

# DH Associates Ltd Safeguarding Policy

Managing Director	Jueliya Mc Mahon	31 August 2021
	J. C.M.M.	
Review Date	Senior Leadership Team	31 August 2022



This policy is reviewed to reflect best practice, changes in legislation and national policy or guidelines. Reviews minimum annually Next review August 2022

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## **DH Associates Safeguarding Statement**

DH Associates is fully committed to safeguarding the welfare of all stakeholders by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for its stakeholders including children and vulnerable groups. Stakeholders includes employers, learners both commercial and funded including apprentices, service users, employees, visitors. This list is not exhaustive.

The company recognises its responsibility and acknowledges that it is the duty of DH Associates' workforce in its entirety to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation or victimisation. Therefore employees, volunteers, delivery partners and contractors will at all times show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind.

#### It is DH Associates intention to:

- ensure that all stakeholders are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership
- ensure that staff are appropriately trained in safeguarding and to understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel is at risk
- ensure that appropriate supervision is given where required
- take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- regularly review and monitor DH Associates policies and procedures to ensure our legal, moral and social responsibilities are met
- take all suspicions and allegations of abuse including risks of radicalisation extremely seriously and to respond to concerns with due speed and consideration
- work in partnership with and in accordance with organisations' procedures where required, including Designated Person in Local Authority, Safeguarding Children's Boards, Safeguarding Adults Boards and the Channel multi-agency panel
- comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance to any amendments to such
- Have Designated Lead Safeguarding Officers & Deputy Lead (DSOs) in place to advise on and manage any concerns and referrals made.
- ensure that relevant employment and security checks are undertaken, as required
- ensure that all personal data will be processed in accordance with the requirements of the Data Protection Act 2018
- ensure that personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the



disclosure of confidential information is necessary in order to protect a child or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or vulnerable adult and on a strict "need to know" basis

• If we are delivering training as part of a subcontract, we will follow the Lead Contracts referral process for Safeguarding.

The following policies demonstrate and support DH Associates' shared commitment to safeguarding and promoting the welfare of its stakeholders:

Bullying & Harassment Code of Conduct
Whistleblowing Policy Data Protection

Safeguarding Policies Disciplinary & Grievance

Bullying and Harassment Policy Equality and Diversity Policy

Online Safety Disclosing and Barring Procedure

Health and Safety Policy Lone Worker

Prevent Policy Complaints Procedure

Appeals Procedure Probation Policy

This policy has been agreed and is sponsored by the DH Associates Managing Director and Senior Management Team as of 3 April 2019. Reviewed 13 November 2020. Reviewed 31 August 2021.

## DH ASSOCIATES Lead Designated Safeguarding Officer

Name	Role	Location	Contact Details
Kate Day	Head of Operations	DHA	07580864473
Caroline Murphy	Director of Quality & Compliance	DHA	07702726912

## **DH ASSOCIATES Designated Safeguarding Officers:**

Name	Role	Location	Contact Details
Jackie Allen	Team Manager	DHA	0151 336 6900
Claire Oakes	Team Manager	DHA	0151 336 6900
Mick Coleman	Operations Manager	Cambian	0151 336 6900

DH Associates' Safeguarding E-mail Address- <u>kate.day@dhassociates.co.uk</u> <u>Caroline.muprhy@dhassociates.co.uk</u>



#### Introduction

DH Associates believes that it is always unacceptable for a child or vulnerable adult to experience abuse or discrimination of any kind, and recognises its responsibility to safeguard the welfare of all children and vulnerable adults by a commitment to practice which protects them. DH Associates have a commitment that no child or vulnerable adult will be treated less favourably than others in being able to access services which meet their specific individual needs and this is linked to our Equality and Diversity Policy and social inclusion strategies.

DH Associates recognises that learners may fall outside of statutory reporting particularly those over 18 years old not classified as vulnerable. DH Associates recognises that all learners may become vulnerable and at risk due to changes in their personal or work life. DH Associates is committed to promoting and ensuring the safety of all learners and will work with learners and key stakeholders to offer support and guidance outside of statutory reporting.

This policy has been developed to describe the responsibilities of Employees, Volunteers, Delivery Partners and Contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that DH Associates fulfils its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

DH Associates will endeavour to safeguard children and vulnerable groups by:

- Valuing, listening to and respecting them
- Adopting Policies, guidelines and a Code of Conduct and behaviour for Employees, Volunteers Delivery Partners and Contractors
- Sharing information about concerns with agencies which need to know, and involving parents and children and vulnerable adults appropriately
- Ensuring that the DBS, in accordance with their guidelines, checks all staff, volunteers and delivery partners with responsibilities for children and or vulnerable groups
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Making all new staff, volunteers, delivery partners and contractors aware of our safeguarding policy and procedures
- Providing all staff, volunteers and delivery partners with safeguarding training
- Ensuring that all children, vulnerable groups their parents and carers are aware of our safeguarding policy and procedures
- Ensuring all staff and stakeholders are aware of their role and responsibilities in relation to safeguarding

DH Associates is committed to reviewing its policies and good practice annually unless there is a change to legislation. The Lead DSO is responsible for updating the policy with support from the strategic management team.

DH Associates operates a culture of openness and transparency and embeds the Principles of The 4R's across all our services and ensure all staff, volunteers, delivery partners and contractors understand their responsibilities with regard to Safeguarding.



#### The 4 R's:

Recognise the signs and indications of abuse

Respond as soon as possible

Record everything you have heard, was said or any actions seen

Refer to the Designated Safeguarding Officer (DSO)

#### Definition of a child:

For the purpose of this policy and procedures, children are any persons up to the age of 18 years.

#### Definition of an Adult at risk:

An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]). An adult at risk may be a person who;

- has a physical or sensory disability
- is physically frail or has a chronic illness
- · has a mental illness or dementia
- has a learning difficulty
- · misuses drugs and or alcohol
- · has social and or emotional issues
- · exhibits challenging behaviours

Statutory guidance and legislation differs in relation to working with these two groups e.g. children and vulnerable groups. Practitioners are familiar with the differences if they are working across the age groups and take advice from the DSO when appropriate.

#### Legislation & Guidance

- The Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1991
- Data Protection Act 1998
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Statutory guidance Working Together to Safeguard Children 2016
- Keeping Children Safe in Education 2021
- Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015
- The Care Act 2014
- The Mental Capacity Act 2005
- The "No Secrets" guidance which sets out a code of practice for the protection of vulnerable adults

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Equality Act 2010

August 2021



Prevent Duty 2015

#### **Definitions and Indications of Abuse**

Abuse, including neglect, is a form of maltreatment of a child or adult at risk (often called a vulnerable adult). In relation to adults the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm' which is a term from the Children Act 1989. Someone may abuse a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children and vulnerable adults 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 also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2016 defines four types of abuse; physical, emotional, sexual and neglect. Vulnerable groups may also be subjected to these forms of abuse therefore the wording from Working Together to Safeguard Children 2016 has been slightly altered to reflect this fact. Adults may also be subjected to financial, discriminatory and institutional abuse and staff should be familiar with indicators for all forms of abuse.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

#### Physical Abuse

Physical Abuse: this may involve	Signs: this may include
<ul> <li>Hitting</li> <li>Shaking</li> <li>Throwing</li> <li>Poisoning</li> <li>Burning or Scalding</li> <li>Drowning</li> <li>Suffocating or otherwise causing</li> <li>Physical Harm</li> </ul>	<ul> <li>Unexplained bruises, marks or injuries on any part of the body</li> <li>Frequent visits to the GP or A&amp;E</li> <li>An injury consistent with the explanation offered</li> <li>Fear of parents or carers being approached for an explanation</li> <li>Aggressive behaviour or severe temper</li> </ul>
Physical Harm  Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates illness in a child, young person or vulnerable adult	<ul> <li>outbursts</li> <li>Flinching when approached</li> <li>Reluctance to get changed or wearing long sleeves in hot weather</li> <li>Depression</li> <li>Withdrawal behaviour or other behaviour change</li> <li>Running away from home/residential care</li> </ul>
	Distrust of adults, particularly those with whom a close relationship would normally be expected



#### **Emotional Abuse**

Emotional abuse is the persistent maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's or vulnerable adult's emotional development.

