

Safeguarding Policy and Procedures

1. Introduction

The Business Portfolio (UK) Ltd makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.

The Business Portfolio (UK) Ltd comes into contact with children and / or vulnerable adults through its training consultancy services.

The types of contact with children and / or vulnerable adults will be through training and development courses designed to support the development of behavioural characteristics that enhance an individuals' personal and professional capability, well-being and skills for life.

This policy seeks to ensure that The Business Portfolio (UK) Ltd undertakes its responsibilities with regard to protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation's expectations.

2. Legislation

The principal pieces of legislation governing this policy are:

- Working together to safeguard Children 2010
- The Children Act 1989
- The Adoption and Children Act 2002:
- The Children act 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Standards Act 2000
- Public Interest Disclosure Act 1998
- The Police Act – CRB 1997
- Mental Health Act 1983
- NHS and Community Care Act 1990
- Rehabilitation of Offenders Act 1974

3. Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

It can take a number of forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying
- Neglect

- Financial (or material) abuse

Definition of a child: A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

Definition of Vulnerable Adults: A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

4. Responsibilities

All staff (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.

We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

The Designated Senior Manager/Lead Officer for TBP and NNL are:

TBP Lead - Kerry Bannon 07711 778848

TBP Deputy - Lead David Otter 07900971263

NNL Lead – Lynn Appleton 07809 332265

NNL Deputy Lead – Liane White 07710 303785

Other Key Contacts/Sources of Information

General

NNL extend support to all employees through their partnership with Lifeworks.

Employees can access can visit the NNL LifeWorks website at

<http://www.login.lifeworks.com/> to find help and resources about almost any issue from health and well-being to financial matters and can call and speak with a caring, professional consultant on 0800 169 1920 at any time.

Merseyside (NNL Warrington)

Merseyside Adult Safeguarding Board

<https://www.merseysidesafeguardingadultsboard.co.uk/>

If in doubt call the Police on 0151 709 6010 or dial 999 in an emergency, contact Merseyside Police's Protecting Vulnerable People (PVP) unit for advice or by calling Careline on 0151 233 3800

Lancaster (NNL Preston)

Lancaster Safeguarding Adults Board

<http://www.lancashiresafeguarding.org.uk/lancashire-safeguarding-adults.aspx>

Lancashire Adult Social Care Services

Telephone 0300 123 6721

Lancashire Police

Telephone 0845 1 25 35 45

Cumbria (NNL Sellafield, Whitehaven and Workington)

Safeguarding Adults at Risk – a Cumbria Partnership

<http://www.cumbriasab.org.uk/>

Cumbria Social Services

Telephone 01228 526690

Cumbria Police

Telephone 999

City of London (NNL BEIS secondees)

City of London Adult Social Care Team

www.cityoflondon.gov.uk/services/adult-social-care/Pages/safeguarding-adults.aspx

Adults Social Care Team

Telephone 020 7332 1224 - 9am - 5pm, Monday to Friday.

Telephone 0208 356 2300 - for all other times

London Police

Telephone 999

5. Implementation Stages

The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation.

These include:

- Whistleblowing –ability to inform on other staff/ practices within the organisation
- Grievance and disciplinary procedures – to address breaches of procedures/ policies
- Health and Safety policy, including lone working procedures, mitigating risk to staff and clients
- Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory
- Data protection (how records are stored and access to those records)
- Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose
- Staff induction
- Staff training

Safe recruitment

The Business Portfolio (UK) Ltd ensures safe recruitment through the following processes:

- Job or role descriptions for all roles involving contact with children and/or vulnerable adults will contain reference to safeguarding responsibilities.
- There are person specifications for roles which contain a statement on core competency with regard to child/ vulnerable adult protection/ safeguarding
- Shortlisting is based on formal application processes/forms and not on provision of CVs
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts.

- No formal job offers are made until after checks for suitability are completed (including DBS and 2 references).

Criminal Bureau Records Gap Management

The organisation commits resources to providing Criminal Bureau Records check on staff (paid or unpaid) whose roles involve contact with children and /or vulnerable adults.

In order to avoid CRB gaps, The Business Portfolio (UK) Ltd will 'maintain and review a list of roles across the organisation which involve contact with children/ vulnerable adults'.

Service delivery contracting and sub contracting

- 'There will be systematic checking of safeguarding arrangements of partner organisations
- Safeguarding will be a fixed agenda item on any partnership reporting meetings.

Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non- compliance procedures'.

