

St Elizabeth's College & Supported Living

Safeguarding Adults at Risk Policy and Procedure

Date Policy Approved: September 2011 and 1st June 2020
Renewal Date: April 2020
Date of next Review: April 2021



St. Elizabeth's College and Supported Living Safeguarding Policy

1. POLICY INTRODUCTION

- 1.1. Safeguarding children and adults at risk is of paramount importance.
- 1.2. The Care Act 2014 sets out a clear framework for how all concerned parties should protect adults at risk of abuse or neglect.
- 1.3. The Safeguarding Vulnerable Groups Act 2006¹ 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.
- 1.4. The Act defines the scope of the DBS 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.
- 1.5. St. Elizabeth's College & Supported Living Services aim to ensure that all our learners / residents have a safe and stimulating environment in which they can fulfil their potential. We are committed to safeguarding the welfare of our vulnerable adult residents and learners.
- 1.6. In the terms of this Policy, the below definition of 'vulnerable adult' is applied, as defined by the Department of Health (2000):

"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".

- 1.7. Taking the above definition, a vulnerable adult may 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.

2. AIM OF THE POLICY

- 2.1. The aim of the policy is to ensure that:
 - a) Trustees, College Governors, Health Care & Quality Committee (HCQC) members, staff, learners, resident's parents, families and carers have an understanding of what safeguarding is;
 - b) Trustees, Governors, HCQC members and staff are familiar with and understand the Safeguarding Policy and know how to apply it when safeguarding matters arise; and
 - c) all those who use St Elizabeth's Centre (learners / residents) are aware of the Safeguarding Policy.
- 2.2. This policy and our procedures are based on '*The Six Principles of Safeguarding*' that underpin all adult safeguarding work, as follows:

¹ <http://www.legislation.gov.uk/ukpga/2006/47/contents>

	What does this mean?	What does this mean for learners / residents?
1. Empowerment	Adults are encouraged to make their own decisions and are provided with support and information.	You are consulted about the outcomes that you want from the safeguarding process and these directly inform what happens.
2. Prevention	Strategies are developed to prevent abuse and neglect that promotes resilience and self – determination.	You are provided with easy to understand information about what abuse is, how to recognise the signs and what you can do to seek help.
3. Proportionate	A proportionate and less intrusive response is made balanced with the level of risk.	You are confident that the professionals will work in your interest, and only get involved as much as needed.
4. Protection	Adults are offered ways to protect themselves, and there is a co-ordinated response to adult safeguarding.	You are provided with help and support to report abuse. You are supported to take part in the safeguarding process to the extent to which you want and are able.
5. Partnerships	Organisations should work in partnership with each other and local communities. Local people also have a part to play in preventing, detecting and reporting abuse.	You are confident that the information will be appropriately shared in a way that takes into account its personal and sensitive nature. You are confident that agencies will work together to find the most effective responses to your situation.
6. Accountability	Accountability and transparency in delivering a safeguarding response.	You are clear about the roles and responsibilities of all those involved in the solution to the problem.

3. SCOPE OF THE POLICY

- 3.1. This Policy applies to Trustees, Governors, HCQC members, 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.
- 3.2. Subcontractors must also be made aware of this policy and understand how to deal with any concerns reported to them, by contacting the 'Designated Person' that has responsibility for the adult at risk within St Elizabeth's College & Supported Living Services.

- 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 placement in the College. All will be invited to comment either individually or in learner / 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 (DBS) 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 DBS, including relevant criminal convictions, cautions, police intelligence and other appropriate sources.

5. OUR COMMITMENT TO SAFEGUARDING

- 5.1. St Elizabeth's Centre is committed to safeguarding and promoting the welfare of adults at risk, across the 365-day provision it offers.
- 5.2. St Elizabeth's College, Day Opportunities and Supported Living Services work parallel to each other, providing both learning opportunities and care. Within the College and Supported Living Services on-site at St Elizabeth's, the majority of staff undertake a dual role within the College and in the learners' 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 applies the guidance from '*Safeguarding Adults at Risk - the multi-agency policy, procedure and practice for working with Adults at risk of abuse or neglect in Hertfordshire*².
- 5.6. St Elizabeth's College and Supported Living Services applies the flow chart at Section 12, below, as formulated by the Safeguarding Adults at Risk multi-agency policy.
- 5.7. St Elizabeth's College follows its local Learner Behaviour 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 / residents and any allegations or indicators of abuse.
- 6.2. St. Elizabeth's College and Supported Living Services have adopted an organisational structure for safeguarding adults at risk and make clear the responsibilities on staff in safeguarding an individual when an allegation has been made, or abuse is suspected.

