JANUARY 2025

SAFEGUARDING AND PREVENT DUTY POLICY

Dental Nurse Academy

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SAFEGUARDING AND PREVENT DUTY POLICY

INTRODUCTION TO THIS POLICY

POLICY STATEMENT

The Dental Nurse Academy (DNA) takes the duty of care towards learners extremely seriously. We accept that we are responsible for the duty of care to safeguard and promote the welfare of our learners. We are committed to safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements.

We recognise their welfare is paramount to the work we do and in the decisions we take.

All learners and staff regardless of age, disability, genetic information, gender identity, marital status, race, colour, creed, national origin, citizenship, socio-economic background, religion or belief, sex, sexual orientation or any other basis prohibited by applicable law, have an equal right to protection from all types of harm or abuse.

Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Working in partnership with learners, employers, the National Examining Board for Dental Nurses (NEBDN) and other agencies is essential in promoting learner's welfare.

DNA

Children can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme. Some organisations in England, Scotland and Wales have a duty, as a specified authority under section 26 of the Counterterrorism and Security Act 2015, to identify vulnerable children and young people and prevent them from being drawn into terrorism. This is known as the **Prevent Duty**. These organisations include:

- Schools

- Registered childcare providers

- Local authorities

- Police

- Prisons and probation services

- NHS trusts and foundations.

- Other organisations may also have Prevent duties if they perform delegated local authority functions.

As such, the Dental Nurse Academy recognises its legal responsibility to fulfil the Prevent Duty Statement.

PURPOSE

This policy aims to:

- Promote and prioritise the safety and wellbeing of learners and staff

- Protect learners and staff from harm

- Provide staff with the overarching principles that guide our approach to learner protection

- Set out clear processes for the identification and reporting of cases of suspected or actual abuse.

- Reduce the risk of abuse through rigorous process and good culture that has Safeguarding at its core.

- Adopt safeguarding best practice through our policies, procedures and code of conduct for Managers and Employees

The Prevent element of this policy aims to

- Sets out our approach to ensuring learners and employees are resilient to extreme narratives.

- Stop learners or employees from becoming terrorists or supporting terrorism. This includes how the DNA will support support the rehabilitation and disengagement of any employee or learner already involved in terrorism.

STAKEHOLDERS

This policy applies to all whom come into contact with the DNA. This includes:

1. DNA staff

    a. The Board

    b. Senior Managers

    c. Employees

    d. Self Employed

    e. Agency Staff

    f. Volunteers

2. Job applicants

3. Learners (current and prospective)

    a. Apprenticeship students

    b. National Diploma students

4. Third Parties

    a. Employers (Dental Practices) of our learners

    b. Sub-Contractors to the DNA

    c. Suppliers to the DNA

DEFINITIONS

GENERAL DEFINITIONS

(i)   **DNA** means the Dental Nurse Academy.

(ii) **Employers** means the employer (Dental Practice) of an Apprentice or National Diploma student who is registered with the Dental Nurse Academy.

(iii) **Learners** means Apprentices and National Diploma students.

(iv) **Staff** means The Board, Senior Managers, Employees, Self Employed, Agency Staff and Volunteers acting on behalf of the Dental Nurse Academy.

(v)   **Third Parties** means Employers, Sub-Contractors to the DNA and Suppliers to the DNA

DEFINITIONS SPECIFIC TO THIS POLICY

(vi) **A Child** is defined by The Children Act 1989 as: anyone who has not yet reached their 18th birthday, even if they are living independently, are a member of the armed forces or in hospital.

(vii) **Adult at Risk**

    i.   An adult who has needs for care and support

    ii.   Is experiencing, or is at risk of, abuse or neglect, and;

    iii. As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

(viii) **Child and Adult Abuse**

Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are 4 main categories of abuse, which are: sexual, physical, emotional abuse, and neglect. It is important to be aware of more specific types of abuse that fall within these categories, they are:

    i.   Bullying and cyberbullying

    ii.   Child sexual exploitation

    iii. Child Criminal exploitation

    iv. Child trafficking

    v.   Domestic abuse

    vi. Female genital mutilation

    vii. Grooming

    viii. Historical abuse

    ix. Online abuse

(ix) **Safeguarding children** is defined in Working Together to Safeguard Children 2018 as:

    i.   protecting children from maltreatment.

    ii.   preventing impairment of children's health or development.

    iii. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

    iv. taking action to enable all children to have the best outcomes.

(x) **A Safeguarding Alert** is made with the Senior Lead for Safeguarding to raise concerns that a person is experiencing, or at risk of, abuse or neglect. An alert may arise as a result of a disclosure, an incident, or other signs or indicators.

