



Safeguarding Policy

1. Introduction

As an employer and training provider, DPG plc. recognises that it has a legal duty to ensure, as far as is reasonably practicable the health, safety and welfare of young people (those under 18) and adults at risk.

In order to protect young people and adults at risk from harm, DPG plc. will act in accordance with the following legislation and guidance:

- The Safeguarding Vulnerable Groups Act 2006 (provides a system for Employers to check the suitability of Employees or Volunteers, to work with children or **vulnerable** adults).
- The Children's Acts 1989 (as amended) and 2006 (as amended in 2018)
- Education Act (2002) section 175
- Rehabilitation of Offenders Act 1974
- Sexual Offences Act 2003
- Safeguarding Children and Safer Recruitment in Education (2007)
- 'Working Together to Safeguard Children' 2018
- 'No Secrets Guidance'

2. Scope

DPG plc. aim to provide a safe environment for those considered to be in a vulnerable group. This is a priority and is the shared responsibility of all DPG plc. staff including associates. Vulnerable groups should be free to develop their potential without fear of abuse or exploitation.

At DPG plc. we value all learners, irrespective of their age, gender, racial origin, religion, belief or sexual orientation and will ensure that their rights are respected.

DPG plc. takes reasonable measures to ensure that members of staff who have regular and significant contact with vulnerable groups do not have a known history of harmful behaviour.

All suspicions or allegations of inappropriate behaviour will be taken seriously by DPG plc. and responded to as appropriate. All members of staff are expected to operate in accordance with all DPG plc. policies including Safeguarding.

All DPG plc. policies are reviewed annually and kept up to date, considering any changes in United Kingdom legislation, guidance and requirements from the Awarding Organisations and other bodies we work with, as well as industry best practice.

3. Policy Statement

Designated Safeguarding Officers (Lead, Deputy and Board rep) are responsible for dealing with safeguarding issues related to this policy. The Designated Safeguarding Officers are appointed by the CEO for a period of two years, at which stage the appointment will be reviewed.

The CEO is responsible for identifying appropriate training, for ensuring that the Designated Safeguarding Officer(s) have attended the necessary training, and that they have the knowledge and skills to give advice and guidance about safeguarding issues. All DPG plc. staff will receive information and guidance about safeguarding and be made aware of who the Designated Safeguarding Officer(s) are.

This policy will be published to all DPG plc. employees and learners, so they are aware of our commitment to the protection of vulnerable groups. Detailed and accurate records of concerns will be kept securely and confidentially by the Designated Safeguarding Officer(s) when concerns arise.

DPG plc. employ 'safer recruitment' procedures and make sure all appropriate checks are carried out on all staff including – facilitators and staff who work with vulnerable groups.

By enrolling on DPG plc. programmes which involve photographic or video assessment, vulnerable people and the parents/guardians/carers of young people consent that we can store those for assessment, internal verification and external verification purposes and circulate with the appointed tutors, and internal and external verifiers. DPG plc. will ensure that photographic and video assessment evidence are only passed to the relevant staff and are not circulated with a wider audience. Evidence will be kept securely and deleted after three years.

DPG plc. has appropriate procedures in place for responding to situations in which they believe a young person or adult at risk has been abused or is at risk of abuse, which also cover circumstances in which a member of staff, or other worker is accused of, or suspected of, abuse.

DPG plc. also recognises that it has, through its staff (including all associates), a duty to take such steps as are reasonable to see that young people and adults at risk are safe from harm. DPG plc. also recognises that young people and adults at risk may suffer harm from sources outside the company's remit. Where signs of such harm are apparent, DPG plc. encourage these to be reported to the appropriate external agency.

4. Female Genital Mutilation (FGM)

Female Genital Mutilation is a form of abuse and we use the World Health Organisation definition as below.

"Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs where for cultural or non-therapeutic reasons (World Health Organisation – 1997).