² <https://www.hertfordshire.gov.uk/media-library/documents/adult-social-services/herts-safeguarding-adults-board/hcs-666-issue-11.pdf>

7. DESIGNATED PERSONS

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

- a) Registered Manager Supported Living
- b) Domiciliary Care Manager Supported Living
- c) Deputy registered Manager Supported Living
- d) Head of College Education

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, in the Head of College's absence, the Director of Education & Skills should be contacted.

8. THE ROLE OF GOVERNANCE IN SAFEGUARDING

8.1. The College Governors and members of the Health, Care and Quality Committee (HCQC), who oversees Supported Living, will:

- a) ensure there is an effective safeguarding policy in place;
- b) ensure safer recruitment practice is followed;
- c) ensure the College and Supported Living Services have procedures for dealing with allegations against members of staff;
- d) designate a member of staff with overall responsibility for safeguarding; and
- e) access relevant safeguarding training, including 'PREVENT³'.

9. EQUALITY STATEMENT

9.1. St. Elizabeth's College and Supported Living Services provide 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 Supported Living Services take seriously its duty of care and will be proactive in seeking to prevent adults at risk becoming the victims of abuse or neglect. They do this in a number of ways, including:

- a) by practising an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds;

³ **What is Prevent?** The Government's counter-terrorism strategy is known as CONTEST. Prevent is part of the strategy and its aim is to stop people becoming terrorists or supporting terrorism. CONTEST has four key principles: (1) **Pursue**: to stop terrorist attacks; (2) **Prevent**: to stop people becoming terrorists or supporting terrorism; (3) **Protect**: to strengthen our protection against a terrorist attack; and (4) **Prepare**: to mitigate the impact of a terrorist attack.

Healthcare professionals have a key role in Prevent. Prevent focuses on working with vulnerable individuals who may be at risk of being exploited by radicalisers and subsequently drawn into terrorist related activity. Prevent does not require you to do anything in addition to your normal duties. What is important is that if you are concerned that a vulnerable individual is being exploited in this way, you can raise these concerns in accordance with this policy, as you would do with any safeguarding issue.

- b) by identifying roles and responsibilities of Trustees, College Governors, HCQC members, Senior Management and staff;
 - c) by informing adults at risk of their rights to be free from harm and encouraging them to talk to College and Supported Living staff if they have any concerns;
 - d) through an 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' at section 20, below);
 - e) 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);
 - f) by following safer recruitment good practice, including DBS checks for staff. See the St Elizabeth's Centre-wide Safer Recruitment policy; and
 - g) by developing a comprehensive training package, focusing on safeguarding issues including 'PREVENT'.
- 10.2. All staff, managers, Trustees, HCQC members and Governors' within St Elizabeth's College and Supported Living Service will undergo training so that they are fully aware of this policy and their responsibilities.

11. REVIEW AND MONITORING OF THE POLICY AND PROCEDURES

- 11.1. Once agreed by the HCQC and College Governors, respectively, the College Leadership Group will review and monitor this 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 HCQC and College Governors on an annual basis, to ensure that any identified deficiencies or weaknesses are addressed without delay.
- 11.2. The impact of this policy will be measured using data collected in relation to reported safeguarding incidents and outcomes.
- 11.3. Relevant related Legislation and statutory guidance includes:
- a) Safeguarding Vulnerable Groups Act 2006⁴;
 - b) Human Rights Act 1998⁵;
 - c) Care Act 2014⁶; and
 - d) Care and support statutory guidance⁷.

