Issue date	January 26
Version number	V6
Review period	Annually
Review due	January 27

Summary	This policy outlines the safeguarding processes a service should follow to protect and support adults at risk. It has been reviewed and updated to include information about the management of allegations against people in positions of trust (PiPoT)
Relevant legislation	Protection of Freedoms Act 2012 (Disclosure and Barring Service Transfer of Functions) Order 2012 Public Interest Disclosure Act 1998 The Criminal Justice and Courts Act 2015 Section 20-25 Anti-social Behaviour, Crime and Policing Act 2014 The Modern Slavery Act 2015 The Counter Terrorism and Security Act 2015 Domestic Violence, Crime and Victims Act 2004 Serious Crime Act 2015 Section 76 FGM Act 2003 The Care Act 2014 Care Quality Commission (Registration) Regulations 2009 Equality Act 2010 The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 Human Rights Act 1998 Mental Capacity Act 2005 Safeguarding Vulnerable Groups Act 2006 Data Protection Act 2018 UK GDPR
This policy supports the embedding of the Persona Values	Respectful Adaptable Caring Honest

Purpose

To protect a person's right to live in safety, free from abuse and neglect

To ensure that this policy includes and refers to Bury Council policy and procedures and details clearly who is responsible and accountable for managing safeguarding concerns within Persona:

Overall accountability for managing safeguarding concerns is the **Manager**
Safeguarding Lead at Persona is the **Director of Care**
Local Authority: **Bury Council**
Local Authority Main Contact Details: 0161 253 5151 / 0161 253 6606

To ensure that the Bury Council Safeguarding Policy and Procedure is understood by all staff at Persona and that the Bury Council safeguarding procedures dovetail with the service's policy and procedure.
To set out the key arrangements and systems that Persona has in place for safeguarding and promoting the welfare of adults at risk and to ensure compliance with local policies and procedures.
Adults are those aged 18 years and over.
To have a clear, well-publicised policy of zero-tolerance of abuse within Persona.
To support Persona in meeting the following Quality Statements and to meet the legal requirements of the regulated activities that Persona is registered to provide:

Key Questions	Quality statements
EFFECTIVE	QSE2: Delivering evidence-based care & treatment QSE3: How staff, teams & services work together
EFFECTIVE	QSE6: Consent to care and treatment
SAFE	QSS3: Safeguarding
SAFE	QSS4: Involving people to manage risks QSS5: Safe environments

Objectives
To ensure that all staff working for, or on behalf of Persona, understand their responsibilities in relation to safeguarding adults at risk and know who to escalate concerns to within Persona. Keeping people safe is everyone duty.
To manage the safety and wellbeing of adults in line with the six principles of safeguarding.
To identify lessons to be learned from cases where adults have experienced abuse or neglect.
Persona aims to support and empower each adult to make choices, to have control over how they want to live their own lives and to prevent abuse and neglect occurring in the future which is a key underpinning principle of Making Safeguarding Personal (MSP). Persona intends to take this approach with all safeguarding concerns.

Policy
Everybody has the right to live a life that is free from harm and abuse. Persona recognises that safeguarding adults at risk of abuse or neglect is everybody's business. Persona aims to ensure that all adults at risk of abuse or neglect are enabled to live and work, be cared for and supported in an environment free from abuse, harassment, violence or aggression. The safeguarding policies and procedures of Persona will dovetail with the Bury Council multi-agency

policy and procedures, which we understand take precedence over those of Persona.

We aim to provide services that will be appropriate to the adult at risk and not discriminate because of disability, age, gender, sexual orientation, race, religion, culture, or lifestyle. We will make every effort to enable people to express their wishes and make their own decisions to the best of their ability, recognising that such self-determination may well involve risk.

We will work with people receiving support and others involved in their care, to ensure they receive the support and protection they may require; that they are listened to and treated with respect (including their property, possessions and personal information) and that they are treated with compassion and dignity.

