



## SAFEGUARDING ADULTS AT RISK

### Policy and procedure – College & Centenary Close

|                        |  |                            |             |
|------------------------|--|----------------------------|-------------|
| <b>DATE CREATED</b>    | September 2011   | <b>DATE OF NEXT REVIEW</b> | August 2024 |
| <b>REVIEW DATES</b>    | April 2020, July 2022 & September 2023                                   |                            |             |
| <b>POLICY OWNER(S)</b> | Head of College & Registered Manager - Supported Living, Centenary Close |                            |             |
| <b>DESIGNATION</b>     | College & Supported Living   |                            |             |

|                                |   |
|--------------------------------|---|
| <b>Purpose of policy</b>       | To provide all staff, learners, residents and parents/carers with an understanding of what safeguarding is.   |
| <b>Intended audience</b>       | All staff within College and Supported Living   |
| <b>Links to other policies</b> | <p>Restraint Reduction policy</p> <p>Learner Voice policy</p> <p>Equality and diversity policy</p> <p>Safer recruitment policy</p> <p>Speaking Out policy (Whistleblowing)</p> <p>Communications, Email and Internet</p> <p>Security policy</p> |

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## 1. Policy Introduction

Safeguarding children and adults at risk is of paramount importance.

- 1.1. The Care Act 2014 sets out a clear framework for how all concerned parties should protect adults at risk of abuse or neglect.
- 1.2. The Safeguarding Vulnerable Groups Act 2006 sets out the type of activity covered by the Act in relation to children and vulnerable adults. The Disclosure and Barring service (DBS) was established in 2009 to protect children and vulnerable adults. The Act defines the scope of the Disclosure and Barring Scheme. It provides that certain activities in relation to children and vulnerable adults are regulated. This is known as 'regulated activity'. All aspects of St Elizabeth's College and Supported Living Services will undertake some sort of regulated activity, from helping learners with their finances to assistance with personal hygiene.
- 1.3. The Health & Social Care Act 2008 (Regulated Activities) Regulations 2014 outlines the "fit and proper persons test" and the "duty of candour" for providers, Regulation 13 is relevant to safeguarding in that it mandates a "zero-tolerance approach to abuse, unlawful discrimination and unlawful restraint".
- 1.4. The GDPR and Data Protection Act (2018) safeguards privacy and wellbeing. This Act sets out the Providers and employers must do everything in their power to protect any of any data of a personal and sensitive nature.
- 1.5. St. Elizabeth's College & Supported Living Centenary Close, wishes to ensure that all our learners/ residents have a safe and stimulating environment in which they can fulfil their potential and we are committed to safeguarding the welfare of our vulnerable adult residents and learners.
- 1.6. In the terms of this Policy, a 'Vulnerable Adult' has the following definition:  
  
*'A person who is over 18 who is or may be in need of Community Care Services by reason of mental or other disabilities, age or illness, or may be unable to take care of him/herself or unable to protect him / herself against significant harm or exploitation. (Department of Health, 2000).'*
- 1.7. This may mean that they have a reduced ability to protect themselves from abuse or neglect. This can be as a result of a learning or physical disability, a physical or mental illness chronic or otherwise (including an addiction to alcohol or drugs); or a temporary or permanent reduction in physical or mental capacity.

It is the responsibility of St Elizabeth's College and St Elizabeth's Centre to take all reasonable steps to safeguard and protect the rights, health and wellbeing of all young people and adults in our care.

- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for earlier review date
- The learners/residents irrespective of their protected characteristics have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a learner/resident is at risk of harm

### 1.8. At St Elizabeth's:

Safeguarding and promoting the welfare of children young people and adults is everyone's responsibility. Everyone who comes into contact with children, adults their families and carers, has a role to play.

We take an '**it can happen here**' approach where safeguarding is concerned.

Everyone who comes into contact with adults has a role to play in identifying concerns, sharing information and taking prompt action.

Victims of harm should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

## 2. Aim of the Policy

2.1. The aim of the Policy is to ensure that:

- All trustees, governors, staff, learners, tenant's parents, families and carers have an understanding of what safeguarding is.
- All trustees' governors and staff know what the Safeguarding Policy is and follow it when safeguarding matters arise.
- All those who use and work for the service know what safeguarding policy is and know when safeguarding matters arise.

