

1625 Independent People Safeguarding Adults policy and procedure

This document is in two parts - Policy and Procedure.

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PART ONE: POLICY

1. Statement of purpose

1.1 Policy objectives

The overriding purpose of this Policy is to enable Independent People to effectively safeguard at risk adults, work proactively to reduce the risk both inside and outside the organisation and its services and meet any statutory safeguarding responsibilities.

The purpose of our work is also driven by application of The Charity Commission's Guidance on [Safeguarding duties for trustees](#), which includes:

- Ensuring that we do not cause harm to anyone who has contact with us
- Acknowledging that through working with children or adults at risk we have extra responsibilities
- Undertaking 5 key actions
 - identifying and managing risks
 - having suitable policies and practices in place
 - carrying out necessary checks
 - protecting volunteers and staff (includes raising concerns and whistleblowing)
 - handling and reporting incidents appropriately

In line with the regional [Safeguarding Adults Multi-Agency Policy](#) and, therefore, the [Care Act 2014](#) and [Care and support statutory guidance](#) the aims of our adult safeguarding work are to:

- Stop abuse or neglect wherever possible
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- Safeguard adults in a way that supports them in making choices and to have control about how they want to live
- Promote an approach that concentrates on improving life, wellbeing and independence for the adults concerned
- Raise public awareness, so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding appropriately to abuse and neglect. This includes work we do in educating and managing risk from young people who perpetrate or may potentially perpetrate abuse
- Provide information and support, in accessible ways, to help adults understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult, and
- Address what has caused the abuse or neglect.

1.2 Scope - who this policy and procedure applies to

This Policy applies to the entire organisation: Board members, all colleagues (paid, temporary and permanent), volunteers, those on work experience and student placements – collectively referred to as colleagues throughout - and young people.

This policy refers to all young people within Independent People's services who are 18 years old and above. If the person colleagues are concerned about is aged under 18 years, they must refer to Independent People's ***Safeguarding Children and Young People Policy and Procedure***.

1.3 Definitions

- For the purposes of this document, the term '**at risk adult**', '**service user**' and '**young people**' are interchangeable and unless otherwise specified refers to young people aged 18 years or over.
- **Adult at risk**; Under statutory safeguarding duty (**Care Act 2014**) safeguarding duty applies to adults who meet the following criteria:
 - Have needs for care and support (whether or not the local authority is meeting any of those needs), and
 - Is experiencing, or is at risk of, abuse or neglect, and
 - As a result of their care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Within the scope of this definition are:

- All adults who meet the above criteria regardless of their mental capacity to make decisions about their own safety or other decisions relating to safeguarding processes and activities
- Adults who manage their own care and support through personal or health budgets
- Adults whose needs for care and support have not been assessed as eligible or which have been assessed as below the level of eligibility for support
- Adults who fund their own care and support
- Children and young people in specific circumstances (see page 12 of [Safeguarding Adults Multi-Agency Policy](#))
- **Safeguarding**; means protecting an adult's right to live in safety, free from abuse and neglect. Adult safeguarding is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time ensuring that the adult's wellbeing is promoted including having regard to their views, wishes, feelings and beliefs in deciding on any action. Professionals and other staff should not advocate 'safety' measures that do not take account of individual wellbeing.
- '**Wellbeing**' is defined within [Care and support statutory guidance](#) as relating to any of the following:

- a) Personal dignity (including treatment of the individual with respect)
 - b) Physical and mental health and emotional wellbeing
 - c) Protection from abuse and neglect
 - d) Control by the individual over day-to-day life (including over care and support or support provided to the individual and the way it is provided)
 - e) Participation in work, education, training, or recreation
 - f) Social and economic wellbeing
 - g) Domestic, family and personal
 - h) Suitability of living accommodation
 - i) The individual's contribution to society
- **Online abuse** is any type of abuse that happens on the internet, facilitated through technology like computers, tablets, mobile phones and other internet-enabled devices ([NSPCC, 2022](#)).

2. Equality statement

1625IP aims to design and implement policy documents that meet the diverse needs of our young people and colleagues, ensuring that none are placed at a disadvantage over others. It considers the provisions of the Equality Act 2010 (including the Public Sector Equality duty) and advances equal opportunities for all.

This document has been Equality Impact Assessed (EQIA) to ensure that no one receives less favourable treatment on the protected characteristics of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex (gender) or sexual orientation.

In carrying out its functions, 1625IP has due regard to the different needs of different protected equality groups in their area. This applies to all the activities for which 1625IP is responsible, including policy development, review, and implementation.

3. Statement of commitment

Independent People commitments

- Adhering to the 6 key principles, that underpin all adult safeguarding work from the regional [Safeguarding Adults Multi-Agency Policy](#)
 - i. **Empowerment** - Adults are encouraged to make their own decisions and are provided with support and information
 - ii. **Prevention** - Strategies are development to prevent abuse and neglect that promote resilience and self-determination
 - iii. **Proportionate** – A proportionate and least intrusive response is made balanced with the level of risk

- iv. **Protection** – Adults are offered ways to protect themselves and there is a coordinated response to adult safeguarding
 - v. **Partnerships** – Local solutions through services working together within their communities
 - vi. **Accountable** – Accountability and transparency in delivery a safeguarding response
- Acknowledging the principle that safeguarding is fundamentally about promoting the safety and wellbeing of an adult in line with the above six principles. This involves risk management, which is used:
 - To promote, and thereby support, inclusive decision making as a collaborative and empowering process, which takes full account of the individual's perspective and views of primary carers
 - To enable and support the positive management of risks where this is fully endorsed by the multi-agency partners as having positive outcomes
 - To promote the adoption by all staff of 'defensible decisions' rather than 'defensive actions'
 - Working to the principle that 'doing nothing is not an option' - if we know or suspect that an adult at risk or is being abused, we will do something about it. Effective risk management strategies identify risks and provide an action or means of mitigation against each identified risk and have a mechanism in place for early escalation if the mitigation is no longer viable.
 - Contingency arrangements should always be part of risk management
 - Risk assessments and risk management should take a holistic approach and we will ensure that our systems enable early identification and assessment of risk through timely information sharing and targeted multi-agency intervention
 - Where an individual is not able to protect themselves without support, our aim is to support them to make their own informed decisions which preserve their safety – we acknowledge that there is a balance to be struck between risk and an individual's right to make their own informed decisions, even if we may consider the decision to be unwise or puts the individual at risk. The importance of a person's right to make decisions about their own life, which is part of an individual's well-being, needs to be considered as well as the safeguarding concerns
 - We will always consult with and refer to Adult Social Care teams and/or (in an emergency) the police and/or our own managers and Designated Safeguarding Leads where concerns about possible abuse arise - working collaboratively to safeguard adults and giving every assistance to the local authority and police in carrying out their statutory duties. Criminal investigations by the police take priority over all other enquiries (but we will continue to participate in any multi-agency approach as appropriate)
 - Ensuring that all young people are given the advice and support that they need, including access to civil and criminal remedies, victim support services and advocacy services