All services will follow the six principles as set out in guidance to the Care Act 2014 and this will inform practice with all people receiving support:

- **Empowerment** – People being supported and encouraged to make their own decisions and give informed consent
- **Prevention** – It is better to act before harm occurs
- **Proportionality** – The least intrusive response appropriate to the risk presented
- **Protection** – Support and representation for those in greatest need
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability** – Accountability and transparency in delivering safeguarding

Persona understands the importance of working collaboratively to ensure that:
The needs and interests of adults at risk are always respected and upheld
The human rights of adults at risk are respected and upheld
A proportionate, timely, professional and ethical response is made to any adult at risk who may be experiencing abuse. All decisions and actions are taken in line with the Mental Capacity Act 2005
Each adult at risk maintains:

- Choice and control
- Safety
- Health
- Quality of life
- Dignity and respect

Persona is committed to the principles of 'Making Safeguarding Personal' and aims to ensure that safeguarding is person-led and focused on the outcomes that people want to achieve. It will engage individuals in a conversation about how best to respond to their safeguarding situation in a timely way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.

Our governance processes will make sure that staff working for and on behalf of Persona recognise and respond to the main forms of abuse which are set out in the Care Act 2014 Statutory Guidance Chapter 14, which is not an

exhaustive list but an illustration as to the sort of behaviour that could give rise to a safeguarding concern:

- Physical abuse
- Domestic violence
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission
- Self-neglect

Manager's Responsibilities

To establish the facts about the circumstances giving rise for concern
To identify sources and level of risk
To ensure that information is recorded and that the Bury Council Adult Safeguarding Team is contacted to inform them of the concern or harm
If an individual is at immediate risk of harm, the Registered Manager will contact the Police. The Care Quality Commission (CQC) will also be informed at the earliest opportunity and without delay for anyone who receives a regulated activity.
In all cases of alleged harm, there will be early consultation between the Manager, Bury Council and the Police to determine whether or not a joint investigation is required. We understand that it may also be necessary to advise the relevant Power of Attorney if there is one appointed being clear whether the appointee is for health and wellbeing or finances. In dealing with incidents of potential harm, people have rights which must be respected, and which may need to be balanced against each other.

- The wishes of the person harmed will be considered whenever possible, this may result in no legal action
- Documentation of any incidents of harm in the individual's file and using body maps to record any injuries
- Follow Bury Council policy guidelines where applicable
- Report any incidents of abuse to the relevant parties
- Work with multi-agencies
- Advise and support staff
- Ensure staff are trained to enhance knowledge
- Actively promote the "Whistleblowing'' policies
- Duty of candor will also be considered

The staff members Responsibilities

To be able to recognise and report incidences of harm
To report concerns of harm or poor practice that may lead to harm in a timely manner and to the appropriate person,
To remain up to date with training
To follow the policy and procedures
To know how and when to use the Whistleblowing procedures
To understand the Mental Capacity Act (MCA) and how to apply it in practice

General Principles

- We have robust recruiting and safe staffing policies in place to make sure that our staff are fit to work with adults at risk and are compliant with national, safe recruitment and employment practices, including the requirements of the Disclosure and Barring Service (DBS)
- A named safeguarding lead will be in place who is responsible for embedding safeguarding practices and improving practice in line with national and local developments. In services, this person is the Manager.
- Any staff member who knows or believes that harm is occurring will report it to their line manager as quickly as possible, or if they feel they cannot follow the regular reporting procedure, they must use the Whistleblowing process
- Persona will work collaboratively with other agencies, including liaison in relation to the investigation of allegations and will ensure its procedures dovetail with the Bury Council multi-agency procedures
- Persona will use incident reporting, lessons learned and auditing to determine themes to improve care practice
- We will have a learning and development strategy which specifically addresses adult safeguarding. We will provide training on the identification and reporting of harm, as well as training on the required standards in relation to procedures and processes should something need to be reported
- Persona recognises its responsibilities in relation to confidentiality and will share information appropriately
- We have zero tolerance to harm
- We will work in partnership with other agencies to ensure that concerns or allegations of abuse are appropriately referred for investigation to the most appropriate agency
- We will ensure that any action that is taken is assessed, proportionate and reflective of the risk presented to the people who use the services
- We will report any incidents in line with our regulatory requirements
- Persona will adhere to the Code of Conduct for Care Workers
- There is a clear, well-publicised Whistleblowing Policy and Procedure in place that staff know how to use

Leadership, Staff and Culture

The Manager is responsible for providing leadership.