⁴ <http://www.legislation.gov.uk/ukpga/2006/47/contents>

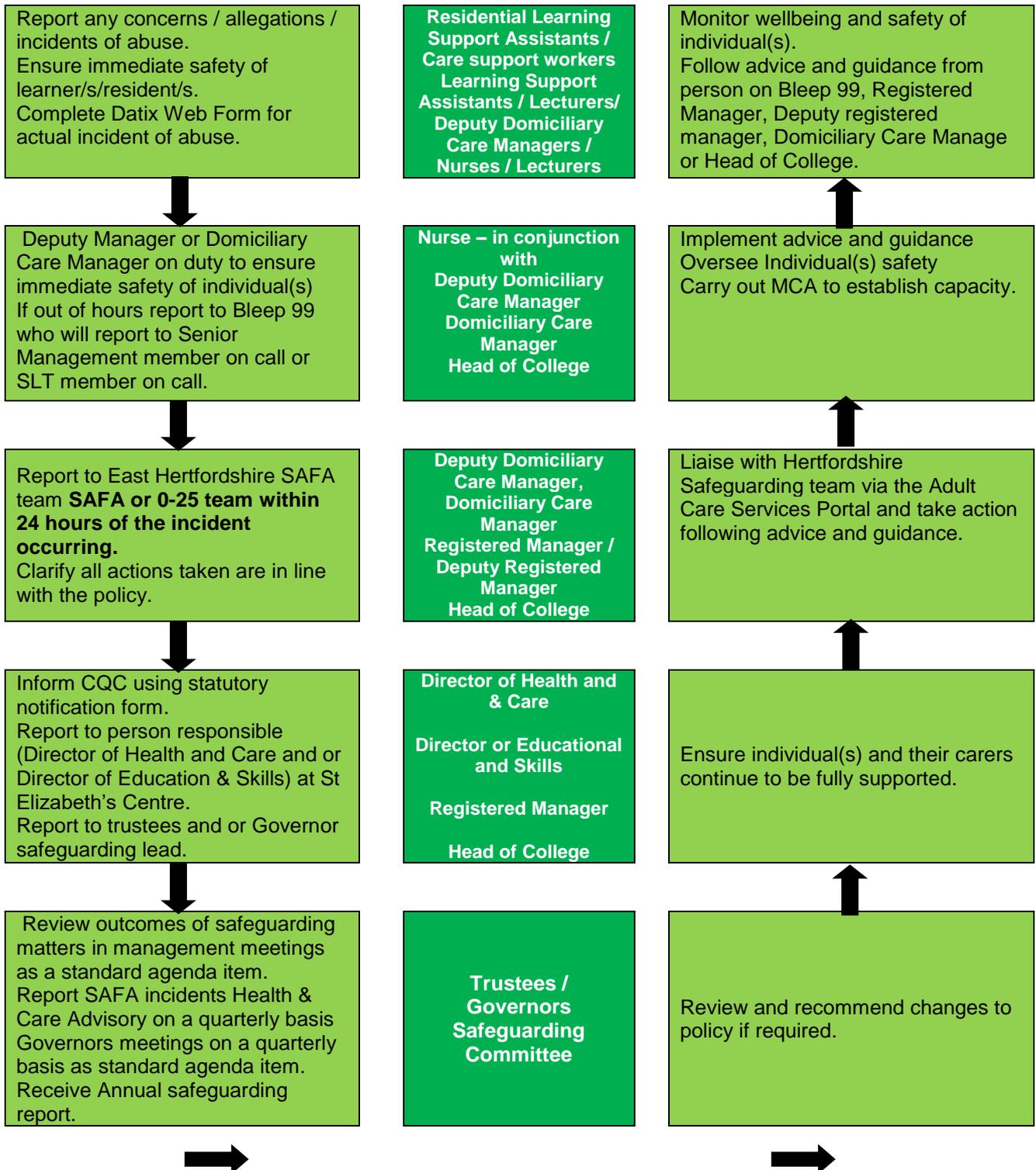
⁵ <http://www.legislation.gov.uk/ukpga/1998/42/contents>

⁶ <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

⁷ <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#first-contact-and-identifying-needs>

12. ORGANISATIONAL FLOWCHART

12.1. We recognise that frontline staff, (CSW, RLSA's and LSA's, lecturers and tutors) are more likely to receive allegations or notice indicators of abuse, due to the amount of time they spend with learners / residents. The following flowchart 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. Examples of abuse can be:

- a) physical
- b) neglect (act of omission)
- c) sexual abuse or exploitation
- d) financial / material (misuse of money, club cards, benefits, personal property)
- e) psychological/emotional
- f) institutional or organisational
- g) discriminatory in nature
- h) pressure ulcers
- i) cyber 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. Abuse and neglect can take many forms. Organisations and individuals should not be constrained in their view of what constitutes abuse or neglect, and should always consider the circumstances of the individual case.