- We will proactively work assess and manage risks with young people in our services who perpetrate abuse or may be at risk of doing so - to protect others but to also continue to provide support whilst they remain in our service, recognising that they may also be vulnerable.
- Responding to safeguarding concerns in a person-led and outcome-focused way, in line with the principles of the Local Government Association's approach to [Making Safeguarding Personal](#) which:
 - Engages the adult in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice, and control; as well as improving their quality of life, wellbeing, and safety.
 - Is an approach that sees people as experts in their own lives
 - Supports work with adults (and their advocates or representatives) at the beginning to identify the outcomes they want to achieve
 - Examples of outcomes people might want are to:
 - Feel safer
 - Maintain a key relationship
 - Get new friends
 - Have help to recover
 - Have access to justice or an apology, or to know that disciplinary or other action has been taken
 - Know that this won't happen to anyone else
 - Maintain control over the situation
 - Be involved in making decisions
 - Have exercised choice
 - Be able to protect themselves in the future
 - Know where to get help
- Remembering that adults sometimes have complex lives and interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and being safe is only one of the things they may want for themselves.
- Ensuring that no young person receives an 'inferior' response in relation to safeguarding on the basis of any protected characteristics or due to misunderstandings (for example cultural or religious factors leading to a permissiveness of abuse). See Independent People's ***Equity, Diversity, and Inclusion Policy*** and this policy's ***Equality's Impact Assessment***.
- Recognising there are likely to be particular safeguarding considerations in relation to adults with learning disabilities or lack mental capacity (see Part 2, [section 2](#)) who, due to their impairment itself or to their experience of dependency, may be especially at risk of exploitation, abuse and harm.

- Ensuring that all Independent People's young people have access to awareness-raising work, discussion, and support to understand safeguarding and its relationship to them - this includes educating perpetrators or people who have potential to perpetrate abuse.
- Participating in all local authority adult safeguarding audits and acting on all agreed action plans.

Independent People will ensure that all colleagues:

- Are aware of their responsibilities for safeguarding and promoting the welfare of young people and of their responsibility to report concerns to the relevant manager.
- Are provided with mandatory safeguarding training as relevant to their role.
- Are conversant with this Policy and Procedure and the regional [Safeguarding Adults Multi-Agency Policy](#) and wider relevant legislation, regulations, and guidance; and understand the mandatory requirements within our safeguarding procedures.
- Are aware of the broader related policy framework relevant to safeguarding, including:
 - *Safeguarding Children and Young People*
 - *Online Safety*
 - *Photography, Filming and Audio Recording (and associated consent procedure)*
 - *Code of Conduct*
 - *Feedback policy and procedure (previously called Complaints)*
 - *Concerns at Work (whistleblowing)*
 - *Disclosure Checks*
 - *Data Protection in Operation*
 - *Domestic Violence and Abuse (Young People)*
 - *Equity, Diversity, and Inclusion*
 - *Safe Recruitment practices (Recruitment Policy)*
 - *Racial Harassment and Hate Crime*
 - *Anti-Harassment (including sexual harassment) and Bullying (young people)*
 - *Property, Money, and Valuables (young people)*
 - *Suicide and Self-injury guidance*
- Take all suspicions and allegations of abuse seriously, respond swiftly and understand the viewpoint of the victim.
- Are aware that no single professional can have a full picture of a young person's needs and circumstances and that, if young people are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- Are clear on when they should consult peer colleagues, line managers or another manager, designated leads, and statutory authorities about any concerns they may have about a young person.
- Have access to clear guidance about how Independent People will handle incidents of actual or suspected abuse.

- Consult with and refer to relevant local authority departments where concerns about possible significant harm to young people arise.
- Have access to advice and support from line managers through reflective supervision and outside of supervision, as required, in safeguarding cases.

It is also incumbent upon our colleagues to not only have regard to their duties in relation to the young people they come into contact with through their work, but to also be vigilant about identifying and responding to safeguarding issues in all areas of their lives.

Independent People will uphold this statement of intent by having:

- A clear senior leadership commitment to the importance of safeguarding adults.
- Policies and procedures for safeguarding adults in accordance with the latest legislation and guidance.
- Clear priorities for safeguarding adults within Independent People's policies, working practices and procedures, including the inter-relationship of these policies.
- Clear lines of accountability within the organisation and a named lead person who is responsible for safeguarding within the organisation ([Appendix 1](#)).
- Recruitment and employment procedures that takes full account of the need to safeguard and promote the welfare of both children and adults (see Independent People's *Recruitment Policy and Procedure*).
- Procedures for dealing with allegations of abuse against colleagues.
- Appropriate and up-to-date training for all colleagues ([Appendix 2](#)).
- Appropriate induction to ensure all colleagues are aware of Independent People's arrangements for safeguarding adults and their responsibilities within those arrangements.
- A culture of listening to and engaging in dialogue with young people (and others who report abuse) and taking account of those views in individual decisions and in the establishment or development of services.
- Whistleblowing policy shared with colleagues and young people (see Independent People's *Concerns at Work Policy and Young People's User Handbook*).

3.1. Duty to prevent radicalisation and terrorism

Independent People recognise our responsibility to incorporate the [Counter-Terrorism and Security Act 2015](#) and the [UK CONTEST Strategy for countering terrorism](#) into our policies and procedures, in order to:

- Undertake our duties in preventing radicalisation and the process of drawing people into terrorism and terrorism related activities
- Ensure that they are given appropriate advice and support, and to work with and/or report to 'specified authorities' where people may be at risk of radicalisation.

Our responsibilities sit under 'Prevent' statutory duty through [HM Government Prevent 2022 programme](#) - a national safeguarding programme that supports people who are at risk of becoming involved with terrorism through radicalisation.

Vulnerable people, such as the young people we work with, can be a target for radicalisation and colleagues need to understand the risks involved and be trained to:

- Understand the legal basis for our involvement and their role in addressing risk
- Be able to use professional judgment to recognise the vulnerable individuals who may need support to be diverted from what could be considered to be linked to terrorist activity, with reference to the Channel early intervention programme and any local context
- Be aware of the local safeguarding and referral mechanisms, agencies and/or people to contact for further specialist help, support, and advice

Independent People commit to

- Have designated 'Prevent' lead manager(s) to act as points of contact within the organisation, who are trained to deliver workshops to frontline colleagues
- Raising awareness of 'Prevent' within the organisation, to ensure all colleagues understand the local risk of vulnerable children and young people being drawn into terrorism and know how to refer individuals of concern for specialist support and help.

