




**ASSOCIATION OF HEALTH PROFESSIONS  
IN OPHTHALMOLOGY**

**Safeguarding and Prevent Policy**

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<b>Signed by AHPO Head of Centre</b>	

## Introduction

The Association of Health Professions in Ophthalmology (AHPO) respects that all individuals regardless of race, gender, disability, religion, sexual orientation, family status, age or social background have a right to equal protection from all types of harm or abuse. Safeguarding is the protection of children and adults at risk from abuse and neglect. A child is defined as anyone under the age of 18. An adult at risk is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. Abusive behaviours can take many forms, including, but not limited to:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse (ongoing, recent or which happened in the past)
- Neglect
- Domestic Abuse/Gender-Based Violence (and its impact on victims and their children who witness it)
- Child criminal exploitation
- Financial abuse
- Discriminatory abuse
- Modern slavery

Definitions of forms of abusive behaviour can be found in the Glossary at the end of this document.

Prevent is one of 4 strands of the Government's counter terrorism strategy, and the responsibilities of training providers is set out in Section 26 (1) of the Counter Terrorism and Security Act 2015 ("The Act"). This imposes a duty on "specified authorities", when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. Extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and should be addressed as a safeguarding concern as set out in this policy. Examples of possible extremism may include race and religious hatred, religious and nationalist extremism and homophobia.

## Scope

The Safeguarding and Prevent Policy applies to everyone working for AHPO and learners and apprentices undertaking AHPO courses. It confers responsibilities on all AHPO trustees and committee members, employees and those working under self-employed arrangements, learners, apprentices and volunteers.

## Our Responsibilities

Safeguarding is our responsibility to ensure that our staff, learners and other individuals connected to our activities, operations and programmes do no harm to children and adults at risk. It is also our responsibility to manage any concerns raised and report them on to the appropriate authorities. AHPO also has a moral responsibility to safeguard all learners, and a responsibility to reduce the risk of staff being unjustly accused of improper or unprofessional conduct. AHPO has a responsibility to promote British values and challenge extremist views, and take steps where appropriate to prevent learners from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.

To meet our responsibilities we will

- Ensure that all staff are (employees and self-employed contractors) are aware of our policies, procedures and systems regarding safeguarding and prevent. We do this by:

- Providing the policy to new AHPO staff and document in the employment contract that this policy has been read and understood
- Including Safeguarding and Prevent in AHPO staff's mandatory training and ensuring this has been undertaken at annual appraisals
- Providing the policy to learners at induction, and confirming the policy has been read and understood
- Including Safeguarding and Prevent as a standard item in all learner reviews
- Including Safeguarding and Prevent as a standard item in the agenda of all AHPO meetings - Trustees' Board, Assessor and IQA, Education Committee, Executive committee
- Ensure all employees and those working under self-employed contracts will have Disclosure and Barring Service (DBS) checks appropriate to their role.
- Embed British Values, equality, diversity and inclusion, wellbeing and community cohesion within the curriculum.
- Maintain registration with the Regional Prevent Lead, Further and Higher Education (West Midlands) Counter Extremism Division, and access advice and training resources.
- Monitor forums on the AHPO Learning Management System and AHPO WhatsApp and undertake investigations where there is evidence of breaches of the Safeguarding and Prevent policy.
- Ensure that every safeguarding issue that is raised will be taken seriously and the correct action and steps are taken.

The Chairperson of the AHPO Trustees' Board is the Safeguarding Officer for AHPO and has overall responsibility for the safety of vulnerable groups in accordance with relevant UK legislation. The duties of the Safeguarding Officer include:

- Overseeing the promotion of safeguarding and prevent procedures and practices within the organisation.
- Dealing with employee concerns over learner's welfare, and signposting and offering guidance.
- Carrying out investigations into reported concerns and liaising with external bodies where appropriate.
- Maintaining secure records in relation to safeguarding issues and allegations.
- Maintaining own CPD to ensure their role can be fulfilled competently.

### **Duties of AHPO staff**

- Employees and those working under self-employed contracts must read and understand AHPO's Safeguarding and Prevent Policy and report any issues or concerns to the Safeguarding Officer.
- Employees and those working under self-employed contracts will only contact learners and apprentices regarding matters relating to their studies and training. Forms of communication include email, messaging through the electronic portfolio, phone calls, text messaging, and other forms of electronic communication such as FaceTime, WhatsApp and Instagram. All employees and self-employed contractors are given an AHPO email address and should use this for all email communications. Discussions (excluding brief communications) with learners about course work and related matters using telephone or electronic media should be recorded and uploaded into the Ecordia

portfolio. AHPO employees and self-employed contractors will not communicate with learners and apprentices through personal social networking platforms such as Facebook and Twitter.