The UK government has written advice and guidance that states;

“FGM is considered as child abuse in the UK and is a grave violation of human rights of girls and women. In all circumstances where FGM is practised on a child it is violation of the child’s right to life, their right to their bodily integrity, as well as their right to health. The UK government has signed a number of international human rights laws against FGM, including the convention on the rights of the child.”

“UK communities that are most at risk of FGM includes Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from Non-African communities that are at risk include Yemeni, Kurdish, Indonesians and Pakistani women.”

Our Designated Safeguarding Lead and Deputy are aware of the guidance that is available in respect of FGM.

5. Reporting suspicions or concerns about abuse or inappropriate behaviour

Staff or learners need to report suspicions or concerns of abuse or inappropriate behaviour to the Designated Safeguarding Officer(s).

The Designated Safeguarding Officer(s) will record and raise concerns with the CEO.

Concerns raised will then be reviewed and investigated and a full investigation takes place in line with this and other DPG plc. policies and processes that are necessary.

For any incident, concern or guidance please contact Karen Cottam in the first instance, then try Emma Thorpe.

Safeguarding & Prevent Designated Lead

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Safeguarding & Prevent Deputy

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If either Karen or Emma cannot be contacted, please call

Board of Directors Safeguarding & Prevent Designated Person

Sarah Aubrey

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Alternatively, you can e-mail us at :

Apprenticeship.safeguarding@dpgplc.co.uk

The Designated Safeguarding Officer(s) will be reviewed in November 2020 or if a position becomes vacant before that.

6. Roles and Responsibilities

The CEO has an overarching responsibility for the development, review and implementation of the Safeguarding Policy. They will be responsible for the appointment of the Designated Safeguarding Officer(s) and have overall responsibility for the correct implementation of the Safeguarding Policy in accordance with current legislation of the United Kingdom.

The Designated Safeguarding Officer(s) are responsible for keeping up to date with safeguarding developments and best practice and sharing this to ensure good practice at all times. The CEO will be informed of all instances relating to reports or suspicions of inappropriate behaviour by the Designated Safeguarding Officer(s).

The Designated Safeguarding Lead has the responsibility for coordinating action and for liaising with the appropriate agencies.

Staff with a designated responsibility for Safeguarding receive the appropriate training.

It is the role of the Designated Safeguarding Lead to:

- Promote positive safeguarding procedures and practice
- Receive information and offer advice about safeguarding concerns, maintain secure records and take appropriate action
- Be familiar with national and local safeguarding guidance and referral procedures
- Assess the development needs of staff and coordinate training
- Keep all staff informed of good practice
- Monitor safeguarding cases within the organisation.

It is not the place of DPG plc. staff to make a judgement about whether abuse or inappropriate behaviour has occurred. This is the remit of the statutory agencies and/or the police. However, all DPG plc. staff and learners have a responsibility for reporting any suspicions or concerns of inappropriate behaviour or abuse to the Designated Safeguarding Officer(s).

7. Recognising Types of Abuse

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect, or an omission to act – an individual may abuse or neglect a child, young person or adult at risk by failing to prevent an act of harm.

In all forms of abuse there are elements of emotional abuse. Adults at risk may also suffer additional types of abuse such as being manipulated financially or being discriminated against. Other examples of abuse include inflicting physical harm such as hitting or misuse of medication, and sexual assault or exposure to sexual acts without informed consent, emotional abuse such as threats, humiliation and harassment, exploitation, ignoring medical or physical needs, withholding necessities of life such as food or heating. This list is not definitive.

8. Types of Abuse

There are four main types of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect.

Additionally, adults at risk may also experience:

- Financial or material abuse
- Discriminatory abuse
- Institutional abuse
- Professional abuse
- Significant harm.

It is not the purpose of this policy to provide a generalised representation of abuse. Young people and adults at risk may experience any combination of these types of abuse, but each group have specific vulnerabilities. For example, current legislation requires us to not only protect the vulnerable from abuse and neglect, but to actively promote the welfare of young people and vulnerable adults – not just to protect but to safeguard.