All colleagues should refer to the Act Early website [Act Early](#) and refer the case to the Designated Senior Manager if they are concerned about a young person showing signs of radicalisation.

4. Definitions of abuse

Abuse is the violation of an individual's human and civil rights by any other person or persons. It may be something that is done to the person, or something not done when it should have been; it can be unintentional, but if an adult at risk is harmed this must be reported.

Abuse can consist of a single or repeated act(s); it can be intentional or unintentional or result from a lack of knowledge. It can affect one person, or multiple individuals. Professionals and others should be vigilant in looking beyond single incidents to identify patterns of harm. In order to see these patterns, it is important that information is recorded and appropriately shared.

Anybody can abuse. Mutually abusive relationships involving two or more adults also exist. The abuser is frequently, but not always, known to the adult they abuse and can include spouses/partners, other family members, neighbours or friends, acquaintances, paid staff or professionals, volunteers and strangers, or people who deliberately exploit adults they perceive as vulnerable to their abuse.

While our focus will generally be to recognise and prevent abuse of young people who use our service and others, e.g., their children or partners who might be housed or staying with them, the nature of our services means that colleagues must also be vigilant about how abuse might be perpetrated by our service users to others, for example:

- To other residents of shared housing
- To neighbours or others within neighbourhoods who are at risk adults
- To other family members

4.1 Why abuse may occur / patterns of abuse

Why abuse may occur

Abuse can occur for many reasons. The risk is known to be greater when:

- The person is socially isolated
- A pattern of family violence exists, or has existed in the past
- Drugs or alcohol are being misused
- Relationships are placed under stress
- The abuser or victim is dependent on the other (for finance, accommodation, or emotional support)

Where services are provided, abuse is more likely to occur where staff are:

- Inadequately trained
- Poorly supervised and managed
- Lacking support
- Working in isolation

Other factors which increase the likelihood of abuse and neglect occurring are:

- Where the person has an illness which causes unpredictable behaviour
- Where the person has communication difficulties
- Where the person exhibits challenging behaviour or major changes in personality, disorientation, aggression, or sexual disinhibition
- Where the person concerned needs or requests more than the carer can give
- Where the family undergoes an unforeseen change in circumstances, e.g., sudden illness, unemployment, bereavement, or divorce
- Where a carer has been forced to change his or her lifestyle unexpectedly as a result of caring
- Where a carer is isolated and can see no end to, or relief from, caring
- Where a carer experiences regularly disturbed nights
- Where the carer has their own health-related difficulties
- Where the carer is dependent on the victim
- Where the carer is physically, emotionally, or practically unable to care for the individual
- Where there has been a reversal of role and responsibilities

- Where there are persistent financial problems
- Where other relationships are unstable or placed under pressure by caring tasks

Patterns of abuse

Incidents of abuse may be one-off or multiple and they may affect one person or more. Colleagues should look beyond single incidents or individuals to identify patterns of harm, and to see these patterns, it is important that information is recorded and appropriately shared.

Patterns of abuse and neglect vary and include:

- Serial abusing, where the perpetrator seeks out and ‘grooms’ individuals by obtaining their trust over time before the abuse begins – sexual abuse or exploitation commonly falls into this pattern, as do some forms of radicalisation and financial abuse
- Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations, or persistent psychological abuse
- Opportunistic abuse, such as theft occurring because money has been left lying around
- Situational abuse, which arises because pressures have built up, or because a carer has difficulties themselves affecting their ability to adequately meet a person’s needs. These could be debt, alcohol, or mental health related, or the specific demands resulting from caring for an adult at risk

Abuse can happen anywhere, for example:

- The person’s own home (whether living alone, with relatives, or others)
- Day or residential centres
- Supported housing
- Work settings
- Educational establishments
- Care homes
- Clinics or hospitals
- Prisons
- Via the internet or social media
- Other places in the community, including doorstep or telephone scams

4.2 Types of abuse

[Care and support statutory guidance](#) lists 10 types of abuse. These are:

- Physical abuse
- Domestic abuse
- Sexual abuse
- Psychological / emotional abuse
- Financial or material abuse
- Modern slavery

- Discriminatory abuse
- Organisational or institutional abuse
- Neglect and acts of omission
- Self-neglect

Please see the regional [Safeguarding Adults Multi-Agency Policy Appendix 1](#) for signs of symptoms of each type of abuse and possible indicators.

In addition to this list, the regional [Safeguarding Adults Multi-Agency Policy Appendix 1](#) also states it is helpful to be aware of the following:

- Hate Crime
- Mate Crime
- Forced Marriage
- Female Genital Mutilation (FGM)
- Prevent (radicalisation to extremism)
- Criminal Exploitation (including cuckooing).

5. Transitions (child to adult)

The Children and Families Act 2014 and the Care Act 2014 create a comprehensive legislative framework for transition when a child turns 18 (the Mental Capacity Act 2005 applies once a person turns 16).

Independent People will ensure our Safeguarding Adults Policy and Procedure work in conjunction with our Safeguarding Children and Young People Policy and Procedure.

Where there are ongoing safeguarding issues for a young person and it is anticipated that on reaching 18 years of age, they are likely to require adult safeguarding, safeguarding arrangements must be discussed as part of transition support planning and protection. Equally, when someone aged 18 and over is still receiving children's services (for example in an education setting until the age of 25) and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements, with children's safeguarding and other relevant partners involved as appropriate. The level of need is not relevant, and the young adult does not need to have eligible needs for care and support under the Care Act (2014).

See [Safeguarding Adults Multi-Agency Policy](#) (section 2.1).

6. Named leads for safeguarding

Named Designated Safeguarding Leads

Named Designated Safeguarding Leads for safeguarding adults within Independent People have been assigned based on their experience and authority to promote safeguarding practice and to challenge practice where necessary.

All colleagues will be made aware through induction, supervision, and training of how to contact the named leads.

The named Designated Safeguarding Leads are responsible for:

- Supporting colleagues to recognise the needs of adults at risk, including taking action to protect them from abuse
- Ensuring that cases are being managed, addressed, and reviewed
- Working with statutory and voluntary agencies to promote good practice in the area of safeguarding and ensuring effective partnerships are in place
- Developing a formal link between the local authority, the local safeguarding adults board and our services to ensure co-operation and information sharing, and promote a clear understanding of accountability and procedures
- Implementing quality assurance processes, to ensure the Safeguarding Policy and Procedures are understood and followed by all colleagues

This includes annual audit of:

- Operational delivery - ensuring delivery is in line with this Policy and Procedure
- Safeguarding logs and client files
- Safeguarding induction and training plans for colleagues and volunteers

The Designated Safeguarding Board member has leadership responsibility for the organisation's safeguarding arrangements, including:

- Ensuring that Independent People has the systems, policies, and procedures to safeguard adults, colleagues, and the organisation
- Championing safeguarding across the Independent People's Board
- Responding to any allegations against senior colleagues

Deputy Designated Leads

Deputies are in place for each Designated Lead at Senior Leadership Team and Board level, should the lead not be available.