### **The Six Principles of Safeguarding**

The policy and procedures are based on **The Six Principles of Safeguarding** that underpin all adult safeguarding work.

|                    |  |  |
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| <b>Empowerment</b> | Adults are encouraged to make their own decisions and are provided with support and information. | I am consulted about the outcomes I want from the safeguarding process and these directly inform what happens. |
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| <b>Prevention</b>     | Strategies are developed to prevent abuse and neglect that promotes resilience and self – determination.  | I am provided with easily understood information about what abuse is, how to recognise the signs and what I can do to seek help.  |
| <b>Proportionate</b>  | A proportionate and less intrusive response is made balanced with the level of risk.                      | I am confident that the professionals will work in my interest, and only get involved as much as needed.  |
| <b>Protection</b>     | Adults are offered ways to protect themselves, and there is a coordinated response to adult safeguarding. | I am provided with help and support to report abuse. I am supported to take part in the safeguarding process to the extent to which I want and to which I am able.  |
| <b>Partnerships</b>   | Local Solutions through services working together within their communities                                | I am confident that the information will be appropriate shared in a way that takes into account its personal and sensitive nature. I am confident that agencies will work together to find the most effective responses for my own situation. |
| <b>Accountability</b> | Accountability and transparency in delivering a safeguarding response.                                    | I am clear about the roles and responsibilities of all those involved in the solution to the problem.   |

## 2.2. Types of Abuse:

Abuse is defined under the following categories: Physical, Domestic, Sexual, Psychological, Financial/material, Modern Slavery, Discriminatory, Organisational, Neglect and acts of omission, and Self neglect. These categories overlap and an abused child/adult does frequently suffer more than one type of abuse.

|                       |  |
|-----------------------|--|
| <b>Physical Abuse</b> | Physical injuries which have no satisfactory explanation, or abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child/adult |
| <b>Domestic Abuse</b> | Domestic abuse can also involve the abuse of an ‘adult at risk’. Abuse involves any incident or pattern of incidents of controlling, coercive or threatening   |

|   |   |
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|   | behaviour, violence or abuse between those that have been intimate partners or family members regardless of gender or sexuality.  |
| <b>Sexual Abuse</b>                     | <p>Involves forcing or enticing a child /young person/adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware what is happening. The activities may involve physical contact including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving looking at or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways or grooming in preparation for abuse.</p> <p>Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children/adults.</p>   |
| <b>Psychological or Emotional Abuse</b> | <p>Psychological, or emotional abuse, includes the use of threats, fears or bribes to negate an adult at risk's choices. Including the maltreatment of a person such as to cause severe and adverse effects on their development. It may involve conveying that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children/young people/adults. These may include interactions that are beyond a person's developmental capability as well as overprotection and limitation of exploration and learning or preventing from participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. It may involve serious bullying (including cyberbullying) causing.</p> |
| <b>Financial Abuse</b>                  | <p>The inappropriate use of a person's funds or resources, including theft, withholding money, inappropriate or unsanctioned use of a person's money or property or</p>   |

|                                   |   |
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|                                   | the entry of an adult at risk into financial contracts or transactions that they do not understand, to their disadvantage.  |
| <b>Modern Slavery</b>             | Modern Slavery encompasses human trafficking, domestic servitude and forced labour.   |
| <b>Discriminatory Abuse</b>       | Abuse targeted at a perceived vulnerability or on the basis of prejudice including racism or sexism, or based on a person's impairment, origin, disability, age, illness, sexual orientation or gender  |
| <b>Organisational Abuse</b>       | Organisational abuse happens when the routines in use force residents or service users to sacrifice their own needs, wishes and preferred lifestyle to the needs of the institution or service provider.  |
| <b>Neglect / Acts of Omission</b> | <p>Neglect can be both physical and emotional. This includes persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development.</p> <p>Neglect may involve a parent or carer failing to provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.</p> |

### 3. Scope of the Policy

- 3.1. This Policy applies to all staff, Trustees, Governors and Health and Care Quality Committee members, who work with or for St Elizabeth's College and Supported Living Services (Centenary Close) temporary staff, volunteers, carers, families and visitors. All have a legal responsibility to take seriously any vulnerable adult concerns that come to their attention and follow the guidance given.
- 3.2. Subcontractors must be informed of this Policy and deal with any concerns reported to them by contacting the Designated Person with responsibility for the adult at risk within St Elizabeth's College and Supported Living (Centenary Close).
- 3.3. Learners/residents who have concerns about other learners or residents, or the behaviour of adults towards them, can use this Policy to ensure they are heard.



3.4. Learners / residents will be given an easy read version of the Policy at the beginning of their tenancy. Day learners will be given a copy at the beginning of their college placement. All will be invited to comment either individually or in learners/ resident forums.

#### **4. Why is Safeguarding necessary?**

4.1. Adult Education and Social Care provisions have a duty of care to take such steps that are reasonable to ensure that the adults at risk are safe.

4.2. The Disclosure and Barring Service has a legal obligation to assess every person who wants to work or volunteer with children and adults at risk. Potential employees and volunteers will be assessed using data gathered by the Disclosure and Barring Service (DBS), including relevant criminal convictions, cautions, police intelligence and other appropriate sources.

#### **5. Our Commitment to Safeguarding**

5.1. The organisation is committed to safeguarding and promoting the welfare of adults at risk, across the 365-day provision it provides.