Good governance in safeguarding will follow where it is seen as an integral part of a person's care and support and all staff take responsibility. Risks of neglect, harm and abuse will be reduced where there is strong leadership and a shared value base where:

- The person is the primary concern
- People receiving services and staff are partners in their care
- Quality is prioritised and measured
- Staff understand the risks of neglect, harm and abuse
- There is a culture of learning and improvement
- There is openness and transparency, and all staff are listened to

Prevention - Providing information to support people receiving support

Persona will support individuals by providing accessible, easy to understand information on what abuse is and what signs to look out for. This will include people's rights and how to get help and support if they need it. We will comply with the Accessible Information Standards

Complaints, Suggestions and Compliments Policy and Procedure and people are given information on how to escalate any concerns to the Commissioner, CQC, advocacy or Local Government and Social Care Ombudsman should they not be satisfied with the approach taken by Persona

Prevention - Raising awareness

Staff will be trained to understand the different patterns and behaviours of abuse as detailed in the Care Act Chapter 14 and all Services will ensure that it is able to respond appropriately

All services will ensure that all staff are trained on the Whistleblowing Policy and Procedure

During induction training, all employees will complete the "Understanding Abuse" workbook, as part of the Care Certificate

Procedure

Responding to Disclosure, Suspicion or Witnessing of Abuse

Where an adult at risk discloses or discusses potential abuse or harm, the staff member must be able to:

Recognise: Identify that the adult at risk may be describing abuse, even when they may not be explicit

Respond: Stay calm, listen and show empathy

Reassure them that it will be taken seriously and explain that there is a duty to report the issues internally and what may happen next

Record: Write up notes of the conversation clearly and factually as soon as possible whilst ensuring confidentiality of information and that it is only shared with appropriate people

Report in a timely manner to the appropriate people and organisations

Responding to a Disclosure

Stay calm and try not to show shock

Listen very carefully

Be sympathetic

Be aware of the possibility that medical evidence might be needed tell the person that:

They did a good/the right thing in telling you

You are treating the information seriously

It was not their fault

Explain that you must tell your line manager, and, with their consent, your manager will contact the Bury Council Safeguarding Adults Team and/or the Police. The manager and the Head of Care and/or Director of Care must be informed.

The manager will, in specific circumstances, need to contact the Bury Council Adult Safeguarding Team without their consent but their wishes will be made clear throughout.

If a referral is made but the adult at risk is reluctant to continue with an investigation, record this and bring this to the attention of the Bury Council Safeguarding Adults Team. This will enable a discussion on how best to support and protect the adult at risk. However, a professional case discussion will still need to take place and must be recorded appropriately.

Responding to Abuse or Neglect – What to do

The Manager must ensure that staff:

Address any immediate safety and protection needs

Assess any risks and take steps to ensure that the adult is in no immediate danger

Report any concerns to your manager or out of hours on call without delay, they will support and guide you through the process

Where appropriate, call 999 for the emergency services if there is a medical emergency, other danger to life or risk of imminent injury, or if a crime is in progress. Where a crime is suspected of being committed, leave things as they are wherever possible

Call for medical assistance from the GP or other primary healthcare service if there is a concern about the adult's need for medical assistance or advice. Care Workers can call the NHS 111 service for medical help or advice when the situation is not life-threatening or is out of hours

The adult may feel frightened, so the Care Worker must ask whether they want the Care Worker to arrange for someone they feel comfortable with to stay with them

Persona will consider if there are other adults or children with care and support needs who are at risk of harm and take appropriate steps to protect them

The Care Worker will support and encourage the adult to contact the Police if a crime has been or may have been committed

The Care Worker will contact their line manager as soon as possible to inform them of the incident or concern

Decision-Making Pre-referral to the Bury Council Adult Safeguarding Team

The Manager or the Safeguarding Lead will usually lead on decision-making. Where such support is unavailable, consultation with another more senior member of staff will take place.

In the event that these are unavailable, advice must be taken from Bury Council. Staff must also act without the immediate authority of a line manager:

If discussion with the manager would involve delay in a high-risk situation

If the person has raised concerns with their manager and they have not taken appropriate action (whistleblowing)

Persona will ensure that staff are aware of the Bury Council reporting procedures and timescales for raising adult safeguarding concerns.

