

## Document Control

Version	Changes	Date live	Document Owner
1	Policy introduced	8 <sup>th</sup> June 2010	Lawrence Carter, Director of HR
2	Reviewed by consultant, Mick Lowe, to reflect key legislation and guidance	20 <sup>th</sup> June 2016	Richard Stacey, Head of HR
3	Karen Foster becomes document owner. Changes made to the Safeguarding Alert Form. E-Safety and Signs and Safety of Abuse appendices updated.	1 <sup>st</sup> November 2017	Karen Foster, Safeguarding Lead
4	Policy reviewed to reflect changes to internal processes. Changes made to the reporting concerns flowchart. More detailed information given on Domestic Abuse and the Serious Crime Act 2015, Modern Slavery, County Lines and Peer on Peer abuse. Updates made to Appendices A, B, C, E & F	8 <sup>th</sup> October 2018	Karen Foster, Safeguarding Lead
5	Policy updated to make references to legislation and statutory guidance for Northern Ireland. Inclusion of reference to statutory guidance Adult Safeguarding: Prevention & Protection in Partnership 2015, Safeguarding Vulnerable Groups (NI) Order 2007, reference to the Prevent Duty and The Care Act only being applicable to England, Scotland & Wales, defining the categories of abuse for Northern Ireland. Inclusion of key Northern Ireland legislation & guidance to Appendix E	17 <sup>th</sup> May 2019	Karen Foster, Safeguarding Lead

## 28.3 Reed in Partnership Safeguarding Policy – ‘Adults at Risk’

### 28.3.1 Objective and Scope of the Policy

Reed in Partnership is committed to providing the highest quality services that meet the needs of all our Participants. We recognise, however, that we have particular responsibilities for certain groups with whom we work and, in certain circumstances, we act on behalf of many statutory organisations who have legal duties for the safeguarding of both **children, young persons** and **‘adults at risk’**<sup>1</sup>. (See Appendix A for definitions.)

<sup>1</sup> The term ‘adult at risk’ has been used widely in this policy document to replace ‘vulnerable adult’ in line with the more recent guidance on safeguarding adults. This is because the term ‘vulnerable adult’ may wrongly imply that some of the fault for the abuse lies with the adult abused. The term ‘adult at risk’ is used as an exact replacement for ‘vulnerable adult’. The terms are, therefore, interchangeable and much statutory and other guidance that is still relevant still use the terms ‘vulnerable adult’.

This policy and accompanying operational procedures will enable Reed in Partnership to meet its responsibilities for safeguarding<sup>2</sup> and it is a policy about which all staff who provide services on behalf of the company need to be aware and with which they need to comply. This policy will also enable the company to meet its requirements for disclosure and barring<sup>3</sup> and will, in addition, comply with the Government's [Prevent Strategy](#). (A full list of the legal compliances is found in the Preventing Extremism and Radicalisation Policy in Section 28 of the Co-Member Handbook)

Compliance with this policy and its procedures is mandatory for everyone who is involved with the management and provision of participant services operated by Reed in Partnership irrespective of the employment relationship. As 'agents' of many different public bodies, we need to meet the highest possible standards of practice in terms of safeguarding and, for this reason, compliance is required from the following individuals and groups:

- Directly employed staff.
- Temporary staff.
- Agency staff
- Volunteers working directly with participants.
- Any other person working on behalf of, or with Reed in Partnership

As part of our pre-contract due diligence processes Supply Chain partners will be asked to provide evidence of how their current safeguarding practices comply with the requirements set out in our Safeguarding Policy and its Procedure. If their current safeguarding practices are deemed insufficient, in order to be engaged as a supply chain partner they would either have to make suitable and approved amendments to their Safeguarding Policy and its Procedure or adopt directly Reed in Partnership's Safeguarding Policy and its Procedure.