5.2. St Elizabeth's College and on site Supported Living Services work parallel to each other providing both learning opportunities and care. Within college and the supported living service on site at St Elizabeth's the majority of staff undertake a dual role within the college and the learners' own homes.

5.3. Robust recruitment processes are in place to ensure all staff are fit to work with adults at risk.

5.4. The service recognises that it has a duty to help learners/ residents and staff to realise their responsibilities (through guidance, support and training), eliminate or reduce risk and avoid situations (where possible) where abuse or neglect might be alleged.

5.5. This Policy uses the guidance from 'Safeguarding Adults at Risk', the Hertfordshire Multi-Agency Policy, Procedure and Practice for working with Adults at risk of abuse or neglect in Hertfordshire.

5.6. St Elizabeth's College follows its local Restrain Reduction Policy, Learner Voice Policy and Equality and Diversity Policy when dealing with bullying, harassment, violence or aggression.

#### **6. Accountability, Roles & Responsibility**

6.1. All staff including volunteers and part time staff are responsible for monitoring, recording and reporting the wellbeing of learners and any allegations or indicators of abuse.

6.2. At St. Elizabeth's College and on site Supported Living we have identified an organisational structure for safeguarding adults at risk and the responsibilities of staff in safeguarding the individual when an allegation has been made or abuse is suspected.

6.3. The flow chart takes guidance from the Hertfordshire Multi Agency Policy (Issue 10) part 2, stage1: Safeguarding concerns.

## 7. Designated Persons

7.1. St Elizabeth's College and on site Supported Living services has designated people responsible for the safeguarding of learners. The role of these staff is to receive any allegations and reports of abuse and to guide and support staff and learners involved. The following staff are the designated team and should be informed of any safeguarding matters relating to learners in their care: -

- Supported Living Manager.                      Supported Living
- Registered Manager                              Supported Living
- Head of College                                      Education (Designated Safeguarding Lead)

7.2. In the designated person's absence contact should be made with the Registered Manager of Supported Living who has overall responsibility for the Care Agency's safeguarding provision. For any matters relating to the college and curriculum the Director of Learning should be contacted.

## 8. The Role of Governance in Safeguarding

8.1 The board of trustees, College board of governors and Health, Care and Quality Committee will: Ensure there is an effective safeguarding policy in place;

- Ensure safer recruitment practice is followed;
- Ensure the college and on site supported living services has procedures for dealing with allegations against members of staff;
- Designate a member of staff with overall responsibility for safeguarding;
- Access relevant safeguarding training, including PREVENT.
- Devise and implement a PREVENT Risk Assessment.

## 9. Equality Statement

9.1. St Elizabeth's provides consistent support to all individuals and ensure the same safeguards are available to them regardless of age, ethnicity or cultural origin, disability or learning difficulty, religion or belief system, gender or sexual orientation.

## 10. Prevention

- 10.1. St. Elizabeth's College and on site Supported Living Services takes seriously its duty of care and will be proactive in seeking to prevent adults at risk becoming the victims of abuse or neglect. It will do this in a number of ways:
- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds;
  - By identifying roles and responsibilities of members of the Health Care Quality Committee, Board of Governors, Senior Management and staff;
  - By informing adults at risk of their rights to be free from harm and encouraging them to talk to College staff if they have any concerns;
  - Through the ongoing programme of support, at an appropriate level to promote self-esteem, social inclusion and address the issue of the protection of vulnerable adults in the wider context (see Learner Support)
  - By identifying and acting upon allegations or indicators of abuse at the earliest opportunity and in accordance with the timeframe outlined by Hertfordshire County Council (our Host Authority)
  - By following safer recruitment good practice including DBS checks for all staff. See Centre Wide Safer Recruitment policy.
  - By ensuring the curriculum develops knowledge of the rights and responsibilities of young people and adults and equips them with a greater understanding of safeguarding
  - By developing a comprehensive training package focusing on safeguarding issues including PREVENT.
- 10.2. All staff, managers, Trustees, Governors and Health and Care Quality Committee will undergo training so that they are fully aware of this policy and their responsibilities, including but not limited to: on line safeguarding training, face to face safeguarding training, attendance at meetings, through bulletins and updates, newsletters and external training. Additionally, all academic staff will undertake annual KCSIE training.

