



Safeguarding Policy

Scope of this Policy

The ABPI is committed to ensuring a safe and supportive environment exists for all staff, workers, agency workers, contractors, other representatives, third parties and visitors to the ABPI, ensuring that all and specifically those that are vulnerable are kept safe from harm while they are involved with the organisation.

This policy covers all ABPI employees (including OHE and PMCPA) collectively referred to as employees in this policy.

This policy does not form part of any employee's contract of employment and therefore may be amended from time to time.

Responsibility for this Policy

The HR Department will be responsible for the monitoring and review of this policy and employees will be advised of any changes.

About this Policy and Eligibility

The aim of this Safeguarding policy is to provide an environment safe from harm, abuse, harassment and bullying and to provide all employees and workers with information about the safeguarding policy adopted by the ABPI.

Safeguarding also includes staff acting in a responsible way to avoid any false allegations of inappropriate behaviour being made about their conduct that would give rise to concern.

The policy is particularly important in any the regulated activity/work that the ABPI does with children and service users.

In England and Wales this is referred to as regulated activity and in Scotland this is referred to as regulated work. In this policy this will be referred to as regulated activity/work.

The ABPI has a responsibility to promote the welfare of children and service users and to keep them safe.

The ABPI complies with all the legal obligations placed upon it by the Safeguarding Vulnerable Groups Act 2006 (England and Wales) and the Protection of Vulnerable Groups (Scotland) Act 2007 (Scotland).

This policy applies to all employees at all levels of the organisation, as well as agency workers. It sets out ABPI's approach to safeguarding children, young people and vulnerable adults when in the presence of an ABPI employee or other representative.

Recruitment Process

In regards to recruitment activity or regulated roles the following will apply;

- Advertisements for job roles at ABPI will specify clearly whether the work involves regulated activity.
- Offers of employment will be made conditional on the receipt of a satisfactory disclosure checks. These will be conducted by the Disclosure and Barring Service in England and Wales and Disclosure Scotland in Scotland.
- The check will confirm that the applicant is suitable to carry out the role and has not been barred from performing this work.
- If the background check reveals that an applicant is not suitable, the offer of employment will be withdrawn by the ABPI and the applicant will not be employed.

Existing Employees

Existing employees may be required to provide a satisfactory disclosure check where their work becomes a regulated activity/work or the ABPI requires them to start carrying out regulated activity/work. Existing employees cannot conduct any regulated activity/work until they have undertaken a satisfactory disclosure check.

The disclosure check will be conducted by the Disclosure and Barring Service in England and Wales and Disclosure Scotland in Scotland. The check will confirm that the employee is suitable to carry out the work and has not been barred from performing this. If employees are unable to provide a satisfactory disclosure check, or refuse to undertake a disclosure check, the ABPI will consider the options for redeployment into any available job roles that do not involve regulated activity/work.

If existing employees become added to the children and adults barred lists by either disclosure body, the ABPI will consider the options for redeployment into any available job roles that do not involve regulated activity/work. All employees who are added to the barred lists are required to inform their line manager of their inclusion on the list at the earliest opportunity. A failure to do so may be deemed a disciplinary matter to be dealt with under the disciplinary procedure.

In both cases, if this is not possible, the ABPI may need to consider dismissal of the employee on the basis of the statutory ban imposed by the disclosure. The ABPI may be unable to continue to employ the employee in any capacity if the continued association with the employee cannot be maintained, causes reputational damage to the employer or other reasons that harm its position in the marketplace.

What is abuse?

Given the risk of abuse to children and service users, all employees are required to be alert at all times to the possibility of abuse towards children or service users.

Abuse may be a single incident or something that occurs over a long period of time. It can take many forms including, but not limited to:

- financial or material abuse
- physical abuse
- mental abuse
- neglect and failures to act
- sexual abuse
- threats of abuse or harm



- controlling or intimidating conduct
- self-neglect
- domestic abuse
- poor practices within an organisation providing care
- modern slavery.