### **28.3.2 What is Safeguarding and why is it so Important?**

"Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect."<sup>4</sup>

As an organisation, we recognise our statutory, moral and ethical duty to ensure all our Participants are adequately safeguarded and, through the implementation of this policy, we will meet this commitment by ensuring that:

- Those who are known to be unsuitable do not gain access to adults at risk.
- Those who become unsuitable are detected at the earliest stage and prevented from continuing to work with adults at risk.
- Those who intend to do harm are prevented at every possible stage from entering the workforce.

---

<sup>2</sup> In particular, the regulations contained in the Care Act 2014 (Adults) and the guidance for safeguarding children as contained in Working Together (Children). Also Adult Safeguarding: Prevention & Protection in Partnership 2015 (NI)

<sup>3</sup> Under the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by [Part 5 of the Protection of Freedoms Act 2012](#)) Safeguarding Vulnerable Groups (NI) Order 2007 <https://www.legislation.gov.uk/nisi/2007/1351/contents>

<sup>4</sup> Care Quality Commission

- Those who are identified as being at risk of abuse are afforded every practicable protection by Reed in Partnership and our supply chain partners.
- Those we discover are being abused are afforded the relevant protection and assistance by the relevant bodies as soon as practicably possible.
- At an individual and collective level, all people working for or on behalf of Reed in Partnership are involved in ensuring Safeguarding is embedded across our services through a 'whole organisation' approach to ensure individuals are adequately covered by this policy. This includes Board Level directors who will set the organisational culture and receive annual reports on our safeguarding responsibilities.
- The physical environments where programmes take place are safe and secure, so as to protect Members from harm, or risk of harm

### **28.3.3 Implementation of the Policy**

All managers and staff providing services for or on behalf of Reed in Partnership must positively support this safeguarding policy and be responsible for their individual and collective responsibilities under the safeguarding procedures before commencing work for or on behalf of the company. Where possible, training will be provided prior to commencement of work and this training will be refreshed every 2 years or as and when required. If it is not possible to receive this training before commencing work, staff must have:

- read an electronic version of the policy on-line and signed that this has been read;
- completed the safeguarding training within the first month of commencing work.

There will be 2 levels of internal training as set out below – basic training for practitioners and Level 3 safeguarding training for Designated Persons and appropriate managers.

This Policy will be regularly reviewed by the Directors of Reed in Partnership, taking relevant expert advice where necessary. Day to day responsibility for identification and elimination of risks and the implementation of the policy is the responsibility of 'Designated Persons' (see Section 28.3.7 for their responsibilities), the business' Safeguarding Lead and ultimately the director with operational management responsibility at Board level within Reed in Partnership. Specific responsibility for obtaining appropriate disclosures regarding criminal convictions for staff and conducting any necessary activities arising from disclosures that raise concerns, rests with the Head of HR for Reed in Partnership.

### **28.3.4 Co-Member Conduct with Participants**

All Co-Members must, at all times, demonstrate the highest standards when working with programme participants in order to avoid allegations that could harm the Co-Member or the standing of Reed in Partnership in the community. This is particularly important for those Co-Member's in operational roles, working directly with programme participants who are adults at risk. All participants have a right of protection from abuse regardless of background, circumstances or other characteristics and no participant shall be treated less favourably than any other

Co-Members therefore must not:

- Unlawfully discriminate, harass or victimise programme members.<sup>5</sup>
- Exploit their privileged position with programme members in order to obtain financial advantage at the expense of the programme participant nor accept gifts from participants (see section 9.1.2.1).
- Enter into a relationship, sexual or otherwise with a programme Member.
- In any way threaten the programme Member.
- Commit any form of crime with reference to the programme Member, or encourage the programme Member to commit a crime as a result of the privileged position of trust placed in the Co-Member.
- Knowingly place the programme Member in a potentially unsafe physical environment.
- Bully or harass the programme Member.

Proven failure to abide by the above standard of conduct or any part of the Safeguarding Policy may be regarded as 'Gross Misconduct' and may result in disciplinary proceedings as detailed in the Co-Members Handbook.