Emotional Abuse: this may involve	Signs: this may include
<ul> <li>conveying to the child or vulnerable adult that they are worthless and unloved,</li> <li>that they are inadequate, or valued only insofar as they meet the needs of another person</li> <li>not giving the child or vulnerable adult opportunities to express their views</li> <li>deliberately silencing them</li> <li>making fun of what they say or how they communicate</li> <li>age or developmentally inappropriate expectations being imposed on the child or vulnerable adult</li> <li>interactions that are beyond the developmental capability</li> <li>overprotection and limitation of exploration and learning</li> <li>preventing the child or vulnerable adult participating in normal social interaction</li> <li>seeing or hearing the ill-treatment of another child or vulnerable adult</li> <li>serious bullying (including cyber bullying)</li> <li>causing children or vulnerable adults frequently to feel frightened or in danger</li> <li>exploitation or corruption of children or vulnerable adults</li> <li>Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult though it may occur alone.</li> </ul>	<ul> <li>Behavioural change</li> <li>Being unable to play or socialise with others</li> <li>Fear of making mistakes</li> <li>Self-harm</li> <li>Fear of parent or carer being approached regarding their behaviour</li> <li>Confusion</li> <li>Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of</li> </ul>



#### **Sexual Abuse**

Sexual Abuse: this may involve	Signs: this may include
<ul> <li>forcing or enticing a child/ren or vulnerable adult/s to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or vulnerable adult is aware of what is happening</li> <li>physical contact including assault by penetration (for example rape or oral sex)</li> <li>non-penetrative acts such as masturbation</li> <li>Kissing</li> <li>Rubbing and Touching outside of clothing</li> <li>They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities</li> <li>encouraging children to behave in sexually inappropriate ways</li> <li>grooming a child in preparation for abuse (including via the internet)</li> <li>Sexual abuse is not solely perpetrated by adult males. Women and same sex can also commit acts of sexual abuse, as can other children.</li> <li>Image based abuse - (up-skirting, nonconsensual sharing of intimate photos, cyber-flashing), and sexual coercion</li> </ul>	<ul> <li>Bruising or bleeding near genital/anal areas</li> <li>Sexually transmitted diseases</li> <li>Vaginal discharge or infection</li> <li>Stomach pains</li> <li>Discomfort when walking or sitting down</li> <li>Pregnancy</li> <li>Sudden or unexplained changes in behaviour</li> <li>e.g. becoming aggressive or withdrawn</li> <li>Fear of being left with a specific person or group of people</li> <li>Nightmares</li> <li>Leaving home</li> <li>Sexual knowledge which is beyond their</li> </ul>



# Neglect

This is the persistent failure to meet a child's or vulnerable adults basic physical and or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development.

Abuse by Neglect: this may involve	Signs: this may include
<ul> <li>Neglect may occur during pregnancy as a result of material substance abuse</li> </ul>	A constant hunger, sometimes stealing food from others
	Dirty or smelly
<ul> <li>A parent or carer failing to provide adequate food, clothing and shelter</li> </ul>	Loss of weight, or being constantly underweight
· ·	Inappropriate dress for the weather
<ul> <li>exclusion from home or abandonment</li> </ul>	Complaining of being tired all the time
<ul> <li>failure to protect a child or vulnerable adult from physical</li> </ul>	Not requesting medical assistance and
harm or danger failure	failing to attend appointments
<ul> <li>to ensure adequate supervision</li> </ul>	Having few friends
Failure to use adequate care takers	Worsening health conditions
	Pressure sores
<ul> <li>failure to ensure access to appropriate medical care or treatment</li> </ul>	Mentioning their being left alone or unsupervised
	Skin infections
<ul> <li>neglect of, or unresponsiveness to a child's or vulnerable adults basic</li> </ul>	Mentioning their being left alone or unsupervised
emotional needs	Lack of response to stimuli or contact
	Poor skin condition(s)
	Frozen watchfulness
	<ul> <li>Anxiety</li> </ul>
	• Distressed
	Inappropriate emotional responses
	Language delay



#### Financial Abuse

Financial Abuse: this may involve	Signs: this may include
<ul> <li>Being overcharged for services</li> <li>Being tricked into receiving goods or services that they do not want or need</li> </ul>	<ul> <li>Lack of basic requirements e.g. food, clothes or shelter</li> <li>Inability to pay bills</li> </ul>
<ul> <li>Inappropriate use, exploitation, or misappropriation of property and or utilities</li> </ul>	<ul> <li>Unexplained withdrawals from accounts</li> <li>Inconsistency between standard of living and income</li> </ul>
<ul><li>Theft</li><li>Deception</li></ul>	<ul> <li>Reluctance to take up assistance which is needed</li> <li>Unusual interest by family or other people in the</li> </ul>
<ul><li>Fraud</li><li>Explanation or pressure in connection with wills</li></ul>	<ul><li>Persons assets</li><li>Recent changes in deeds</li></ul>
	<ul> <li>Power of Attorney obtained when person lacks capacity to make the decision</li> </ul>

# **Institutional Abuse**

Institutional Abuse: this may involve	Signs: this may include
Service users required to fit in excessively to the routine of the service	<ul> <li>Inflexible daily routines, e.g. set bedtimes and or deliberate waking</li> </ul>
More than one individual is being	Dirty clothing and bed linen
neglected	<ul> <li>Lack of personal clothing and possessions</li> </ul>
<ul> <li>Everyone is treated in the same way</li> <li>Other forms of abuse on an institutional scale</li> </ul>	<ul> <li>Inappropriate use of nursing and medical procedures</li> </ul>
	<ul> <li>Lack of individualised care plans and failure to comply with care plans</li> </ul>
	<ul> <li>Inappropriate use of power, control, restriction and confinement</li> </ul>
	<ul> <li>Failure to access health care, dentistry services, etc.</li> </ul>
	<ul> <li>Inappropriate use of medication</li> </ul>
	<ul> <li>Misuse of residents finances or communal finances</li> </ul>
	<ul> <li>Dangerous moving or handling practices</li> </ul>
	<ul> <li>Failure to record incidents or concerns</li> </ul>



#### **Domestic Violence and Abuse**

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse; psychological, physical, sexual, financial and or emotional.

#### Identifying cases of Female Genital Mutilation (FGM) and Forced Marriage

There are many different types of abuse but there are some that staff may be less aware about. Female Genital Mutilation and Forced Marriage fall into this category. Any indications that children or vulnerable adults may be subjected to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision DH Associates will do everything that it can to ensure that:

- The DSOs are aware of the issues surrounding FGM and Forced Marriage
- Advice and signposts are available for accessing additional support e.g. the NSPCC's helpline, Childline services, Forced Marriage Unit
- Awareness raising about FGM and Forced Marriage is incorporated in the DH Associates safeguarding training

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency.

It is also extremely important that if a child or vulnerable adult has disclosed that they are at risk or FGM or Forced Marriage, the case is referred to Social Care even if it is against that person's wishes. DH Associates' staff must NOT consult or discuss these concerns with the child or vulnerable adult's parents or family or others within the community. If there is an imminent risk e.g. the child or vulnerable adult being taken out of the country, police must be informed (999) and the safety of the child or vulnerable adult whilst awaiting the police response must be the prime consideration.

#### **Prevent Duty**

The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

The government have defined extremism in the Prevent Strategy as vocal opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The Prevent Team will, in partnership with other professionals including those involved in Safeguarding investigate further to assess the nature and extent of the risk. The relevant local police prevent teams will complete an initial assessment which will be used to inform the decision as to whether an individual should be referred to Channel.

#### How does Channel work?

Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age and is shaped around the circumstance of each individual and can provide support for any form of radicalisation or personal vulnerabilities.

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency



partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

#### What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

#### Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

#### What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

#### Raising a concern

If you believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding procedures to escalate your concerns to the DSO, who can raise concerns to Channel if appropriate.

#### Abuse of Position of Trust

DH Associates recognises that our staff, volunteers, delivery partners and contractors are in a position of trust with our learners in our care whether children, young people or vulnerable adults and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital that for all of those in positions of trust to understand the power this can give them over those they care for and the responsibility.