The Senior Operations Team is responsible for ensuring cases are being managed, addressed, and reviewed.

Names and contact details of the Designated Safeguarding Leads and Board members are provided in [Appendix 1](#).

7. Information sharing and confidentiality

We will record and store information on secure (confidential) internal systems, to which only nominated colleagues have access. We will only share information with those who have a right to access it and we will only share information via approved secure means.

As a general rule, Independent People will only disclose information that identifies the young adult with that person's consent. Consent should be sought from the individual thought to be experiencing or reporting abuse/neglect if they have capacity (see [Part 2 section 2 below](#)). However, we may not do so if this would:

- Place the alleged victim at increased risk of significant/serious harm
- Place a third party at risk of harm
- Prejudice the prevention or detection of a serious crime.

A colleague must seek the approval of their line manager or other designated manager before disclosing any information without the consent of the young adult unless it is an emergency and someone is in immediate harm's way.

For further information refer to the Independent People's **Confidentiality and Data Protection Policy** and guidance in the regional [Safeguarding Adults Multi-Agency Policy](#) (sections 4 and 6).

8. Support for young people and colleagues

Independent People will ensure a planned approach to supporting victims of abuse and ensure that they are supported at the time of crisis and on an ongoing basis. Independent People will also ensure that young people who are parents also receive adequate and proactive support.

Where we are unable to provide this support ourselves, we will endeavour to refer to appropriate support agencies, including counselling services and legal advice.

We will ensure that all young people using our services have access to awareness-raising work, discussion, and support to understand safeguarding and its relationship to them - this includes educating young people who may be perpetrators or have potential to perpetrate abuse.

Where appropriate, and in addition to our duty to keep people safe and report safeguarding concerns, we will proactively work with any young people who perpetrate abuse or may be at risk of doing so - to undertake risk assessments and risk management plans - and bring in other involved professionals, continuing to provide support whilst they remain in our service, recognising that they may also be vulnerable.

Independent People acknowledges that abuse can be very traumatic and emotionally draining. Support is available for all colleagues as needed and regularly through supervisions, reflective practice, and team meetings. Where additional external support is needed (including counselling) this can be accessed either through Independent People's employee's assistance scheme or through other agreed bespoke support, including where necessary 'whole team' support.

9. Conduct of colleagues

All colleagues must abide at all times by Independent People's **Safeguarding Code of Conduct** ([Appendix 3](#)) and full **Code of Conduct**.

If colleagues are found to be in breach of either, the police and/or local authority may be involved, in addition to Independent People taking disciplinary action under our **Disciplinary Procedure** for action that may be considered as misconduct or gross misconduct.

10. Allegations against colleagues

All allegations or suspicions of abuse being perpetrated by a colleague will be taken seriously.

All colleagues should be alert to any signs that another colleague worker within Independent People or another organisation is behaving inappropriately in relation to an adult and take appropriate action quickly.

Colleagues hold a position of trust and an adult at risk may be deterred from disclosing abuse out of a sense of loyalty, fear, or other repercussions.

Colleagues **must** report any concerns that another colleague may have behaved inappropriately or where they have received information that may constitute an allegation to the Designated Safeguarding Lead immediately, but no later than within 1 working day, however trivial the allegation may seem.

Colleagues subject to allegations of abuse will be offered as much support as is possible without compromising the investigation or its outcome.

See [Part 2, section 11](#) for detailed procedure.

11. Safe recruitment practice

Independent People acknowledges that safe recruitment plays a key role in effective safeguarding practice - all recruitment must follow the procedures in our **Recruitment Policy and Procedure**.

Recruitment and employment procedures fully take account of the need to safeguard and promote the welfare of adults, children, and young people, including DBS checks for all colleagues, checking employment gaps and references and testing at interview.

All job descriptions, role profiles and volunteer role descriptions reference safeguarding responsibilities.

12. Working with translation and interpreting services

Translation and interpreting services will be provided where required. This is to ensure we communicate effectively with adults and their families, for example, where spoken English is not their first language or deaf people are reliant on British Sign Language to communicate or where written documentation needs to be understood using Braille.

Family, friends or involved professionals should not be used to translate or interpret, but professionals can be used to arrange appointments and establish communication needs. Children or adults at risk should never be used as interpreters.

Where necessary, we will work in partnership with the police and local authority safeguarding teams to ensure arrangements are in place for all relevant documents and information to be translated into an accessible format, which the adult and their family can clearly understand.

13. Making our policy available

This Policy will be made available to all colleagues during their induction.

The Policy is available on Independent People's website and young people are given a summarised version at commencement of service in the Young People's Handbook.

The Policy will be also made available to young people's kinship and support networks and other practitioners through our website and provided upon request.

14. Policy assurance, development, and review

Independent People is committed to ensuring that we deliver the best practice we can, to safeguard adults at risk.

We ensure that all our policies and procedures are both live, working and developing documents. This Policy and Procedure will be reviewed and updated as necessary, and at least once a year. Each review is ratified at Board level.

Policies are reviewed regularly and in consultation with young people, Unison, or other identified stakeholders as relevant, through:

- Team briefings, team meetings and development days
- Board / Committee meetings
- Independent People Ambassadors, 1625 Connects events and other young people's meetings as appropriate
- Stakeholder feedback processes

Independent People also:

- Conducts an annual audit of safeguarding to ensure compliance and identify learning and development needs (reported to Board)
- Completes statutory safeguarding self-assessments as required, transferring relevant learning and action into our strategic safeguarding plan, which is overseen by the senior leadership team.

PART TWO: PROCEDURE

1 Key principles for colleagues

You should not let other considerations, such as the fear of damaging relationships with involved adults, get in the way of protecting adults from abuse and neglect. If you think that referral to a local authority adult team is necessary, you should view it as the beginning of a process of inquiry, not as an accusation.

You should never assume that someone else will pass on information.

It is our role to observe and record incidents and not to investigate. Our role, where we have possible evidence of adult abuse, is to pass the information on to Adult Social Care Teams or the police to enable them to carry out their investigative duties.

You must ensure you are alert to the signs of abuse and neglect, that you question the behaviour of involved people and do not necessarily take what you are told at face value.

During an assessment by Adult Social Care Teams and any subsequent enquiries into suspicions of significant harm investigation, it is colleagues' role to support the process by providing accurate information and continuing to support the victim.