(xi) **Radicalisation** is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm.

(xii) **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

(xiii) **Designated Safeguarding Lead** (DSL) is the DNA Senior Lead for Safeguarding, and vice versa.

RELATED POLICIES AND ARRANGEMENTS

Related Policies:

- POL-1-1 Diversity, Equality and Inclusion Policy
- POL-1-4 Complaint Policy
- POL-1-6 Privacy Policy
- POL-1-9 Whistle Blower Policy
- POL-1-10 Harassment and Bullying Policy
- POL-1-11 Malpractice Policy
- POL-1-22 Learner Support and Wellbeing Policy Policy
- POL-1-32 Supervision of Learners Policy
- POL-1-37 Staff Fitness to Practice Policy
- POL-1-42 Incident Policy

The DNA's policies will be reviewed regularly (on an annual basis) and any identified elements which breach or risk deviation from this policy shall be removed.

LEGAL FRAMEWORK

This policy and the associated arrangements shall operate in accordance with statutory requirements.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and vulnerable adults in the UK. A summary of the key legislation is available from **nspcc.org.uk/learning**

The Prevent Duty has been drawn up on the basis of the and UK Government Prevent Duty Guidance.

- Children's Act 2004
- Care Act 2014.
- Keeping children safe in education (2023) (DfE)
- Working together to safeguard children (DfE)
- Counter-Terrorism and Security Act 2015 (CTSA 2015)

OUR COMMITMENT

The Dental Nurse Academy, and in particular its Board, accepts that it is responsible for ensuring that Safeguarding and Prevent procedures are in place to prevent incidents occurring, and to deal with incidents if they do occur.

Failure to comply with the policy and related procedures will be addressed without reasonable delay and may ultimately result in dismissal/exclusion from the organisation.

SAFEGUARDING AS PART OF THE AGREEMENT

In safeguarding children and vulnerable adults, employers agree to joining with DNA and comply fully with the principles of safeguarding.

DNA

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PROTECTING LEARNERS

Protecting learners is a priority for the Dental Nurse Academy. We do this by:

- Ensuring that our policies and procedures are adopted by everyone in our organisation.

- Safe recruiting that includes identity checks DBS Enhanced with Barred List checks for everyone in our team.

- Having processes in place for identifying, reporting, recording and responding to concerns relating to safeguarding or the Prevent duty.

- Implementing human intervention through training and management processes to identify and prevent incidents from happening in the first place.

- Implementing technology frameworks to continuously monitor our digital platforms for signs that give cause for concern.

PREVENTING ABUSE TOWARDS LEARNERS

PHYSICAL ABUSE

Physical abuse includes anything which causes physical harm, including physical neglect (e.g. failure to provide appropriate food or clothing). It also includes physical sexual abuse i.e. activities involving physical contact of a sexual nature and electronic forms of sexual abuse such as encouraging, watching or preparing for sexual activities via electronic devices, Female Genital Mutilation (FGM) and forced marriage. Serious violence and gang involvement are also considered to be aspects of physical abuse in the context of this policy.

The remote nature of learning within the DNA reduces risk for our learners. Face to face meetings between learners and staff, or learners and other learners, are not facilitated by the DNA and in fact are not permitted in either case.

Physical abuse while at home or in practice (with their employer) are therefore more of a risk for our learners. DNA staff are vigilant to look for signs such as change of behaviour which may indicate this type of abuse, and a clear process is defined (see below 'Raising Concerns') for reporting and recording such incidents for investigation.

The DNA accepts that there is a greater risk of remote physical abuse such as those involving electronic forms of abuse as described above. Our protection processes are therefore focused on this type of abuse:

- Automated monitoring systems are in place to scan for suspicious content in communications

- All staff are required to attest to having read, understood and agreed to the Safeguarding and Prevent Duty Policy on an annual basis

- All staff require DBS Enhanced with Barred List checks

EMOTIONAL ABUSE

Emotional abuse includes anything that causes an adverse effect on an individual by persistent emotional mistreatment. This may include but not be limited to radicalisation, issues relating to mental health and ongoing harassment (see DNA Harassment and Bullying Policy POL-1-10).

The DNA aims to prevent emotional abuse by ensuring the following:

- Automated monitoring systems are in place to scan for suspicious content in communications
- All staff are required to attest to having read, understood and agreed to the Safeguarding and Prevent Duty Policy on an annual basis
- All staff require DBS Enhanced with Barred List checks
- That the process for identifying, raising and recording concerns is clear and straightforward within the DNA.