DH Associates acknowledge the principle of equality embedded into the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation, neither homosexual or heterosexual relationships are acceptable within a position of trust.

We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years.

DH Associates recognises the importance that its staff, volunteers, delivery partners and contractors protect the rights and needs of all children, young people and vulnerable adults on our programmes and in our care.



#### Whistleblowing

DH Associates' policy on whistleblowing is set out in a separate policy and acknowledges that it may lead to consideration under safeguarding children or vulnerable adults' procedures. All incidents of whistleblowing will be dealt with in accordance with our whistleblowing policy. Our policy on whistleblowing is explained at the induction process for new learners and their parents/carers.

#### Safer Recruitment

DH Associates' policy on safer recruitment is set out in a separate policy and acknowledges the importance of minimising the risk of employing unsuitable *staff* to work with vulnerable children and vulnerable adults by having robust selection and *recruitment* procedures in place.

#### **Concerns Policy**

DH Associates' concerns policy is set out in a separate policy and acknowledges that it may lead to consideration under safeguarding children or vulnerable adults' procedures. All concerns will be dealt with in accordance with our concerns policy. Our concerns policy is explained at the induction process for new learners and their parents/carers.

#### **Bullying and Harassment**

DH Associates policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding children or vulnerable adults' procedures. All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying, will be dealt with in accordance with our anti-bullying policy. DH Associates recognise that children and vulnerable adults with special needs and or disabilities are more susceptible to being bullied. Our policy on bullying is explained at the induction process for new learners and their parents/carers.

#### **Online Safety**

All staff, volunteers, learners, delivery partners and contractors if relevant are trained in and receive regular updates in e-safety and recognising and reporting concerns. Our acceptable use policy recognises that internet safety is a whole team/organisation responsibility which includes customers and their parents and carers.

Children, young people and vulnerable adults may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some children, young people and vulnerable adults may find themselves involved in activities which are inappropriate or possibly illegal.

DH Associates therefore recognise our responsibility to educate our learners, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. These issues are addressed within the learner journey and relevant policies and procedures and with parents and carers.

Additional measures and support have been implemented during & post Covid 19 taking into account changes in delivery methodology highlighting personal e-safety & online risks. This includes side by side modules which learners must complete within 1 month of commencement of programme. Trainers to document and follow up face to face discussion afterwards and throughout learner journey.

Radicalisation & extremism Online safety



Who can you trust? British values

Updated online domestics and signalling for help.

We are aware of the Local Safeguarding Children Board escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interest of safeguarding and promoting the welfare of children and vulnerable adults. If inappropriate, harmful or indecent images are found then the Police will be informed immediately and DH Associates will fully support their investigation. If involving a staff member/volunteer, immediate suspension in line with the disciplinary process will immediately take effect.



#### Role of the Designated Safeguarding Officer

DH Associates has appointed DSOs and a Lead DSO to have overall responsibility for issues related to safeguarding children and vulnerable adults. The DSO is responsible for acting as a source of advice on child and vulnerable adult safeguarding matters, for coordinating action within the organisation and for liaising with health, children's services, adult services and other agencies about suspected or actual cases of abuse. The lead DSO will be assisted by other designated members of staff drawn from senior management and suitably experienced staff. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for children and vulnerable adults within DH Associates.

Designated members of staff receive training in Safeguarding children and vulnerable adults and interagency working as required by the LSCB and receive refresher training annually as required by DH Associates. The team are required to keep up-to-date with developments in safeguarding children and vulnerable adults as required.

The Lead DSO has governance over safeguarding matters across DH Associates and DH Associates Managing Director has overall responsibility for safeguarding at Board level. The Managing Director will ensure that resources, support and all relevant training are available and in place for staff. The Managing Director will support the Safeguarding team in meeting their responsibilities and ensuring that DH Associates meets its commitments and takes it seriously.

- There is a clear description for the DSO role within DH Associates which can be accessed
  on the system. The Lead DSO is responsible for reviewing the child and vulnerable adult
  safeguarding policy annually along with any policies linked to the safeguarding policy and
  processes and procedures that support the embedding and working practices of this policy
- The DSO / relevant contract manager is responsible for ensuring the child and vulnerable adult policy is available publicly and to parents and carers and that parents and carers are aware that suspected abuse referrals may be made and DH Associates' role in this
- The Lead DSO will alert the DBS where a person has been dismissed or left due to risk to or harm that they presented or may have presented to a child or vulnerable adult
- The DSO will alert the Police where a crime may have been committed
- DSOs foster strong links with the LSCB and Designated Local Authority Person
- Refer all cases of suspected abuse to the local authority children's social care agency or in the case of a vulnerable adult to the local authority adult's social care
- Liaise with senior management to inform them of issues especially on-going enquiries and police investigations
- DSOs will maintain a proper record of any safeguarding referral, complaint or concern even where that concern does not lead to a referral
- DSOs act as a source of advice, support and expertise to staff on matters of safety and safeguarding
- Liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether or not a resolution has been achieved



- DSOs ensures that DH Associates works with employers and other training organisations that provide apprenticeships and or work placements for children or vulnerable adults from DH Associates to ensure that appropriate safeguards are in place
- The individual responsible for HR and Training with support from the Managing Director ensures that all staff, volunteers and delivery partners receive training in safeguarding children and vulnerable adults, are aware of DH Associates procedures for safeguarding children and vulnerable adults and that refresher training takes place annually
- Lead DSO provides information on a quarterly basis to the MD and SMT setting out how DH Associates has discharged its duties. The lead DSO is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity

Under no circumstances should a member of staff, volunteer or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSOs with support from the senior management team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

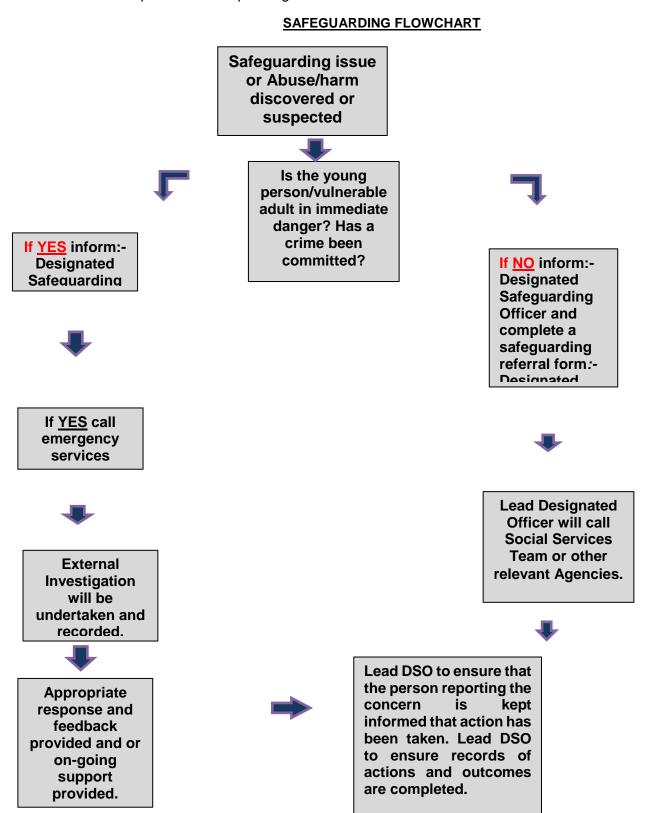
Delivery partners may make their own referrals but must inform DH Associates' DSO immediately.

If DH Associates is working in schools then any concerns about pupils or school staff must be reported to the designated safeguarding lead. The DH Associates DSO also needs to be informed.



