

POLICY

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# SAFEGUARDING AND PREVENT DUTY POLICY



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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 safeguarding and promoting the welfare of all learners. We recognise that safeguarding in a remote-only apprenticeship model presents unique and increased risks, requiring enhanced vigilance, robust systems and strong partnership working.

DNA is committed to safeguarding practice that reflects statutory responsibilities, government guidance, local safeguarding arrangements, and the expectations of Ofsted under the Education Inspection Framework (EIF). The welfare of all learners is paramount.

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.

We recognise that some learners may be additionally vulnerable because of previous experiences, communication needs, personal circumstances or workplace factors. We also recognise transitional safeguarding needs for learners aged 16–25, including care leavers, and will ensure support continues appropriately as they move into adulthood.

Safeguarding responsibilities apply equally to children and adults, including adult apprentices.

Working in partnership with learners, employers, the National Examining Board for Dental Nurses (NEBDN) and other agencies is essential to promoting learner welfare and ensuring that risks across remote delivery, workplace settings and online environments are effectively managed.

## PURPOSE

This policy aims to:

- Promote and prioritise the safety and wellbeing of learners and staff
- Protect all learners, regardless of age or circumstance, from harm, abuse, neglect, exploitation, or radicalisation
- Provide a clear and consistent safeguarding approach suitable for remote education and apprenticeship delivery
- Set out the processes for identifying, reporting, recording and responding to safeguarding concerns
- Ensure all staff understand remote-delivery risks (e.g., online safety, reduced visibility of learners, unsafe home/work environments)
- Ensure DNA meets its statutory Prevent Duty and protects learners from extremist narratives and radicalising influences
- Strengthen employer partnerships by making explicit the safeguarding responsibilities employers must uphold within the workplace
- Embed safeguarding within curriculum, progress reviews, induction processes and ongoing learner engagement

## STAKEHOLDERS

This policy applies to all who 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 learners (apprentices)
  - b. Diploma learners
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: 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.
- (xiv) **Remote Safeguarding** means measures taken to ensure learner safety in online delivery settings including video teaching, digital communication, and remote engagement.
- (xv) **Online Harm** means risk of abuse, grooming, bullying, harassment, coercion, extremist influence or exploitation facilitated through digital platforms.
- (xvi) **Contextual Safeguarding** means understanding that harm may occur in settings outside the home, including workplaces such as dental practices, online spaces and peer groups.
- (xvii) **Employer (Workplace) Safeguarding** means responsibilities held by employers to ensure apprentices are safe in the workplace, including supervised practice, protection from bullying/harassment, and having a named workplace mentor.
- (xviii) **Digital / Online Safeguarding** is measures taken to protect learners and staff from harm in digital environments, including online lessons, messaging platforms, social media and use of personal devices. It covers privacy, safe communication, online conduct, cyberbullying, grooming, extremist content and other online harms.
- (xix) **Low-level concern** (about an adult's conduct) is any concern, no matter how small, that an adult working with learners may have acted in a way that is inconsistent with the staff Code of Conduct, or has shown behaviour that could be misinterpreted, but which does not meet the threshold for referral to the Local Authority Designated Officer (LADO).
- (xx) **Early Help** is support provided at an early stage to meet a child's or family's needs, to prevent issues from escalating into significant harm. Early Help may be delivered by the Local Authority, NHS, voluntary agencies or a combination of partners. DNA will work with local safeguarding partners to request or contribute to Early Help where appropriate.
- (xxi) **Transitional Safeguarding** is recognition that risks and vulnerabilities do not stop at age 18, and that older teenagers and young adults (typically aged 16–25) may continue to require safeguarding support as they move into adulthood. DNA will consider transitional safeguarding needs, particularly for care leavers and those with additional vulnerabilities.