Referral to the Bury Council Adult Safeguarding Team

When a safeguarding issues is identified, it is the responsibility of the service where the incident has happened to report this to the safeguarding team

Persona must ensure that the Bury Council Safeguarding Adult referral process is followed and must collect the following information to assist with the

referral. The referral process must be clearly visible with contact numbers, including out-of-hours, where staff can access the information.
The referral information will also be required for the CQC notification of abuse.
Persona must use any up-to-date care plan information where possible and have the following information available where possible:
Demographic and contact details for the adult at risk, the person who raised the concern and for any other relevant individual, specifically Care Workers and next of kin
Basic facts, focusing on whether or not the person has care and support needs including communication and ongoing health needs
Factual details of what the concern is about; what, when, who, where?
Immediate risks and action taken to address risk
Preferred method of communication
If reported as a crime, details of which police station/officer, crime reference number, etc.
Whether the adult at risk has any cognitive impairment which may impede their ability to protect themselves
Any information on the person alleged to have caused harm
Wishes and views of the adult at risk, in particular consent
Advocacy involvement (includes family/friends)
Information from other relevant organisations, for example, the CQC
Any recent history (if known) about previous concerns of a similar nature or concerns raised about the same person, or someone within the same household
Names of any staff involved

Documenting a Disclosure
Persona must ensure that staff:
Consider where written documentation is made and who has access to it. e.g., if implicates other staff do not write within care notes.
Make a note of what the person actually said, using his or her own words and phrases
Describe the circumstance in which the disclosure came about
Note the setting and anyone else who was there at the time
When there are cuts, bruises or other marks on the skin, use a body map to indicate their location, noting the colour of any bruising
Make sure the information the Care Worker writes is factual
Use a pen with black ink so that the report can be photocopied
Try to keep your writing clear
Sign and date the report, noting the time and location
Be aware that the report may be needed later as part of a legal action or disciplinary procedure

When completing the Bury safeguarding alert form, you must ensure that all section are fully completed, that factual information is recorded and that the forms is correctly dated and signed. Once this is completed it must be sent to the safeguarding email, notifications, and the Director of Care.

Informing the Relevant Inspectorate

By law, the manager must notify the Care Quality Commission (CQC) without delay, of incidents of abuse and allegations of abuse, as well as any incident which is reported to, or investigated by, the Police

The Manager must notify the Care Quality Commission (CQC) about abuse or alleged abuse involving a person(s) using the service, whether the person(s) is/are the victim(s), the abuser(s), or both

The Manager must also alert the relevant local safeguarding authority when notification is made to the CQC about abuse or alleged abuse

The forms are available on the CQC website and the portal

If a concern is received via the whistleblowing procedure, Persona must inform the Bury Council Safeguarding Team

Strategy Meeting / Case Conference

Following the investigation or at any time during the process, a case conference with all relevant agencies may be called to make decisions about future action to address the needs of the individual

Any agency involved in the case may ask for a case conference to be held but the final decision to hold a conference is with the Bury Council Safeguarding Adults Team Manager

The Manager must ensure that it attends this meeting when invited and that all relevant information about the incident is available. A timeline of events is a useful document to prepare in complex cases

Involve the individual Concerned Throughout the Process

The process of the enquiry must be explained to the individual in a way they will understand and their consent to proceed with the enquiry obtained, if possible

Arrangements will be made to have a relative, friend or independent advocate present if the individual so desires. The relative, friend or independent advocate must not be a person suspected of being in any way involved or implicated in the abuse

A review of the individual's care plan must be undertaken to ensure individualised support following the incident

The individual will be supported by the service to take part in the safeguarding process to the extent to which they wish, or are able to, having regard for their decisions and opinions. They must be kept informed of progress

Desired Outcomes Identified by the Adult

The desired outcome by the adult at risk must be clarified and confirmed at the end of the conversation(s), to:

Ensure that the outcome is achievable

Manage any expectations that the adult at risk may have

Give focus to the enquiry

Staff will support adults at risk to think in terms of realistic outcomes but must not restrict or unduly influence the outcome that the adult would like. Outcomes must make a difference to risk and, at the same time, satisfy the person's desire for justice and enhance their wellbeing

The adult's views, wishes and desired outcomes may change throughout the course of the enquiry process

There must be an ongoing dialogue and conversation with the adult to ensure that their views and wishes are gained as the process continues and enquiries re-planned if the adult change their views
The individual will be informed of the outcome of any investigation, but guidance will be sought from the Bury Council Adult Safeguarding Team before any outcome is shared

Disclosure and Barring Service (DBS) Referral

There is a statutory requirement for providers of care to refer workers to the DBS for inclusion on the DBS Vetting and Barring scheme list if they consider that the person is guilty of misconduct such that a vulnerable adult was harmed or placed at risk of harm. This requirement covers both existing employees and those who leave their employment, and whose conduct becomes known at a later date. Please see the DBS/Disclosure Policy and Procedure for further procedures regarding initial employment and referral.