#### **Responding to Concerns**

DH Associates ensure and emphasise that everyone in the organisation understands and knows how to share any concerns immediately with the lead or deputy for safeguarding and the additional DSO's. The process for responding concerns is set out below:





When an allegation of abuse is made to a member of staff, the member of staff who receives it should:

- reassure the individual (child or vulnerable adult) making the allegation that they have done the right thing
- listen and not interrupt
- do not promise that the matter will be kept confidential. Explain to him/her that you must report the matter to a member of DH Associates designated safeguarding team as part of your legal duty, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the designated safeguarding team members.
- let the individual finish speaking and then only ask questions if you are still unsure whether this is a safeguarding issue
- note, this is not an investigation, simply establish the key facts, remember TED Tell, Explain, Describe
- only ask simple, open, non-leading questions, e.g. if a child or vulnerable adult tells you they
  have been hurt ask "Can you describe how that happened" rather than "did someone hit you"
- accept what the individual is saying and do not offer an alternative interpretation of the alleged events
- raise the concern with a DSO, do not ask any more questions
- write down what has been said immediately afterwards, to the best of your memory, in the words used by the individual and you ensure you make clear what is fact and what is opinion or hearsay in any given piece of information
- not ask the individual to sign anything at this stage
- note anything about the individual which may be connected e.g. any visible injuries including the position and description
- report the matter to a DSO immediately within the same working day
- complete the relevant documentation (the DSO Referral Form located in the DH Associates system) and submit to the designated safeguarding team via the safeguarding e-mail address: <a href="mailto:kate.day@dhassociates.co.uk">kate.day@dhassociates.co.uk</a>
- · ensure you tell the individual what will happen next

Remember, if a child or vulnerable adult tells you about abuse that happened a long time ago it doesn't make it any less real and distressing for the child or vulnerable adult. Abuse can be historic and relate to incidents that happened a long time ago. They must still be referred on to the DSO as per this procedure.

Staff should be mindful that an allegation may involve another child/children/young person(s) and if a child has been involved, and the Lead DSO should be contacted immediately as equally the welfare of the child being accused is paramount at this time.

The DSO will ensure that the member of staff reporting the incident/concern is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.



If a child or vulnerable adult chooses to disclose, you should never:

- take photographs of injuries
- examine marks or injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse
- · make promises to the individual about confidentiality or keeping secrets
- assume that someone else will take the necessary action
- jump to conclusions or react in any way to what the individual is disclosing
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told what may seem insignificant to you could be
  extremely important in supporting external agencies to decide whether abuse has occurred
  or is indeed likely to occur.

#### Remember: IF ANY STEP IN THE PROCESS IS NOT RECORDED THEN IT IS ASSUMED THAT IT DID NOT HAPPEN

- fail to pass the information on the designated safeguarding team
- ask the individual to sign a written copy of the disclosure or a statement

Where a child or vulnerable adult has communication difficulties or use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children or vulnerable adults.

If a young person or adult has personal needs their requirements would be discussed prior to commencement of programme and an additional support plan implemented. DH ASSOCIATES will respect personal privacy and dignity, ensuring that young people and adults are supported in meeting their own physical care needs wherever this is possible.

# Talking to Parents/Carers

In most cases, it is good practice to be open and honest at the outset with parents/carers about concerns and any action that DH Associates intends to take. DH Associates Safeguarding Policy will be presented to parents/carers at information sessions held to inform them of our commitments and responsibilities, including the mechanism for communication of this. Where a referral is to be made the DH Associates Lead DSO will make all reasonable efforts to ensure parents/carers are informed. However, an inability to inform parents/carers should not prevent a referral being made. Consideration will be given to not informing them when a child or vulnerable adult expresses a wish that their parent/carer should not be informed at this stage.

There are cases where it would not be good practice for the lead DSO to discuss concerns with parents/carers before referral.

In these cases, arrangements for discussing concerns with the parents/carers should be agreed in advance with Social Care and or the Police. Concerns must not usually be discussed with August 2021



parents/carers before referral where:

- discussion would put a child or vulnerable adult at risk of significant harm
- discussion would impede a police investigation or social work enquiry eg FGM or forced marriage
- sexual abuse is suspected
- organised or multiple abuse is suspected
- the fabrication of an illness is suspected
- to contact parents/carers would place you or others at risk
- it is not possible to contact parents/carers without causing undue delay in making the referral

In each case the lead DSO must make a reasoned judgement and record the decision s/he reaches. Where further guidance is needed, contact should be made with the Designated Local Authority Person or relevant social care department or Police.

#### Abuse Requiring Immediate Response

If medical attention or police emergency action is required then:

- The emergency services should be contacted on 999 immediately. The DH Associates DSO team should be informed without delay
- The DSO team will contact the relevant Social Care and or police services
- If the referral is out of hours then you will need to inform the DSO
- The DSO must consider if it is safe for the child or vulnerable adult to return home to a
  potential abusive situation, seeking advice from Social Care or Police as required
- Managers in the Police or Social Care agencies will then advise about how to proceed to ensure immediate wellbeing of the child or vulnerable adult
- If the child or vulnerable adult is in immediate danger or in need of medical attention they should remain with DH Associates staff, volunteers, delivery partner or contractor.

All DH Associates' staff have details the name and contact details of each manager including those out of hours who will be responsible for dealing with any incidents or crisis. All DH Associates staff are given a copy of the DH Associates safeguarding policy and these documents are accessible on the website and will also be displayed at relevant sites where DH Associates' activities will be undertaken.

Where there is any doubt about the safety of the child or vulnerable adult if they were to return home to a potentially abusive situation, the lead DSO must inform the relevant Social Care agency and or the Police of their concerns. Managers in the Police or Social Care agencies will then advise about how to proceed to ensure the immediate well-being of the child or vulnerable adult.

If after 48 hours no action has been taken the Lead DSO or DSO Team member should utilise the escalation process with the LSCB.

Staff must also be aware that if they feel the referral has not been dealt with, no action has been taken or that DH Associates is trying to disregard the referral they should follow the procedures as set out in the Whistleblowing Policy.



#### Allegations against Staff, Volunteers, Delivery Partners or Contractors

All allegations of abuse made against a member or members of staff, volunteers, delivery partners or contractors will be managed in line with DH Associates' safeguarding and employment policies and procedures. (See also section 3).

# Support for the Referrer

DH Associates will fully support and protect staff, volunteers, delivery partners and contractors who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or vulnerable adult and reports his or her concern about a colleague's practice. This is also covered through DH Associates whistle blowing policy.

Following a referral, staff, volunteers, delivery partners and contractors may be involved in the assessment and management process led by the relevant Social Care Team and may be invited to take part in any strategy meeting or attend an initial Case Conference, where there is a criminal investigation they may be required to co-operate with the Police. In all these circumstances, they will be offered sufficient time to prepare and attend meetings with the support of their line manager and DH Associates DSO Team.

They will also receive appropriate senior management support and the DSO will continue to provide support and guidance as required/appropriate

Records will be kept of every concern raised and they will be detailed as what actions have been taken, whether an external agency has been involved and is leading on any investigation and what the outcome has been so that the file can be closed and then stored for legal purposes on the secure system.

# **Record Keeping and Information Security**

Well-kept records are essential in situations where it is suspected or believed that a child or vulnerable adult may be at risk from harm.

Records should state who was present, time, date and place. Be factual, state exactly what was said, observed or alleged, be written in ink and signed by the recorder.

Records must also be stored, retrieved and destroyed within current Data Protection laws and DH Associates robust Data and Information Security requirements.

The use of a standard Safeguarding Referral Form for all staff irrespective of their role or which delivery contract they currently work with and is available on the system.

Staff, volunteers, delivery partners and contractors are guided in recording, to be mindful of the possibility that this may be shared with others at some stage and in exceptional circumstances, the possibility that they may become evidence in court proceedings. Equally staff, volunteers, delivery partners and contractors must be aware that documents regarding an individual that DH Associates hold may be subject to a Freedom of Information request under the Freedom of Information Act. Under the Act individuals have the right to access their own records unless the situation is covered by the following exemptions:

 Information that would be likely to prejudice the prevention and detection of a crime, or the capture or prosecution of an offender



 Information held for the purposes of social work where disclosure would be likely to prejudice the work, by causing serious harm to the physical or mental health or condition of the data subject or another person

Records are kept for the time required legally and or contractually by the various government Commissioners and there is a robust storage, retrieval and disposal process and system in place. Details of allegations that are found to be malicious will be removed from personnel files. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, detail of how the allegation was followed up and resolution to the allegation and notes of action/s taken and any decisions reached, is kept on the confidential personnel file of the accused and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the Police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if an allegation re-surfaces at a later date. In respect of safeguarding allegations against an adult the record should be retained at least until the accused has reached normal pension age of for a period of 10 years from the date of the allegation if that is longer. Records in respect of a safeguarding concern about a child should be kept for 7 years unless a minimum time is specified by specific contracts held by DH Associates. Where a request for information sharing is made, the Lead DSO and Managing Director, would make a decision as to whether they are able to share the information and if necessary would seek relevant legal advice and advice from other bodies such as the NPCC and Childline. All decisions taken about information sharing are expected to keep the safety of the young person or vulnerable adult of central and paramount important. Once the decision has been made regardless of whether it is to be shared or not this is still recorded identifying the reasons for the decision. If the request has come from the LSCB, they will provide DH Associates with clear rationale as to why the information is needed and the request should be proportionate to the reason. DH Associates follow the 7 Golden Rules to Information Sharing as per the guidance document "Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers".