13.6. Government statutory guidance to the Care Act 2014, '*Care and support statutory guidance*⁸', identifies examples of abuse and neglect, as follows. The indicators set out below are examples and are non-exhaustive:

a) **Physical Abuse**

Examples: Assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical 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.

b) **Domestic violence**

Examples: Psychological, physical, sexual, financial, emotional abuse, so called 'honour' based violence.

c) **Sexual Abuse**

Examples: Rape; indecent exposure; sexual harassment; inappropriate looking or touching; sexual teasing or innuendo; sexual photography; subjection to pornography or witnessing sexual acts; indecent exposure;

⁸ <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#first-contact-and-identifying-needs>

sexual assault; and sexual acts to which the adult has not consented or was pressured into consenting

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

d) **Psychological Abuse**

Examples: Emotional abuse; threats of harm or abandonment; deprivation of contact; humiliation; blaming; controlling; intimidation; coercion; harassment; verbal abuse; cyber-bullying; isolation or unreasonable and unjustified withdrawal of services or supportive networks.

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

e) **Financial or material Abuse**

Examples: Theft; fraud; internet scamming; coercion in relation to an adult's financial affairs or arrangements; including in connection with wills, property, inheritance or financial transactions; and the 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.

f) **Modern Slavery**

Encompasses slavery; human trafficking; forced labour; domestic servitude; and traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

g) **Discriminatory Abuse**

Examples: Harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

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

h) **Organisational abuse**

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Examples: 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.

i) **Neglect and acts of omission**

Action: Ignoring medical, emotional or physical care needs; failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and 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.

j) **Self-Neglect**

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

Incidents of abuse may be one-off or multiple, and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of more serious problems and of what is now described as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

14. RESPONDING TO AN ALLEGATION OF ABUSE

Any suspicion, allegation or incident of abuse must be reported to the designated Duty Manager / Person in Charge immediately, in accordance with section 7 above. If this is not possible, a member of the Senior Management Team must be notified (see organisational flowchart at Section 12, above).

15. RESPONDING TO SUSPICIONS/ INDICATORS OR ACTUAL ABUSE

- 15.1. St Elizabeth's College & Supported Living Services recognise their legal duty to work with other agencies in safeguarding adults at risk and 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 how ever 'minor' they may 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 DATIX 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 Registered Manager of Supported Living Services or Head of College, as appropriate, must report the concerns to East Hertfordshire Adult Safeguarding Team or the 0 to 25 Safeguarding Team. **For further guidance on completing Incident Reporting Forms, consult the St Elizabeth's Centre overarching policy, 'Reporting Serious and Untoward Incidents', available on the intranet.**
- 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's 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. Refer to the following guidance in respect in the event of concerns relating to radicalisation or terrorism:

- a) The Prevent Duty (Department of Advice for Schools and Child care Providers) June 2015⁹;
 - b) The use of social media for online radicalisation. Guide for schools on how terrorist groups such as ISIL use social media to encourage travel to Syria and Iraq. (Home Office and Department of Education)¹⁰; and
 - c) Preventing and dealing with Racist incidents (Handbook for Hertfordshire Schools)¹¹.
- 15.5. It is not the responsibility of College or Supported Living care staff to investigate a safeguarding concern, unless directed to do so by the Herts 0-25 Safeguarding Team or Adult Safeguarding Team.
- 15.6. This procedure also takes guidance from St. Elizabeth's Centre Whistle-Blowing Policy.
- 15.7. On being notified of any suspicion or allegation of actual abuse of an adult at risk, the Duty Manager / Person in Charge shall:
- a) 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;
 - b) report the matter to the Registered Manager or Head of College;
 - c) ensure that a report of the matter is completed (on an incident reporting form via DATIX Web) by the person who reported the original concern/incident.

If a complaint is made against any member of the Senior Management Team or a designated safeguarding co-ordinator, the person dealing with the complaint must be either the Director of Education and Skills or Director of Health and Care.

If a complaint is made against the Director of Education or Director of Health and Care then the Chief Executive should be immediately notified and in the case of the Director of Education and Skills, the Chair of the Governing Body should also be immediately notified.

16. RECORD TAKING

- 16.1. A full record shall be made as soon as possible on an incident report form (IRF) form, via DATIX Web, setting out the nature of the allegation and any other relevant information including:
- a) the date and time the alleged incident took place;
 - b) the date and time the report is made;
 - c) the place where the disclosure of information took place;
 - d) the place where the alleged abuse happened;
 - e) your name and the names of others present;
 - f) the name of the complainant and, where different, the name of the vulnerable adult who has allegedly been abused;
 - g) the nature of the alleged abuse;
 - h) a description of any injuries observed;

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

¹⁰ <https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

¹¹ https://www.hertfordshire.gov.uk/statweb/compaperarchive/archive/older_meetings/Reports/103/365/10.pdf

- i) an account of the allegation.