The programme participant complaints procedure (as detailed on Reed in Partnership's website) clearly identifies safeguarding and abuse as grounds for complaint. Programme participants alleging either verbally, or in writing, that a Co-Member has conducted themselves in a manner which breaches the above list of prohibitions or any aspect of this Safeguarding Policy, must be referred immediately to the Designated Person. He/she will liaise with Reed in Partnership's HR Department regarding any appropriate measures. In the event that the concern is about the Designated Person, the matter should be referred to the Head of HR.

Co-Members who have concerns that another Co-Member's conduct is in breach of this policy should use the Reed in Partnership Whistleblowing Policy and procedures detailed in the Co-Member Handbook in order to raise this with the appropriate levels of management. Any concerns raised regarding an employee's conduct posing a risk to participants should be raised with line management. This may require referral to the local authority or, in extreme circumstances, to the police.

### **28.3.5 Responsibilities of all Co-Members to Identify and Report Safeguarding Issues**

All Co-Members— of whatever status - are directly responsible for ensuring that programme Participants are safe from abuse, damage or harm or the risk of this occurring. Safeguarding is everyone's business and we recognise that abuse may continue if it is not identified or addressed. All people working with Members – whether engaged directly by Reed in Partnership or its agents, must, therefore:

- Report any concerns to their line manager, or in their absence the 'Designated Person' for the contract where the service is provided, if abuse against participants may have taken place in the workplace or may be taking place outside the workplace or is likely to take place in either location. (See below for a definition of the 'Designated Person'.)
- Be vigilant for any signs of significant harm and avoidable danger potentially coming to programme participants from any source. (Please note that this is not about eliminating all risk from their lives, as learning how to deal with and avoid risks is part of learning to cope with the world.)
- Participants who have an additional need which covers Special Educational Need and Disability (SEND) could be more susceptible to abuse or harm due to their level of understanding or awareness to what

---

<sup>5</sup> Within the Equality Act 2010 certain groups are defined as having 'protected characteristics' about which discrimination is against the law due to their, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.

may be taking place, and their possible inability to express or disclose. Co-Members will need to be more vigilant to potential signs of harm

- Watch out for evidence of the following being presented by the programme participant:
  - Any unlawful victimisation due to 'protected characteristics' (see note 5 above).
  - Exploitation including financial abuse, sexual exploitation, forced marriage, radicalisation and Modern Slavery
  - Being the victim of crime, the fear or tangible threat of crime.
  - Being prone to accidents, where this leads to suspicion that these may not genuinely be accidents.
  - Being in a potentially unsafe physical environment, rough sleeping or in the case of young person, being missing from care or home.
  - Being subject to physical abuse, including domestic violence.
  - Bullying.
  - Self-harm.
  - Self-neglect.
  - Neglect, by person (s) formally responsible for the care of the individual.
  - Referencing Female Genital Mutilation (FGM) - Under the Serious Crimes Act 2015, FGM is a now a criminal offence in the UK for anyone involved in carrying this out on a child under the age of 18 years. FGM is a form of abuse and needs to be reported as a safeguarding concern if disclosed.
  - Poor or irregular attendance, or persistent lateness
  - Regularly arriving and then going 'missing' from the programme, or leaving without permission / agreement to do so
  - Poor or irregular attendance, or persistent lateness
  - Regularly arriving and then going 'missing' from the programme, or leaving without permission / agreement to do so
  - Domestic abuse where control and coercion are prevalent, and can take the form of physical, psychological/emotional, financial or sexual abuse. The Serious Crime Act 2015 now makes it a criminal offence for controlling or coercive behaviour to be committed within an intimate or family relationship

In the event of a programme participant presenting evidence of the above, either verbally or in writing, or it being observed by a Co-Member, the Co-Member must do the following:

- Tell the programme participant that you will need to discuss this with your immediate line manager.
- Tell the programme participant that we may not be able to guarantee that anything they disclose to us that may be covered by our Safeguarding Policy will be treated as confidential as we have an overriding Duty of Care to ensure their wellbeing is safeguarded and to report any areas of concern we identify to the appropriate authorities.
- Ask whether they need a private room to discuss this further, ask them to detail the facts to you and take verbatim notes of exactly what was said to you. Do not ask leading questions, though please do encourage them to detail the facts.
- Do not display emotional reactions, whatever is being said - just get them to tell you the facts.
- If the disclosure highlights an immediate concern then type up your verbatim notes on the **Safeguarding Alert Form** that is in Appendix I to this policy. Print, sign and date and arrange to see, or speak to, your line manager as soon as is practically possible to discuss – but by the end of the day. If your immediate line manager is not available, you must contact the Designated Person, or Safeguarding Lead if he/she is also not available. In exceptional circumstances – where the adult at risk

may be in immediate danger – you may need to report this to the police, and Adult Social Care, but every attempt must be made to contact your line manager, the Designated Person or HR before doing so. Do not discuss what the programme participant has told you with anyone other than your line manager. Do not file this statement in the normal programme participant file.

- If the disclosure doesn't present an immediate safeguarding concern, then the disclosure still needs to be reported to your line manager, who will complete a **Safeguarding Concerns logiform**
- Do not file this statement in the normal programme participant file as this will be retained by the Designated Person.
- Contact your line manager immediately following the interview and, in his/her absence contact the Designated Person.
- Do not discuss what the programme participant
- has told you with anyone other than your line management or unless someone else has a 'need to know' e.g. a co-worker who may have witnessed an incident.
- Where your line manager is not the 'Designated Person', he/she will discuss the situation with the appropriate 'Designated Person' for your programme who will take a copy of your signed and dated notes which will be held in a separate filing system maintained by the Designated Person.
- Where your line manager is not the 'Designated Person', he/she will discuss the situation with the appropriate 'Designated Person' for your programme who will take a copy of your signed and dated notes which will be held in a separate filing system maintained by the Designated Person.
- The Designated Person will be responsible for ensuring that any further appropriate action either on the part of Reed in Partnership or in consultation with other bodies or organisations is carried out.

Programme participant may raise harrowing or emotionally difficult matters with Co-Members and while Co-Members may not discuss these with colleagues, they should feel able to rely upon the support of their line manager in working through any difficult issues that are raised. It should also be noted that all Co-Members have access to Reed's Co-Member assistance programme, a free, confidential, 24-hour telephone based advice line (0800 316 9337).

Staff of supply chain/local partners will follow either a broadly comparable and authorised Safeguarding Policy and Procedure or follow Reed in Partnership's policy and procedure, recognising that some of the internal arrangements and named staff may vary.

### 28.3.6 Compliance with The Government's 'Prevent Duty'<sup>6</sup>

PREVENT is part of the Government's counter-terrorism strategy *Contest*, which is led by the Home Office. PREVENT is about recognising when vulnerable individuals are being exploited for terrorist related activities and reporting concerns to the relevant authorities via Channel panels which are in place to help identify and assess the extent to which individuals are at risk of being drawn into terrorism, and the support needed to be provided to those individuals. This forms part of a duty Reed in Partnership has when acting on behalf of a public sector organisation that contributes to the prevention of terrorism by safeguarding and protecting vulnerable individuals.

---

<sup>6</sup> See [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/215253/dh\\_131912.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/215253/dh_131912.pdf) for further details and guidance. Applies only to England, Wales & Scotland

Our staff may meet and treat people who are vulnerable to radicalisation. Where there are signs that someone has been or is being drawn into terrorism, it is imperative that this is reported to the 'Designated Person' as soon as is possible. Preventing someone from becoming a terrorist or from supporting terrorism is no different from safeguarding vulnerable individuals from other forms of exploitation although the 'Designated Person' may report this directly and immediately to the police rather than the local authority **but not** before liaising with the Head of HR - other than in extenuating circumstances.

Section 28 of the Co-Member Handbook has the detailed Preventing Extremism and Radicalisation Policy.

### 28.3.7 Designated Persons

Every programme will have a clearly nominated the Designated Person responsible for safeguarding. This person is likely to be Operations Manager but in larger projects it may be a more senior person. For supply chain partners, a 'Designated Person' must to be identified to take on these responsibilities before commencement of the contract.