All learners undergo induction relevant to the business or contract area. Part of this process includes consent forms as required and collection of other personal details. This is recorded on electronic customer relationship management systems relevant to the business area and other documents directly relating to delivery, all are stored securely.

Learners and their parents/carers are made aware of the need for DH Associates and or delivery partners to hold information relating to them, what will be held, how it will be held, how long it might be held, who might have access to it and how it will be used.

The safeguarding form is sent to the DH Associates safeguarding e-mail address and this is then uploaded by a member of the DSO Team to the system within 24 hours and can only be accessed by the DSO Team. Once a copy has been uploaded to the system local records will be destroyed. All concerns and incidents are reported on at senior management level and lessons learnt in how these were dealt with are discussed and where appropriate procedures are revised.

All partner's policies and procedures are checked during due diligence and any policies or procedures that do not meet DH Associates and legislative standards must be revised. DH Associates will support partners to revise these documents if they are unsure. Depending upon the contract being delivered, the partners will follow their own policy and procedures which are checked by the DSO during Monitoring Reviews and then quarterly during the Quarterly Monitoring Reviews to highlight if any safeguarding concerns have been raised, if their policy and procedures have been



followed, if any of the concerns have been referred and to whom and if the referral has been followed up to ensure action has been taken.

Awareness sessions regarding data and information security are delivered to staff at all levels in the organisation with regular reminders through Intranet news items. All information covering data protection and security are held on our system which all staff, volunteers, delivery partners and where applicable contractors are made aware of through the awareness and induction sessions. DH Associates' definition of its staff's roles and responsibilities to data security and protection are detailed in a number of documents on our system. DH Associates and all delivery partners have security plans which are reviewed annually for agreement.

#### Safer Recruitment and Training for Staff

When recruiting new members of staff DH Associates follows the government guidance "Safeguarding Children: Safer Recruitment in Education and Safer Recruitment principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. DH Associates adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that DH Associates uses the DBS checking service to assess applicants' suitability for positions of trust; the Company compiles fully with the Code of Practice and undertakes to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance. Applicants will also have to complete a Declaration Form in line with DH Associates recruitment policy.

Newly appointed staff will have a job role induction (JRI) in line with the DH Associates Probation policy over a 6-month period. A robust induction into the child and vulnerable groups safeguarding procedures will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for an Employee to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role.

Probation allows the manager of the newly-appointed Employee to assess objectively whether the new recruit is suitable for the role, taking into account the individual's overall capability, skills, performance and general conduct in relation to the job in question.

DH Associates shall ensure that all Employees are made aware of the standards expected of them and will put in place the appropriate support, training and feedback to achieve these standards. For the organisation, Probation allows the assessment of the Employee's contribution, potential and suitability for the role to which they have been appointed.

Furthermore, Probation aims to identify the essential development required to undertake the job role, identify any areas for development following initial interventions, and provide support in these areas through a structured plan.

They will be made aware of the relevant Safeguarding procedures as part of that induction programme, and be given a copy of DH Associates Safeguarding Children and Vulnerable Groups Policy



# Safeguarding Children and Vulnerable Group's Policy Training Interventions

Individual/Group	Training	Frequency
All new staff	Safeguarding induction Prevent Duty and Chanel	During probation period
All staff	Safeguarding refresher Prevent Duty/Chanel	Annually
Lead DSO/DSO	DSO training/refresher for children and vulnerable groups safeguarding	Every 2 years
Recruitment managers	Safer recruitment	Every 2 years
Senior Managers	Safeguarding awareness and refresher.	Annually
Delivery Partners staff	Safeguarding refresher Prevent Duty & Chanel	Annually
Volunteers	Safeguarding refresher Prevent Duty Chanel	Annually



### **DH Associates Safeguarding Code of Conduct**

All employees are required to abide with the DH Associates Code of Conduct alongside the Safeguarding Code of Conduct below, which applies to behaviour of all staff and volunteers in direct contact with young people and on-line.

This Safeguarding Code of Conduct also details how individuals can also protect themselves against allegations of abuse.

## How to Protect Yourself against Allegations of Abuse:

Avoid personal and social contact with children or vulnerable adults and seek to minimise the risk of any situation arising in which misunderstandings can occur.

#### You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult
- Issue or threaten any form of physical punishment
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss staff's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person even where the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment in order to discipline. Shouting at young people should be avoided whenever possible and only if alternative forms of discipline have failed.
- · Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer or games etc.) that has inappropriate content for young people.
- Invite, or allow, a young person or vulnerable adult who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in, or tolerate, any inappropriate physical activity involving young people.
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature for children or vulnerable adults that they can do for themselves
- Dismiss an allegation of any sort relating to a customer's welfare or delay the reporting of an allegation
- Discourage anyone from reporting concerns or ask individuals to keep secrets
- Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they suspect abuse
- Spend excessive amounts of time alone with children or vulnerable adults, away from others
- Make unnecessary physical contact with children or vulnerable adults, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of



distress or physical support in contact sports or similar. In all cases, contact should only take place with consent of the child or vulnerable adult

- Do not arrange to meet a child or vulnerable adult or their families with whom you work outside of working hours unless it is with consent of the parents/carer and person in charge of the activity
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a young person or their family.
- Consume alcohol, take illegal drugs or legal highs, during the working day/evening or at events, including during any breaks or when in the presence of young people.
- Smoke/vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.

#### You Should:

- Work in a room where you can be visibly seen, leave the door open and make sure other
  adults visit the room regularly whilst respecting children and vulnerable adults' rights to
  privacy and encourage children and adults to feel comfortable enough to report attitudes or
  behaviours they do not like
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
- All staff, volunteers, delivery partners and contractors at organised activities will be expected
  to act with discretion with regard to their personal relationships. This should ensure their
  personal relationships do not affect their leadership role within the organisation. All preexisting relationships between staff, volunteers, delivery partners, contractors and or
  participants of the organised activities must be declared
- Avoid working in isolation with Children and vulnerable adults, follow the recommended adultto young people ratios for meetings and activities and ensure there is separate sleeping accommodation for young people, adults and Young Leaders.
- Never give out a personal mobile number or private e-mail address
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSOs
- Treat all young people and adults equally and listen to them; avoid favouritism and gossiping.
- Ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children or vulnerable adults on social network sites. Always use
  professional language when writing, phoning, emailing or using the social media to
  communicate with young people or vulnerable adults.
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned
- If staff, volunteers, delivery partners and contractors have concerns relating to the welfare of a child or vulnerable adult in their care, be it concerns about actions/behaviours of another



colleague or concerns based on any conversation with the child or vulnerable adult, particularly where they make an allegation, they should report this immediately

- Act as a role model
- Set and monitor appropriate boundaries and relationships when working with children and vulnerable adults based on openness, honesty and respect for the child or vulnerable adult. Ensure that the focus of your relationship with a young person that you have met through any programmes remains professional at all times. The aim should never be to develop the relationship into a friendship or intimate relationship.
- Respect a young person's/adult's right to personal privacy but never agree to keep any
  information relating to the harm of a young person/adult confidential. Provide support to a
  child, young person or vulnerable adult making a complaint
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSOs without delay and record all the facts
- Ensure that if a young person who has become distressed needs comfort that this is done in
  a way that is both age appropriate and respectful of their personal space. Never act in a way
  which may be perceived as threatening or intrusive. Always ask a young person before you
  act. Hugging should be limited and never initiated by staff/volunteers. Any hugging should be
  done by the side of the young person with an arm placed around the shoulders side by side.
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary in relation to the activity and that this is done in a way that other colleagues can observe you.