Consent

When reporting information that directly concerns the safety of an adult at risk of harm, consent from the individual is not required. However, informing the person of your concerns and your referral is good practice unless it would put you or your colleagues at risk or it would put the adult at further risk. When reporting to a Local Authority allegations or concerns about an adult at risk of harm, the Local Authority must be informed whether the person is aware of the report. In reporting all suspected or confirmed cases of harm, an employee has a responsibility to act in the best interest of the individual but still operate within the relevant legislation and the parameters of the codes and standards of their practice.

Confidentiality and Information Sharing

In seeking to share information for the purposes of protecting adults at risk, Persona is committed to the following principles:
Personal information will be shared in a manner that is compliant with the statutory responsibilities of the service
Adults at risk will be fully informed about information that is recorded about them and as a general rule, be asked for their permission before information about them is shared with colleagues or another agency. However, there may be justifications to override this principle if the adult or others are at risk
Staff will receive appropriate training on individual's confidentiality and secure data sharing
The principles of confidentiality designed to protect the management interests of Persona must never be allowed to conflict with those designed to promote the interests of the adult at risk
Staff will follow the policy on Data Protection and Confidentiality and comply with the Caldicott principles

Pressure Ulcers

Pressure ulcers are costly in terms of both the person suffering and the use of resources. If the pressure ulcer is believed to have been caused by neglect, it must be reported as an adult safeguarding concern whether the pressure ulcer was acquired in a hospital, care setting or the individual's own home. Staff must ensure that staff read and follow Safeguarding Adults Protocol Pressure Ulcers and the interface with a Safeguarding Enquiry, seeking advice and further guidance where required.

Where a person is new to the service, any pressure ulcers must be documented on a body map and reported in line with safeguarding procedures. Treatment must also be sought from the GP.

Management of Allegations Against People in Positions of Trust (PiPoT)

A relationship of trust is one in which one person is in a position of power or influence over the other person because of their work or the nature of their activity. Any allegation against a person who works with adults with care and support needs must be reported immediately to a senior manager at Persona and the Registered Manager.

Concerns about a PiPoT's behaviour may be identified by the following people or procedures:

- Police intervention or investigation
- Whistleblowing disclosure
- Safeguarding adult's enquiry
- Safeguarding children investigation
- Complaints
- Reports from members of the public
- Providers alerting commissioners of services
- Commissioner's contract monitoring activity
- Reports from staff and volunteers
- Or any other source of disclosure

When an allegation is made against a PiPoT, Persona will refer this to Bury Council as part of the safeguarding process.

Where the person who is alleged to have caused the abuse or neglect has a relationship of trust with the adult at risk because they are a member of staff, a paid employee, a paid carer, a volunteer or a manager, it may be necessary for Persona to follow disciplinary procedures as well as acting in line with this policy. Persona must ensure that a referral is made to the Disclosure and Barring Service (DBS) if an employee is found to have caused harm to an individual.

Bury council has a lead PIPOT who will be involved in a safeguarding process where there are concerns around staff in relation to a safeguarding, it is the PIPOT responsibility to ensure that the organisation has taken appropriate actions to ensure no further risk to an adult at risk.

Abuse of Trust

A relationship of trust is one in which one person is in a position of power or influence over the other person because of their work or the nature of their activity

Where the person who is alleged to have caused the abuse or neglect has a relationship of trust with the adult at risk because they are; a member of staff, a paid employee, a paid carer, a volunteer or a manager, Persona must invoke disciplinary procedures for employed staff as well as acting in line with this policy

Persona must ensure that a referral is made to the Disclosure and Barring Service if an employee is found to have caused harm to an individual

If the person who is alleged to have caused the harm is a member of a recognised professional group, Persona must act under the relevant code of conduct for the profession as well as acting under this policy
Where the person alleged to have caused the harm or neglect is a volunteer or a member of a community group, Persona must work with adult social services to support any action under this policy
Where the person alleged to have caused the harm is a neighbour, a member of the public, a stranger or a person who deliberately targets vulnerable people, in many cases the policy and procedures will be used to ensure that the adult at risk receives the services and support that they may need
In all cases, issues of consent, confidentiality and information sharing must be considered