The abuse may come from employees, personal assistants, service users, relatives, neighbours, social workers, providers of support services etc.

ABPI expects all of its employees, contractors and third parties to act in a professional and appropriate way towards children, young people and vulnerable adults with whom they may come in to contact and to ensure that their behaviour does not give rise to questions about their integrity or to allegations of abuse.

ABPI sets out the following expectations of behaviour that should be complied with by all its employees, contractors and third parties representing the organisation:

- Treat everyone with dignity, fairness, equality and respect;
- Be sensitive to an individual's appearance, race, culture, religious belief, sexuality, gender or disability;
- Be sensitive to the needs and preferences of others
- Never make belittling or discouraging remarks Do not use inappropriate language and subject matter. Be careful not to do or say anything that could be misunderstood or be interpreted as innuendo.
- Avoid any questionable behaviour and communication in all face to face, telephone, email and social media activities
- Challenge unacceptable behaviour immediately
- Report all allegations or suspicions of abuse using the Safeguarding procedures;
- Take every reasonable precaution to minimise risk
- Be aware that physical contact with a child, young person or vulnerable adult may be misinterpreted;
- Consider whether contact with an individual child, young person or vulnerable adult should involve a colleague being present;
- Retain a professional approach to children, young people and vulnerable adults including avoiding physical contact with a child, young person or vulnerable adult

Reporting and investigating abuse

The ABPI will treat all complaints, allegations, or suspicions of abuse with the utmost seriousness.

Employees that suspect abuse is occurring should refer the matter to their line manager immediately, with as much detail as possible. The line manager will need to be informed of the names of the people involved (if known), what type of abuse is or may be occurring, and the dates and times this occurred (if known). An official written report of the alleged act may be requested at this stage as part of the evidence gathering procedure.

Employees may be asked to refrain from discussing alleged abuse with fellow colleagues, other than those specified by their line manager, to avoid the spread of potentially harmful misinformation and to protect the validity of any investigation.

The allegations will be investigated fully and all such reports are taken seriously. The investigation will be conducted in a discrete and timely manner, and will involve the collation of evidence typically



derived from witness statements and surveillance footage where possible. If it is suspected that a criminal act may have been committed, the ABPI will report the situation to the police.

Employees suspected of abuse will be suspended on full pay pending a full investigation of the complaints. It should be noted that this suspension is not an indication of the employee's guilt, but rather a necessity given the circumstances. ABPI appreciates the impact prolonged suspension can have on an employee's reputation, even when allegations are later found to be incorrect, and does not take the decision to suspend lightly.

The ABPI may be under a duty to disclose allegations of abuse to the Disclosure and Barring Service or Disclosure Scotland as appropriate. The organisation may also consider it necessary to inform the police of allegations under investigation.

Maintaining Records

ABPI will ensure that all details associated with allegation of abuse are recorded clearly and accurately. The records will be maintained securely in line with the ABPI's confidential record keeping procedure.

Disciplinary Action

If the investigation reveals that abuse has happened, or is happening, the ABPI will set up a disciplinary hearing for the employee concerned. Abuse of service users is regarded by the ABPI as an act of gross misconduct and the allegation could result in summary dismissal, in line with the ABPI's disciplinary procedure.

Employees will have the chance to appeal any disciplinary action that is taken against them.

Duty of disclosure

ABPI is legally required to send information to the Disclosure and Barring Service or Disclosure Scotland if a decision is taken to dismiss an employee or remove them from working in regulated activity/work.

The ABPI may also be required to inform the Disclosure and Barring Service or Disclosure Scotland if the ABPI suspends an employee, or an employee resigns in suspicious circumstances where their work has been regulated work.

Additional support and guidance

Employees who wish for further information on safeguarding are encouraged to contact their line manager or HR. ABPI will endeavour to provide up to date support and guidance to all staff when it comes to safeguarding and their duty to protect service users from harm. Relevant supporting material is also readily available online and we will look to furnish employees with this where requested.

Contact

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