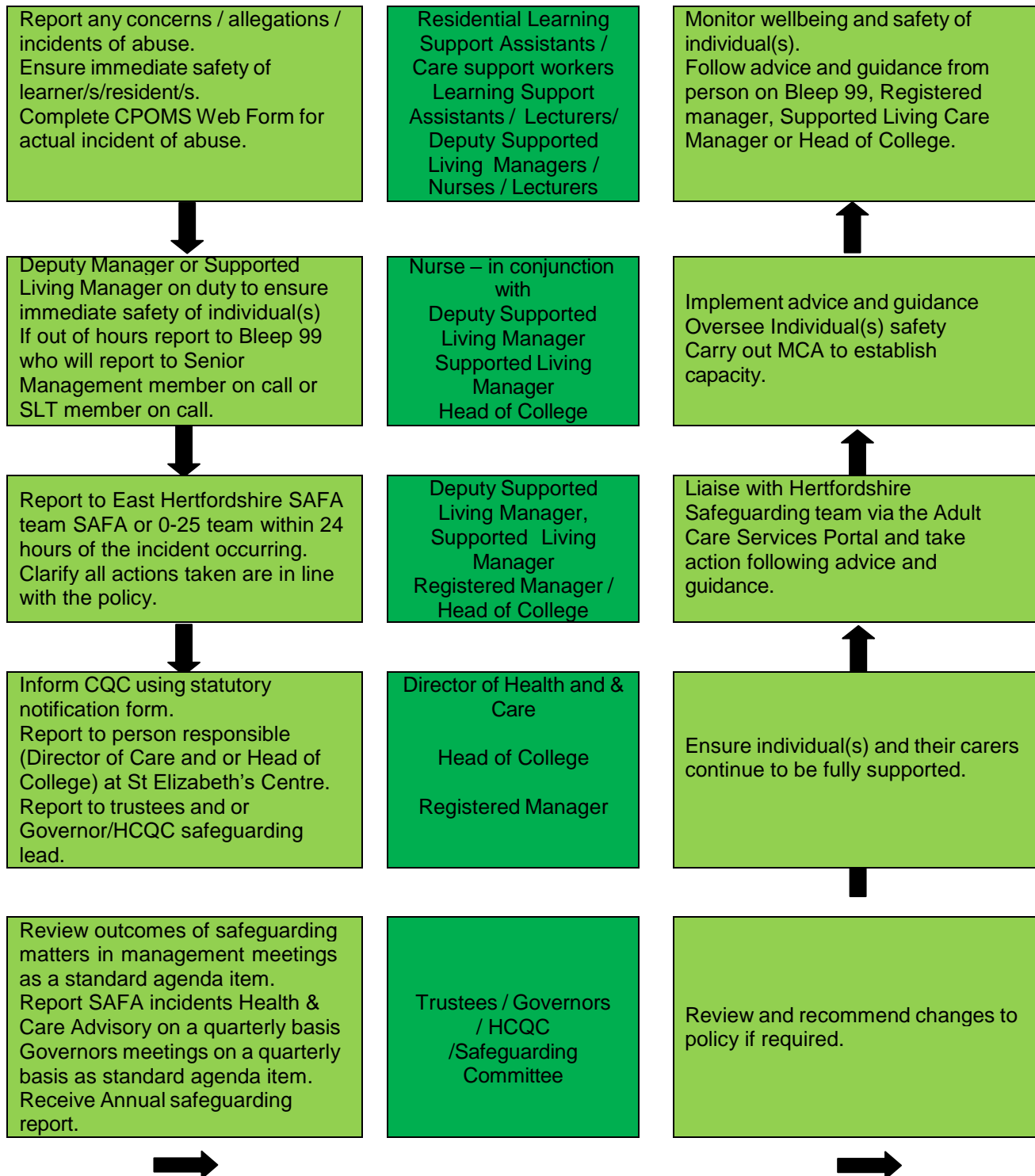
## 11. Review and Monitoring of the Policy and Procedures

- 11.1. Once agreed by the Health Care Quality Committee and College Board of Governors the College Leadership Group will review and monitor the policy and procedures on an annual basis and will recommend and implement approved changes where necessary. A revised version of the policy will be submitted to the Governing Body on an annual basis to ensure that any identified deficiencies or weaknesses have been dealt with without delay.
- 11.2. The impact of the policy will be measured using data collected in relation to reported safeguarding incidents and outcomes.

### 11.3. Relevant related Legislation

- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- KCSIE 2023 and annual updates
- Care Act 2014
- The Health & Social Care Act 2008 (Regulated Activities) Regulations 2014
- The GDPR and Data Protection Act (2018)
- Equality Act 2010

## 12. Organisational Flowchart



St. Elizabeth's realise that frontline staff, (RLSA's and LSA's and Lecturers) are more likely to receive allegations or notice indicators of abuse due to the amount of time they spend with

the learners/residents. The flow chart is based on this, but the same actions apply to any member of staff who first receives the disclosure or notices an indication of abuse regardless of position within the College and all areas of Supported Living.