2 Involving the adult in their safeguarding

Unless there are exceptional circumstances that would increase the risk of abuse were we to involve a victim, Independent People considers it to be vital that an individual is fully involved in every aspect of managing a safeguarding issue that relates to them.

Risk enablement and management

We will always involve the adult from the beginning of a safeguarding case – discussion informs the process and, to some extent, timescale of response.

We will take account of the fact that an individual's right to safety needs to be balanced with other rights, such as liberty and autonomy, and rights to family life.

All adults at risk of, or experiencing abuse or neglect, regardless of whether they have capacity or not, may not want highly intrusive help, such as the barring of a person from their home, or a person to be brought to justice. They may wish to be helped in less intrusive ways, such as through the provision of advice about options available to them and the relevant risks and advantages.

For further information about risk enablement and management, refer to section 7 of the [Safeguarding Adults Multi-Agency Policy](#) or section 10 of the [Making Safeguarding Personal Toolkit](#).

Advocacy

An at risk adult's involvement in a safeguarding case may be supported by an independent advocate, especially if the adult has substantial difficulty in being involved, is struggling to clearly understand the process or where there is no other suitable person to represent and support them. Where an independent advocate is appointed, we will work closely with them to ensure they are able to carry out their duties.

For more information, see section 5 of the [Safeguarding Adults Multi-Agency Policy](#).

2.1 Mental capacity

Mental capacity refers to the ability to make a decision about a particular matter at the time, it is time and decision specific. Ability to make and/or execute a decision may fluctuate over time.

The presumption in the [Mental Capacity Act 2005 \(MCA\)](#) is that adults have the mental capacity to make informed choices about their own safety and how they live their lives. We must work on the basis that people have the capacity to make their own informed and safe decisions as well as taking or prompting action to protect those that are not able to protect themselves.

Issues of mental capacity and the ability to give informed consent are central to decisions and actions in adult safeguarding:

- All interventions need to consider the ability of adults to make informed choices about how they wish to live their lives and the risks they are wanting to take
- This includes their ability to understand the implications of their situation and to take action themselves to prevent abuse, and to participate fully in decision-making about interventions.

The MCA provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves and establishes a framework for making decisions on their behalf.

- It applies to anyone over 16 who is unable to make some or all decisions for themselves
- All decisions taken in the adult safeguarding process must comply with the Act
- It is essential that in any level of safeguarding enquiry the mental capacity of those involved is clarified at the outset.

It is important to ensure that safeguarding decision-making and mental capacity best interests decision-making do not become confused, as safeguarding procedures do not convey any authority to act on behalf of a person who may lack mental capacity.

Any protective measures thought to be necessary for a person who lacks mental capacity to consent to them must be subjected to a robust consideration and follow the [Mental Capacity Act 2005](#) principles of acting in the person's best interests and using the principle of 'least restriction'.

For further information about mental capacity and consent refer to Section 4 of the regional [Safeguarding Adults Multi-Agency Policy](#).

If there is uncertainty about the capacity of an adult to give informed consent or if there are disputes about capacity or the best interests of any adult deemed to be at risk feel like they are not being served, then Independent People's Designated Safeguarding Lead should be consulted immediately.

3 Disclosures and confidentiality

Colleagues should never give a guarantee of confidentiality to an adult wishing to disclose abuse. Colleagues who receive such information should handle the situation sensitively and explain it may be necessary to involve other agencies. Although best avoided, the situation may arise where information must be passed on without the adult's agreement.

- The first priority in safeguarding should always be the safety and wellbeing of the adult
- Sharing the right information, at the right time, with the right people is fundamental to good safeguarding practice
- Fears about sharing information cannot be allowed to stand in the way of the need to protect and meet the needs of adults at risk
- As a general principle, we must assume it is our responsibility to raise a safeguarding concern if we believe an adult at risk is suffering or likely to suffer abuse or neglect, and/or are a risk to themselves or another, rather than assume someone else will do so.

Adults may choose to not give their consent to the sharing of safeguarding information for a number of reasons. For example, they may be unduly influenced, coerced, or intimidated by another person, they may be fearful of reprisals, they may fear losing control, they may lack trust in statutory services, or fear their relationship with the abuser will be damaged.

Reassurance and appropriate support can help to change their view on whether it is best to share information, and colleagues should consider the following approaches:

- Explore the reasons for the adult's objections – what are they concerned about
- Explore the concern and why you think it is important the information is shared
- Tell the adult with whom you may be sharing the information with and why
- Explain the benefits, to them or others, of sharing information – could they access better help and support?
- Discuss the consequences of not sharing the information – could someone come to harm?
- Reassure them that the information will not be shared with anyone who does not need to know

- Reassure them that they are not alone, and that support is available to them

If, after this, the adult refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, in general their wishes should be respected.

All young people receiving services from Independent People will be informed of Independent People's **Data Protection in Operation Procedure** and the exceptions we will make when we believe a child's safety is at risk.

However, in addition to the references to exceptions in Independent People's **Data Protection in Operation Procedure**, the [the Social Care Institute for Excellence \(SCIE\)](#) lists the following examples of circumstances where a professional can reasonably override a decision by an adult to not give consent for their information to be shared:

- The person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the MCA
- Other people are, or may be, at risk, including children
- Sharing the information could prevent a crime
- The alleged abuser has care and support needs and may also be at risk
- A serious crime has been committed
- Independent People or external colleagues are implicated
- The person has the mental capacity to make that decision, but they may be under duress or being coerced The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral
- A court order or other legal authority has requested the information

It is critical to keep a careful record of the decision-making process and what, if any, information was shared in such situations. Colleague may want to seek advice from their manager or the Designated Safeguarding Lead before overriding the adult's decision, except in emergencies.

For further information refer to Sections 4.1 and 6, and Appendix 3 of the regional [Safeguarding Adults Multi-Agency Policy](#).

4 Responding to an incident or suspicion of abuse

4.1 Immediate threat - protective action

Where there is a risk to the life of a young person or likelihood of serious immediate harm, an agency with statutory protection powers must be contacted immediately:

- Adult Social Care Teams
- Police

Colleagues should ensure that the person subject to alleged abuse is safe and supported before proceeding with any other action.

Where a young person needs immediate medical assistance, this overrides all other considerations and must be sought immediately. The colleague involved must tell the doctor or medical staff if they believe the young person has been abused.

See [Appendix 1](#) for links to all relevant agencies.

Preserving evidence and gathering information: Be aware that in certain situations medical or other evidence will be needed. Colleagues may need to lock rooms or ensure that equipment and documents are secured appropriately, so that evidence cannot be tampered with. If there has been physical or sexual assault colleagues should not clear up, move things, wash people or their possessions, e.g., bedding or clothing, before reporting the incident and having taken the advice of the police.