- The designated person will take responsibility for promoting positive safeguarding procedures and the implementation of good practice within his/her area of responsibility.
- They will receive information from, and ensure appropriate advice is given to, all Co-Members, temporary, agency staff and volunteers.
- Record information on the safeguarding alert template or reporting concerns logiform; assess this information promptly and take appropriate action.
- They will ensure Co-Members are familiar with procedures for referrals, and where and when to make appropriate use of these.
- Be aware of and have the contact details of the local Adult's Safeguarding Team and all other relevant agencies, and make sure all Co-Members know where this information is held and ensure that it will be readily available when the Designated Person is absent.
- Support other organisations and agencies in an Early Help assessment. These should be kept under constant review and a referral made to Adult Social Care if the adult at risk's situation doesn't improve
- Ensure that the local Adult's Safeguarding Team keep the Designated Person informed of safeguarding matters as appropriate including the opportunities for training provided by the Local Safeguarding Board in their area.
- Ensure the safeguarding leads for delivery partners are known and their details are readily available to all relevant Co-Members within Reed in Partnership.
- Make sure all Co-Members within their geographical area of responsibility are aware of their role and how to contact them or their deputy in their absence.
- They will assess the safeguarding development needs of all Co-Members and ensure that steps are taken to spread good practice, and that all Co-Members are fully familiar with this policy and procedures and any updates to this policy are clearly communicated to all - including third party providers.
- They will monitor the number of safeguarding concerns; keep confidential records of the incidents and feed back to their programmes or business units and their Operations Director on the quality of their safeguarding work.
- Ensure that the Reed in Partnership Disciplinary Procedure – are followed in the event of a safeguarding alert concerning a Co-Member.
- Have additional Level 3 safeguarding training that will be refreshed every 2 years

### 28.3.8 Information Sharing and Confidentiality

Investigating, assessing and responding to risk in adults at risk are multi-disciplinary, joint agency activities. They depend on the selective sharing of information, which is normally confidential. Information sharing should still comply with the common law duty of confidentiality, the Data Protection Act and Human Rights Act.

Sharing information is an intrinsic part of any practitioners' job when working with children and adults at risk. The decisions about how much information to share, with whom and when, can have a profound impact on individuals' lives. It could ensure that an individual receives the right services at the right time and prevent a need from becoming more acute and difficult to meet. At the other end of the spectrum, it could be the difference between life and death. Poor or non-existent information sharing is a factor repeatedly flagged up as an issue in Serious Case Reviews carried out following the death of, or serious injury to, a child or adult at risk. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and adults at risk, who are at risk of abuse or neglect.

Conversely, there is common law duty to keep information confidential either when the person supplying it says the information is confidential, or where it is clear from the circumstances that it should be treated as confidential. A professional who reasonably believes that people will be put at risk of danger if confidential information is not disclosed "is entitled to take such steps as are reasonable in all the circumstances to communicate the grounds of (their) concern to the responsible authorities".<sup>7</sup>

The Government has provided guidance<sup>8</sup> through "Seven Golden Rules" on when it is important to share information with other agencies, despite it being confidential. These are attached as Appendix F. Any decision on sharing information with other agencies can only be made by a Designated Person, Safeguarding Lead or the Head of HR within Reed in Partnership.

It will be the responsibility of the Designated Person to retain information collected about a safeguarding issue. The safeguarding information template will be completed for every case and retained by the Designated Person for a period of seven (7) years unless other circumstances prevail. This information must be password protected if held electronically or kept securely in a locked system if held manually.

Information must be made available in the case of any police investigation, a court request or at the request of the Local Safeguarding Adult Board in the event of a Case review. Otherwise, access is only available to the Designated Officer or HR on a need-to-know basis.

### 28.3.9 Recruitment and Development of Managers, Staff and Supply Chain Partners

All individuals whether joining Reed in Partnership as permanent Co-Members, moving between roles either on a permanent, temporary or seconded basis, engaged through agencies as temporary workers, or working with us as volunteers or contractors will be subject to the following processes whether they are working in regulated positions<sup>9</sup> or not.

---

<sup>7</sup> This is a legal precedent set in a court case in 1990 *W v Egdell and Others*.

