



Adult Training Network

Unit 3, Triangle Centre

399, Uxbridge Rd

Southall UB1 3EJ

02085749588

Safeguarding Policy and Procedures

Approved by: Sarjeet Singh Gill

Date: 01/04/2019

Last reviewed on: 01/04/2019

Next review due by: 01/04/2020

Contents

1. Principles	3
2. Legislation and Statutory Guidance	5
3. Definitions	6
4. Signs and Indicators of Abuse	8
5. Roles and Responsibilities	9
6. Training and Induction	11
7. Procedures for Managing Pathways to Help and Support	12
8. Records and Information Sharing	14
9. Safer Recruitment	15
10. Managing Allegations Against Staff and Volunteers	16
11. Links with Other Policies	18
12. Local Authority Details	19

1. PRINCIPLES

1.1 The guidance given in this policy and procedure is based on the six principles of adult safeguarding as outlined by the [The Care Act 2014](#).

Empowerment - People being supported and encouraged to make their own decisions and informed consent.

“I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”

Prevention – It is better to take action before harm occurs.

“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”

Proportionality – The least intrusive response appropriate to the risk presented.

“I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed.”

Protection – Support and representation for those in greatest need.

“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”

Partnership – Local solutions through services working with their communities.

Communities have a part to play in preventing, detecting and reporting neglect and abuse “I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”

Accountability – Accountability and transparency in delivering safeguarding.

“I understand the role of everyone involved in my life and so do they.”

1.2 All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.

1.3 Adult Training Network will seek to ensure that we are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.

1.4 The rights, dignity and worth of all adults will always be respected.

1.5 We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.

1.6 We recognise that a disabled adult may or may not identify themselves or be identified as an adult ‘at risk’.

1.7 We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within Adult Training Network or elsewhere.

1.8 All allegations will be taken seriously and responded to quickly in line with Ealing Safeguarding Adults Board policies and procedures.

1.9 Adult Training Network recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Board.

1.10 Adult Training Network recognises the role and responsibilities that relate to the protection of children. We understand that the same safeguarding issues that arise for adults can have an impact on children and we fulfil our responsibilities in line with [Working Together to Safeguard Children 2018](#) as well as [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.

2. LEGISLATION AND STATUTORY GUIDANCE

2.1 The practices and procedures within this policy are based on the principles contained within legislation and Government Guidance and have been developed to complement the Ealing Safeguarding Children and Adults Board's policies and procedures, and take the following into consideration:

- [The Care Act 2014](#), which provides a framework for the care and protection of adults
- [The Protection of Freedoms Act 2012](#)
- [Domestic Violence, Crime and Victims \(Amendment \) Act 2012](#)
- [The Equality Act 2010](#)
- [Mental Capacity Act 2005](#)
- [Sexual Offences Act 2003](#)
- [The Human Rights Act 1998](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#),
- [The Data Protection Act 1998](#)
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- [The Health and Social Care Act 2008](#) (where applicable)
- ['No Secrets' guidance on protecting vulnerable adults in care](#) (where applicable)
- [Working Together to Safeguard Children 2018](#)

3. DEFINITIONS

3.1 To assist working through and understanding this policy a number of key definitions need to be explained:

3.2 **Adult at Risk** is a person aged 18 or over who is in need of care and support regardless of whether they are receiving them and because of those needs, are unable to protect themselves against abuse or neglect.

3.3 **Abuse** is a violation of an individual's human and civil rights by another person or persons. See below for further information.

3.4 **Adult** is anyone aged 18 or over.

3.5 **Adult safeguarding** is protecting a person's right to live in safety, free from abuse and neglect.

3.6 **Capacity** refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

Types of Abuse and Neglect

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern.

3.7 **Self-neglect** – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

3.8 **Modern Slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce deceive and force individuals into a life of abuse, servitude and inhumane treatment.

3.9 **Domestic Abuse** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence.