- Personal relationships between AHPO assessors and tutors, and learners and apprentices, are strictly prohibited. Any existing personal relationships, e.g. a family member or friend must be declared to an AHPO administrator prior to the learner joining the programme.

### **Obligations of employers who have contracts with AHPO**

Employers who contract with AHPO to provide training have a responsibility to ensure the safeguarding of learners in their employment. AHPO will seek assurance that the employer implements safeguarding and prevent policies and strategies. If an AHPO staff member has a concern regarding safeguarding that falls within the remit of the employer, AHPO will raise the issue with the relevant employer representative and agree a course of action. AHPO can refuse to work with and withdraw the services provided to any employer who breaches their commitment to safeguarding.

If an employer has any concerns that an AHPO employee or individual with a contract with AHPO is not complying with safeguarding policies and practices, this should be raised with the AHPO Safeguarding Officer or an AHPO administrator or trustee and a course of action should be agreed.

### **Obligations of AHPO learners and apprentices**

Whilst there are no obligations by law, AHPO will expect all learners and apprentices to be vigilant and aware of the signs of possible abuse or extremism and report anything they feel is suspicious. They should report issues related to themselves and also related to their fellow learners.

### **Monitoring and Review**

The effectiveness of this policy will be reviewed annually or as necessary.

## Procedure

### What to do if you are concerned about the safety or welfare of a child or vulnerable adult

Someone may disclose something which prompts a concern, such as in a conversation, in a written assignment or a posting on a forum. You may receive information about someone in a position of authority which raises a concern, and this may relate to incidents which occurred recently, or in the past.

- Listen to what they are saying to you calmly so as not to make them more anxious.
- Respect the person's right to privacy but do not promise confidentiality - say that you may have to pass on information if a child or vulnerable adult is at significant risk of harm.
- Reassure the person that they have done the right thing in telling you this information.
- Make notes as soon as you can, using the exact words that you can remember.

If you are concerned that a child/young person/vulnerable adult is in possible **IMMEDIATE** danger, please take action to ensure their safety by contacting the Emergency Services by telephoning 999 or 112 from outside the UK.

- Then email details about the incident to [safeguarding@ahpo.net](mailto:safeguarding@ahpo.net)
- If you cannot send an email, call Tel +44(0) 1283 204846, and leave a message and the Safeguarding Officer will contact you during standard business hours.

### Outside standard business hours or during holidays:

If you are concerned about the risk to a child/young person/vulnerable adult outside business hours and expert advice is needed, you can contact the local Children's Social Care or Adult Social Services. Or you can contact:

- [NSPCC Helpline](https://www.nspcc.org.uk) 0808 800 5000 Mon- Fri 8am – 10pm or 9am – 6pm at the weekends
- [Domestic Abuse](https://www.domesticabuse.org.uk) Helpline Tel 0808 2000 247, 24 hours a day

If you do this, please also email [safeguarding@ahpo.net](mailto:safeguarding@ahpo.net) with the information that you have reported.

The Safeguarding Officer may require further information from the person who has made the initial referral at some point following the referral.

- The Safeguarding Officer will seek advice regarding further action required. Following advice they will refer, if necessary, to the relevant local authority children's social care, adult safeguarding service or the police.
- The Safeguarding Officer may report back to you once the case is closed on the action taken, as appropriate.

### Allegations against AHPO staff

- Any allegations of abuse involving a member of AHPO staff will be taken seriously by the AHPO. A learner can report an allegation about a member of staff to the Safeguarding Officer ([safeguarding@ahpo.net](mailto:safeguarding@ahpo.net)) which will then be referred to the AHPO Administration team and external agencies, as appropriate.
- Any member of AHPO staff who has a concern about abuse by another member of staff should report their concern to an appropriate senior manager, who will follow AHPO's safeguarding and disciplinary procedures.

## **Data protection**

- Under AHPO's Statutory Safeguarding duty, AHPO staff must report any safeguarding concerns to the Safeguarding Officer. Whilst measures will be taken to protect individuals' privacy on a need-to-know basis, confidentiality levels will be managed as outlined in the Appendix.
- The Safeguarding Officer keeps electronic records of referrals/concerns securely and confidentially on a restricted server with restricted access, in accordance with data protection guidelines. Data held is retained on a need-to-know basis according to the Safeguarding Privacy Notice – see Appendix.