## Guidance for Staff

### 13. Recognising Abuse

13.1. Definitions of abuse are set below but it can be:

- Physical
- Neglect (act of omission)
- Sexual abuse or exploitation
- Financial / material (misuse of money, club cards, benefits, personal property)
- Psychological/emotional
- Institutional or organisational
- Discriminatory in nature
- Pressure ulcers
- Cyber abuse
- Online abuse

13.2. Abuse is behaviour towards a person that either deliberately or unknowingly causes a vulnerable adult harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm.

13.3. Abuse can be a one-off incident or something that is repeated.

13.4. Staff are responsible for the identification of abuse and referral to the appropriate authorities via the service's designated persons.

13.5. Definitions of Abuse (Adults at risk). "No Secrets" identifies categories of abuse as:

13.6. Physical Abuse

**Action:** Hitting, slapping, pushing, kicking, misuse of medication, restraint, inappropriate sanctions.

**Indicators:** Series of unexplained falls or injuries. Injuries / bruises at different stages of healing. Bruising in unusual sites, e.g., inner arms / thighs. Teeth indentations. Injuries to head or face. Client very passive.

13.7. Sexual Abuse

**Action:** Rape and sexual assault or sexual acts to which the vulnerable adult has not consented.

**Indicators:** Change in behaviour. Overt sexual behaviour or language. Difficulty in walking / sitting. Injuries to genital and / or the anal area.

13.8. Neglect

**Action:** Acts of omission. Ignoring physical or care needs. Failure to provide access to appropriate health, social care or educational services. Withholding necessities of life e.g. medications nutrition heating.

**Indicators:** Absence of food, heat, hygiene, clothing, absence of prescribed medication. Not given person dignity, respect, not providing hearing aid, glasses, dentures, weight loss, weight gain, pressure sores.

13.9. Psychological Abuse

**Action:** Emotional abuse. Threats of harm or abandonment. Deprivation of contact. Humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**Indicators:** Withdrawal, depression. Cowering and fearfulness. Change in sleep patterns. Agitation, confusion or change in behaviour. Change in appetite / weight.

13.10. Financial Abuse

**Action:** Theft, fraud exploitation. Pressure in connection with financial transactions, misuse or misappropriation of property, possessions or benefits.

**Indicators:** Unpaid bills, basic needs not being met. Lack of money on a day to day basis.

13.11. Organisational Abuse

**Action:** Poor care standards, lack of positive responses to complex needs. Rigid routines. Inadequate staffing. Insufficient knowledge base within service.

**Indicators:** Inability to make choices or decisions. Agitation if routine broken. Disorientation. Patterns of challenging behaviour.

13.12. Discriminatory Abuse

**Action:** Racist, sexist, or that based on a person's disability. Other forms of harassment, slurs or similar treatment. Failure of agencies to ensure staff receive adequate anti-discrimination practice training.

**Indicators:** Low self-esteem. Withdrawal. Depression. Fear. Anger.

13.13. Modern Slavery

Encompassing slavery, human trafficking, forced labour and domestic servitude.

13.14. Self-Neglect

A wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

13.15. Radicalisation

Being drawn into acts of terrorism including support for extremist ideas that are part of terrorist ideology.

13.16. On line abuse

Categorised in four areas of risk: context, contact, conduct and commerce. On line safety is considered when planning the curriculum and through filtering and monitoring of IT systems.

#### 14. Responding to an allegation of abuse

- 14.1. Any suspicion, allegation or incident of abuse must be reported to the designated Duty Manager / Person in Charge immediately. If this is not possible, a member of the Senior Management Team must be notified (see Organisational flowchart – Section 12).

#### 15. Responding to suspicions/indicators or actual abuse

- 15.1. St Elizabeth's College and on site Supported Living Service recognises its legal duty to work with other agencies in safeguarding adults at risk and in responding to abuse. All members of staff involved with adults at risk have a responsibility to be mindful of issues related to vulnerable adult safety and welfare and a duty to report and refer any concerns however "minor" they appear to be, this includes any suspected or witnessed misuse of ICT equipment.
- 15.2. When abuse is suspected, or concerns are raised regarding a vulnerable adult's wellbeing, the member of staff will complete an Incident Report Form via CPOMS Web and if necessary attach a body map to the form. This must be given to the Duty Manager / Person in Charge immediately. In suspected cases of abuse the Supported Living Manager/Head of College must report the concerns to East Hertfordshire Adult safeguarding team or the 0 – 25 safeguarding team. **For further guidance on completing Incident Reporting Forms consult the organisational policy on Reporting Serious and Untoward Incidents.**



15.3. In cases where it is deemed that a person lacks capacity to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed about any concerns about the vulnerable person's welfare or any action taken to safeguard and promote the Adult at risk welfare, providing this does not compromise the vulnerable adult's safety. Where there are possible concerns about a vulnerable adult's safety, unconditional confidentiality cannot be guaranteed and should not be offered. Guidance from the East Hertfordshire Adult safeguarding team or the 0-25 Safeguarding Team must be sought before disclosing information.