<sup>8</sup> Information Sharing - Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. HM Government. March 2015

<sup>9</sup> A 'Regulated Position' is one defined by the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by [Part 5 of the Protection of Freedoms Act 2012](#)) and also Safeguarding Vulnerable Groups (NI) Order 2007 <https://www.legislation.gov.uk/nisi/2007/1351/contents>

All offers of employment are conditional upon obtaining a satisfactory disclosure from Disclosure and Barring Service. This applies to all Co-Members engaged by third party providers acting on behalf of Reed in Partnership.

“Enhanced Checks” will be required where services:

- are deemed to fall within the definition of a ‘Regulated Activity’.
- involve providing services to anyone under 18.
- are required under the terms of the contract, or
- are specifically requested by the commissioner.

All ‘Disclosures’ are, upon receipt, reviewed by a Panel independent of operational management to determine whether or not they are satisfactory and any necessary further risk assessments completed before the offer of employment becomes unconditional.

Where an individual is dismissed from work because the person poses a risk of harm to children or adults at risk or he/she has resigned before disciplinary action could be taken, we will refer this person to the Disclosure and Barring Service as quickly as is reasonably possible. Our supply chain partners will make a similar referral if this person is employed by a third party provider.

#### **28.3.10 Training**

We will ensure that all individuals – whether employed full or part-time, volunteering, working through an agency, self-employed or engaged by a supply chain partner - receive basic mandatory induction training with respect to awareness of safeguarding and the types of abuse that could occur with respect to adults at risk. This will take place before the contract commences or within one month of the contract start.

This safeguarding policy - and the procedures - are part of the compulsory, centralised induction programme for all operational staff irrespective of their role. (Equivalent to level one or basic safeguarding training provided by local authorities.) Unsupervised access to programme participants and their records is only permitted once this training has occurred. The Safeguarding Policy is accessible to all staff as part of the Co-Member Handbook and is regularly referred to and knowledge refreshed through regular team refresher briefings carried out by local line management.

All Designated Persons will have Level 3 Safeguarding training which will be refreshed every 2 years and delivered in line with standards and expectations of the local authority safeguarding board

#### **28.3.11 Review of Safeguarding Policies and Procedures**

The Safeguarding Lead will verify all aspects of this policy in line to changes to key legislation and guidance. Processes will be reviewed annually and be amended and updated as and when necessary. The Safeguarding Lead will produce regular reports safeguarding, and the Operations Director will take responsibility for presenting this to the Board of Reed in Partnership.

## 28.4 SAFEGUARDING PROCEDURE

### 28.4.1 Referral and Accountability Procedure if there is Concern about Safeguarding

The following procedure is to be followed if any member of staff or agent working on behalf of Reed in Partnership has any concern that abuse or neglect has or is occurring irrespective of where this abuse and/or neglect may be taking place. This could mean taking action if, for example, an adult at risk reveals, in a workshop, that they are being bullied by other family members or if there concerns about self-neglect or if there is a concern about the actions of another member of staff or a practitioner abusing another practitioner.

Staff of supply chain partners will follow either a broadly comparable and authorised Safeguarding Policy & Procedure or follow Reed in Partnership's policy and procedure, although some of the internal arrangements and named staff may vary.

For staff directly accountable to Reed in Partnership, if a practitioner has a concern about safeguarding he/she should take notes of the concern and how it has manifest itself. He/she should then report it to the line manager who should investigate and if the concern still exists, it should be reported immediately to the Designated Officer. Where the manager is the Designated Officer, the issue should be reported directly to the relevant local authority department – Children or Adults.

If the issue involves a member of staff or volunteer directly accountability to Reed in Partnership, the matter should be referred to the Head of HR or an HR member of staff to decide what appropriate action is required to comply with personnel policies. If the incident is serious, consideration should be made about referral to the local police but only after the involvement of the Head of HR or his staff if it deemed serious and could constitute gross misconduct or be a criminal offence.

