Safeguarding policy elements

What needs to be included in a safeguarding policy?

Safeguarding covers a very wide range of practices and responsibilities. We all share a responsibility to treat people who use services with respect; to behave towards them in a way that we would want to be treated ourselves. This means in practice that we must always act in a way that is best for the person, not for our convenience or the convenience of our organisation.

Posters

Anyone providing support to an adult at risk has a dual role, not only to provide services but also to safeguard welfare. The heading 'posters' is used here as shorthand for the idea that people are better protected when organisations are explicit about not just their responsibilities to provide services but also their responsibilities to act to safeguard adults at risk. How explicit is your organisation about its responsibilities? Is your policy on posters, is it on your headed paper or in contracts? How do the individuals using your service know that in addition to meeting the adult's needs you also have a responsibility to safeguard their welfare? If an organisation 'owns' the responsibility to safeguard adults in an overt and explicit way it makes it easier for the staff it employs to carry out their responsibilities.

Accurate client details

It is important that organisations keep clear records about each person using their services, listing their age, gender, date of birth, next of kin (after asking the person who this is), address, contact details and emergency contacts. It may also be appropriate to list any orders in force, such as injunctions prohibiting certain people from having contact. Where the adult is also a parent details of their children should be recorded. The challenge is to:

- Update details regularly
- Have a consistent place to document this information so that all staff know where to find it

Record of concerns

Increasingly organisations are improving their documentation on concerns brought to their attention. Organisations are less good at recording the action taken in response to the concerns.

Serious case reviews, commissioned by **Safeguarding Adults Partnership Boards (SAPBs)** when an adult at risk dies or is very seriously abused, consistently show that when recording concerns about abuse, there is a tendency to focus on what the alleged abuser did or didn't do, to the exclusion of the impact on the person. It is also important to ensure that whatever system of recording is used that there is a built-in system of review so that the safeguarding lead in each organisation is able to discern patterns of behaviour as they emerge. This is important because some forms of abuse are episodic or cumulative.

Safe recruitment procedures including Criminal Records Bureau (CRB) checks

One of the ways in which the risks to people can be reduced is if employing organisations ensure that all staff with access to people are recruited using safer recruitment practices (including CRB checks).

The CRB is an executive agency of the Home Office set up to help organisations make safer recruitment decisions. This service enables organisations in the public, private and voluntary sectors to identify candidates who may be unsuitable for certain work, especially work involving children or adults at risk.
http://www.homeoffice.gov.uk/agencies-public-bodies/crb/partners-reg-bodies/code-of-practice/

CRB checks can only tell you if a person's activities have brought them to the attention of the authorities in this country and while they can never guarantee the suitability of a candidate for employment they are one strategy for reducing risk.

Employers also have a responsibility to fulfil their legal obligations under the Vulnerable Groups Act 2006 and the Vetting and Barring Scheme as administered by the Independent Safeguarding Authority (ISA)/Disclosure and Barring Service (DBS).
http://www.homeoffice.gov.uk/crime/vetting-barring-scheme/

Personal budgets and self-directed care
People who direct their own care have a responsibility to consider, through their support plan, how to manage any risks to their safety and work to address these. In particular, they need to consider their responsibility to use safe recruitment and employment practices.

Safety of premises (inside and out)
Employers and employees have responsibilities to maintain safe premises under their health and safety obligations (to ensure a safe working and living environment). Risk assessments must be undertaken when thinking about the care of people who use services. This could include some very practical activities such as: fire drills, first aid lessons, infection control, food safety and

nutrition, use of medications, strategies to prevent falls, training on handling and lifting, procedures to ensure health needs are met, transport training and staff ratios (further examples can be found at www.skillsforcare.org.uk). Other activities might relate more directly to the person using the services, through developing a care plan that outlines their preferences and the safest way to carry this out.

It is worth remembering we all have the right to make unwise decisions and we cannot entirely rule out risk in someone's life.

Staff awareness

Safeguarding is everybody's concern. As long ago as 2000 the Department of Health document 'No secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse' stated:

''A senior manager should be identified in each agency to take the lead role with regard to the development of the policy and strategy, issuing operational guidance, promoting good practice, making policy recommendations to corporate management groups and negotiating with other agencies within an inter-agency framework. It is important that lead managers in different agencies should have comparable discretion and authority to make strategic and resource decisions. To achieve effective working relationships, based on trust and open communication, such managers will need to understand the organisational frameworks within which colleagues in different agencies work.''