4.2 Where there is concern

All colleagues have a responsibility to consult with their line manager or Designated Safeguarding Lead when they have concerns about the safety of an adult who may be at risk, if:

- You believe that you have seen possible evidence of abuse
- You have concerns that a young person may be at risk of significant harm; or
- You receive an allegation of abuse or possible abuse.

It is better to share a concern that may prove groundless than to wait for certainty, which may result in irreparable damage to the young person.

Where the concern raises questions about the immediate safety of the young person, then immediately consult with the relevant manager, or directly with Adult Social Care Teams, if a manager is unavailable (see 4.1 above).

4.3 Responding to a disclosure

Remember to:

- Stay calm and try not to show if you are shocked
- Listen carefully and be sympathetic, you do not need to press the person for lots of detail, indeed taking a full written statement from the person at this point could be too stressful and jeopardise any future police investigation
- Tell the person they have done the right thing in telling you and that the abuse is not their fault
- Tell the person that you are treating what they said seriously and that you will be talking to someone responsible about it, e.g., at least your manager
- Tell them that you will do your best to support them
- Clarify with them the nature of the abuse and establish if it needs an urgent response. If so, keep them as calm as possible until the police arrive
- Make sure that everything you do keeps the person safe for now

- Consult with your line manager, another appropriate manager or if they are not available, the Designated Safeguarding Lead as quickly as possible and, as a maximum, **within 24 hours of a concern or allegation coming to light**
- If this is not possible then you should consult directly with Adult Social Care Teams (see [Appendix 1](#)). Any steps taken should be reported to your line manager as soon as possible
- Record all details of the incident and what action has been taken (see [Part 2, section 10](#)).

4.4 Discussion with your manager

The following questions will help you and your manager decide what to do next:

- What is your concern?
- How long have you been concerned?
- Who else has concerns?
- What do you think could be happening to the at risk adult?

List a range of possible things that could be happening, rather than jumping to one conclusion:

- How could you find out whether each of these possibilities is true?
- What information do you have already?
- What have you already done to address your concerns?
- Have you discussed your concerns with the at risk adult?
- If yes - what did they say?
- If no - why not?
- What would be the possible impact on the at risk adult?

Your manager should question you about the reasons for your concerns.

Possible evidence of abuse should be considered in relation to the situation in which it occurred and the person's history. You should check our records for additional information which might help show whether the concern is likely to indicate abuse or the risk of abuse. This could include information about what interventions have been previously offered to the young person and their outcomes.

Following consultation with your line manager a decision will be reached on how to proceed. This will include deciding whether, when and how any concerns will be discussed with the young person and whether a referral to the local authority is necessary.

If concerns remain following the discussion you (or your manager) could contact someone from another agency and discuss the situation (without mentioning the person's name if appropriate). You or your manager may also seek advice from the relevant safeguarding adults team prior to a decision on how to proceed.

4.5 No longer has concerns

If you and your manager decide that there is no reason to be concerned or that the

adult's needs can be met by Independent People alone, you should continue to provide services as before or additional services from Independent People and partner agencies as required.

Decisions made should be clearly recorded on case records, giving a clear explanation why a referral to the relevant safeguarding adults team was not made.

5 Raising a concern

If the person you are concerned about, appears to meet the criteria in [Section 1 Statement of purpose](#) and appears to be experiencing some form of abuse outlined in [Section 4. Definitions of abuse](#), then you should contact the relevant Adult Social Care Team.

5.1 How to report your concerns

You should report as much information as possible, but **do not delay**. You must pass on the following details (where known) and refer to the relevant local authority reporting process as detailed in [Appendix 1](#):

- Name and date of birth of victim and why they are considered to be vulnerable
- Whether consent to share information has been provided and/or if there is concern about mental capacity
- Circumstances and type of the abuse (including location), where the victim lives and with whom
- Services the victim receive and from whom, including other named professionals if known
- Who is providing the information to you
- Who is the person or persons suspected or implicated in the abuse and their relationship to the victim if known and, if they are one of our young people, what we are doing to support them and manage the risk
- Your concerns and the reasons for those concerns, including if there is a risk of further harm to the victim or other people may be at risk of harm.

If you do not have all this information and the situation is urgent **do not delay**, report it first. There should be no delay in reporting serious concerns.

If you are quoting someone else then be sure this is clear when reporting - it is important that the initial referral is clear, so try to use the person's own words.

Ensure all records are signed and dated.

Ensure that all responses are recorded in the Safeguarding Log, including full details and roles/responsibilities of any designated local authority officers or colleagues and/or other professionals involved, including the police.

The information we share will be treated in the strictest confidence within the limits of the law, which requires that the police be informed where there is serious risk to life or information about a crime is discovered.

There is a lot of information to impart when you hear about safeguarding concerns, so unless it is an absolute emergency, taking notes will show the person that you are taking them seriously, are trying to get it right and not panicking because of their disclosure.

5.2 Receiving a referral

Upon a concern being reported, there will be one of three outcomes:

- i. The concern does not meet the threshold for a safeguarding enquiry and is better dealt with through other means, such as a multi-professionals meeting. This will ensure any risks are managed and that everybody knows who is involved with the person.
- ii. The situation requires a notification only. This would be a concern which has not caused harm but still needs to be recorded. If this relates to a provider service, then they will be asked to send in a copy of their own written incident report and /or risk assessments.
- iii. A full safeguarding concern needs to be raised by Independent People so that further enquiries can be carried out. It is important that you complete and return this as soon as possible and that the information you share is accurate and is clear about what has been seen/heard and what is opinion.

6 If a child (not adult at risk) is being harmed or is at risk of harm

See *Independent People's Safeguarding Children and Young People Policy and Procedure*.

7 Historic abuse

Where an adult reports abuse which happened whilst they were a child it is essential to seek advice from the adult safeguarding team who will make the necessary contacts.

These situations are often complex, and decisions will be required about who should lead the investigation and who will offer support to the adult. Under no circumstances should we investigate historic abuse.

8 Professional disagreements

If, following a safeguarding referral, the relevant worker and their line manager are dissatisfied with the local authority's proposed action or decision not to investigate, in the first instance, this should try to be resolved between the relevant professionals through discussion.

If agreement is not reached and becomes 'stuck', the worker and their manager should notify the Designated Manager, who will consult the relevant Local Authority's Escalation Policy and agree next steps.

Professional challenge is good practice and should be encouraged as learning from case reviews consistently highlights that good professional challenge could have led to better outcomes for children and families. Professional disagreement is only dysfunctional if not resolved in a constructive and timely fashion.

9 Keeping people informed and closing cases

Where an adult has disclosed information about abuse or the risk of abuse the relevant Independent People manager/colleague should ensure, as far as they are able to, that the "discloser" is kept informed about what will happen next. This will help to reassure them about what to expect.