### 28.4..2 Safeguarding Reporting Procedures

#### In terms of safeguarding, what is a disclosure?

It is when you are told something that indicates that the person is currently, or has previously been subject to a form of abuse. If a participant discloses to you something that is of a safeguarding concern, all Co-Members have a duty of care to ensure that they **immediately report the concern to their line manager**, and then follow one of two pathways:-

- (a) If the disclosure relates to a serious, or potentially serious incident, ie, threatening suicide or risk of immediate physical harm to themselves or others then a **'Safeguarding Alert Notification Form'** will need to be completed.
- (b) If the disclosure relates to a safeguarding concern which is not an immediate concern, nor requires immediate intervention, ie, low mood / withdrawn, untidy or unkempt, this too needs to be discussed with your line manager, however details of this will need to be recorded by the line manager on the **'Recording Safeguarding Issues'** logiform.

Both of these forms can be found in the following locations:-

**My HR & Rewards**  
**Safeguarding – RinP**  
**Appendix I – Safeguarding Alert Notification Form or**  
**Recording Safeguarding Issues**

Anything disclosed to you will need to be recorded verbatim, or in the words of the person telling you, so that it is a true and accurate account of what they have said. The participant must be told that you have a **duty of care** to report all safeguarding concerns that are reported to you in line with the business' safeguarding policy and procedures, and **you should never promise confidentiality**. You must always try to obtain consent from the participant to share the information that has been disclosed.

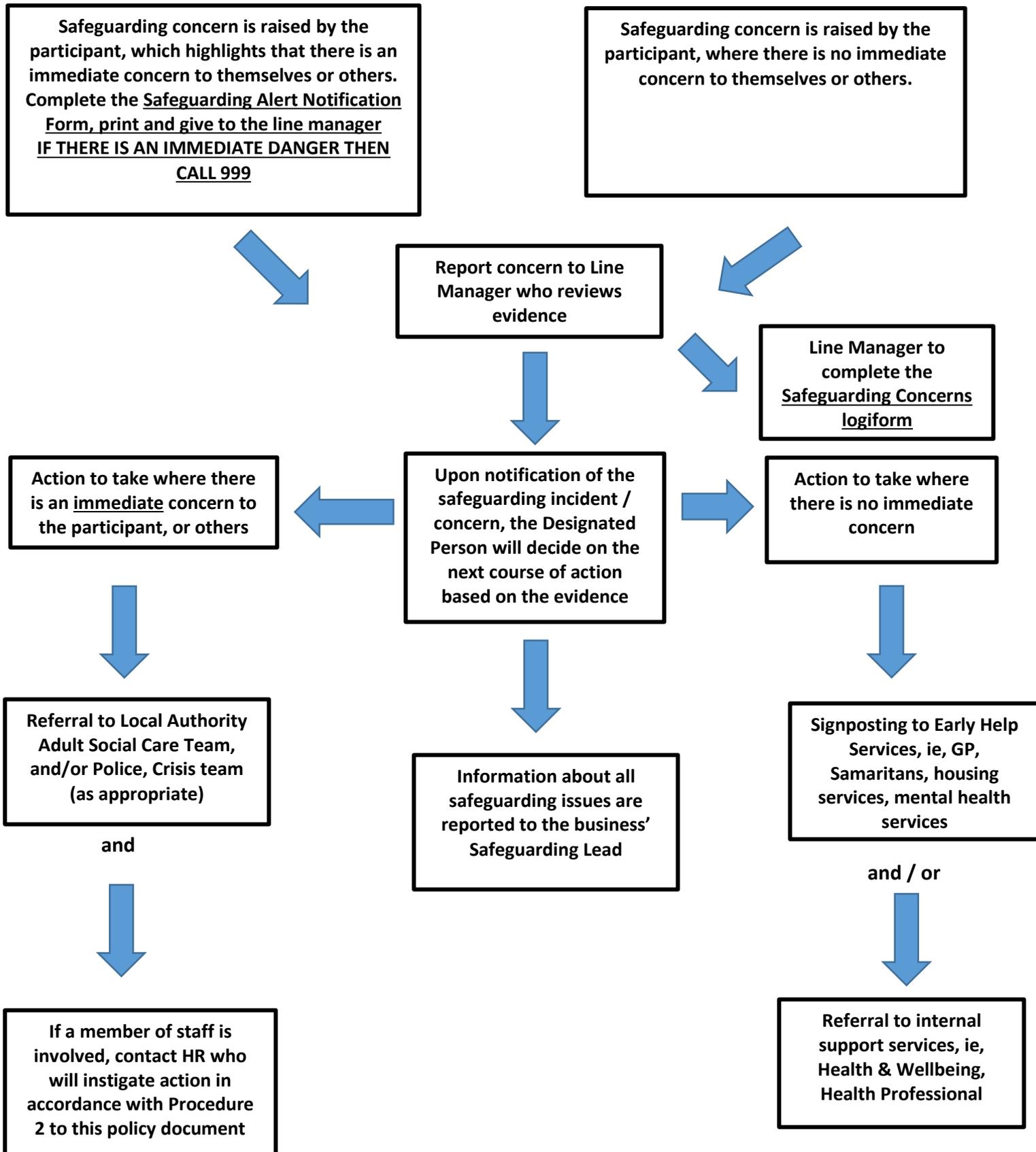
If the participant is under 18 years of age then consent should be obtained from their parent / carer, unless doing so would put the child or young person at more risk, ie, the allegation is about the parent/carer. In these situations advice needs to be sought immediately from children's social care.

