

The Learning Station

SAFEGUARDING AND PROTECTION OF CHILDREN AND VULNERABLE ADULT

Child and Vulnerable Adult Protection Policy

Introduction

The Learning Station takes responsibility for safeguarding and promoting the welfare of children and vulnerable adults as a duty to all there learners and staff.

This document sets out the policies and procedures The Learning Station staffs need to adhere to with relation to Safeguarding Vulnerable adults from abuse. The policies have been developed to promote good practice requirements across the different agencies in the Borough and beyond, and have been adopted by The Learning Station.

Effective communication and an understanding of each staff roles and responsibilities are crucial to the implementation of this policy. These policies and procedures have not been developed in isolation; they represent a unified approach to safeguarding adults across Haringey and beyond.

As a statutory organisation The Learning Station has a duty of care to promote the best interest of all the Adults it supports. The Learning Station Safeguarding Adults Policy and Procedures exist so that any suspected abuse of a vulnerable adult is reported; vulnerable adults at risk are protected from further abuse; The Learning Station would give clear guidance and support to those reporting abuse; procedures and guidance are in place for those investigating alleged abuse; ensure that effective monitoring and recording systems are in place to collect evidence; promote the rights of vulnerable adults and protect them from abuse and ensure that there is a robust assessment process in place that will safeguard adults from abuse.

A vulnerable adult is defined as a person “who is or may be in need of community care services, by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself or unable to protect him or herself against significant harm” (Department of Health 2000).

The Children Act 1989 defines a child as a person under the age of 18. The Act places a duty to investigate and take action in appropriate cases to safeguard or promote the welfare of children believed to be suffering or likely to suffer significant harm.

It is the aim of the policy for the Learning Station staff, including Volunteers to be aware of the signs and symptoms of abuse and to follow the procedures.

Terms of Reference: - Legislation – section 47(1) The Children’s Act 1989.

“The local authority has a duty to investigate situations where it has ‘reasonable cause to suspect that a child or vulnerable adult who lives, or is found in their area is suffering; or likely to suffer significant harm’. Enquiries must be made to decide whether it should take any action to safeguard the child’s welfare.” The learning Station takes account and follows the child protection procedures outlined in the Local Safeguarding Children Boards “Child Protection Handbook”.

The term “community care services” in this document includes all social and health care services in any context. This includes adults with Mental Disability, Physical Disability, Learning Disability, Illness and Frailty.

The term “harm” should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment that are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health. It should also be taken to include the impairment of physical, intellectual, emotional, social or behavioural development.

For young people or children under the age of 18, who may be at risk of abuse, or significant harm, The Learning Station’s Safeguarding Children Procedures should be referred to.

There will be certain circumstances when it will be appropriate for the Children and Young People’s Directorate to work jointly with Adult Services to safeguard a young person, for example a young person who is aged 17 years old and is in transition.

What Constitutes Abuse?

Abuse can take place in a number of different ways and in any setting. Fundamentally, abuse violates an individual’s human and civil rights.

Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Abuse can constitute “a single or repeated act or lack of appropriate action occurring within any relationship where there is an expectation of trust, which causes harm or distress to a vulnerable adult

Abuse of a vulnerable adult may be obvious for example, where this is a visible injury, but in many instances the evidence may be subtle.

Abuse is an ill treatment that causes significant harm and can result in the deterioration of a person’s physical, emotional, social or behavioural development. Neglect and poor professional practice can be considered abuse. This may take the form of isolated incidents of poor practice through to ill treatment or gross misconduct.

Prevention of Abuse

The Responsibility of all agencies.

The primary aim of all care agencies/organisations within Haringey and beyond (Police, Adult Services, The Care Quality Commission, Day Centres, care homes, private and voluntary organisations and any other care provider) is to prevent abuse. Each agency has a duty to ensure that policies and procedures are based on a strategies for prevention as much a possible.

Each agency must provide accessible information available to users, carers and the general public on how to raise a concern or make a complaint.

Staff, need to be aware of safeguarding adults procedures. Safeguarding Adults should feature in induction and training packs for staff at a level that is commensurate with their role in the Safeguarding Adults process. Safeguarding Adult training must be mandatory training across each agency. All staff should be made aware that abuse can occur and what processes are in place to keep vulnerable adults safe.

Procedures are in place that deals with disclosure of abuse by a vulnerable adult. These procedures are compatible with this Haringey Multi-Agency Safeguarding Adults Policy and Procedures Adopted by The Learning Station.

The Learning Station Have in place Assessment and risk assessment forms that identify vulnerability and possible risks relating to abuse as a holistic part of our regular communication between staff, service users and will report all concerns immediately to senior managers.

The Learning Station staff will have access to all relevant policies and procedures which will enable them to carry out their work to the best interest of the service user and carer. It is one of our conditions that staffs are made aware of the importance of keeping accurate, factual and contemporaneous records. All information will be recorded in a sensitive non judgemental manner keeping in mind service users and carers have access to their records under the Freedom of Information Act 2000. Any record kept about a service user may be also be used in the court arena as a legal document.