Upon induction to the programme the child/ young person or vulnerable adult will be given a copy of the code of conduct and the DH Associates staff will go through this document with them to ensure they understand their responsibilities.

If a child, young person or vulnerable adult feels that there has been a breach of the code of conduct they should report this breach by utilising the DH Associates complaints process. The complaint will be fully investigated as per the policy/process and actions taken to ensure the individual making the complaint is fully supported. If the complaint is in regard to another child, young person or vulnerable adult there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of code of conduct may need the intervention of the DSO Team and the DH Associates safeguarding procedures should be followed.

All complaints are recorded and followed up to a satisfactory conclusion. The manager responsible for the relevant contract would conduct the investigation with support from the DSO. DH Associates Staff/volunteers who breach this code of behaviour may be subject to DH Associates disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.

All children, young people and vulnerable adults should be treated with respect and the code of conduct has been written with respect, dignity and safety for every individual in mind, however staff understand that children/young people are capable of abusing their peers. Peer abuse can take many forms such as sexting, bullying, physical and emotional abuse, and inappropriate banter.



DH Associates National Designated Safeguarding Referral Form

Name of Child/Vulnerable Adult:											
If a DH Associates learner, please state which programme and location they are allocated to:											
Programme	ime				L	Location					
					E	Ethnicity:					
Gender:	M/F	DoB:			L	₋an	guage:				
					I	nte	rpreter nee	ded?	Y/ <b>i</b>	N	
Address:											
Postcode:				Ph	one:						
Service/Organisation:				Date started at Service/Organisation							
Main Carer/s: (Specify relationship)		Name:			DoB: Addres		Address:	idress:		Phone No:	
Is the main ca	arer aware	of the referra	al?				Yes		N	Ю	
If No, state reason:											
Does the individual concerned know a referral is b				s bei	ng made?	?	Yes		N	10	
If No, state reason:											



Other Relevant I	Other Relevant Information (GP, Health Visitor Name)				
		y what the individuevent. Please use		id or what you obselleet if necessary)	ved that caused
Category of cond	cern:				
Physical	Neglect	Emotional	Sexual	Financial	Extremism
Who have you spoken to and what was said?					
State what action	taken, and wher	1:			
Signed:					
Print Name:					
Date:			Position:		

It is important that you complete all sections of the form. Once completed, please forward the form for the attention of the Designated Safeguarding Officers via email <a href="mailto:team@dhassociates.co.uk">team@dhassociates.co.uk</a> and your form will be dealt with accordingly.



# Safeguarding Children and Vulnerable Group's Policy Human Resources Declaration Form

DH Associates is steadfast in its commitment to safeguarding and promotes thorough and safe recruitment practices in line with the Company's duty of care in ensuring the safety and wellbeing of its stakeholders.

	Surname	9								
	Full Fore	names								
	Full Perr Address	nanent								
	Date of I	Birth								
S	afeguard	ing								
CC As wl	ore, the pressociates	inciple the fully sup ne into c	nat the welfar port this prince contact with c	e of children ciple and the hildren/vulne	iting to the we and young p refore, we re erable adults dren's/vulner	eople must quire that e or their per	t be the para everyone cor sonal details	mount cons nected with , complete	sideration. n DH Assoc and sign th	DH iates
•	investig		out any alleg		the NSPCC oncerns that yo					oung
	Y	es		No						
•	Have y	ou ever l	peen convicte	ed of any offe	ence relating	to children,	young peop	ole or vulner	rable adults	?
	Y	es		No						
•					inary proced				yment or	
		es	'	No						

#### Access to Government Assets

Furthermore, DH Associates has Government contracts, some or all of which require it to access Government Assets (defined as premises, systems, information or data). The Company has a duty to protect these assets and this obligation extends to its employees and agents. Since you are, or may become, such a person, all sections on this form will need to be completed.

**Note:** If a conditional offer of employment is made to you, you may be required to obtain and produce for inspection, a Disclosure certificate, which is an independent check against the National Collection of Criminal Records to confirm the accuracy of the information provided on this form.



- Have you ever been convicted of or found guilty by a Court of any offence in any country (excluding
  parking but including all motoring offences even where a spot fine has been administered by the Police)
  or have you ever
- been put on probation (probation orders are now called community rehabilitation orders) or absolutely/conditionally discharged or bound over after being charged with any offence or is there any action pending against you?

You need not declare convictions which are "spent" under the Rehabilitation of Offenders Act (1974).	(If yes,
please provide further details in the section provided)	

provide further details in the section provided)	
Yes No	

 Have you ever been convicted by a Court Martial or sentenced to detention or dismissal whilst serving in The

Armed Forces of the UK or any Commonwealth or foreign country? You need not declare convictions which are "spent" under the Rehabilitation of Offenders Act (1974). (If yes, please provide further details in the section

provided)		
Yes	No	

• Do you know of any other matters in your background which might cause your reliability or suitability to have access to Government assets to be called into question?

Yes	No	
-----	----	--

If you answered 'YES' to any of the questions on this form, please give details below.						



This declaration must be signed and returned to Human Resources prior to commencing any work.

I declare that the information I have provided on this form is true and complete to the best of my knowledge and belief. I also consent to my personal data being processed and kept for the purposes described above in accordance with the Data Protection Act 2018. In addition, I understand that any false information or deliberate omission in the information I have given on this form may disqualify me for employment in connection with Government contracts. I undertake to notify any material changes in the information I have given above, including any future criminal convictions, to the HR department.

I understand that a Disclosure check will be undertaken as a condition of my employment, details of which will be held by DH Associates. I declare that I am aware of my statutory rights under the Data Protection Act 2018 and hereby give my consent for DH Associates to release my name, Disclosure reference number and date of issue to third parties for bid and/or contractual purposes only.

Name	
Job Role	
Signature	
Date	

<u>Note:</u> You are advised that under the provision of the Rehabilitation of Offenders Act (NI Order) (1974) (Exceptions) Order 1975 as amended by the rehabilitation of Offenders Act 1974 (Exceptions) (Amendments) Order 1986 you should declare all convictions, including spent convictions. *(applicable where working with children and/or vulnerable groups)* 



# Safeguarding Children and Vulnerable Group's Policy DH Associates Code of Conduct

DH Associates Code of Conduct is set out below. It covers the main standards of behaviour DH Associates requires from employees. The Code includes the Company Rules, which employees need to follow, and examples of misconduct which DH Associates normally regards as gross misconduct. A breach of the Company Rules may result in disciplinary action. A single instance of gross misconduct may result in dismissal without notice.

DH Associates rules and the examples of misconduct are not exhaustive. All employees are under a duty to comply with the standards of behaviour and performance required by DH Associates, and to behave in a reasonable manner at all times.

Employees are required to comply with the rules relating to notification of absence set out in DH Associates Absence Policy and Procedure. Employees are required to arrive at work promptly, ready to start work at their contracted starting times. Employees are required to remain at work until their contracted finishing times. Employees must obtain management authorisation if for any reason they wish to arrive later or leave earlier than their agreed normal start and finish times.

Staff working remotely must keep a detailed record of appointments using Outlook. Appointments and any changes are to be recorded as they occur and the line manager informed/updated on any significant changes. To support this process mobile phones have been enabled with a tracker that in the event of any safeguarding concern can be used to support their record of contacts.

DH Associates reserves the right not to pay employees in respect of working time lost because of poor timekeeping. Persistent poor timekeeping or failing to keep an accurate record of contacts will result in disciplinary action.

Employees will actively promote the service supplied by the organisation where appropriate. Employees are required to maintain satisfactory standards of performance at work. Employees will strive to deliver the highest quality service to service users. Employees will actively review and improve their performance when necessary. Employees are required to dress in a smart professional manner. Employees are required to comply with all reasonable management instructions. Employees are required to co-operate fully with their colleagues and with management, and to ensure the maintenance of acceptable standards of politeness. Employees are required to take all necessary steps to safeguard the Company's public image and preserve positive relationships with its customers, clients or members of the public.