15.4. Please see additional appendices to this policy in relating to concerns of radicalisation and terrorism as follows:

**Statutory guidance issued under section 29 of the Counter Terrorism and Security Act 2015.**

- Section 26 of the Counter-Terrorism and Security Act 2015, places a duty on certain bodies, in the exercise of their functions to have 'due regard to the need to prevent people from being drawn into terrorism
- For further information, please following the below hyperlink: [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevent-duty-guidance-england-and-wales-2023)

**15.5. IT IS NOT THE RESPONSIBILITY OF COLLEGE OR SUPPORTED LIVING CARE STAFF TO INVESTIGATE A SAFEGUARDING CONCERN UNLESS GIVEN THE GO AHEAD AND INSTRUCTIONS FROM THE HERTS 0-25 SAFEGUARDING TEAM or ADULT SAFEGUARDING TEAM.**

**15.6. This procedure also takes guidance from St. Elizabeth's "Speaking out Policy (Whistle blowing)" policy section 6 – How to raise a concern.**

15.7. Any suspicions or allegations of actual abuse of an adult at risk must be reported to the Supported Living Manager/Person in Charge/Head of College immediately.

15.8. On being notified of any such matter, the Supported Living Manager / Person in Charge/Head of College shall:

- Take such steps as he / she considers necessary to ensure the safety of the person in question and any other person who might be at risk.
- Report the matter to the Director of Learning and Director of Wellbeing
- Ensure that a report of the matter is completed (on an incident reporting form via CPOMS Web) by the person who reported the original concern/incident. If the complaint is made against any member of the Senior Management Team or a designated safeguarding coordinator, then the person dealing with the complaint must be either the Director of Learning and Director of Wellbeing
- If the complaint is made against the Director of Learning and / or Director of Wellbeing then the Chief Executive should be immediately notified and in the case

of the Head of College the Chair of the Governing Body and Health, Care Quality Committee should also be immediately notified.

## 16. Record Taking

16.1. A full record shall be made as soon as possible on an IRF form via CPOMS Web of the nature of the allegation and any other relevant information including:

- The date
- The time
- The place where the disclosure of information took place
- The place where the alleged abuse happened
- Your name and the names of others present
- The name of the complainant and, where different, the name of the vulnerable adult who has allegedly been abused
- The nature of the alleged abuse
- A description of any injuries observed
- The account which has been given of the allegation

## 17. Guidance for designated Manager

17.1. The designated manager must immediately discuss the matter with the 0-25 Safeguarding Team or Hertfordshire Adult Safeguarding team to determine whether it is a Safeguarding matter. (**NB:** The Local Authority Safeguarding Team is responsible for coordinating action in adult cases, including liaison with police).

17.2. If it is agreed to be a Safeguarding matter, a written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the local authority 0-25 Safeguarding Team/ Adult Safeguarding team within 24 hours. If the consent has not been gained from the Young person / Adult, the designated safeguarding coordinator will discuss with Herts Adult Care Services what action will be taken to inform the parents / carers of the adult at risk and a note of that conversation should be made. The nominated member of staff must notify the Head of College or the Registered Manager as soon as practicable and in any event within 2 hours of the initial concern arising.

17.3. **Note:** It is important to convey that Hertfordshire Adult Care Services will need to assess the situation and would want to work **with** the adult at risk in determining what could/should happen next. They would want to respect the vulnerable adult's wishes and feelings provided no one is at immediate risk of harm.

17.4. The mental capacity of the adult at risk and their ability to give informed consent for an enquiry to be under these procedures is a significant but not the only factor in deciding what action to take.

17.5. If the Adult at risk is fully aware of what could happen, they can:

- Choose whether they want to speak now or have time to think about it.
- Be as informed as possible regarding the implications of passing on this information.

17.6. If the complainant is the adult at risk, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

## 18. Reporting “Notifiable Events” to the Care Quality Commission

18.1. The Registered Manager will need to complete and send a statutory notification or under the authority of the Registered Manager the designated person will complete the statutory notification form.

18.2. **Comprehensive guidance on how to complete these forms when to complete them and descriptors of notifiable events can be found on [www.CQC.org.uk](http://www.CQC.org.uk). Key points to keep in mind are:**

- Statutory notification forms are kept in the Supported Living office and can also be found on College Data under Safeguarding, when appropriate the Head of College will apply regulated procedures to report to Ofsted.
- The notification will be sent via the CQC notification e-mail address. All details are coded and individuals are given ID codes to protect confidentiality.  
[HSCA\\_notifications@cqc.org.uk](mailto:HSCA_notifications@cqc.org.uk)
- The regional contact address is: East Region, Care Quality Commission, Citygate, Gallowgate, Newcastle upon Tyne, NE1 4PA
- Or alternatively telephone: 03000 616161
- Copies of the forms are stored electronically by the Administration support assistant to the Registered Manager

## 19. Learner / Resident Support

19.1. St. Elizabeth’s College and Supported Living service (Centenary Close) will be proactive and take positive steps to inform learners / residents of their rights to safety and protection and the options available to express their fears or concerns. This will be in the following formats.