## RELATED POLICIES AND ARRANGEMENTS

### Related Policies:

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

- POL-I-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](https://nspcc.org.uk/learning)

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

- Children's Act 2004
- The Equality Act 2010
- Care Act 2014
- Online Safety Act 2023 (where relevant to provider responsibilities)
- Keeping Children Safe in Education (2024/25 updates) – including online safety and safer remote learning expectations
- Working together to safeguard children (DfE)
- Prevent Duty Guidance for Further Education Providers
- Counter-Terrorism and Security Act 2015 (CTSA 2015)
- Education Inspection Framework (EIF) – Ofsted expectations for safeguarding in further education and apprenticeships

## OUR COMMITMENT

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

Failure to comply with this policy and related procedures will be addressed without unreasonable delay and may ultimately result in disciplinary action, including dismissal or exclusion from the organisation.

## SAFEGUARDING AS PART OF THE AGREEMENT

In safeguarding children and vulnerable adults, employers agree to work in partnership with DNA and to comply fully with the principles of safeguarding. This commitment applies to all DNA learners, including adult apprentices and Diploma learners, and extends to safeguarding in both workplace and remote/online learning environments.

## PROTECTING LEARNERS

Protecting learners and fulfilling our Safeguarding and Prevent duties is a priority for the Dental Nurse Academy:

- Ensuring that our policies and procedures are adopted by everyone in our organisation.
- Safe recruiting that includes identity checks and 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.
- Carrying out safeguarding and wellbeing checks through remote progress reviews and online interactions, with particular attention to signs of distress, isolation or unsafe environments.

## 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 (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), forced marriage, serious violence and gang involvement are also considered aspects of physical abuse under this policy.

The remote nature of learning within DNA reduces the overall risk of physical abuse occurring during learning activity. Face-to-face meetings between learners and staff, or between learners themselves, are not facilitated or permitted by DNA.

Risk of physical abuse is therefore greatest while learners are at home or in practice (i.e. with their employer or colleagues). DNA staff are vigilant for indicators such as changes in behaviour that may suggest this type of abuse, and concerns are managed through the 'Notice, Check, Share' and 'Raising Concerns' processes.

However, the DNA also recognises an increased risk of abuse occurring through electronic means, including online sexual abuse or grooming. Our protection processes include targeted measures to identify and mitigate these risks, such as:

- Automated monitoring of electronic communication for harmful or concerning content
- Annual attestation that all staff have read and understood this Safeguarding and Prevent Duty Policy
- DBS Enhanced with Barred List checks for all staff
- Ensuring that the process for identifying, raising and recording concerns is clear and straightforward

### 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-I-10).

DNA recognises that significant mental health difficulties, self-harm, suicidal thoughts or sudden deterioration in emotional wellbeing may in themselves indicate abuse or neglect, or create a serious risk of harm. These must always be treated as safeguarding concerns and reported using the 'Notice, Check, Share' and 'Raising Concerns' processes in this policy.

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

- Automated monitoring of electronic communication for harmful or concerning content
- Annual attestation that all staff have read and understood this Safeguarding and Prevent Duty Policy
- DBS Enhanced with Barred List checks for all staff
- Ensuring that the process for identifying, raising and recording concerns is clear and straightforward

## 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

Where concerns of radicalisation are identified, DNA will follow its Prevent referral procedure and, where appropriate, engage with local authorities, police Prevent teams or Channel panels.

## PREVENT RISK ASSESSMENT

DNA recognises national concerns regarding young people and adults being drawn into extremism or terrorism.

A Prevent risk assessment is conducted annually: '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. Because learning is remote, communication between learners is not facilitated through DNA systems. 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 in-person tutoring on a 1-1 basis is minimised.

## 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 feedback is sampled regularly for every assessor and every student.

### BEYOND THE DNA INFRASTRUCTURE

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 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 refreshers) to identify and report such signs.

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 or 6 times each week. We therefore run regular all-business meetings, including things like the annual Festive 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

IT monitoring is in place primarily for safeguarding and Prevent purposes, including the detection of online harm, bullying, grooming, self-harm indicators and extremist content linked to DNA systems. Any safeguarding alerts generated through monitoring follow the 'Notice, Check, Share' and 'Managing Concerns' processes set out in this policy.