All colleagues who continue to have a role in a safeguarding case should keep themselves and other professionals involved and informed throughout, to the point that the case is concluded and/or handed over to other professionals or the police.

Once a case has been fully investigated, prescribed actions have been undertaken and the safeguarding issue has been resolved, open safeguarding logs will be authorised for closure by the relevant team manager.

A decision will be made about what information is shared with the individual adult, the alleged/proven perpetrator (if they are one of the young people who use our services) and involved professionals regarding the resolution of the case - and who will share it. This includes any information that needs to be shared with others who may need to know if any individual or group of individuals continue to pose a threat to other people.

Finally, the relevant manager will, as required, complete a written record of the investigation and outcome, and share it, including any lessons learned that may need to be adopted by the organisation, with relevant internal managers and senior managers and external professionals - to enable suitable practice, policy or other changes to be made.

10 Record keeping

Good record keeping is critical to ensure Independent People's colleagues are accountable to young people, statutory authorities, and the organisation in relation to safeguarding. They help to provide continuity through case management as well as staffing changes or absences.

Good records provide an essential source of evidence for investigations and enquiries where young people may be at risk.

For further information refer to Section 6.3 in the regional [Safeguarding Adults Multi-Agency Policy](#).

All cases of suspected or actual abuse must be recorded through Independent People's In-Form Safeguarding Log.

Your records should always cover key facts and information:

- **What you saw:** when and where
- **What you said:** when, where and who to
- **What was said or shown to you:** when, where and who by
- **What you thought** and why you thought it
- **What you did**

Safeguarding Logs must be regularly reviewed by the team manager.

Records must be kept up-to-date, accurate and factual. Records relating to suspected, possible, or actual abuse must record the name of the worker making the entry and the date of the entry.

Records should be clear, accessible and comprehensive and any decisions and interventions clearly recorded.

Where there is suspicion of non-accidental injury, expert advice is required. Colleagues must not try to diagnose, but simply and factually describe what they see. Where there are concerns that an injury to a young person may be the result of abuse, colleagues must record in detail any known history of the injury, in order that any physical findings can be assessed in relation to the explanation given.

Where a colleague has concerns about the welfare of a young person, records should include both positive and negative developments, e.g., they should record concerns, but also factors that alleviate previous concerns.

Records may show patterns that are of concern or provide corroborative evidence when abuse is suspected.

11 Allegations against colleagues

An allegation may relate to any person who works with at risk adults in their role, who has:

- Behaved in a way that has harmed or may have harmed an at risk adult; and/or
- Possibly committed a criminal offence against or related to an at risk adult; and/or
- Behaved towards an at risk adult or adults in a way that indicates they may pose a risk of harm to children, young people and at risk adults.
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children [Working Together to Safeguard Children criteria revised the threshold for managing allegations regarding people in a position of trust to include a fourth criteria; "suitability"].

Such allegations are distinct from a general concern about the quality of care or practice or a complaint.

If you have a concern that a colleague may have behaved inappropriately or you have received information that may constitute an allegation, you should:

- Report it to the Designated Safeguarding Lead as soon as possible, unless:
 - The concern relates to a director in which the report should be to the CEO; or
 - The concern relates to the CEO, in which case, the report should be to the Designated Safeguarding Board Lead see [Appendix 1](#)
 - If for any reason the Designated Senior Managers are not available, then this must be reported to the CEO or the Designated Safeguarding Board Lead

You should complete a written record of the nature and circumstances surrounding the concern, including any previous concerns and where the concern came from. This should include brief details only and be dated and signed. Due to the nature of this information, please confirm with the Designated Safeguarding Lead where this information should be stored (it should not be recorded on In-Form).

You must maintain confidentiality and guard against publicity whilst an allegation is being considered or investigated and follow local information sharing protocols.

The allocated person with responsibility for ongoing management of any concerns raised will ensure that appropriate neutrality is maintained in relation to the individuals involved.

You should not:

- Attempt to deal with the situation yourself
- Make assumptions, offer alternative explanations or diminish the seriousness of the behaviour or alleged incidents
- Keep the information to yourself or promise confidentiality
- Take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses or informing the alleged perpetrator or parents or carers.

The Designated Safeguarding Lead will contact the relevant local authority safeguarding adults team within 1 working day of receiving the report of an allegation.

Referral to the safeguarding adults team should not be delayed in order to gather further information, nor should any action be taken, that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses, or informing or interviewing the alleged perpetrator, prior to contacting the safeguarding adults team.

The safeguarding adults team will provide advice and guidance and be involved in the management and oversight of all allegations, as well as liaising with the Designated Safeguarding Lead, all other parties and monitoring the progress of all cases. They will advise on further action that needs to be taken and will liaise with police or relevant local authority teams, where they are or may need to be involved.

Consideration of allegations against colleagues may include up to 3 elements:

- Enquiries and assessment by local authority teams about whether an adult is in need of protection or in need of services
- Police investigation of possible criminal offences
- Consideration by an employer of disciplinary action in respect of the individual, which could initially include suspension from duty.

11.1 Support for colleagues subject to allegations

The police and other relevant agencies should always be consulted before informing a person who is the subject of allegations, as the colleague's action may possibly require a criminal investigation.

Independent People will ensure that local authority teams and/or the police are given all assistance in pursuing any investigation in accordance with relevant law and safeguarding procedures.

Colleagues subject to allegations of abuse will be offered as much support as is possible without compromising the investigation or its outcome. They will be provided with support from the organisation throughout the investigation process and will be helped to understand the concerns expressed and the processes being operated. They will be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.

If the person is suspended, Independent People will plan to keep the individual informed about developments in the workplace. If the person is a member of a union or professional association, they should be advised to contact that body at the outset.

12 Concerns about abuse or suspected abuse of at risk adults living in temporary accommodation and supported housing

At risk adults that receive support from Independent People may be placed in a range of accommodation types. This includes 24 hour supported accommodation services and supported housing.

Independent People colleagues must report any concerns about the abuse or suspected abuse of young people in line with this document and, if they are a child, the **Safeguarding Children and Young People Policy**.