Employees are required to ensure that they behave in a way that does not constitute unlawful discrimination. Employees are required to comply with DH Associates Operating Policies and Procedures. Employees will respect individuals, their rights and responsibilities.

Any queries received from the media must be referred immediately to management. Employees must not attempt to deal with queries themselves.

Employees may be required to work additional hours at short notice, in accordance with the needs of the business. Employees may be required from time to time to undertake duties outside their normal job remit.

Employees may be required from time to time to work at locations other than their normal place of work.



Employees must not discuss company matters outside the organisation without the prior consent of the partners. Employees are required to keep confidential, both during their employment and at any time after its termination, all information gained in the course of their employment about DH Associates business, and that of DH Associates clients or customers, except as required by law or in the proper course of their duties. Employees are not permitted to engage in any activity outside their employment with DH Associates which could reasonably be interpreted as competing with the Company. Employees are required to seek permission from management before taking on any other employment while employed by DH Associates.

Employees are required to gain an understanding of company's health and safety procedures, observe them, and ensure that safety equipment and clothing are always used. Employees must report all accidents, however small, as soon as possible, making an entry in the Accident Book. Except for use on authorised Company or client business, employees are not permitted to make use of DH Associates or its clients, telephone, fax, postal or other services. Employees must not remove Company or site property or equipment from Company or site premises unless for use on authorised Company business or with the permission of management.

If an employee damages property belonging to DH Associates, either through misuse or carelessness, DH Associates reserves the right to make a deduction from the employee's pay in respect of the damaged property. On termination of their employment employees must return all Company property, such as keys, laptops, mobile telephones, Company vehicles, documents or any other items belonging to DH Associates. This list is not exhaustive.

DH Associates may reasonably request to search employees' clothing, personal baggage or vehicles. An authorised member of management in the presence of an independent witness must conduct any such search. Should an employee refuse such a request, DH Associates will require the appropriate authorities to conduct the search on behalf of DH Associates. An employee's failure to cooperate with DH Associates in this respect may be treated as gross misconduct.

Employees are solely responsible for the safety of their personal possessions on Company premises and should ensure that their personal possessions are kept in a safe place at all times. Should an employee find an item of personal property on the premises he or she is required to inform management immediately.

DH Associates will normally reimburse employees in respect of any expenses wholly, necessarily and proportionately incurred in the course of their work against the relevant receipts. DH Associates reserves the right to refuse to pay an expense claim where the expenditure is unreasonable, disproportionate or unnecessary.

In order to provide a cost effective service, employees are requested to use the Company's equipment, materials and services wisely.

Employees should try to reduce wastage and the subsequent impact on the environment by ensuring that they close windows, avoid using unnecessary lighting or heating or leaving taps running, switch off equipment when it is not in use, handle all materials with care and where possible recycle any necessary items accordingly.

In order to provide a working environment which is pleasant and healthy, smoking is not permitted anywhere on Company premises. For the avoidance of doubt, failure to comply with DH Associates' policy on smoking may result in disciplinary action, up and including dismissal.

Employees must notify DH Associates of any change in personal details, including change of name, address, telephone number or next of kin. This will help DH Associates to maintain accurate



personal details in compliance with the Data Protection Act 1998, and ensure it is able to contact the employee or another designated person in case of an emergency.

Set out below are examples of behaviour which DH Associates treats as gross misconduct. Such behaviour may result in dismissal without notice. This list is not exhaustive.

- theft, dishonesty or fraud
- deliberate recording of incorrect working hours
- smoking on Company premises
- assault, acts of violence or aggression
- unacceptable use of obscene or abusive language
- possession or use of or being under the influence of non-prescribed drugs or alcohol on Company premises or during working hours
- wilful damage to Company, employee or customer property
- serious insubordination
- serious or gross negligence
- bringing DH Associates into disrepute
- falsification of records or other Company documents, including those relating to obtaining employment
- unlawful discrimination, including acts of indecency or sexual harassment
- refusal to carry out reasonable management instructions
- gambling, bribery or corruption
- serious breach of the Health and Safety policies and procedures
- breach of confidentiality, including the unauthorised disclosure of Company business to the media or any other party
- unauthorised accessing or use of computer data
- unauthorised copying of computer software

Employees have the right to appeal against any disciplinary action taken against them. All appeals must be made in writing no later than the end of the fifth working day after the disciplinary decision was notified in writing to the employee. The first of these five working days is the day on which the employee received written confirmation of the disciplinary decision. The employee should submit the written appeal to the Managing Director.

DH Associates will arrange and hold an appeal hearing as quickly as possible, and, in any event, within seven working days of the date on which the appeal was submitted. The employee will be entitled to attend the appeal hearing and will be given an opportunity to state his or her case. The findings of the appeal hearing will be notified to the employee within three working days of the hearing. The decision at this stage will be final. Employees are entitled to be accompanied by a fellow employee or a trade union official at all stages of the procedure.



#### **DH Associates - Code of Practice**

The associates and employees of DH Associates will operate in such a way that they meet two basic principles when conducting the business of the firm.

These key principles are:

#### To provide a high standard of service to customers.

- We will only accept engagements for which we are qualified and experienced.
- We will clearly define the terms and conditions of the assignment, including the nature, scope, and period of service to be provided. We will clearly allocate responsibilities and the basis of remuneration.
- We will take responsibility for the quality of all work undertaken in the name of DH Associates and agree the standards of provision with the client.
- All information disclosed to DH Associates in the nature of their business will remain confidential to clients.
- Recommendations will be developed that are specific to individuals clients needs; such solutions will be practicable, realistic and understood by clients.
- DH Associates will ensure the good management of any project undertaken through careful planning, frequent progress reviews and effective controls.

#### To operate in such a way that maintains independence, objectivity and integrity in practice.

- DH Associates staff will maintain a fully independent position with clients, ensuring that
  advice and recommendations are based on thorough, impartial consideration of all
  pertinent facts, circumstances, and on opinions developed from reliable relevant
  experience.
- DH Associates staff will declare any interest, relationships, or circumstances which might influence or impair their judgement or objectivity in relation to any particular assignment.
- DH Associates staff will not use any information gained through assignment to their advantage or benefit.
- DH Associates staff will not take gifts, discounts, or commissions offered as an inducement to show any favour to any person or body.
- DH Associates will advise clients of any significant reservations they have about the client's
  expectations of benefits from an engagement; we will not accept any engagement in which
  we cannot serve the client effectively.
- DH Associates will not advise a client on short term benefits without due consideration of long term consequences.
- DH Associates will discuss and agree with clients any significant changes in the objectives, scope, approach, and anticipated benefits, or other aspects of the engagement which might arise during the course of the assignment.
- Any conflict of interest will be brought to the attention of clients and will be subject to
  withdrawal by the consultant or by determining a future input to be agreed in writing to the
  client's satisfaction.
- We will only operate within a framework of equality; in accordance with our policy statement on 'Equality of Opportunity'.



#### **D H Associates - Customer Charter**

As a customer of DH Associates you will...

...be dealt with promptly.

We will respond to your enquiry immediately. Your enquiry will be passed to our Customer Service Team and you will be contacted within one week maximum.

...only have to make one call to receive the full range of DH Associates' services.

We will do the ringing round for you if the information or service you require is held by another organisation.

...always know in advance if there will be a charge for the service you require.

We will make it clear if there will be a charge so that you can make an informed decision.

...receive a service that is confidential, impartial, objective and professional.

We will treat your enquiry in confidence and only disclose your details with your permission. We will act independently and objectively in the delivery of our services.

...receive a service that is based on the most accurate and relevant information.

We will ensure a consistently high quality of service through our quality assurance systems and processes.

...be encouraged to feedback your views on the service you have received to help us evaluate our services and improve the quality of our services. As part of this you will have access to our customer complaints and appeals procedure.

We will use any feedback you give us to continually improve the quality of our services to better meet the needs of our customers.



#### Policy Aim

DH Associates (DHA) strives to ensure all learners and employers have an excellent service. If anything is going wrong we want to know and ensure we resolve and improve our service.

#### What is a complaint?

Complaints may be made by anyone receiving a service from DH Associates. This includes all learners, commercial or funded such as apprentices and all employers. Complaints may be about a member of staff, the learning delivery or assessment decisions.