## **Implementation and enforcement of procedure**

- Safeguarding is a statutory duty of AHPO's business, and, as such, there is no flexibility or exemption to this policy. A failure to comply with the safeguarding policy and procedures will be investigated and may result in dismissal or exclusion from AHPO.

## Appendix: Privacy Notice – Safeguarding

### Scope

- This document sets out what we do with your personal data when safeguarding concerns are reported to us.
- This document applies to you if you report a safeguarding concern, if a safeguarding concern is reported about you, or a safeguarding concern is reported where you are at risk.

### Who we are

- AHPO is the data controller in relation to the processing activities described below. This means that AHPO decides why and how your personal information is processed.
- Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to AHPO.

### What information do we collect about you, and how do we collect it?

- If information is brought to the attention of a member of AHPO staff about a potential safeguarding risk, that member of staff is obliged to notify the Safeguarding Officer. This could include the name of the person identifying the issue, the names of the individuals potentially at risk, and the name of the person they are at risk from, as well as details of personal circumstances which relate to the safeguarding concern.
- This information may include “special category” data, for example, about health or disability, sexual life or sexual orientation.

### How do we use your personal information?

- We use this information to assess whether there is a safeguarding risk, and if there is any action that we need to take to keep individuals safe. This is a statutory and legal obligation informed by legislation including [Keeping Children Safe in Education 2020](#) and [The Care Act 2014](#) and equivalent legislation for Scotland, Wales and Northern Ireland.
- The condition for processing special category data for this purpose would be that it is in the substantial public interest, for the purposes of protecting an individual from harm (see [DPA 2018 sch 1 \(part 2\) 18.1](#)).
- We also keep statistical information about the number of safeguarding concerns that have been raised, and how they were resolved. This is in our legitimate interest to plan our services.

### Who do we share your information with?

- We will share information with police forces, and government agencies, where we deem it necessary to protect an individual. This is a legal and moral obligation.
- Information relating to safeguarding concerns will be shared with consent where possible, but may be shared without consent where necessary, in accordance with [HM Government guidance](#).

### How long do we keep your personal information for?

AHPO retains information about safeguarding concerns for three years from the date of case closed, if we decide they are not necessary to act on, and for 25 years if we do act on them.

## **Your rights**

You have a number of rights in relation to your personal information, which apply in certain circumstances under the General Data Protection Regulations.

You have the right:

- To access your personal information that we process
- To rectify inaccuracies in the personal information that we hold about you

In some circumstances, you also have the right:

- To have your details removed from systems that we use to process your personal data
- To restrict the processing of your personal data in certain ways
- To obtain a copy of your personal data in a structured electronic data file
- To object to certain processing of your personal data by us
- To request that we stop sending you direct marketing communications.

If you are concerned about the way we have processed your personal information, you can complain to the [Information Commissioner's Office \(ICO\)](#).

## **Contact us**

If you have any queries about safeguarding at AHPO, please contact the Safeguarding Referrals Team at [safeguarding@ahpo.net](mailto:safeguarding@ahpo.net).



## **Glossary of terms/Definitions**

### **Child and childhood sexual abuse**

When a child or young person is sexually abused, they're forced or groomed into sexual activities. They might not understand that what's happening is abuse or that it's wrong. There are two types of sexual abuse:

1. Contact abuse can include touching, kissing and oral sex – sexual abuse isn't just penetrative.
2. Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online.

### **Consent**

This means giving permission for something to happen or agreeing to do something and being comfortable with that decision. Consent can be withdrawn at any time.

### **Controlling behaviour**

This is a range of acts designed to make a person subordinate and/or dependent by, for example: isolating the individual from sources of support; depriving them of the means needed for independence, resistance and escape; regulating their everyday behaviour.

### **Coercive behaviour**

This is defined as an act or pattern of acts of assault, threats, humiliation and intimidation or other abuses that is used to harm, punish or frighten a victim. This involves controlling and manipulating small aspects of everyday life that, on their own, can be difficult to see as a criminal offence. However, when considered together, they add up to a pattern of violence and abuse.

### **Economical abuse**

This is wider in its definition than 'financial abuse', as it can also include restricting access to essential resources such as food, clothing or transport, and denying the means to improve a person's economic status (for example, through employment, education or training).

### **Emotional, mental and psychological abuse**

Often closely linked terms that can be used interchangeably. The aim of emotional abuse in relationships is to reduce confidence and esteem to make their victim increasingly reliant on them. They use tactics such as intimidation, bullying, constant criticism and keeping someone isolated from family and friends in order to exert control.