3.10 **Discriminatory** – discrimination is abuse, which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

3.11 **Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill- treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

3.12 **Physical Abuse** – includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

3.13 Sexual Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

3.14 Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

3.15 Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

3.16 Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

3.17 Cyber Bullying - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

3.18 Forced Marriage - forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

3.19 Mate Crime - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Safeguarding Adult Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

3.20 Radicalisation - the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

4. SIGNS AND INDICATORS OF ABUSE

Please remember that different people will have different thresholds of what they think is “ok”. Some people may need to be encouraged to recognise and report abuse. Tolerating and living with abuse is never “ok”.

Abuse can take place in any context and by all manner of perpetrator. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- 4.1 Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- 4.2 Person has belongings or money going missing.
- 4.3 Person is not attending / no longer enjoying activities.
- 4.4 Someone losing or gaining weight / an unkempt appearance.
- 4.5 A change in the behaviour or confidence of a person.
- 4.6 They may self-harm.
- 4.7 They may have a fear of a particular group or individual.
- 4.8 They may tell you / another person they are being abused – i.e. a disclosure

5. ROLES AND RESPONSIBILITIES

Roles	Name	Contact Details
Designated Safeguarding Lead	Sarjeet Singh Gill	07956484114
Senior Lead for Safeguarding	Kamaljit Kaur	02085749588
Tutor and Deputy Safeguarding Lead for North Hertfordshire	Kansaa Muhsen	07940505967
Deputy Safeguarding Lead for ATN Hayes	Fatima Somji	02085613131
Deputy Safeguarding Lead for ATN Southall	Shifalli Panesor	02085749588

5.1 It is the responsibility of every member of staff, volunteer and regular visitor to our practice to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of adults. This includes the responsibility to provide a safe environment.

The Senior Safeguarding Lead

5.2 The Senior Safeguarding Lead at Adult Training Network is accountable for ensuring the effectiveness of this policy and our compliance with it.

5.3 The Senior Safeguarding Lead will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available to the public and has been written in line with statutory guidance and the requirements of Ealing Safeguarding Children and Adults Board's procedures.
- A senior member of staff is designated to take the lead responsibility for safeguarding.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate child protection training for their role.
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.
- Safer recruitment practices are followed to prevent individuals who may pose a risk from working within the organisation.
- Any weakness with regard to safeguarding arrangements that are brought to their attention will be remedied without delay.
- Policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaison will take place with the Designated Officer for the Local Authority or the Adult Safeguarding Lead in the event of an allegation of abuse being made against a member of staff or volunteer.

The Designated Safeguarding Lead (DSL)

5.4 The Designated Safeguarding Lead is a member of staff who takes lead responsibility for adult and child safeguarding at Adult Training Network.

5.5 The DSL will provide advice and support to other staff on adult welfare and adult and child safeguarding matters. Any concern for an adult's safety or welfare will be recorded in writing and given to the DSL.

5.6 During opening hours, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns. If in exceptional circumstances, a DSL is not available in person, we will ensure that they are available via telephone and any other relevant media.

5.7 Through appropriate training, knowledge and experience our DSL will liaise with Adult's and Children's Services and other agencies where necessary, and make referrals of suspected abuse, take part in strategy discussions and other interagency meetings and contribute to the assessments of adults and children (where appropriate).

5.8 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received relevant safeguarding information during induction and that appropriate training needs are identified.

6. TRAINING & INDUCTION

6.1 When new staff join our organisation, they will be informed of the safeguarding arrangements in place. They will be given a copy of Adult Training Network's safeguarding policy along with a staff code of conduct and told who our Senior Lead for Safeguarding and DSL are. All staff are expected to read these key documents.

6.2 Every new member of staff or volunteer that comes into regular contact with vulnerable adults will receive safeguarding training during their induction period. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure, how to record and the remit of the role of the DSL. The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability relating to their work with vulnerable adults or children.