### 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](http://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 Framework Agreement (employers i.e. dental practices)
- c. Apprenticeship Commitment Statement (Apprenticeship learners)
- d. Student terms and conditions (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](http://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.

As a minimum:

- All staff, including contractors and volunteers, receive safeguarding and Prevent training at induction and an update at least annually, including online safety and remote-delivery risks.
- The Designated Safeguarding Lead (DSL) and Deputy DSL undertake enhanced DSL training (including Prevent) at least every two years, with interim updates as guidance changes.
- Recruiting managers involved in appointing staff complete safer recruitment training and refresh this at least every three years.
- Board members receive safeguarding and Prevent awareness training at least every three years, so they can fulfil their oversight responsibilities.

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 DSL immediately. The duty of care is to report concerns immediately so that the safeguarding team can investigate as quickly as possible.

Training completion is recorded centrally and monitored by the DSL.

# 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-I-6 Privacy Policy.

DNA follows the principle that safeguarding concerns override confidentiality where necessary to protect a child or adult at risk. Staff must:

- Share information that is relevant, proportionate, accurate, timely and secure;
- Record what has been shared, with whom, and why; and
- Seek advice from the DSL if they are unsure whether to share information.

Lack of consent must not prevent information being shared if a child or adult at risk may be in danger.

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 (where there is an immediate threat to life or risk of harm), staff must contact the police on 999 before notifying the DSL. For further guidance on information sharing and safeguarding see POL-I-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 Quality Assurer (IQA) or Operations Director. Concerns are raised using the process below: 'Raising Concerns'.

Persistent non-attendance, disengagement from online learning, or unexplained absence from the workplace is treated as a potential safeguarding risk and will trigger further exploration and, where appropriate, a safeguarding referral.

## 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](mailto:raisingconcerns@dentalnurseacademy.com)

### LOW-LEVEL CONCERNS ABOUT STAFF CONDUCT

A low-level concern is any concern, no matter how small, that an adult working for or on behalf of DNA may have acted in a way that is inconsistent with the Staff Code of Conduct or has behaved in a manner that could be misinterpreted.

Examples include:

- being over-familiar with a learner;
- using unprofessional language;
- contacting a learner using non-approved communication channels; or
- breaching professional boundaries during remote sessions.

Low-level concerns must still be reported to the DSL using the same 'Raising Concerns' route. The DSL will:

- Record each low-level concern in the Policy Concerns Log;
- Review patterns over time; and
- Escalate to the Local Authority Designated Officer (LADO) or other agencies where behaviour appears to meet the threshold for an allegation against an adult.

## 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).

Safeguarding and Prevent records are retained securely for a minimum of seven years after a learner leaves DNA, or until the learner's 25th birthday where concerns relate to a child, whichever is longer, unless a longer period is required for legal or regulatory reasons.

## EARLY HELP AND THRESHOLDS

The DSL will consider whether a concern meets the threshold for:

- Internal support from DNA;
- Early Help from local partners; or
- Statutory intervention under children's or adults' social care.

Where a learner under 18, or an adult at risk, would benefit from Early Help, the DSL will liaise with the relevant Local Authority and, with consent where appropriate, share information to support an Early Help assessment. DNA will contribute to multi-agency plans and continue to monitor the learner's welfare through reviews and remote contact.

## 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

## **ALLEGATIONS AGAINST STAFF, CONTRACTORS OR VOLUNTEERS**

An allegation against a member of staff, contractor or volunteer is where it is alleged that they have:

- Behaved in a way that has harmed, or may have harmed, a child or adult at risk;
- Possibly committed a criminal offence against, or related to, a child or adult at risk; or
- Behaved towards a child, adult at risk or another person in a way that indicates they may pose a risk of harm.