THE PREVENT DUTY

The Prevent Duty means that the DNA is required to:

- Protect learners and employees from radicalising influences
- Ensure learners and employees are resilient to extreme narratives
- Identify changes in behaviour of apprentices and employees

PREVENT RISK ASSESSMENT

The DNA recognises that the government has expressed concerns regarding an increase in numbers of learners being arrested for terrorism-related offences in recent years.

A prevent risk assessment is conducted regularly: 'DNA Prevent Risk Assessment'. This is stored securely on our HR drive.

Learner to Learner influence is considered low risk as our learners are remote and contact information is not shared between learners. As learners are not in a classroom environment, communication is not facilitated between one learner and another. DNA email accounts, fileserver and computer equipment are not provided for students.

Staff to Learner (or Learner to Staff) is considered low risk as our IT monitoring systems are in place for electronic forms of communication, and no in-person tutoring occurs on a 1-1 basis.

PROTECTING LEARNERS AND EMPLOYEES FROM RADICALISING INFLUENCES

The DNA is committed to protecting learners and staff from radicalising influences. Our commitments described are set out to provide such protection.

WITHIN THE DNA

By restricting IT equipment and access (for example no learners receive equipment or Microsoft accounts / email address etc. from the DNA), conducting learning remotely, and by avoiding platforms that link one student to another, we are able to reduce exposure from radicalising influences via DNA infrastructure.

Tutor communications are monitored automatically using our IT platform and work is sampled regularly for every tutor and every student.

BEYOND THE DNA INFRASTRUCTURE

However the DNA acknowledges that external influences beyond the DNA's control are still possible. This has been factored into the risk assessment, and our team are trained to in the Prevent Duty to help them identify signs of radicalisation in their learners or colleagues.

ENSURING APPRENTICES AND EMPLOYEES ARE RESILIENT TO EXTREME NARRATIVES

Our automated systems scan inbound communications for signs of extreme narratives, and members of staff are trained (with annual refresher) to identify and report such signs.

The DNA's focus on team and sense of belonging is strong although we recognise that with remote working this is harder to foster than in-person businesses whereby everybody physically comes together 5 times each week. We therefore run regular all-business meetings, including things like the annual Christmas Quiz. The team culture helps to create resilience for everyone in the organisation.

SAFE RECRUITMENT & SELECTION

The DNA is committed to safe employment and safe recruitment practices, that reduce the risk of harm to children and vulnerable adults from people unsuitable to work with them or have contact with them.

The DNA has policies and procedures that that cover the recruitment of all staff. (See DNA Recruitment procedure and staff handbook).

All members of staff must provide documentation for photo-ID check and DBS Enhanced with Barred List checks. These are stored securely on our HR drive. All tutors and members of the clinical team (all those directly involved in training) are GDC registrants and must evidence as much to the DNA as a condition of employment.

I.T. USAGE

MONITORING

FILES

The DNA uses Microsoft Essentials and Microsoft Defender to secure files. Multi-factor authentication (MFA) is enforced for all users.

Activity spikes are monitored, with alerts enabled.

Learners and third parties are not given Microsoft 365 accounts, so cannot use our file systems.

EMAIL

The DNA uses Microsoft Essentials and Microsoft Defender to secure email. Multi-factor authentication (MFA) is enforced for all users.

Reply-all Storm Protection is enabled

Alerts are in place for spikes in network traffic (large-volume file changes) to identify unusual activity or trends that could indicate an attack.

Learners and third parties are not given Microsoft 365 accounts, so cannot use our email systems.

Emails are automatically monitored (inbound and outbound) for suspicious language against a set of prescribed keywords associated with radicalisation and terrorism. Alerts are triggered to the Senior Lead for the Prevent Duty whenever these words are used in communications.

WEB SERVER

The DNA subscribes to advanced security monitoring from GoDaddy, which includes daily scans for:

1. Malware scanning

2. SPAM injection detection

3. Defacement scanning

4. Blocklist checks

Server uptime and website uptime is also monitored 24/7, using services from GoDaddy and UptimeRobot.

Traffic spikes are monitored using Google Analytics (GA4) to identify unusual activity or trends that could indicate an attack.

SOCIAL MEDIA

All employees, volunteers and agents working on behalf of DNA should be aware of the DNA Social Media Policy and procedures and the code of conduct for behaviour towards the children and vulnerable adults we support.

USE OF MOBILE PHONES AND OTHER DIGITAL TECHNOLOGY

All employees, and volunteers should be aware of DNA policy and procedures regarding the use of mobile phones and any digital technology and understand that it is unlawful to photograph children and young people without the explicit consent of the person with parental responsibilities. (see Staff Handbook).