6.3 Guidance about acceptable conduct will also be given to all staff during induction. These are sensible steps that every member of staff or volunteer should take in their daily professional contact with those in receipt of a service. All staff are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

6.4 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities. In order to achieve this we will ensure that:

- All staff members undertake appropriate safeguarding training based in their role.
- All staff members receive safeguarding updates (for example, via email, e-bulletins, staff meetings), as required to provide them with relevant skills and knowledge to safeguard adults and children effectively.

6.5 All regular visitors, temporary staff and volunteers will be given a set of our safeguarding procedures; they will be informed of whom our Senior Lead for Safeguarding and DSL are and what the recording and reporting system is.

6.6 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance.

6.7 Our Senior Lead for Safeguarding will also undertake appropriate training to ensure they are able to carry out their duty to safeguard vulnerable adults and children in line with Ealing Safeguarding Children and Adults Board's procedures.

7. PROCEDURES FOR MANAGING PATHWAYS TO HELP AND SUPPORT

7.1 Adult Training Network adheres to safeguarding procedures that have been agreed locally with Ealing Safeguarding Children and Adults Boards. Where we identify adults or children and families in need of support, we will carry out our responsibilities in accordance with Ealing Safeguarding Children and Adults Board's procedures..

7.2 Every member of staff (including volunteers) working with children at Adult Training Network are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or adult, staff members should always act in the interests of that child or adult and have a responsibility to take action as outlined in this policy.

7.3 All staff members are encouraged to report and record any worries and concerns that they have and not see these as insignificant. On occasion, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, worries and concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on worries and concerns in accordance with this policy to build up a picture and access support for the adult or child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

7.4 It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

7.5 The DSL should be used as a first point of contact for worries, concerns and queries regarding any safeguarding concerns at Adult Training Network. Any member of staff or visitor who receives a disclosure of abuse or suspects that a child or adult is at risk of harm must report it immediately to the DSL or, if unavailable, to the Senior Lead for Safeguarding.

7.6 All concerns about a child or adult should be reported without delay and recorded in writing using the agreed procedures.

7.7 Following receipt of any information raising concern, the DSL will consider what action to take. All information and actions taken, including the reasons for any decisions made, will be fully documented.

7.8 The DSL will decide whether to make a referral to Adults or Children's Services when there are additional needs or safeguarding concerns that are not being addressed.

7.9 If a referral to Adults or Children's Services has not met the threshold for targeted support or statutory intervention the DSL will make a full written record of the decision and outcome.

7.10 If, at any point, there is a risk of immediate serious harm to an adult or child, a referral should be made to Children's Services or Adult's Services immediately. Where the risk is deemed to be imminent, it may be appropriate to contact the Police. Anybody can make a referral. If the child or adult's situation does not appear to be improving, the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Senior Lead for Safeguarding. Concerns should always lead to help for the child or adult at some point.

7.11 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, Adult's Services or the Police if:

The situation is an emergency and the DSL and the Senior Lead for Safeguarding are all unavailable

They are convinced that a direct report is the only way to ensure the child's safety.

7.12 Any member of staff who does not feel that concerns about an adult or child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Lead for Safeguarding. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Adult's Services or Children's Services directly with their concerns.

7.13 We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same use Ealing Safeguarding Children Board threshold guidance will apply in respect of any child who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to peer on peer abuse.

7.14 We recognise that children and adults with special educational needs and disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the individual's disability without further exploration.
- Children or adults with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

8. RECORDS AND INFORMATION SHARING

8.1 Any information recorded will be kept in a separate named file, in a secure cabinet or electronically.

8.2 If staff are concerned about the welfare or safety of any child or adult they will record their concern on the agreed reporting procedure. Any worries or concerns should be passed to the DSL without delay.

8.3 Any information recorded will be kept on the relevant adult's records. Adult safeguarding information will only be shared on the basis of 'need to know in the adult's interests' and on the understanding that it remains strictly confidential. The same applies to information relating to safeguarding for children. Consent should be sought when sharing any personal information relating to adults or children unless to do so may place them at additional risk of harm.