## **20. Learner Support: Education**

- 20.1. The curriculum will embed safeguarding welfare, health and safety and the PREVENT agenda.
- 20.2. Key work sessions, House / flat meetings, induction and tutorial with Lecturer and Learner council and house meetings will discuss safeguarding themes and will be instrumental in promoting safeguarding and developing resources and information.
- 20.3. Learners/ residents will be consulted in the review and development of this policy.
- 20.4. Promotion of the use of individual's social workers and independent advocates to promote choice and rights for learners/ residents unable to communicate their needs/concerns effectively.
- 20.5. The service user policy on how to make a complaint will be explained and discussed in individual Key worker meetings Bungalow/ House meetings, Induction with lecturer or Learner Council meetings.
- 20.6. The college learner involvement strategy will further identify strategies to implement the above formats. The Supported Living Managers will advise on safeguarding during allegations and monitor and evaluate the effectiveness of procedures carried out within the services provision.

## **21. Learner /Resident Support: During / Post Incident**

- 21.1. St. Elizabeth's College and Supported Living service will endeavour to support learners/residents following any incidents of abuse and follow guidance and instruction from the local 0-25 Safeguarding Authority. Learners/ Residents are entitled to and have available in house and external counselling services. This service will be offered to learners involved after any allegation even if the allegation has not been upheld.

## **22. Confidentiality and Information Sharing**

- 22.1. Staff will take instruction from the Supported Living Manager/Head of College or Person in Charge on what to tell stakeholders in relation to allegations and / or suspicions of abuse. The Supported Living Manager or Person in Charge will take guidance from the 0-25 Safeguarding Team in relation to this.
- 22.2. Adults at risk enquiries, investigations and conferences can only be successful if professional staff share and exchange all relevant information. That information must be treated as confidential at all times and staff will be bound by the ethical and statutory codes that cover confidentiality and the General Data Protection Regulation (GDPR)

- 22.3. Disclosure of confidential personal information without the consent of the person providing it may take place under circumstances, which must be capable of justification. Problems around the disclosure of information can be avoided if the consent of the individual is obtained, preferably in writing, so long as they have mental capacity.
- 22.4. Disclosure may be necessary in the public interest where a failure to disclose information may expose another to risk of death or serious harm.
- 22.5. All those providing information should take care to distinguish between fact, observation, allegation and opinion. It is important that, should any information exchange be challenged in respect of a breach of confidentiality or, for example, as a breach of the Human Rights Act, the information can be supported by evidence.
- 22.6. Information must be adequate, relevant and not excessive in relation to the purpose for which it is held and must be held no longer than is necessary for that purpose.
- 22.7. Each agency is responsible for maintaining their own records on work with adults at risk protection cases. The agency should have a policy stating the purpose and format or keeping the records and for their destruction.

### **23. Record Keeping**

- 23.1. The Supported Living Manager / Head of College will retain the central record of all incident report forms and safeguarding records. This will include:
- The formal report on an Incident Reporting Form via CPOMS Web
  - Entries on the central tracker
  - Any notes, memoranda or correspondence dealing with the matter
  - Any other relevant material
- 23.2. Copies of reports, notes etc will be kept securely locked at all times, but will be shared in accordance with the General Data Protection Regulation (GDPR)

### **24. Staff Support / Development**

- 24.1. As identified within the policy statement, St. Elizabeth's College and on site Supported Living Service recognises it needs to provide staff with adequate support and training to provide a safe and secure environment for our learners/residents
- 24.2. A planned programme of formal e-safety training is available to staff. An audit of the e-safety training needs of all staff will be carried out regularly. Mandatory training for all staff includes:

- Safeguarding training and yearly refreshers
- Safer recruitment (e-learning for managers)
- PREVENT

## **25. Post Incident Support for Staff**

25.1. St. Elizabeth's College and Supported Living Service will endeavour to support staff following any incidents of abuse and follow guidance and instruction from the local safeguarding authority. Staff are entitled to and have available in house and external counselling services. This service will be offered to staff involved during an investigation and after an investigation, if the allegation has not been upheld. Support for staff is also available through the workplace option.

## **26. Young People and Transition from Children's Services**

26.1. Safeguarding Adults applies to anyone aged 18 years or over. However, Children's services support people from 0-25 years so any safeguarding concerns raised for adults aged 18-25 will come under the 0-25 Safeguarding Team. For those over 25 years of age, the adult safeguarding team manage concerns raised. Where a vulnerable young person is known or suspected to be at risk of abuse, and is receiving services, they should have a transition plan to move from children to adult services. In this instance, a Safeguarding Adults process should be initiated as part of that transition.

