

<b>Title:</b>	<b>Safeguarding Policy</b>
<b>Version:</b>	<b>1.0</b>
<b>Date:</b>	<b>December 2021</b>
<b>Reviewed:</b>	<b>December 2021</b>
<b>To be reviewed:</b>	<b>December 2024</b>
<b>Classification:</b>	<b>Public</b>

## 1. Introduction

Organisations that work regularly with vulnerable people (children or adults at risk, their parents, carers or families) need to comply with safeguarding legislation and best practice recommendations.

The definition of an adult at risk includes any person 18 years and over who has needs for care and support and is experiencing, or is at risk of, abuse and neglect and as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect. While the Dunhill Medical Trust does not work regularly with vulnerable people directly, the nature of its charitable objectives means that those whom it funds may well do so.

## 2. Scope of the policy

While the Trust does not work directly with groups defined by the Care Act 2014 as vulnerable, it expects and requires organisations who do and which it funds, or with which it collaborates, to have suitable policies and mechanisms in place to prevent and address incidents of exploitation, abuse or harm to:

- individuals directly involved in activity funded by DMT, including research participants, staff, students and any associated personnel by any other individual(s) directly involved in the activity.
- staff, students, associate personnel or research participants by individuals not directly involved in the activity, such as members of the general public or other groups, as a direct result of their involvement in the activity.
- vulnerable adults who are not directly involved in a DMT-funded activity but may be vulnerable to exploitation, abuse or harm by staff, students or any associated personnel directly involved in DMT-funded activities while they are conducting the activity.

The organisations with which DMT works or to which it provides funding differ widely in nature and in the types of work in which they are engaged, so it is not practical or feasible for us to prescribe exactly how individuals and organisations should meet the expectations set out in this. Instead, this policy sets out our expectations for the policies, processes and procedures that recipient or partner institutions will have in place. We have provided links to a number of helpful sources of support and information in section 9. By meeting the expectations set out in this policy, we anticipate that individuals and organisations will:

- be better equipped to anticipate the potential risks for exploitation, abuse and harm within all their activities
- have taken all reasonable steps to mitigate these risks
- have robust policies and procedures in place to enable them to respond to and address incidents of exploitation, abuse and harm when they do occur.

### **3. Expectations of organisations in which individuals involved in DMT-funded activities work**

We expect organisations to take all reasonable steps to anticipate and mitigate the risk that exploitation, abuse and harm might happen to an individual as a direct result of a DMT-funded activity. Organisations should promote a fair, transparent and positive culture, where individuals feel able to report concerns and are confident that they will be acted upon.

We expect DMT grant holders to take a leadership role in developing and role-modelling a positive culture where exploitation, abuse and harm is not tolerated, and to anticipate, mitigate and address the risks of exploitation, abuse and harm within their funded activities in line with their organisation's policies and procedures, and for the organisations in which they work to support them in this endeavour.

DMT recognises that organisations it funds may be subject to different regulatory, statutory and legislative frameworks. If any of the expectations set out in this policy are incompatible with the frameworks by which an organisation is bound, then those frameworks will take precedence. However, under these circumstances, DMT will expect the organisation to be able to evidence why it is unable to meet the expectations set out in this policy and provide evidence of alternative approaches in place to cover the area of policy and practice.

We expect all organisations receiving DMT funding either directly or indirectly to have policies and procedures in place that clearly set out:

- the standards of behaviour it expects from its staff, students and any associated personnel engaged in activities;
- routes for reporting and escalating allegations of exploitation, abuse or harm;
- how individuals reporting concerns will be protected and kept informed of procedural stages and outcomes;
- how it will respond to and investigate reports of exploitation, abuse or harm
- disciplinary procedures the organisation will follow if an allegation of exploitation, abuse or harm is upheld.

Accountability for, and management of, the policies should be clearly articulated, and the policy or policies should be readily available to all staff, students and any associated personnel.

As part of the design and implementation of a DMT-funded activity it must be made clear to any participants and, if relevant, members of the general public, what standards of behaviour they should expect from the staff, students and any associated personnel involved in the activity, including how to report incidents and concerns and what response they can expect. The methods used should be contextually and culturally appropriate.

Wherever possible, organisations should use participatory processes to co-develop their policies. Organisations should review their policies and procedures on a regular basis and have a process for monitoring and evaluating their effectiveness, drawing on feedback from interested parties.

Where an organisation follows national regulatory or legislative frameworks, rather than having organisational-specific policies, they should be able to evidence how these are implemented in their organisation.

#### **4. DMT's approach to managing the risk of exploitation, abuse and harm**

If DMT identifies a risk of exploitation, abuse or harm relating to an application for funding or a DMT-funded activity through independent means, for example media reports, we will raise our concerns with the employing or enrolling organisation. Where the risk of exploitation, abuse or harm relates to an activity rather than a specific individual, DMT will communicate its concerns to the organisation which is receiving funds on behalf of the partnership. DMT will work with the organisation(s) to identify an appropriate course of action to mitigate the risk(s).