Appendix 1: Contact details for adult safeguarding

1. Designated Safeguarding Leads within Independent People.

- **Operations Director:** Paul Hale
1625 Independent People, Kingsley Hall, 59 Old Market Street, Bristol, BS2 0ER
Telephone: 0117 317 8800
Work mobile: 07872 305 642
paul.hale@1625ip.co.uk
- **Or in their absence** – Operations Director: Vicky Harwood
Address as above
Work mobile: 0777 595 1617
vicky.harwood@1625ip.co.uk
- **Or in their absence** - Chief Executive: Dom Wood
Address as above
Work mobile: 07531 820 242
dom.wood@1625ip.co.uk

Independent People Designated Board member for safeguarding

- Sarah Gallacher
Please contact 0117 317 8800 for contact details
- **Or in their absence** - Chair of the Board, Nick Hooper
Please contact 0117 317 8800 for contact details

3. PREVENT leadership within Independent People:

- Karen Clark, Team Manager
karen.clark@1625ip.co.uk
Work mobile: 07984 576 305

4. EXTERNAL REPORTING

Bristol. Report a concern: 0117 922 2700 (office hours)
Concerns can also be reported using the [reporting adult abuse form](#)

South Gloucestershire. Report a concern; 01454 868 007 (office hours)

Bath and North East Somerset (BANES). Report a concern; 0300 247 0201

North Somerset. Report a concern; 01275 888 801 (office hours)

Out of Hours – Emergency Duty Team. All areas (Bristol, BANES, South Gloucestershire and North Somerset) - call 01454 615 165.

If a young person is in **immediate danger dial 999** and ask for the police.

Appendix 2: Safeguarding adults training commitment

- All colleagues receive specific safeguarding induction training on commencement of their work with Independent People.
- All relevant direct support colleagues, managers and senior leaders complete appropriate safeguarding and associated training.
- Managers or specialist colleagues disseminate information from advanced training courses to relevant colleagues as appropriate, including notifying colleagues about legislative or policy changes.
- Safeguarding training is monitored through our safeguarding training plan, which provides us with an organisational view of all safeguarding training attended or planned - to ensure that all relevant people have attended or are booked to attend, at the earliest available date, on initial, advanced or refresher safeguarding training as required for their role.

Appendix 3: Colleague safeguarding Code of Conduct

Colleagues should also refer to [Section 8](#) of this Policy.

1. Every young person should be treated equally and with dignity, with their safety and wellbeing central to each colleague's relationship with them.
2. All colleagues are required to be conversant with and follow Independent People's **Concerns at Work Policy** (Whistleblowing).
3. Where there are any safeguarding concerns that a colleague may have behaved inappropriately or where we receive information that may constitute an allegation, all colleagues are required to report this to the Designated Safeguarding Lead as soon as possible, however trivial. This includes reporting concerns about colleagues from other organisations.
4. Colleagues should not enter into a close relationship - social, physical, emotional or sexual - or form relationships with any young person outside of the range of our service specification.

Colleagues should not take young people to their homes, give out their personal telephone numbers or email addresses or connect with them via any social media sites (unless expressly authorised to do so) or befriend young people using personal online accounts, including e-mail, chat rooms and social networking sites.

5. Any inappropriate behaviour towards colleagues by a young person should be recorded and reported, and if this behaviour was witnessed by other colleagues, the witness (es) should also record and report what they witnessed.
6. Colleagues should avoid giving lifts to young people except to assist in the provision of housing and support services or as part of organised activities.
7. Colleagues must never threaten or physically punish young people in their care. Any use of corporal punishment is not permitted. This may be a criminal matter for the police and will be viewed as a disciplinary matter and may be considered as gross misconduct. The term corporal punishment should be taken to include:
 - Any application of force as a punishment; slapping; throwing missiles; rough handling;
 - Punching or pushing in the heat of the moment in response to violence from young people.

Neither will any colleague make a physical intervention (restraint), where any other course of action is likely to fail, even if this is to avert the immediate and serious danger of personal injury to a child / young person, themselves or another person - our colleagues are not trained to do this safely.

8. Colleagues are required to follow clear procedures to prevent themselves or others from personal benefit when working with young people.

Independent People is not a specialist financial advice or welfare rights agency and it is outside of colleagues' professional role to provide such a level of advice to young people on their finances. However, we need to recognise that, as part of their support role, colleagues inevitably find that money is an important issue in people's lives and need to be able to offer basic budgeting, benefits and debt advice to young people. Where there is a need for specific, detailed professional financial advice, young people will be referred to an appropriate internal or external service.

To ensure appropriate accountability, details of all interactions in relation to finance, e.g. budgeting, debt, benefits, are recorded by colleagues in detail and discussed through the supervision process.

All colleagues are required to account fully for any monies paid to Independent People or handled by Independent People's teams on behalf of a young person, for example, individual grants. When handling or accounting for any monies held by Independent People or Independent People's colleagues on behalf of a service user, colleagues must follow the relevant financial procedures which includes Independent People's *Property, Money and Valuables (young people) Policy & Procedure*.

9. Colleagues must never take on the role of Lasting Power of Attorney for a service user and if requested to do so, should discuss the situation with their line manager immediately, so that appropriate support and advice can be provided to the service user.
10. Gifts offered or given to colleagues by young people (or vice versa) must be reported to the line manager, so that a decision can be made on how the gift, or offer of a gift, should be dealt with.
11. All allegations or suspicions of abuse, including inappropriate behaviour, inappropriate relationships or corporal punishment by a colleague will be taken seriously and treated carefully and fairly in accordance with our **Safeguarding Policies**, the South West Child Protection Procedures and the Safeguarding Adults Multi-agency Policy and, where appropriate, reported to the police as potential or actual criminal activity.
12. Inappropriate behaviour or relationships with any service user outside the boundaries of our service specifications, including the list above is likely to additionally result in a disciplinary investigation being undertaken and may be considered as gross misconduct.

Appendix 4: Safeguarding resources

Regional and Local Authority Guidance

- [Keeping Bristol Safe Partnership](#)
- [South Gloucestershire Safeguarding Adults Board](#)
- [BANES Community Safety and Safeguarding Partnership](#)
- [North Somerset Safeguarding Adults Board](#)

- [Safeguarding Adults Multi-Agency Policy](#) - Bristol, BANES, North Somerset, South Gloucestershire and Somerset

Radicalisation

- [HM Government Prevent 2022 programme](#)
- [Act Early](#) – spot the signs, advice, support and Channel programme information

Legislation

- [Care Act 2014](#) and;
- [Care Act 2014, Care and Support Statutory Guidance](#) (last updated April 2021)

Best Practice Guidance

- [Making Safeguarding Personal Toolkit](#)

Care Quality Commission (CQC): CQC inspect and regulate social care services and have powers under to take action if services are putting people at risk of harm and, as such are key partners in any safeguarding plan to protect at risk people using social care services.

Version #	Owner	Issued date	Date of next review
1 – 6	Senior leaders	To 2020	December 2021
7	Operations Director	10 December 2021	April 2022
8	Operations Director	30 August 2022	August 2023
9	Operations Director	August 23	August 24

Approved by Board:



Nick Hooper, Chair of Board

Date: 31st August 2023

Approved by Chief Executive:



Dom Wood, Chief Executive

Date: 31st August 2023