PROMOTION AND COMMITMENT

PROMOTING THIS POLICY

All stakeholders (defined above) are required to engage with this policy and the procedures described.

This policy is promoted via the Staff Handbook, the Student Handbook and is readily available on the DNA website at **www.dentalnurseacademy.com**.

GAINING COMMITMENT TO THIS POLICY

Confirmation of engagement is required by all stakeholders. Our contracts and agreements require agreement to this Policy's acceptance:

a.　Employee Contract (employees)

b.　Employer Agreement (employers i.e. dental practices)

c.　Apprenticeship Commitment Statement (Apprenticeship learners)

d.　Student terms and conditions (National Diploma learners)

e.　Sub Contracting Agreement (suppliers)

Learners and employers are made aware of the Policy on joining and have to commit to accepting the policy as a condition of joining.

All members of staff are required to attest to their having read, understood and commit to this policy.

1.　Upon joining the Dental Nurse Academy, new staff members complete policies and procedures training as part of their induction. Attestation is completed via the web form

2.　Each year on an annual basis, all staff members must renew their attestation via the web form.

Web form for staff attestation: **www.dentalnurseacademy.com/staff-attestation-form** (staff only)

TRAINING

The DNA will:

- Ensure an appropriate level of safeguarding training is available to its board, Employees, Volunteers and any relevant persons linked to the organisation who require it (e.g. contractors).

- Ensure that these groups know about our policies, procedures and behaviour codes and follow them confidently and competently.

- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of safeguarding concerns.

- Share information about safeguarding and good practice with managers, employees and learners.

- Make sure that managers, employees and learners know where to go for help if they have a concern.

For all employees who are working or volunteering with children, this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in safeguarding children.

- Recognise a child potentially in need of safeguarding and take action.

- Understand how to report a Safeguarding Alert.

- Understand dignity and respect when working with children and vulnerable adults.

- Have knowledge of the Safeguarding and Prevent Policy.

Similarly, employees and volunteers may encounter concerns about the safety and wellbeing of an adult at risk of abuse. Any concerns should be pointed out to the Safeguarding Officer immediately. The duty of care is to carry out an investigation as quickly as possible.

CONFIDENTIALITY AND INFORMATION SHARING

The DNA expects all employees, volunteers and trustees to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and POL-1-6 Privacy Policy.

However, information should be shared with the relevant authority (Governing body, police or authorising body; or possibly a combination) if a child or vulnerable adult is deemed to be at risk of harm or contact the police if they are in immediate danger, or a crime has been committed. For further guidance on information sharing and safeguarding see POL-1-9 Whistle Blower Policy.

MONITORING

See IT Usage > Monitoring above.

IDENTIFYING CHANGES IN BEHAVIOUR

The Dental Nurse Academy adopts the 'Notice, Check, Share' approach.

1. Notice: Staff and Managers are trained to look for behaviours that cause concern, including knowing which people are susceptible to radicalisation and extremist signs and symbols. Our automated IT monitoring (see IT Usage > Monitoring, above) is also in place to help identify such changes.

2. Check: Staff and Managers check with a colleague or named contact (see below) to see if they agree with the cause for concern, including assessing the context.

3. Share: Information is then shared between practitioners, organisations, and the DNA Senior Lead for Safeguarding. This ensures we effectively identify, assess, and manage risk. Only relevant information is to be shared.

Any changes in behaviour of learners are discussed at meetings with the Internal Moderator (IM) or Operations Director. Concerns are raised using the process below: 'Raising Concerns'.

MANAGING CONCERNS

RAISING CONCERNS

To raise a concern, contact the Senior Lead in the first instance. If that person is not available, please contact the Deputy Senior Lead. In the event of neither being available please escalate to the point of escalation. Full contact details are described below for each of these individuals.

All concerns should be raised formally by email to
raisingconcerns@dentalnurseacademy.com

RECORDING CONCERNS

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made.

Concerns are recorded in the DNA's Policy Concerns Log, which is stored securely on our HR server. Access is restricted to this folder so that only relevant persons can access the log. It is the responsibility of the Senior Lead to record all concerns and action taken.

All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR).

INVESTIGATING CONCERNS

We aim to objectively assess every concern, evaluating its severity in the context of this policy. We aim to apply common sense and judgement, and commit to deal with allegations as quickly, fairly and consistently as is reasonably practicable. Our process will always involve two (2) senior management team members in any investigation, as well as a relevant Manager as appropriate.