### **Female genital mutilation (FGM)**

This is defined by the World Health Organisation (WHO) as the range of procedures that involve 'the partial or complete removal of the external female genitalia or other injury to the female genital organs whether for cultural or any other non-therapeutic reason'.

### **Financial abuse**

This involves a perpetrator using or misusing money which limits and controls their partner's current and future actions and their freedom of choice. It can include using credit cards without permission, putting contractual obligations in their partner's name, and gambling with family assets.

Financial abuse can leave individuals with no money for essentials such as food and clothing. It can leave them without access to their own bank accounts.

## **Forced and child marriage**

Forcing a person into a marriage is a crime in England, Wales, Scotland, Northern Ireland and the Republic of Ireland. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

## **Gaslighting**

A form of manipulation and psychological control. Victims of gaslighting are deliberately and systematically fed false information that leads them to question what they know to be true, often about themselves. They may end up doubting their memory, their perception, and even their sanity. Over time, a perpetrator's manipulations can grow more complex and potent, making it increasingly difficult for the victim to see the truth.

## **Harassment**

Any unwanted conduct which has the purpose or effect of violating the dignity of an individual, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, related to their gender, sexual orientation or gender identity.

## **Historic abuse or Non-recent abuse**

This is when an adult was abused in any way, as a child or young person under the age of 18. This can also include abuse carried out by individuals who are the same age as the victim (peer on peer abuse).

## **Honour based violence (HBV) or Honour based abuse (HBA)**

Or so-called HBV/HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. Abuse and violence may include female genital mutilation (FGM), forced marriage, restrictions on behaviour and communication and practices such as breast ironing. Abuse committed in the context of preserving "so called honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Threats of such acts, coercion or deprivation of liberty, whether occurring in public or private life.

## **Intimate Image Abuse/Revenge porn**

This is the distribution of a private sexual image of someone without their consent and with the intention of causing them distress, to shame, bully or take revenge on a person.

## **Intimate partner**

This means (i) persons legally married/or in a civil partnership agreement to one another, (ii) persons formerly married/ or in a civil partnerships agreement to one another, (iii) persons who have a child in common, regardless of whether such persons are married or have lived together at any time, (iv) couples who live together or have lived together, or (v) persons who are dating or who have dated in the past. The definition of Intimate Partners includes same sex couples.

## **Online abuse**

Online domestic abuse can include behaviours such as monitoring of social media profiles or emails, abuse over social media such as Facebook or Twitter, sharing intimate photos or videos without your consent, using GPS locators or spyware.

## **Physical abuse**

The most visible form of domestic abuse. It includes such behaviour as slapping, burning, beating, kicking, biting, stabbing and can lead to permanent injuries and sometimes death. Strangulation, Non-Fatal strangulation, along with suffocation are also classed as physical abuse.

## **Sexual abuse**

Includes rape, forced sexual acts and sexual degradation. Any sexual act that involves force (including emotional blackmail) is abuse - this includes pestering, name calling and threatening to get sex from 'elsewhere' in order to manipulate someone who does not want to have sex at that time into having sex. Sexually abusive relationships can include being forced to watch pornography as well as being forced into having sex with the perpetrator's friends or engaging in prostitution.

## **Stalking**

It is a pattern of persistent and unwanted attention that makes the victim feel pestered, scared, anxious or harassed. Some examples of stalking are: Regularly giving unwanted gifts, making unwanted communication, damaging property, repeatedly following or spying on a victim, and making threats.

Taken in isolation, some of these behaviours may seem like small acts, but together they make up a consistent pattern of behaviour that is frightening and upsetting. It's important to know that stalking is a criminal offence and the police will take it seriously.

## **Under 18**

A child or young person is classed as under 18 until the eve of their 18th birthday.

## **Vulnerable Adult**

A person aged 18 or over in England, Wales and Northern Ireland who is, or may be, in need of services by reason of mental or other disability, age or illness, and who is, or may be, unable to take care of themselves, or unable to protect themselves against significant harm, abuse or exploitation, including being drawn into terrorism.

In Scotland a vulnerable adult is known as an 'Adult at Risk' is someone over 16, who is unable to look after their own wellbeing, OR is at risk of harm from either another person's behaviour or from their own behaviour, OR because they have a disability, mental disorder, illness or physical or mental infirmity, and are more vulnerable to being harmed than other adults.