



Safeguarding Policy

Introduction

The aims of the company safeguarding policy are to provide an environment where all can work safely;

The Company will take every reasonable precaution to minimise risk while providing demanding, challenging and enjoyable training and development activities at our own premises and the premises of customers and clients.

Purpose

The purpose of the policy is to contribute to the personal safety of all persons using our facilities and resources, through actively promoting awareness, good practice and sound procedures.

OCU Group is committed to ensure that all and specifically those that are vulnerable are kept safe from harm while they are involved with the organisation.

Aims

Safeguarding has a meaning wider than child protection. The policy aims to ensure that all learners, staff, customers, linked employers, freelance trainers' stakeholders and visitors are safe from harm and abuse, harassment and bullying.

Harm and harassment have formal legal meanings within civil and criminal law. Safeguarding also includes all staff acting in a responsible way to avoid any false allegations of inappropriate behaviour being made about their conduct that would give cause for concern.

This policy is based on the law and statutory guidance and deals with aspects activity. The Equality Act (2018) and the Health & Safety at Work Act (1974) are also relevant to safeguarding. A HR Department designated person maintains this Safeguarding Policy, is supported by the SHEQ Department and deputy designated persons.

This policy is directly linked to the company disciplinary procedures. All company personnel have a legal duty to report instances of harm and abuse in regulated activity to the Disclosure & Barring Service (DBS) following action in accordance with staff disciplinary procedures where appropriate. In addition to the legal aspects it is our policy to ensure that all persons learning and working with us respect each other and strive to help each other in a professional and caring manner. This policy is reviewed on an annual basis

Roles and Responsibilities

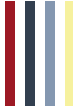
The legal situation is complex and therefore we have appointed a HR Department (Designated person) who has received training in this specific duty and who is responsible for maintaining their professional development in this area and overseeing and co-ordinating the company's approach to Safeguarding.

The HR Department holds all the key documents and is able to consult with the relevant authorities. The HR Department is not entitled to give formal legal advice but is able to obtain such advice from experts.

In the absence of the HR Department- the HR function or deputy HR Departments take on this function. The HR Department will liaise closely with the relevant authorities where and when appropriate.

All staff as stated above have a responsibility to work within the framework of this policy and to adhere to all relevant and current legislation. All staff have a personal responsibility for safeguarding. The welfare and wellbeing of all persons at risk of harm by protecting them from abuse which may be:

- Neglect
- Emotional or Psychological abuse



- Physical abuse
- Sexual abuse
- Financial or material abuse
- Discriminatory abuse In addition to the above- all personnel have a responsibility to undertake the safeguarding training provided by the company or third parties.

Staff should also ensure they review the appropriate guidance and maintain currency of knowledge. Line managers are accountable for managing safeguarding training for their line reports and ensuring relevant information in respect of Safeguarding is provided to individuals for whom they have line management accountabilities.

Managers undertaking recruitment are responsible for applying for appropriate DBS checks and advising selected applicants of this fact and advising such applicants of appropriate information to access the relevant DBS portal to satisfactorily complete a submission.

Training & Development

The Senior Management team are responsible for providing or signposting company personnel to relevant safeguarding training and coaching resource.

HR Team

The HR team are responsible for ensuring that recruitment processes and employment offers are compatible with the safeguarding principles and meet legislative requirements in terms of relevant pre-employment checks via the DBS if the contract or role requires it.

The HR team are responsible for the provision of information and guidance in terms of appropriate practice in the recruitment selection process.

The senior management team and Directors are accountable for the execution of this policy throughout the organisation. The HR Department (Designated person) is responsible for providing the Board with information pertaining to Safeguarding and such notifications will be addressed where required, under the health and safety agenda item of all Board meetings. The HR Department shall ensure active compliance with this policy by all staff, learners, stakeholders' freelance trainers and linked employers. All staff will actively endeavour to implement this policy. The aim of safeguarding actions with regard to personnel is to ensure as far as is possible that anyone, who seeks to work with persons in relation to the companies' activities and who gains substantial access to them thereby (whether within activity hours and/or beyond) is as safe to do so in safeguarding protection terms as can be guaranteed.

The HR Department is accountable for the following checks being carried out on employees whose contract or role requires it.

- DBS criminal records check at enhanced level including barring and police disclosure where legal and appropriate (without breaching the Rehabilitation of Offenders Act) but complying with regulated activity safeguarding requirements.
- References are sought and checked as, nominated by the applicant.

Such references must come from a person who is not related to the applicant and who preferably knows of the applicant's character, trustworthiness, any previous experience of working with/looking after children and young people. The HR Department will, in liaison with the Board, define if the post is in regulated activity, with guidance to be sought from the HR Department. In that case they shall give to the applicant, and get the applicant to give written confirmation of receipt a letter/notice stating the checks are required as a condition of working in our company.

No applicant may start work unsupervised without the above enquiries being completed. However, the HR Department may, in consultation with the managing director and HR Department authorise an applicant to commence supervised (one-to-one basis) work where it is absolutely clear there will be no problems arising from the checks. The HR Department and HR team will not accept any previous reference, police check, social services endorsements provided by an applicant in substitution for the above enquiry process. At all times the initiative must lie with our company to make its own, completely



independent enquiries. Record keeping shall be in accordance with our personnel policies and will comply with GDPR.

Harassment

No learner or staff member shall be harassed. No learner or staff member shall harass any visitor, client customer or employer.

Harassment can be of two kinds – civil harassment linked to discrimination under the Equality Act and criminal harassment linked to the Protection from Harassment Act 1997 or racial harassment under a range of Police laws.

Learners have the right to complain about harassment. Staff also have this right. Staff have the same rights to protection as learners.

Bullying

Although bullying is not precisely defined in law, any physical or mental duress which makes a person feel as though they are being forced against their will to act in an inappropriate way or to feel unduly stressed, or to be alarmed at the thought of coming to work, will be deemed to be bullying and may also be harassment.

However, the reasonable requests of the appropriate authorities within the company for staff to do their work to the required quality and for learners to actively take part in learning cannot be misconstrued as bullying. In respect of all learners/clients all staff, will act in an understanding way taking into account any disability, learning difficulty or personal circumstances that could impact on an individual's sense of vulnerability.

Staff who teach train or instruct adults exclusively for education do not have to be DBS checked. However, if they also work with children they will need to be checked. OCU Group has an open style of management and we wish to support anyone who feels concerned about their treatment and any reported incident will be kept confidentially in line with policy and GDPR.

Legal requirements

Regulated activity providers and personnel suppliers are required by law to refer a person (to the DBS using the correct form)

Review Arrangements

OCU Group will review the policy annually with the next review scheduled for November 2025 as part of our self-evaluation arrangements;

Amendment and review may also be in response to feedback requests or good practice guidance issued by Regulators, to align with their appeals and complaints process.

Michael Hughes

Chief Executive Officer

Date: 6th January 2025

(This Policy will be reviewed on an annual basis)