Bullying is not defined as a form of abuse in 'Working Together to Safeguard Children' 2018', but there is clear evidence that it is abusive.

Abuse is defined as 'a single or repeated act of lack of appropriate action occurring within any relationships where there is an expectation of trust, which causes harm or distress. Abuse is defined in 'No Secrets Guidance' as the 'violation of an individual's human or civil rights by any other person'.

A. Physical Abuse

Physical abuse occurs when non-accidental harm is caused to the body using force, which results in pain, injury or a change of the person's natural physical state.

Examples of physical abuse include hitting, slapping, pushing, kicking, misuse of medication, restraint, inappropriate sanctions, rough handling, pinching, punching, shaking and burning.

B. Emotional/Psychological Abuse

Psychological or emotional abuse is behaviour that has a harmful effect on a vulnerable adult or young person's emotional health or development.

Some examples of emotional abuse include:

- Threats of harm
- Deprivation of contact
- Humiliation, blaming, controlling, intimidation, coercion, harassment
- Verbal abuse
- Isolation or withdrawal of services or support networks
- Withholding affection, shouting
- Depriving a person of a right to choice, information or privacy
- Any behaviour that has a harmful effect on an adult at risk or young person's emotional health and development.

C. Sexual abuse

Sexual abuse is the involvement of an adult at risk or a young person in sexual activities or relationships which are for the gratification of the other person and which:

- They have not consented to
- They cannot understand
- Are not able to consent to
- Which violates the individual's expressed cultural or religious preferences, sexual taboos or family custom and practice.

Examples of sexual abuse include:

- Assault or sexual acts to which the individual has not consented or was pressurised into consenting
- Inappropriate touching and fondling
- Indecent exposure or attempted penetration.

D. Neglect and acts of omission

Neglect is behaviour that results in an individual's basic needs not being met. Examples of neglect and acts of omission include:

- Ignoring medical or physical health needs
- Individual's physical condition/appearance is poor
- Failure to provide access to appropriate health, social care or emotional services
- The withholding of the necessities of life such as medication, nutrition and heating.

E. Financial or material abuse:

Financial or material abuse involves the use of an individual's property, assets or income without their informed consent or making financial transactions that they do not understand, to the advantage of the other person.

Examples of financial or material abuses include:

- Theft
- Exploitation and pressure in connection with wills, property or inheritance or financial transactions
- The misuse or misappropriation of property, possessions or benefits.

F. Discriminatory abuse

Discriminatory abuse is behaviour that makes or sees a distinction between people as a basis for prejudice or unfair treatment. Examples of discriminatory abuse include racism, sexism, ageism, slurs or similar treatment.

G. Institutional abuse

Institutional abuse involves the collective failure of an organisation to provide an appropriate professional service to vulnerable people. It can be seen or detected in processes, attitudes or behaviour that amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and stereotyping.

H. Professional abuse

Professional abuse is the misuse of power and of trust by a professional. Professional abuse can include:

- The failure of a professional to act on suspected abuse
- Poor care practice or neglect in the provision of services
- Culpability as a result of poor management systems structures.

I. Significant harm

Significant harm can be taken to include not only ill treatment including sexual abuse and forms of ill treatment which are not physical, but also the impairment of, or an avoidable deterioration in physical or mental health, and the impairment of physical, intellectual, social or behavioural development

Recognising Abuse

The abuse of adults at risk or young people is often detected through symptoms or indicators. There are often physical indicators of maltreatment or neglect such as bruises, bites, burns, fractures. However, symptoms can also reveal themselves through emotional, psychological behavioural patterns such as depression and or any changes to their normal behaviour/routine.

Associated or Related Policies

Prevent Policy

Safer Recruitment Policy

9. Document Control Information

Owner: Karen Cottam

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