6. Training and support for staff

The Business Portfolio (UK) Ltd commits resources for induction, training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding

Induction will include:

- Discussion of the Safeguarding Policy (and confirmation of understanding)
- Discussion of other relevant policies
- Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence)
- Initial training on safeguarding including: safe working practices, safe recruitment, understanding child protection and the alerter guide for adult Safeguarding
- All staff who, through their role, are in contact with children and /or vulnerable adults will have access to safeguarding training at an appropriate level.

Support

We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:

- Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with.
- Seeking further support as appropriate e.g. access to counselling.
- Staff who have initiated protection concerns will be contacted by line manager/DSM within 1 week.

7. Professional boundaries

Professional boundaries are what define the limits of a relationship between a member of our staff and a client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.

The Business Portfolio (UK) Ltd expects staff to protect the professional integrity of themselves and the organisation.

The following professional boundaries must be adhered to: (insert rules)

- Giving and receiving gifts from clients: The Business Portfolio (UK) Ltd does not allow paid or unpaid staff to give gifts to or receive gifts from clients. However, gifts may be provided by the organisation as part of a planned activity’.
- Staff contact with user groups. Personal relationships between a member of staff (paid or unpaid) and a client who is a current service user is prohibited.

Consideration is also given to the following areas:

- Use of abusive language
- Response to inappropriate behaviour / language
- Use of punishment or chastisement
- Passing on service users’ personal contact details
- Degree of accessibility to service users (e.g. not providing personal contact details)
- Taking family members to a client’s home
- Selling to or buying items from a service user
- Accepting responsibility for any valuables on behalf of a client
- Accepting money as a gift/ Borrowing money from or lending money to service users
- Personal relationships with a third party related to or known to service users
- Accepting gifts/ rewards or hospitality from organisation as an inducement for either doing/ not doing something in their official capacity
- Actively pursuing or engaging in areas of work that could potentially provide a Conflict of Interest

8. Reporting

The process outlined below details the stages involved in raising and reporting safeguarding concerns at The Business Portfolio (UK) Ltd

Communicate concerns with the immediate manager



Seek medical attention for the vulnerable person if needed



Discuss with parents of child or with vulnerable person.
Obtain permission to make referral if safe and appropriate



if needed seek advice from the Children and Families helpdesk or Adults helpdesk



Complete the Local Authority Safeguarding Vulnerable Groups Incident Report Form if required and submit to the local authority within 24 hours of making a contact



Ensure that feedback from the Local Authority is received and their response recorded

9. Allegations Management

The Business Portfolio (UK) Ltd recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

1. Any member of staff (paid or unpaid) from The Business Portfolio (UK) Ltd is required to report any concerns in the first instance to their line manager/ safeguarding manager/ peer.
2. A representative of The Business Portfolio (UK) Ltd will contact the relevant local authority for advice.
3. The Business Portfolio (UK) Ltd follow the advice provided and record actions taken.

The Business Portfolio (UK) Ltd recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the ISA referral guidance document

10. Monitoring

The organisation will monitor the following Safeguarding aspects:

- Safe recruitment practices
- DBS checks undertaken
- References applied for new staff
- Records made and kept of supervision sessions
- Training – register/ record of staff training on child/ vulnerable adult protection
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant
- Reviewing the current reporting procedure in place

- Presence and action of Designated senior manager responsible for Safeguarding is in post

11. Managing information

Information will be gathered, recorded and stored in accordance with the following policies Data Protection Policy and the Confidentiality Policy.

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Senior Manager.

All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

12. Conflict resolution and complaints

The Business Portfolio (UK) Ltd is aware of the GSCB policy on resolution of professional disagreements in work relating to the safety of children / Escalation Policy (at www.gscb.org.uk) and if necessary this will be taken forward by Kerry Bannon the Designated Senior Manager.

Conflicts in respect of safety of vulnerable adults will be taken forward by Kerry Bannon the Designated Senior Manager.

13. Communicating and reviewing the policy

The Business Portfolio (UK) Ltd will make clients aware of the Safeguarding Policy through the following means a statement to customers about safeguarding arrangements.

This policy will be reviewed by Kerry Bannon the Designated Senior Manager, every 12 months and/or when there are changes in legislation.

14. Confirmation of reading

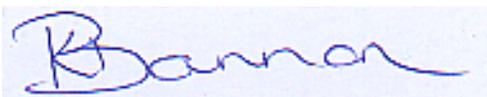
I confirm that I have been made fully aware of, and understand the contents of, the Safeguarding Policy and Procedures for The Business Portfolio (UK) Ltd

Please complete the details below and return this completed form to Kerry Bannon.

Employee Name:

Employee Signature:

Date:



Signed:
Director

Date: 28.05.19