Any such allegation must be reported to the DSL immediately. The DSL will:

- Consult with the Local Authority Designated Officer (LADO) or equivalent within one working day;
- Follow LADO / Local Authority advice on next steps, including whether the person should be suspended, restricted from duties, or reported to the police or professional regulators; and
- Ensure that DNA’s disciplinary procedures run in parallel with, and do not obstruct, any external investigation.

Staff must not investigate allegations about themselves or colleagues. Learners and whistle-blowers will be supported and protected in line with the Whistleblower Policy.

## PREVENT DUTY REFERRAL

DNA follows the statutory Prevent Duty Guidance for Further Education Providers when managing concerns and referrals. 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. All Prevent concerns must be reported to the DSL, who is responsible for making external referrals unless immediate police action is required.
2. Provide any relevant contextual information already known to DNA to assist the police or Prevent team. The DNA Senior Lead for Safeguarding or equivalent might share this information on your behalf, or you can share it directly. A Prevent referral 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 have concerns about practices or individuals that risk the safety of others. Whistleblowing occurs when a person raises a concern about dangerous or illegal activity, or any wrong-doing within their organisation. This includes safeguarding or Prevent concerns, and concerns about the conduct of any employee, agent or volunteer.

There is also a requirement by DNA to protect whistleblowers. No whistleblower will ever suffer detriment for raising a concern in good faith. (See POL-1-9 Whistleblowing Policy and the Staff Handbook). Where a safeguarding concern is not addressed appropriately within DNA, whistleblowers may escalate their concern directly to external bodies such as the Local Authority, the police, NEBDN or Ofsted.

## RESPONSIBILITY

Responsibility for ensuring the effective implementation and operation of this policy rests with the MD/Chief Executive. Operational day-to-day responsibility for safeguarding and Prevent lies with the Designated Safeguarding Lead (DSL). Partners (as defined within DNA's organisational structure) 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;
- Accurate and secure records are maintained
- All staff complete required safeguarding and Prevent training and maintain up-to-date knowledge.

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:

Rob Mustoe (contact details below), who acts as the senior escalation point for safeguarding concerns where required.

## GETTING SUPPORT OR GUIDANCE

### SUPPORT

Learners can get support from the lead contacts described below. Learners may contact the Designated Safeguarding Lead (DSL) or Deputy DSL directly for any safeguarding or Prevent concern.

Learners can also seek support for wellbeing or mental health concerns, which will be handled sensitively and in confidence wherever possible.

### GUIDANCE

The following resources provide additional independent information for learners, staff and employers on recognising abuse, understanding risk factors and knowing how to respond to concerns. Staff can also use these resources to support their understanding of safeguarding responsibilities and the Prevent Duty.

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

All safeguarding contacts treat concerns confidentially and share information only where necessary to protect learners.

### SENIOR LEAD FOR THIS POLICY (DESIGNATED SAFEGUARDING LEAD - DSL)

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

### DEPUTY SENIOR LEAD FOR THIS POLICY (DEPUTY DESIGNATED SAFEGUARDING LEAD - DEPUTY DSL)

- 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

If you are unsure who to contact, raise your concern with the DSL in the first instance.

## NEBDN (AWARDING BODY)

- Name: Customer support
- Email address: [customersupport@nebdn.org](mailto:customersupport@nebdn.org)
- Telephone number: 01772 429 917

## GENERAL DENTAL COUNCIL (GDC)

- <https://www.gdc-uk.org/contact-us> - use contact form
- Telephone number: 0207 167 6000

## DBS HELPLINE

- Telephone: 0300 0200 190

## NSPCC HELPLINE

- 0808 800 5000

## POLICE

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

## LOCAL AUTHORITY SAFEGUARDING CONTACTS

- Children's Social Care (local authority of learner's home address) – details available at: <https://www.gov.uk/report-child-abuse>
- Adult Safeguarding (local authority of learner's home address) – details available at: <https://www.gov.uk/report-abuse-of-adult>

## 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 2026

Reviewed by: Rob Mustoe, MD



### NEXT REVIEW

January 2027