8.4 Adult or child safeguarding information will only be kept in the individual's records and this file will be kept up to date. Records of concern, copies of referrals, invitations and minutes of meetings and reports will also be stored here.

9. SAFER RECRUITMENT

9.1 At Adult Training Network we will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service (DBS) checks where required to do so and use any other means of ensuring we are recruiting and selecting the most suitable people to work with patients and staff.

9.2 We will maintain a record of all safer recruitment checks carried out in line with statutory requirements.

9.3 We will ensure that those responsible for recruiting staff have completed appropriate 'safer recruitment' training. At all times we will ensure that safer recruitment practices are followed in accordance with our statutory requirements.

9.4 For those staff/volunteers who have new or historical entries on their DBS that may raise concerns of a safeguarding nature but not exclude them from being able to undertake their role, a risk assessment will be completed and kept on file outlining any measures that will be in place to manage any assessed risk.

10. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

10.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for adults and children. We do, however, recognise that sometimes allegations of abuse are made.

10.2 We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are adults who deliberately seek to harm or abuse children or vulnerable adults.

10.3 We will take all possible steps to safeguard vulnerable adults or children and to ensure that the adults in our organisation are safe to work with those in receipt of our services.

10.4 With regards to allegations made against individuals that we believe to be working with children, we will always ensure that the procedures outlined by [Working Together to Safeguard Children 2018](#) are adhered to and will seek appropriate advice from the Designated Officer for the Local Authority (formerly known as LADO in previous versions of Working Together to Safeguard Children which this procedure will continue to use for ease of reference). The LADO can be contacted to request a consultation or to make a referral via e-mail: aap@ealing.gov.uk or by phone on 020 8825 8930.

10.5 If an allegation is made or information is received about any member of staff (or volunteer) who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children*

*In addition, staff should also alert the Senior Lead for Safeguarding if an individual who is working in London has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to directly relate to a child (see Chapter 7 of the London Child Protection Procedures for further guidance).

the member of staff receiving the information should inform the Senior Lead for Safeguarding immediately. This includes concerns relating to agency and supply staff and volunteers.

Should an allegation be made against the Senior Lead for Safeguarding, this will be reported to the most senior member of staff within the organisation unless this is not possible. In such cases where it is not possible, a consultation will be sought by that staff member with the LADO.

10.6 The Senior Lead for Safeguarding will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

10.7 Any member of staff or volunteer who does not feel confident to raise their concerns within the Organisation should contact the LADO directly on 020 8825 8930. Further national guidance can be found at: [Advice on Whistleblowing](#).

The [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – this line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk.

10.8 Adult Training Network has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our organisation, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

10.9 Where there are safeguarding concerns raised that relate to an allegation that a member of staff or volunteer poses a risk towards adults, a consultation will be sought with the Adults Safeguarding Lead within the Local Authority within one working day.

11. LINKS WITH OTHER POLICIES

This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below the additional policies in place that underpin our safeguarding practice:

- Equality Opportunities Policy
- Race Equality Policy
- Disability Statement
- IT Policy
- Anti-bullying and harassment policy
- Staff Code of Conduct
- Health & Safety Policy

12. LOCAL AUTHORITY DETAILS

Designated Officer for the Local Authority:

Name:	Kogie Perumall
Email Address:	aap@ealing.gov.uk
Phone Number:	020 8825 8930

Adult Safeguarding Contact for the Local Authority:

Name:	Sophie Shah
Email Address:	shahso@ealing.gov.uk
Phone Number:	020 88256228

MASH/Children's Services Details:

Email Address:	Ecirs@ealing.gov.uk
Phone Number:	0208 8255000
Out of Hours Number:	0208 8255000

CQC CONTACT DETAILS (where applicable for Regulated Settings):

Email Address:	enquiries@cqc.org.uk
Phone Number:	03000 616161