Allegations against People who are Relatives or Friends

There is a clear difference between unintentional harm caused inadvertently by a relative or friend and a deliberate act of either harm or omission, in which case the same principles and responsibilities for reporting to the police apply. In cases where unintentional harm has occurred, this may be due to lack of knowledge or due to the fact that the relative's own physical or mental needs make them unable to care adequately for the adult at risk. The relative may also be an adult at risk. In this situation, the aim is to protect the adult from harm, work to support the relative to provide support and to help make changes in their behaviour in order to decrease the risk of further harm to the person they are caring for. A carers assessment will consider a number of factors and a referral to Bury Council will be made as part of the safeguarding process.

Whistleblowing

Whistleblowing is an important aspect of the support and protection of adults at risk of harm where staff are encouraged to share genuine concerns about a colleague's behaviour. Their behaviour may not be related to an adult at risk, but they may not be following the code of conduct or could be pushing boundaries beyond normal limits or displaying conduct which is a breach of the law, conduct which compromises health and safety or conduct which falls below established standards of practice with adults at risk.
Persona has clear whistleblowing policies and procedures in place which staff are frequently reminded about and with which they must be familiar. They must also understand how to escalate and report concerns.

Abuse by Another Adult at Risk

We recognise that we may also have responsibilities towards the person causing the harm, and certainly will have if they are both in a care setting or have contact because they attend the same place (for example, a day centre). The person causing the harm may themselves be eligible to receive an assessment. In this situation, it is important that the needs of the adult at risk who is the alleged victim are addressed separately from the needs of the person causing the harm. It will be necessary to reassess the adult allegedly causing the harm.

Exploitation by Radicalisers who Promote Violence

Individuals may be susceptible to exploitation into violent extremism by radicalisers. Staff will be expected to follow the Protecting Vulnerable People from Radicalisation Policy and Procedure in place.

Self-Neglect and Refusal of Care

Persona must ensure that staff understand the importance of delivering care as detailed in the Care plan. Where a person refuses care, this must always be documented. Where refusal occurs repeatedly, it must be escalated by Persona as a safeguarding concern and a request for a review of the person's care will be instigated.

Abuse and Sexual Safety

We recognise that culture, environment, and processes support a individuals sexuality and keep them and staff safe from sexual harm. As such, Persona will ensure that sexuality is discussed as part of

The care planning process and is addressed positively to support people to raise concerns where necessary.

The recent CQC publication on sexuality and sexual safety can be referred to for further guidance in this area.

Self-Funding individuals

People who fund their own care arrangements are legally entitled to receive support if subject to abuse or neglect in exactly the same way as those supported or funded by the Local Authority. They are also entitled to the protections of the Deprivation of Liberty Safeguards (DoLS) process.

Sexual harassment towards staff is identified through risk assessment and forms part of a separate policy

Risk Assessment and Management

Achieving a balance between the right of the individual to control their care package and ensuring that adequate protections are in place to safeguard wellbeing is a challenging task. The assessment of the risk of abuse, neglect and exploitation of people will be integral in all assessment and planning processes. Assessment of risk is dynamic and ongoing, especially during the adult safeguarding process, and must be reviewed throughout so that adjustments can be made in response to changes in the levels and nature of risk.

Audit and Compliance

It is essential that the implementation of this policy and associated procedures is audited to ensure that Persona is doing all it can to safeguard those people receiving its services. The audit of this policy will be completed through a systematic audit of:

Recruitment procedures and Disclosure and Barring Checks

Audit of incident reporting, frequency and severity

Audit of training processes, including reviews of uptake of training and evaluations

Safeguarding concerns and incidents will be reviewed by the Senior Management Team

- Review incident themes
- Look in detail at specific cases to determine learning or organisational learning

- Ensure implementation of the Safeguarding Policy and Procedure

Training and Competencies
Persona will ensure that staff receive training in recognising and responding to incidents, allegations or concerns of abuse or harm as part of their induction programme. Persona will ensure that it benchmarks training and competencies within the service with the framework outlined in Adult Safeguarding: Roles and Competencies for Healthcare Staff which it recognises applies to social care staff also and does not replace any local or contractual requirements but acts as a minimum benchmark.