#### **5. How DMT handles allegations**

Allegations of exploitation, abuse and harm must be reported to the employing organisation of the person against whom the allegation is being made and/or the appropriate authorities. It is the employing organisation's responsibility to investigate, not DMT's.

If an allegation is made directly to a member of DMT staff, we will encourage the individual making the allegation to report it to the employing or enrolling organisation of the individual against whom the allegation is being made, or to the relevant authority, in line with the policies which the organisation has indicated are in place.

#### **6. How DMT will monitor compliance with this policy**

DMT may, through our funding processes, audits and other review processes:

- check that an organisation has appropriate policies and procedures in place and is following them. This may include asking for evidence of how they have applied their policies and procedures when responding to an allegation of exploitation, abuse or harm
- ask for information about an organisation's risk management framework and evidence of how it has been applied to mitigate and address the risks of exploitation, abuse and harm in DMT-funded activities
- review how organisations receiving and managing funds from DMT on behalf of a partnership ensure appropriate policies and procedures are in place across all partners as well as throughout the lifecycle of the partnership, including asking for evidence of how risk will be monitored and managed
- ask for summary information about the number of allegations of exploitation, abuse and harm relating to DMT-funded activities, the nature of the allegation, whether the allegation was investigated, and the outcome of the investigation.

Where we identify that an organisation does not have sufficient policies and procedures in place to meet the expectations set out in this policy, or are not following their policies and procedures, DMT will require the organisation to set out and implement an improvement plan. The organisation must undertake the remedial action plan in a timely manner in order to meet the required standard. Where an organisation fails to comply with the improvement plan, DMT reserves the right to apply an escalating series of actions in order to mitigate the risk of exploitation, abuse or harm occurring, until the remedial action plan has been completed.

#### **7. Actions against individuals**

##### **7.1 How organisations should respond to allegations of unacceptable personal conduct**

We expect all organisations receiving DMT funding to:

- in an impartial, fair and timely manner, investigate allegations that a member of staff or student has exploited, abused or harmed another member of staff, student, associated personnel, research participant or member of the general public. It must:
  - protect the rights of all individuals involved
  - take a victim/survivor-centred approach, listen and take concerns seriously, and provide appropriate support for the victim/survivor
  - take appropriate action

Where an allegation is made to an organisation about any associated personnel involved in a DMT-funded activity, the allegation should be referred to their employing or enrolling organisation, which will be responsible for following their own investigation and disciplinary procedures.

Where an organisation has reason to believe that a crime has been committed or that there is imminent risk of harm occurring, a report should be made to the appropriate authority, except in circumstances where there is a reasonable expectation that to do so would cause further harm to the victim/survivor, for example in situations where reporting a crime could result in the victim/survivor also being treated as a criminal.

- Have processes and procedures in place to review and manage the risks associated with the continued involvement of an individual in a DMT grant application or DMT-funded activity while an allegation of exploitation, abuse or harm is investigated.

If, following the investigation, the allegation of exploitation, abuse or harm against an individual directly involved in a DMT-funded activity is upheld, the organisation must notify DMT of the investigation and the decision in a timely manner. Notification should include:

- a brief factual statement about the nature of the allegation
- the findings of the investigation
- what, if any, disciplinary action is being taken and/or remedies are being given to the victim/survivor
- what, if any, changes to policy and practice have been implemented in response to this case and what assurances will be put in place as to their effectiveness

If DMT receives a notification that an allegation of exploitation, abuse and harm has been upheld against an individual directly involved in a DMT funded activity or application for funding, we reserve the right to review the outcome of the investigation and ask for additional information, for example about the investigation process to ensure that the organisation has followed its policies and procedures.

DMT will work with the organisation to minimise the impact on any DMT grant applications or DMT-funded activities that are affected.

Wherever possible, organisations must see an investigation through to its conclusion. This includes:

- documenting the findings.
- applying any disciplinary procedures.

While we recognise that the requested disclosures under this policy may include personal data, we consider that we have a legitimate interest in handling this data under the General Data Protection Regulation (GDPR). Any information you send us will be:

- stored in accordance with data protection law requirements
- communicated only on a need-to-know basis (with access restricted)
- updated and/or deleted in line with our retention policy.

It is the organisation's responsibility to ensure that they have the appropriate terms in place to allow them to share the required information with DMT.

Exploitation, abuse and harm as defined in this policy covers a broad range of possible offences of varying severity, therefore any action taken will be on a case-by-case basis. If an organisation upholds an allegation of exploitation, abuse or harm against a member of staff, or student, DMT expects the organisation to apply appropriate disciplinary measures in accordance with their policies and procedures. If, following the completion of the disciplinary procedures, the individual remains employed or enrolled at the organisation, DMT expects the organisation to review the risks and impacts associated with the individual's continued involvement in any DMT-funded activities or applications for funding, and to put in place appropriate measures to manage these risks, including, where appropriate, removing the individual from a DMT grant or application. DMT will also expect the organisation to review and manage the risks associated with any future involvement in a DMT-funded activity or application for funding.

Where an organisation removes an individual from a DMT-funded activity or application for funding, we will work with the organisation to minimise the impact on any other staff, student or any associated personnel involved in the affected work. This may include transferring the grant to another grant holder.