#### **Complaints Procedure**

- The first point of contact for learners is their trainer or employer. Trainers in receipt of a complaint shall take immediate steps to try and resolve the issue. This must be reported to DH Associates manager.
- The first point of contact for employers is the Business Development Team and any complaints received can be resolved at by them or where appropriate passed to the Director of Quality & Compliance for investigation under the procedure outlined below.
- 3. If the complaint cannot be resolved informally the Director of Quality & Compliance must be informed. A formal investigation will be planned and the complaint will be responded to within 3 working days of reporting.
- 4. A written record of the complaint, investigation and how it is resolved must be made. The learner and employer must be informed of the outcome.
- 5. Learners and employers can appeal the decision reached within 5 working days and the complaint will be reviewed by DH Associates Senior Management Team.
- 6. If the complainant remains dissatisfied registered learners can complain direct to the awarding body.
- 7. Learners and employers on funded learning can make a complaint to the Education & Skills Funding Agency. The escalation process to the ESFA Apprenticeship Service Support on 08000 150 600 or helpdesk@manage-apprenticeships.service.gov.uk
- 8. Information regarding complaints, the response times and outcomes, shall be collated and reviewed by the. Director of Quality & Compliance.



# Safeguarding Children and Vulnerable Group's Policy DH Associates Information Security Management

In accordance with DH Associates Information Security Management System (ISMS) documents are reviewed on an annual basis, Risk is managed continually through a controlled Risk management process and full annual analysis. The Risk Register records all risks which are reported to SMT and Directors.

All information security incidents will be reported to DH Associates Information Security Manager immediately who is responsible for ensuring the incident is correctly raised and evaluated for risk. The IT Security Manager will work with the identified asset owner responsible to resolve such incidents and take any further actions required for future mitigation. If appropriate, part of the process would be to inform the Managing Director for the resolution of any such incidents

All delivery partners and DH Associates direct delivery sites are subject to DH Associates scheduled audits against relevant security controls in DH Associates IT Policy. Any non-conformity is recorded in the corrective action log to be dealt with according to our ISMS. If a security incident is identified, this is followed up in accordance with DH Associates ISM process by the IT Security Manager.

DH Associates ensure encryption is in place, computers are looked down so no one can use USB data sticks. We have clear desk policies and this is checked during audits at delivery partner's premises and all policies are checked annually with our delivery partner's.

All assets relating to DH Associates information systems are controlled and maintained in accordance with the IT Security Policy.

All customer data has been classified as Corporate Sensitive and is protected under the Corporate Sensitive protection method as set out in the IT Security Policy. Aggregation of data must be considered and is covered under the classification that has been attributed.

All physical storage media is marked with physical asset tags and recorded in the IT asset management system. All protectively marked classifications will be dealt with as set out in the IT Security Policy under Corporate Sensitive data.

All delivery partners are subject to DH Associates' scheduled audits against relevant security controls. Any none conformities are recorded in the corrective action log to be dealt with according to our corrective action procedures. Where a security incident is identified, this is followed up in accordance with DH Associates' ISM process by the IT Security Manager.

Under DH Associates' Information Security Management System the ISM states all learner related data is to be treated as Corporate Sensitive. DH Associates agreed delivery partner's sign agreements stating they will work in complete compliance to DH Associates' document set – Disclaimer detail is also included in all communication via email.

All employees are issued with a Job Description for the job role they are employed for. The Roles and Responsibilities are defined within the Job Description. Job Descriptions clearly state individual responsibility for IT security, Safeguarding and other operational areas.

All DH ASSOCIATES staff sign a confidentiality agreement under DH Associates' standard terms of employment. Data security/protection awareness is maintained by regular communications, inductions and visits by internal auditors. DH Associates carry out scheduled internal audits in accordance with our ISMS.



System records are maintained so that the Company Network and systems can be adequately monitored and audited for signs of actual, or possible, security breaches and attacks. 24 x 7 monitoring is in place through DH Associates' Hosted Contract and in accordance with the IT Security Policy and IT Service Delivery Document.

Delivery partners are required to undertake the security training before they are given access to the systems. Where we collect such items as learner CVs and / or training certificates these are all handled in the same way as any paper record in that they are stored electronically on encrypted storage drives or where a paper copy is maintained it would be stored with the particular customer file and stored in secure locked cabinets, all learner data is classified within our ISM systems as corporate sensitive.

DH Associates has classified all data as Corporate Sensitive in order for a full compliant backup and restore service to be applied in line with its contractual agreements.

DH Associates maintain a corporate classification system to ensure that all Corporate Sensitive data is held on archive for the life time of the contract in addition to the agreed retention period for audit purposes, this is fully documented within our ISM.

All hard copy data once archived is securely stored. We shred all paperwork not required to be kept for audit purposes on site.

Access to the Internet is via a fully managed firewall with access to web sites being restricted by Internet filtering software. No laptop or other device can access customer data away from a secure site unless the contract is delivered on secure premises.

Access to sensitive data will be provided only through the uses of a company PC or Laptop (asset) which must be a domain member unit which will be regulated through End Point analysis. All devices will be encrypted. 2 factor authentications will be configured to ensure the staff would connect using a username and password. Role level Active Directory security will then ensure the system direct the member to the dedicated systems file.



**DH Associates - Concerns From** Learners Name.....Employer..... Address..... Telephone..... Email.... Assessor..... Alerter ..... Received by ..... Date..... Is this a concern or a safeguarding issue Outline issue Reported to who at DHA Date Reported to who at establishment Next Steps; Record any other information



This section to be completed by senior management only	
Outcome:	
Name:	Signature:
name.	Signature.
Date:	



# List of relevant Agencies and Contact Details

Local GP Finder: www.nhs.uk/Servicedirectories/page s/servicesearch.aspx

Website: www.bacp.co.uk Email: bacp@bacp.co.uk

Website: www.nspcc.org.uk Telephone: 0808 800 5000

Textphone: 0800 056 0566 Email: help@nspcc.org.uk

Website: www.bullying.co.uk/ Email: help@bullying.co.uk

Website: www.mind.org.uk Telephone: 020 8519 2122 or 0845 766 0163

Email: contact@mind.org.uk

Website: www.elderabuse.org.uk

Website: <a href="https://www.cruse.org.uk">www.cruse.org.uk</a> Telephone: 0844 477 9400 (helpline) Email:

info@cruse.org.uk or helpline@cruse.org.uk

Young Person's Free Helpline: 0808 808 1677

Website: www.suzylamplugh.org Telephone: 020 7091 0014

Email: info@suzylamplugh.org

National Centre for domestic violence

Website: www.ncdv.org.uk/ Telephone: 0800 970 2070

Email: office@ncdv.org.uk

Website: <a href="https://www.respond.org.uk">www.respond.org.uk</a> Helpline: 0808 808 0700

Website: www.relate.org.uk Telephone: 0845 456 1310 or 01788 573241

Email: enquiries@relate.org.uk

Support for under 25's Website: <a href="https://www.thesite.org">www.thesite.org</a>

Website: www.talktofrank.com

Tel: 0800 77 66 00 (in 120 languages) Textphone: 0800 917 8765

Website: www.stonewall.org.uk

Website: <a href="https://www.thinkuknow.co.uk">www.thinkuknow.co.uk</a> Telephone: +44 (0)870 000 3344



Email enquiries@ceop.gov.uk

Website: <a href="www.carers.org">www.carers.org</a>
Email: <a href="mailto:info@carers.org">info@carers.org</a>

Website: www.youngminds.org.uk/

Telephone:0808 802 5544 or 0207 089 5050 Email: <a href="mailto:ymenquiries@youngminds.org.uk">ymenquiries@youngminds.org.uk</a>

Website: www.dyslexiaaction.org.uk/

Telephone: 0300 303 8840

Email: <a href="mailto:supportus@dyslexiaaction.org.uk">supportus@dyslexiaaction.org.uk</a>

Website: //rapecrisis.org.uk/

Email: <a href="mailto:rcewinfo@rapecrisis.org.uk">rcewinfo@rapecrisis.org.uk</a>/Website: https://rapecrisis.org.uk/