Details about any safeguarding concerns or incidents **should not** be recorded on Orion or Sunesis, as it is sensitive and confidential information that should only be divulged on a need to know basis, and the decision to share any information related to it will be made by the Designated Person.

Completed copies of the Safeguarding Alert Notification Form **should not** be saved on your desktop or shared with other Co-Members.

If you are unclear about any of these processes, please speak to your line manager, your Designated Person or the business' Safeguarding Lead.

**28.4.3 Action to follow if a Safeguarding concern or incident is Raised**



### 28.4.2 Governance Arrangements and Responsibilities

Level in Organisation	Responsibility
<b>Practitioner</b>	Practitioners are accountable for ensuring they: <ul style="list-style-type: none"> <li>• Have read the Safeguarding Policy and Procedure</li> <li>• Been appropriately trained in the Policy</li> <li>• Are alert to the possibility of abuse and neglect</li> <li>• Are familiar with local procedures and ready to refer as appropriate</li> </ul>
<b>Manager<sup>10</sup></b>	<ul style="list-style-type: none"> <li>• Ensuring good practice in safeguarding in all their staff and fully aware of the policy and procedures</li> <li>• Respond to alerts appropriately and in line with the procedures</li> </ul>
<b>Designated Person</b>	<ul style="list-style-type: none"> <li>• Specialist in safeguarding</li> <li>• Fully aware of policy and procedures</li> <li>• Completed 'advanced' training</li> <li>• Aware of the local authorities role in adults safeguarding</li> <li>• Keep accurate records on all concerns raised</li> <li>• Fully comply with their responsibilities</li> </ul>
<b>Head of HR</b>	<ul style="list-style-type: none"> <li>• Fully aware of policy and procedures</li> <li>• Cognisant of the relationship between safeguarding issues and personnel procedures</li> <li>• Responsible for implementing Safer Recruitment Practices</li> <li>• Responsible for ensuring the regular review of the policy</li> <li>• Author of the annual Board report on Safeguarding</li> <li>• Conduit to CEO and Board Directors</li> </ul>
<b>Operations Director</b>	The Operations Director will: <ul style="list-style-type: none"> <li>• Present the annual report on safeguarding to the Board</li> <li>• Ensure that any feedback and operational changes are implemented</li> </ul>
<b>Chief Executive, Directors and Board</b>	<ul style="list-style-type: none"> <li>• Overall responsibility and accountability for setting and implementing the safeguarding policy and procedures</li> <li>• Ensuring safeguarding is key to governance</li> <li>• Respond to the annual safeguarding report</li> </ul>

<sup>10</sup> The manager could also be the 'Designated Person'