If you would like to view the document in detail use the link: http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/ @dh/@en/documents/digitalasset/dh_4074544.pdf

In practice this means that each agency should identify a senior manager to take responsibility for ensuring that all staff, including

volunteers, understand their role within a multi-agency safeguarding system. Agencies should provide training for staff and volunteers on the policy, procedures and professional practices that are in place locally, commensurate with their responsibilities in the adult protection process. This should include:

- Basic induction training with respect to awareness that abuse can take place and duty to report
- More detailed awareness training, including training on recognition of abuse and responsibilities with respect to the procedures in the particular agency
- Specialist training for investigators
- Specialist training for managers

Training should take place at all levels in an organisation and within specified time scales, and no staff group should be excluded. Training is a continuing responsibility and needs to be provided as a rolling programme ('No secrets' 5.2). Training programmes also need to ensure that internet safety forms part of the training provided, where relevant.

Procedures for reporting concerns
All staff need to be aware of their responsibility to pass on promptly their concerns to the safeguarding lead within their organisation. As a general rule of thumb no staff member should ever go home without reporting their concern. In some organisations this will mean filling out an incident report which is signed, dated and timed. The safeguarding structures within local authorities will vary but safeguarding leads also need to recognise the importance of speedy referrals to Adult Social Care generally and to their own adults safeguarding service in particular.

Staff also need to be aware of the local timescales by which Adult Social Care will respond to a safeguarding concern and, if not

already explicit within their local procedures, take steps to ensure they are provided with prompt feedback.

Being alert to the signs and symptoms of abuse both in families and in caring or professional relationships
Safeguarding training must address not only who is considered an adult at risk but also when, and to whom, concerns should be passed. To be able to do this effectively staff need to be aware of the signs and symptoms of abuse both within families and in caring or professional relationships. Those who care need to understand that not all abuse occurs within families. Professionals may also behave in an abusive manner. Some acts may be criminal and result in prosecution under Section 44 of the Mental Capacity Act 2005.

Whistleblowing
All personnel providing care need to understand that their first priority must be the adult to whom they are providing services, and not their colleagues. This is particularly relevant in organisations where staff are recruited locally. Staff need to be aware that their organisation actively supports those who draw attention to the poor performance of others and that they will not be penalised for doing so.

Open door policy
Adults at risk are better protected when those with concerns can go straight to the person who can do something about it, and are not hampered by bureaucratic reporting procedures. Some of you may recall that in the past rigid hierarchies in hospital staffing meant that a nursing auxiliary would not be allowed to speak directly to Matron. By the time the nursing auxiliary's concern reached Matron 'Chinese whispers' would have occurred causing information to be omitted or distorted along the way.

Having one person or a small team to whom people can report concerns helps: it ensures that all concerns are funnelled to one place. The particular vulnerabilities of adults at risk mean that there may be several warning signs noticed by a variety of personnel, but not acted upon.

Imagine a day centre, for example. An activity leader may notice some worrying behaviour during a session. The catering staff may notice another incident. The receptionist on her way home may witness yet another source of concern. These three incidents on their own may not be sufficiently serious to prompt anybody to report their concern. However, added together these three incidents may add up to more than the sum of their parts. Unless these concerns are recorded the safeguarding lead cannot do their job to protect the person, and nor can the safeguarding professionals such as the police or Adult Social Care.

It is also worth stating that support staff, including carers, have a responsibility to report all concerns; not just those that occur in their establishment or on their shift, but also those that occur out of hours or in a different setting.

Cooperating with investigations by Adult Social Care (ASC)
Safeguarding is about preventing abuse and neglect as well as promoting multi-agency good practice. Currently, there is no legislation that places a statutory duty to cooperate on any agencies involved in safeguarding adults. However, the Department of Health 'No secrets' document places a duty on local authorities and gives guidance on developing and implementing multi-agency polices to protect adults at risk. Those providing support to adults at risk need to be aware that they are required by their locally agreed procedures and the underpinning guidance in 'No secrets' to cooperate with investigations undertaken by Adult Social Care.

Supporting any protection plan put in place by ASC

Where a multi-agency investigation, led by Adult Social Care, finds that an allegation of abuse has been substantiated and the adult concerned stands in need of a protection plan, all agencies providing services to the individual are bound by their locally agreed procedures, to cooperate with the implementation of any plan.