17. GUIDANCE FOR DESIGNATED MANAGER

- 17.1. The Duty Manager / Person in Charge must immediately discuss the matter with the 0-25 Safeguarding Team or Hertfordshire Adult Safeguarding team to determine whether it is a Safeguarding matter. 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 obtained from the adult, the designated safeguarding co-ordinator 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.

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.

- 17.3. 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 deciding factor in determining what action to take.
- 17.4. If the adult at risk is fully aware of what could happen, they can:
 - a) choose whether they want to speak now or have time to think about it; and
 - b) be as informed as possible regarding the implications of passing on this information.
- 17.5. 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 CQC AND OFSTED

- 18.1. The Registered Manager (or under the authority of the Registered Manager the Designated Person) will need to complete and send a statutory notification form to the Care Quality Commission.
- 18.2. Comprehensive guidance on how to complete these forms, when to complete them and descriptors of notifiable events can be found at www.CQC.org.uk. Key points to keep in mind are:
 - a) Statutory notification forms are kept in the Supported Living office. They are also available on 'College Data' under 'Safeguarding'.
 - b) The notification will be sent via the CQC notification e-mail address (HSCA_notifications@cqc.org.uk). All details are coded and individuals are given ID codes to protect confidentiality.

- c) The regional CQC postal address is: East Region, Care Quality Commission, Citygate, Gallowgate, Newcastle upon Tyne, NE1 4PA. Or alternatively telephone: 03000 616161,
 - d) Copies of forms are stored electronically by the Registered Manager's administration support assistant.
- 18.3. When appropriate, the Head of College will apply regulated procedures to report to Ofsted.

19. LEARNER / RESIDENT SUPPORT

19.1. St. Elizabeth's College and Supported Living Services will be proactive and take positive steps to inform learners / residents of their rights to both safety and protection and the options available to them to express their fears or concerns. This will include the following:

a) Learner Support: Education

- i. The curriculum will embed safeguarding welfare, health and safety and the PREVENT agenda.
- ii. Key work sessions, house / flat meetings, inductions and tutorials with lecturers and Learner Council and tenants' meetings will discuss safeguarding themes and will be instrumental in promoting safeguarding and developing resources and information.
- iii. Learners / residents will be consulted on the review and development of this policy.
- iv. 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 or concerns effectively.
- v. The policy on how to make a complaint will be explained and discussed in individual key worker meetings, tenants' meetings, inductions with lecturers or Learner Council meetings.
- vi. The College's learner involvement strategy will further identify strategies to implement the above formats. The Supported Living Registered Manager will advise on safeguarding during allegations and monitor and evaluate the effectiveness of procedures carried out.

b) Learner / Resident Support: During / Post Incident

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 in-house and external counselling services. This service will be offered to learners / residents involved after any allegation, even if the allegation has not been upheld.

20. CONFIDENTIALITY AND INFORMATION SHARING

- 20.1. After consultation with the 0-25 Safeguarding Team, the Supported Living Services' Registered Manager, Head of College or Person in Charge will advise staff on how best to manage stakeholders in relation to any allegation and / or suspicion of abuse.
- 20.2. Adults at risk enquiries, investigations and conferences can only be successful if professional staff share and exchange all relevant information. Information must be treated as confidential at all times and staff will be bound

by the ethical and statutory codes that cover confidentiality, as well as the General Data Protection Regulation (GDPR).

- 20.3. 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, providing they have mental capacity.
- 20.4. Disclosure may be necessary in the public interest where a failure to disclose information may expose another to risk of death or serious harm.
- 20.5. 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 the disclosure can be supported with evidence.
- 20.6. 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.
- 20.7. 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.

21. RECORD KEEPING

- 21.1. The Registered Manager / Head of College will retain the central record of all incident report forms and safeguarding records. This will include:
 - a) the formal report on an Incident Reporting Form via DATIX Web;
 - b) entries on the central tracker;
 - c) any notes, memoranda or correspondence dealing with the matter; and
 - d) any other relevant material.
- 21.2. Copies of reports, notes etc must be kept securely locked at all times, and where necessary, shared in accordance with the General Data Protection Regulation (GDPR).

22. STAFF SUPPORT / DEVELOPMENT

- 22.1. As identified within the policy statement, St. Elizabeth's College and Supported Living Service recognises it needs to provide staff with adequate support and training to provide a safe and secure environment for learners / residents
- 22.2. 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:
 - a) Safeguarding training with yearly refresher training;
 - b) Safer recruitment (e-learning for managers); and
 - c) PREVENT.