1. Ensure the log is completed for this concern

2. Categorise the concern level of the allegation

3. Create an initial response to the allegation

4. Ensure the full facts are presented to the investigation team

5. Seek advice from regulatory/government body if appropriate

6. Reach decision

1. Where "no further action" is the outcome:

    1. The record log must be updated including the justification for the decision

    2. A response will be put in writing to the individual concerned

2. Where "further enquiry" is the outcome:

    1. A schedule for review will be created to determine frequency for updates

    2. An action plan for next steps will be created

    3. The record log will be updated accordingly

PREVENT DUTY REFERRAL

Where a Prevent referral is adopted, the DNA commits to co-operate as reasonably practicable with local authority-led Channel panels, in accordance with Section 38 of the Counter-Terrorism and Security Act 2015. In addition, the DNA will engage appropriately where required with other partners, such as the police and Prevent leads in local authorities.

The process for a Prevent Duty Referral is as follows, in line with the UK Government's Prevent process:

1. Speak to the DNA Senior Lead for Safeguarding (detailed below) or an equivalent, if you are concerned about someone.

2. Collect as much contextual information as possible to be shared with the police. The DNA Senior Lead for Safeguarding or equivalent might share this information on your behalf, or you can share it directly. The template is available on the HR Drive of the DNA Management Sharepoint Site.

3. A police gateway assessment will determine if the referral needs to be discussed at a multi-agency meeting. The assessment determines the level of susceptibility and risk around the referred person.

4. A multi-agency meeting, called a Channel panel decides whether the person will be adopted as a case and how they will be supported. This is detailed in the action plan created at the meeting. In Scotland, the meeting is known as a Prevent Multi-Agency Panel (PMAP).

5. You may be called upon to provide information to the panel and provide support to the person as agreed in the action plan.

WHISTLEBLOWING

It is important that people within DNA have the confidence to come forward to speak or act if they are unhappy if they have concerns about practices or individuals that risk the safety of others. Whistle blowing occurs when a person raises a concern about dangerous or illegal activity, or any wrong- doing within their organisation. This includes concerns about another employee, agent or volunteer. There is also a requirement by DNA to protect whistleblowers. (See POL-1-9 Whistle Blower Policy and the Staff Handbook).

RESPONSIBILITY

Responsibility for ensuring the effective implementation and operation of this policy rests with the Chief Executive. Partners and Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to ensure continuity plans and contingencies are in place on an ongoing basis. Each partner will ensure that:

- All staff are aware of the processes and arrangements referenced in this policy;
- Proper records are maintained.

The person responsible for monitoring the operation of the policy, including periodic departmental audits, and with responsibility for considering and taking action if any instances breach this policy is:

Paul Mustoe (contact details below)

GETTING SUPPORT OR GUIDANCE

SUPPORT

Learners can get support from the lead contacts described below

GUIDANCE

Guidance regarding Safeguarding can be obtained from https://learning.nspcc.org.uk/safeguarding-child-protection/

For help regarding the Prevent Duty please visit https://www.gov.uk/guidance/get-help-if-youre-worried-about-someone-being-radicalised

IMPORTANT CONTACTS

SENIOR LEAD FOR THIS POLICY

- Name: Demelza Mustoe
- Title: Operations Director
- Email address: demelzao@dentalnurseacademy.com
- Telephone number: 020 4591 2333

DEPUTY SENIOR LEAD FOR THIS POLICY

- Name: Elaine Mustoe
- Title: Course Director
- Email address: elainem@dentalnurseacademy.com
- Telephone number: 020 4591 2333

POINT OF ESCALATION FOR THIS POLICY

- Name: Rob Mustoe
- Title: MD
- Email address: consultant@dentalnurseacademy.com
- Telephone number: 020 4591 2333

NEBDN (AWARDING BODY)

- Name: Customer support
- Email address: customersupport@nebdn.org
- Telephone number: 01772 429 917

GENERAL DENTAL COUNCIL (GDC)

- Email address (https://www.gdc-uk.org/contact-us - use contact form)
- Telephone number: 0207 167 6000

DBS HELPLINE

- Telephone: 0300 0200 190

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NSPCC HELPLINE

- 0808 800 5000

POLICE

- **Emergency – 999**
- Non-emergency – 101

DEPARTMENT FOR EDUCATION (DfE) PREVENT SUPPORT

- Web: https://report-extremism.education.gov.uk/
- In an emergency, including a threat to life, always call the police on 999.
- Anti-Terrorist Hotline: 0800 789 321

REVIEW

This policy is fully supported by senior management (The Board at the DNA).

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Chief Executive/MD, to ensure alignment with current GDC guidelines and educational best practices.

LAST REVIEWED

January 2025

Reviewed by: Rob Mustoe, MD

NEXT REVIEW

January 2026