adequate food, clothing, warmth, shelter and hygiene, protect them from physical and/or emotional harm or danger, ensuring there is access to appropriate medical care or treatment.

Recognising Neglect: Evidence of neglect is often built up over a period of time and indicators can include: an individual appearing to be listless, apathetic and unresponsive with no apparent cause, poor appearance and hygiene, being smelly or dirty, being hungry (e.g. not given money or food), health and developmental problems, anaemia, family issues, changes in behaviour e.g. becoming clingy.

Radicalisation (Prevent Agenda): People can be drawn into extremist views or violence through many channels and influences. These can include family members or friends, direct contact with members groups and organisations or, through public media on websites or social media. This can put a person at risk of being drawn into extremist behaviour and views and has the potential to cause significant harm.

Recognising radicalisation (Prevent Agenda): The expression of extremist views, advocating violent actions or means, use of inappropriate language, possession or discussion of violent extremist literature, referral to well known extremists, seeking to persuade others towards extremist views. Staff need to use their professional judgement on whether the combination of behaviours warrants seeking further advice.

Modern Slavery is defined as: the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Recognising Modern Slavery: Some indicators include: individuals appearing to be under the control of someone else, reluctant to interact with other people, do not have personal identification with them, have few personal belongings, wear the same clothes every day, wear unsuitable clothes for work, do not appear to be able to move around freely, reluctant to speak to strangers or those in authority, appear frightened, withdrawn, or show signs of physical or psychological abuse, are dropped off and collected when away from the home environment.

## **Reporting & Investigating**

The DMA will treat all complaints, allegations or suspicions of abuse with the utmost seriousness and urgency and any party involved in alleged incident(s) will be treated with dignity, respect and reassured.

If you feel that you have been subject to, or have witnessed, a safeguarding concern, you are encouraged to let us know. We promise to take anything you tell us seriously. You should report any safeguarding issues to the DMA's safeguarding lead at [jessica.reilly@dma.org.uk](mailto:jessica.reilly@dma.org.uk).

In circumstances where an allegation or a disclosure is made to the DMA we will:

1. Listen to what the individual has to say.
2. Make no observable judgement.
3. Ask open ended questions that encourages them to speak in their own words.
4. Ensure that they are safe, comfortable and not left alone.
5. Make no promises that cannot be kept, such as promising not to tell anybody what they are being told. Where possible the DMA will always respect the wishes of the individual who does not consent to share confidential information, we will also take into consideration the safety and the welfare of the individual and where there is a concern that they are suffering, or at risk of suffering harm, their safety and welfare will be the overriding factor.
6. Report the matter immediately to the Service Provider where an allegation and/or a disclosure involves an External Third-party, Volunteer or Agency Worker.

Training will be provided to ensure employees and Volunteers are aware of the warning signs of abuse and the correct reporting procedure to follow should they suspect it is, has or going to take place.

Employees and Volunteers will be instructed to refer the matter to their Line Manager immediately, providing as much information as possible including the names of the people involved, dates and times and what type of abuse is suspected of occurring in the form of a written statement.

All reported matters will be investigated in a confidential and timely manner by authorised personnel. Investigations will include taking witness statements and surveillance footage (where available).

Where a suspected case involves an employee, the matter will be dealt with under the Company's disciplinary procedure which, may include a period of suspension (with full pay and contractual benefits).

Our policy allows for progressive levels of sanctions to be applied, up to and including dismissal. We will ensure that the disciplinary policy and all decisions are applied fairly and consistently. All employees will be given the right of appeal against any sanction applied, including the right to challenge any information they believe is incorrect.

Where the suspected case involves a Volunteer, an External Third-party or Agency Worker the DMA will take appropriate action in conjunction with the Service Provider.

The DMA will demonstrate great care when distinguishing between fact and opinion when recording suspected incidents. Where the Company establishes that a complaint and/or allegation has been made maliciously or vexatiously, it will be treated as misconduct and may lead to disciplinary action under the Company's disciplinary procedure or dealt with as appropriate with the Service Provider in the case of a Volunteer, External Third-party or Agency Worker.

Depending upon the case, the DMA may be obliged to disclose allegations to the Disclosure and Barring Service (or Disclosure Scotland) where a decision has been taken to:

- Suspend an employee.
- Dismissal of an employee.
- Remove an employee (External Third-party Worker, Agency Staff, or Volunteer) from a regulated activity/work.
- Or where an employee resigns (or a Volunteer, External Third-party Worker or Agency Staff leaves) in suspicious circumstances.

If it is suspected that a criminal act has been committed the DMA will report the situation to the Police.

### **Record Keeping**

The DMA will ensure that records associated with all allegations and subsequent actions taken, are treated as confidential, recorded, maintained and securely stored in accordance with The General Data Protection Regulations (GDPR/Data Protection Act).