23. POST-INCIDENT SUPPORT FOR STAFF

St. Elizabeth's College and Supported Living Services 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. www.workplaceoption.co.uk.

24. YOUNG PEOPLE AND TRANSITION FROM CHILDREN'S SERVICES

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's to adult services. In this instance, a 'Safeguarding Adults' process should be initiated as part of that transition.

25. ONLINE SAFETY & GUIDANCE

- 25.1. St Elizabeth's College and Supported Living Services will be responsible for ensuring that the IT infrastructure / network is as safe and secure as is reasonably practicable. We will also ensure that the policies and procedures approved within this policy are implemented.
- 25.2. All users will be provided with a username and password by the Head of IT, who will keep an up to date record of users and their usernames.

26. ONLINE SAFETY IN EDUCATION

- 26.1. 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.
- 26.2. In lessons and Day Opportunity classes, where internet use is pre-planned, it is best practice that learners should be guided to sites that have been checked as suitable for use and that processes are in place for dealing with any unsuitable material that is found in any internet search.
- 26.3. Where learners / residents are allowed to freely search the internet using search engines, staff should be vigilant in monitoring the content of the websites the learners / residents visit.
- 26.4. 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 Network Manager (or 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.

27. PROMOTION OF ONLINE SAFETY

- 27.1. Online safety should be reinforced as part of a planned programme of learning or tutorial activities/key worker session.
- 27.2. 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.
- 27.3. Rules for use of ICT systems / internet will be posted in all rooms and displayed on log-on screens.
- 27.4. Staff should act as good role models in their use of ICT, the internet and mobile devices.

- 27.5. For further details, please refer to the St Elizabeth's Centre's 'Communications, Email & Internet Security Policy' and 'Information Security Policy'.

28. USE OF DIGITAL & VIDEO IMAGES

- 28.1. 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.
- 28.2. 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:
- 28.3. **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.**
- 28.4. 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.
- 28.5. Care should be taken when taking digital / video images that learners / residents are appropriately dressed and are not participating in activities that might bring the individuals or the organisation into disrepute.
- 28.6. Learners / residents must not take, use, share, publish or distribute images of others without their permission.
- 28.7. 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 28.9, below).
- 28.8. Learners' / residents' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- 28.9. If learners / residents are deemed not to have capacity to consent. Written permission from parents / carers will be obtained before photographs of are published on the college website or other promotional materials.

29. E-MAIL

- 29.1. 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 the College or on College systems, e.g., by remote access.
- 29.2. Users need to be aware that e-mail communications may be monitored.
- 29.3. 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.
- 29.4. 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.

- 29.5. 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 reminded of the need to write emails clearly, correctly and not include any unsuitable or abusive material.

30. UNSUITABLE / INAPPROPRIATE ACTIVITIES

- 30.1. 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.
- 30.2. St. Elizabeth's College and Supported Living Services believe 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 organisation's equipment or systems.
- 30.3. For further details, please refer to the St Elizabeth's Centre's 'Communications, Email & Internet Security Policy' and 'Information Security Policy'.

31. RESPONDING TO INCIDENTS OF MISUSE

- 31.1. 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. Listed below are the responses that will be made to any apparent or actual incidents of misuse:
- 31.2. 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.

32. ST. ELIZABETH'S CENTRE POLICIES

St Elizabeth's College and Supported Living Services are part of St Elizabeth's Centre which also operates a school and children's home. St. Elizabeth's Centre has a directory of policies available to all staff on the St Elizabeth's Intranet, some of which have a safeguarding focus, including:

- a) **Whistle Blowing Policy for Raising Concerns** is available in the Human Resources Documents link under Key Policies.
- b) **Social Network Policy** is available in the Human Resources Documents link under Standards and Expectations.
- c) **Policy regarding Photography, Filming and Recording** is available in the Human Resources Documents link under Standards and Expectations.
- d) **Safeguarding and other checks and controls for Staff, Volunteers, Visitors and Others attending St Elizabeth's** is available in the Human Resources Documents link under Standards and Expectations in the Safeguarding Folder.

33. STATUS OF POLICY

This policy will be reviewed in full no less than annually. It was last reviewed in May 2020 and was approved by the Governing Body on 1 June 2020.

It is due for review June 2021 (up to 12 months from the above date).