Outstanding Practice
To be 'outstanding' in this policy area you could provide evidence that:
Care planning includes tailored information to support individuals to make safe choices to promote independence and wellbeing. People report that they feel safe and well supported
Records are kept in regard to safeguarding and are extremely clear, transparent and well-ordered with all incidents reviewed and learning disseminated. Training materials are updated to reflect any learning
The same issues do not reoccur, and robust measures and systems have been put in place to address the original safeguarding concern
Staff report that the service is fully aware of its responsibilities with regard to safeguarding, that they are encouraged to report incidents and are fully supported through the process
People receiving support report that if they are involved in a safeguarding incident, then they are supported to be involved as much as they would like
Persona has reviewed the CQC's 'The Adult Social Care Key Lines of Enquiry and Prompts: Sources of evidence' and ensures that systems, processes and practices are in place to safeguard people from abuse

Definitions
Enquiry
An enquiry is any action that is taken (or instigated) by a Local Authority, under Section 42 of the Care Act 2014, in response to indications of abuse or neglect in relation to an adult with care and support needs who is at risk and is unable to protect themselves because of those needs
An enquiry can also refer to similar action but not undertaken under Section 42. It must establish whether any action needs to be taken to prevent or stop abuse or neglect and if so, by whom

A Person with Care and Support Needs
According to the Care Act 2014; an older person, a person with a physical disability, a learning difficulty or a sensory impairment, someone with mental health needs, including dementia or a personality disorder, a person with a long-term health condition, someone who misuses substances or alcohol to the extent that it affects their ability to manage day-to-day living

Safeguarding
Safeguarding means protecting an adult's right to live in safety, without suffering abuse and or neglect

It is multi-agency in approach to prevent and stop both the risks and experience of abuse or neglect, whilst supporting the adult's wellbeing including their views, wishes, feelings and beliefs on the action to be taken where possible

Investigation
Investigation is a process that focuses on gathering "good evidence" that can be used as a basis for the decision as to whether or not abuse has occurred
It must be a rigorous process, and the evidence must be capable of withstanding close scrutiny, as it may later be required for formal proceedings

Referral
Referral is when information regarding a possible safeguarding incident is passed on to another person for their direction. In the case of this policy, from the Provider to the Adult Social Care Team. Sometimes this may be referred to as 'reporting'

Wellbeing
The Care Act 2014 defines wellbeing as: 'in relation to an individual, means that individual's wellbeing so far as relating to any of the following':
Personal dignity (including treatment of the individual with respect)
Physical and mental health and emotional wellbeing
Protection from abuse and neglect
Control by the individual over their day-to-day life (including over care and support provided to the individual and the way in which it is provided)
Participation in work, education, training or recreation
Social and economic wellbeing
Domestic, family and personal relationships
Suitability of living accommodation
The individual's contribution to society

Multi-agency
More than one agency coming together to work for a common purpose
This could include partners of the Local authority such as: NHS England CCGs, NHS trusts and NHS foundation trusts, Department for Work and Pensions, the police, prisons, probation services, and/or other agencies such as general practitioners, dentists, pharmacists, NHS hospitals, housing, health and care providers

Caldicott Principles
The Caldicott Principles were developed in 1997 following a review of how patient information is protected and only used when it is appropriate to do so
Since then, when deciding whether they needed to use information that would identify an individual, an organisation must use the principles as a test
The principles were extended to adult social care records in 2000
The principles were revised in 2013

Abuse
Abuse includes physical, sexual, emotional, psychological, financial, material, neglect, acts of omission, discriminatory and organisational abuse

The types and behaviours of abuse are documented in the Care Act Statutory Guidance Chapter 14

Adults at Risk
Adult at risk means adults who need community care services because of mental or other disability, age or illness, and who are, or may be unable to take care of themselves against significant harm or exploitation
The term replaces 'vulnerable adult'

Concern
A concern may be any worry about an adult who has, or appears to have care and support needs, who is subjected to, or may be at risk of abuse or neglect, and who may be unable to protect themselves from the abuse or neglect or risk of it
A concern may be raised by anyone and can be:
A direct or passive disclosure by the adult at risk
A concern raised by staff, volunteers, others using the service, a carer or a member of the public
An observation of the behaviour of the adult at risk, of the behaviour of another person(s) towards the adult at risk, or of one person towards another
Patterns of concerns or risks that emerge through reviews, audits and complaints or regulatory inspections or monitoring visits