## **8. Actions against organisations**

### **8.1 How organisations should respond to allegations of unacceptable conduct**

If DMT receives a notification report from an organisation that it has upheld an allegation of exploitation, abuse or harm against an individual directly involved in a DMT-funded activity, DMT will work with the organisation to identify any actions that should be taken to improve its systems and processes.

DMT reserves the right to take action against any organisation receiving funding from us in order to mitigate the risk of exploitation, abuse or harm occurring as a result of our funded activities while they improve their systems and processes.

DMT also reserves the right to take action if we find that an organisation has failed to:

- comply with a remedial action plan
- respond to allegations of exploitation, abuse and harm by a member of staff or student promptly and objectively in line with their policies and procedures
- keep DMT informed as outlined in 'Expectations of organisations we fund'.

Action will be taken by DMT on a case-by-case basis. Therefore, actions may vary in length and type. Except in the most serious cases, actions will generally be applied in order of escalation. Actions we may apply against an organisation include:

- sending a formal letter setting out our concerns and areas for improvement which we would expect to be addressed in a timely manner
- suspending a grant(s) for a limited period of time until a remedial action plan is agreed and implemented
- restricting applications for specific grant types, for example, doctoral training programmes, until a remedial action plan is agreed and implemented
- not accepting any new grant applications for a limited period of time until a remedial action plan is agreed and implemented
- terminating a grant(s) if it is not possible to identify a remedial action plan to mitigate the risks.

Organisations must inform DMT of the concern or incident in a timely manner so that DMT can work with the organisation to determine an appropriate course of action to mitigate the risk that harm, or further harm, could occur.

The report should provide a brief factual statement about the nature of the concern or incident, any action taken and any further planned action. No personal information should be included in the report. In order to support learning, organisations should investigate the incident and identify whether any changes to policy and practice should be implemented in response to this case.

## 9. Further information and guidance

### 9.1 Risk assessment

Exploitation, abuse and harm can happen in all activities and as a result, everyone in the sector has a role to play in preventing it from occurring. Therefore, there is a need to understand the risks and vulnerabilities to exploitation, abuse and harm and to have clear response pathways, training, guidance and named sources of advice to support decision-making across all different disciplines and across sector.

Guidance on anticipating, mitigating and addressing exploitation, abuse and harm, and responding to allegations of these, is available:

- For Researchers: [Research Councils' Policy and Guidelines on Governance of Good Research Conduct.](#)
- For Charities and not-for-profit organisations: [Safeguarding and protecting people for charities and trustees](#)  
[Equality Act: Guidance for Charities](#)

When considering the risks and vulnerabilities to exploitation, abuse and harm it is important to recognise that:

- risks are not experienced equally by people of different gender, age, sexuality, religion, ethnicity, (dis)ability, socio-economic status etc
- risks and vulnerabilities are present everywhere, but these can be exacerbated in resource-poor
- vulnerability is context-specific; therefore adults could be vulnerable as a result of a change in circumstance or situation.

Therefore, approaches to prevent and address exploitation, abuse and harm should be sensitive to these different and changing dimensions of risk and vulnerability and to the different and changing contexts in which activities take place.

While no activity is without risk, it is important to anticipate the risks and take reasonable steps to mitigate them.

Organisations should assess whether a job role will involve contact with vulnerable adults and ensure that appropriate and effective recruitment, vetting and disciplinary processes are in place to manage the risk(s). The level of risk associated with a job role should be reviewed on a regular basis and more frequently if there is a significant change in responsibilities or activities.

They should also have a risk management framework which includes the assessment of the risks of exploitation, abuse and harm associated with current and planned DMT-funded activities, and the development and implementation of effective risk mitigation strategies.

## **9.2 Provision of access to training, advice and guidance**

Organisations should provide appropriate guidance, awareness raising activities and training for staff, students and, where necessary, any associated personnel so that they understand the different types of exploitation, abuse and harm that might occur, their responsibilities, how to anticipate, mitigate and address the risks to themselves and others, and how to report and respond to concerns.

They should also have policies, procedures and training in place to anticipate, mitigate and address issues relating to the safety of staff, students and any associated personnel involved in activity, including, but not limited to:

- policies and training which cover international travel and safety while working overseas, risk assessments, pre-departure briefings and procedures to follow in case of an emergency
- lone-working policies and procedures

The expectations for policies and training are set out in the [Research Councils' Policy and Guidelines on Governance of Good Research Conduct](#) .

The Charity Commission also provides guidance: [Charity Commission Guidance on Safeguarding and protecting people for Charities and Trustees](#).

If organisations are receiving funds from DMT on behalf of a partnership, they should make all reasonable endeavours to ensure that effective policies and procedures are in place to prevent and address incidents of exploitation, abuse and harm across the partnership. They should have processes in place to anticipate, monitor and manage the risks across the partnership over the lifetime of the DMT-funded activity. There should be an agreed process in place for sharing information about upheld allegations against individuals directly involved in the activity, and/or risks to the activity by the partner organisations.