## **27. Online Safety & Guidance**

27.1. St Elizabeth's College / supported Living will be responsible for ensuring that the IT infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The Director of Learning reviews updates through KCSIE (Keeping Children Safe in Education) and provides this information to the Head of IT to be reflected in policy development and review.

27.2. All users will be provided with a username and password by the IT Department who will keep an up to date record of users and their usernames.

## **28. Online Safety in Education**

28.1. Online safety is a focus in all areas of the curriculum and staff should reinforce safe practice in the use of ICT across the curriculum.

28.2. In sessions where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

- 28.3. Where learners/residents are allowed to freely search the internet, eg using search engines, staff should be vigilant in monitoring the content of the websites the young people visit.
- 28.4. The organisation applies policies in regard to Filtering and Monitoring and reviews access of and to online searches monthly.
- 28.5. It is accepted that from time to time, for good educational reasons, learners/residents may need to research topics (e.g. racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Head of IT (and other relevant person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

## **29. Promotion of Online Safety**

- 29.1. Online safety should be reinforced as part of a planned programme of learning or tutorial activities/key worker session.
- 29.2. Learners should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- 29.3. Rules for use of ICT systems / internet will be posted in all rooms and displayed on log-on screens.
- 29.4. Staff should act as good role models in their use of ICT, the internet and mobile devices.

## **30. Use of Digital & Video Images**

- 30.1. The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff and learners need to be aware of the risks associated with sharing images and with posting digital images on the internet.
- 30.2. Those images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. The college will inform and educate users about these risks and will implement this policy to reduce the likelihood of the potential for harm
- 30.3. When using digital images, staff should inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their**

**own images on the internet e.g. on social networking sites. Updates in relation to KCSIE will be applied to on line safety.**

- 30.4. Staff are allowed to take digital / video images to support educational aims, but must follow this Policy concerning the sharing, distribution and publication of those images. Those images should only be taken on college equipment. Personal equipment of staff must not be used for such purposes.
- 30.5. Care should be taken when taking digital / video images that learners are appropriately dressed and are not participating in activities that might bring the individuals or the organisation into disrepute.
- 30.6. Learners/residents must not take, use, share, publish or distribute images of others without their permission.
- 30.7. Photographs published on the website, or elsewhere that include learners/residents will be selected carefully and will comply with good practice guidance on the use of such images, and adhere to written consent (see 30.9).
- 30.8. Learners'/residents' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- 30.9. If learners/residents are deemed not to have capacity to consent. Written permission from parents or carers will be obtained before photographs of are published on the college website or other promotional materials.

### **31. Email**

- 31.1. The official college e-mail service may be regarded as safe and secure and is monitored. Staff and learners should therefore use only the college e-mail service to communicate with others when in college or on college systems, e.g., by remote access.
- 31.2. Users need to be aware that e-mail communications may be monitored.
- 31.3. Users must immediately report to the nominated person, in accordance with the Policy, the receipt of any e-mail that makes them feel uncomfortable, is offensive, threatening or bullying in nature and must not respond to any such email.
- 31.4. Any digital communication between staff and learners or parents / carers must be professional in tone and content. These communications may only take place on official (monitored) college or supported living systems. Personal email addresses, text messaging or public chat / social networking programmes must not be used for these communications.



- 31.5. Learners/ residents should be taught about email safety issues, such as the risks attached to the use of personal details. They should also be taught strategies to deal with inappropriate emails and be reminded of the need to write emails clearly and correctly and not include any unsuitable or abusive material.
- 31.6. All learners will have their own log in to ensure filtering and monitoring security is maximized.

### **32. Unsuitable / inappropriate activities**

- 32.1. Some internet activity, e.g., accessing child abuse images or distributing racist material is illegal and are banned from College and all other organisational ICT systems. Other activities, e.g. Cyber-bullying are banned and could lead to criminal prosecution.
- 32.2. St. Elizabeth's Agency believes that the activities referred to in the following section would be inappropriate in a College context and that users should not engage in these activities in College or outside college when using the organisations equipment or systems.
- 32.3. **PLEASE SEE CENTREWIDE INTERNET POLICY FOR FURTHER INFORMATION**

### **33. Responding to Incidents of Misuse**

- 33.1. It is hoped that all members of staff will be responsible users of ICT, who understand and follow this policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.
- 33.2. If members of staff suspect that misuse might have taken place, but that the misuse is not illegal it is essential that correct procedures are used.

### **34. Use of Technology**

All staff must apply the following policies in relation to use of technology:

- BYOD
- Filtering and Monitoring
- DPO
- Retention
- Safer Recruitment Policy - Information on this can be found in the Centre Wide Policy and Procedures.