Making Safeguarding Personal
Making Safeguarding Personal is about person-centred and outcome-focused practice
It is how professionals are assured by adults at risk that they have made a difference to people by acting on what matters to people and is personal and meaningful to them
Modern Slavery
Modern Slavery encompasses slavery, human trafficking, forced labour and domestic servitude
Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Significant Harm
Significant harm is not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health, and the impairment of physical, intellectual, emotional, social or behavioural development

Enquiry Planning / Strategy Meeting
Enquiry Planning / Strategy Meeting or discussion is a multi-agency discussion between relevant organisations involved with the adult at risk to agree how to proceed with the referral
It can be face to face, by telephone or by email
Following this meeting, there may be actions and it is the managers responsibility to ensure these are completed and reported as closed back to the safeguarding chair.

Honour-Based Violence

The terms 'honour crime', 'honour-based violence', and 'izzat' embrace a variety of crimes of violence (mainly but not exclusively against women), including physical abuse, sexual violence, abduction, forced marriage, imprisonment and murder where the person is being punished by their family or their community

They are punished for actually, or allegedly, 'undermining' what the family or community believes to be the correct code of behaviour

In transgressing this, the person shows that they have not been properly controlled to conform by their family and this is to the 'shame' or 'dishonour' of the family

'Honour crime' may be considered by the perpetrator(s) as justified to protect or restore the 'honour' of a family

Hate Crime

Hate (Mate) Crime - A disability hate crime is: "Any criminal offence which is perceived by the victim or any other person, to be motivated by a hostility or prejudice based on a person's disability or perceived disability."

Incidents can include:

Physical attacks such as physical assault, damage to property, offensive graffiti and arson

Threat of attack including offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate and unfounded, malicious complaints

Verbal abuse, insults or harassment - taunting, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes and bullying at school or in the workplace

Forced Marriage

The Anti-Social Behaviour, Crime and Policing Act 2014 protects people from being forced to marry without their free and full consent as well as people who have already been forced to do so

We will ensure that staff are reminded of the one chance rule: i.e., our employees may only have one chance to speak to a potential victim of forced marriage and, therefore, only one chance to save a life

Forced marriage can involve physical, psychological, emotional, financial and sexual abuse including being held unlawfully captive, assaulted and raped

Law enforcement agencies will also be able to pursue perpetrators in other countries where a UK national is involved under powers defined in legislation

Underpinning knowledge - What have we used to ensure that the policy is current:	• Author: Nursing and Midwifery Council, (2024), *Adult Safeguarding: Roles and Competencies for Health Care Staff*. [Online] Available from: https://remedy.bnssg.icb.nhs.uk/media/igekotxo/intercollegiate-documents-for-adults-_2024_.pdf • Author: scie, (2024), *Safeguarding Adults*. [Online] Available from: https://www.scie.org.uk/safeguarding/adults/ • Author: NICE, (2022), *Safeguarding Adults in Care Homes*. [Online] Available from: https://cks.nice.org.uk/topics/safeguarding-adults-in-

	care-homes/ • Author: GOV.UK, (2024), *Pressure Ulcers: How to safeguard adults*. [Online] Available from: https://www.gov.uk/government/publications/pressure-ulcers-how-to-safeguard- adults?utm_medium=email&utm_campaign=govuk-notifications-single- page&utm_source=73a1257f-6afc-4684-bed5-7301bd5c711d&utm_content=immediately#full-publication-update-history • Author: Social Care Institute for Excellence, (2019), *Safeguarding Adults: Sharing information*. [Online] Available from: https://www.scie.org.uk/safeguarding/adults/practice/sharing-information/ • Author: CQC, (2018), *Statement on CQC's Role and Responsibilities for Safeguarding Children and Adults*. [Online] Available from: https://www.cqc.org.uk/sites/default/files/20190621_SC121706_CQC_statement_February_ • Author: Local Government Association, (2024), *Making Safeguarding Personal*. [Online] Available from: https://www.local.gov.uk/our-support/our-improvement- offer/care-and-health-improvement/making-safeguarding-personal • Author: Department of Health and Social Care, (2024), *Care and Support Statutory Guidance*. [Online] Available from: https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance Author: Department of Health and Social Care, (2022), *NHS Prevent Training and Competencies Framework*. [Online] Available from: https://www.gov.uk/government/publications/nhs-prevent-training-and-competencies- framework/nhs-prevent-training-and-competencies-framework
Suggested action:	Ensure relevant staff are aware of the content of the whole policy