The Learning Station have in place recruitment procedures and practices for all staff . This includes agency staff, staff bank, seasonal staff, student volunteers and any other staff/people working with vulnerable adults or children. Work references will be obtained prior to the employment commencing; candidates would be subject to an enhanced Criminal Record Bureau (CRB) check that is cross referenced with the Protection of Vulnerable Adults (POVA) register. Where a profession is regulated, for example social workers are regulated through the General Social Care Council (GSCC) and nurses are regulated via the Nursing and Midwifery Council (NMC), agencies should ensure that candidates are properly registered with their respective regulators and are not subject to any conduct proceedings or suspended from the register.

Procedures are in place for 'whistle blowing' or addressing allegations or concerns against staff, volunteers or any other person working on behalf of The Learning Station. These procedures are accessible to all staff and the public. And they promote the safety and welfare of vulnerable adults.

Furthermore, The Learning Station guarantees that staff and service users, using these procedures appropriately, will not prejudice their own positions and prospects.

The Learning Station have robust systems to evidence the Safeguarding Adults guide And will apply them fully when staff are suspended or dismissed. Professional bodies will be informed of the suspension or dismissal. All staff will be inducted in the The Learning Station Codes of Conduct and what we expect of them, The minimum Standards and what we will not accept before the commencement of work, and copies placed in the staff handbook for regular reference showing clearly how The Learning Station will deal with such Behaviour and any Lapse in standards.

Failure to Investigate

If a statutory agency (Police, Adult Services or Health), does not investigate an allegation of abuse, other agencies or concerned parties (i.e. family, friends etc) have the right to make a formal complaint using the complaints procedures in place within those statutory organisations.

Such complaints should always be brought to the attention of the Haringey Safeguarding Adults Board as well as The Learning Station. The complaint will be followed up in writing, outlining how the complaint is being investigated. There will also be an appropriate plan of action in place to ensure that support is provided to the Vulnerable Adult and the procedures would be correctly implemented.

Where we believe that a member of The Learning Station or another organisation is not fulfilling their obligations to fully investigate or contribute to the investigation The Learning Station will raise a complaint and demand a discussion with the manager of that organisation, team, or section.

If a satisfactory reply is not received the complainant should:

Any failure of Staff or agency to investigate or contribute effectively to an investigation of alleged abuse may have serious consequences for a vulnerable adult. In the worst case scenario it may even result in the death of that vulnerable adult, which may lead to a criminal investigation.

The Learning Station would urge the importance to escalate any concerns to a senior manager in the

Organisation, if there is no response from a team or unit manager.

When can intervention be justified?

As soon as an alert is received outlining an allegation of abuse, The Learning Station would approach all reports and allegations with an open mind and would consider the appropriate intervention by assessing the risks involved and also consider the factors below:

- the vulnerability of the individual
- the Mental Capacity of the individual
- the nature and extent of the abuse
- the length of time it has been occurring
- the impact on the individual
- the risk of repeated or increasingly serious acts involving this or other vulnerable adults.

Once the assessment has highlighted the level of risk involved in the case and a decision has been made that professional intervention is required in order to safeguard that vulnerable adult, The Learning Station's intervention will be based on the following principles:

- Once an individual makes an informed decision about his or her circumstances, where risk has been identified, and a choice is made to decline the intervention of a statutory authority, then his or her wishes must be respected. The Learning Station would override the decision if there exists a statutory obligation to intervene.
- Intervention may be necessary to reduce the risk and the individual has accepted the intervention, The Learning Station will pursue a course of action that reduces the risk in the least disruptive way to the individual.
- The Learning Station will give the vulnerable adult relevant information and advice that will assist that individual in making an informed decision. The information will always be presented in a format that is appropriate to that individual's needs.
- The Learning Station staff will document their decisions that takes in to account the welfare of the vulnerable adult and their civil liberties.
- The Learning Station would at all times consider the needs of the carer.
- The Learning Station would maintain (If possible) a link with that vulnerable adult in case the situation becomes intolerable and swift action is needed.

The degree of abuse that would justify intervention builds on the concept of 'significant harm' introduced in The Children Act 1989.

Child Protection

In cases of Domestic Violence or abuse of a vulnerable adult which involves a child, or puts a child at risk of significant harm, The Learning Station and its staff would In these situations make a referral to:

The local Child Protection Referral and Assessment Team and also to Haringey Child Protection Referral and Assessment Team on 020 8489 1856/1805/1806 (Hornsey) or 02084895402/5403/5404 (Tottenham).

If there are children in a household and there is concern/evidence of Domestic Violence, the welfare of the child must always be paramount. That child or children may themselves be subject to violence or other forms of harm. Children who witness Domestic violence are at risk of significant harm, in that this is a form of psychological abuse and should be logged via a referral to the Children and Young People's directorate on the afore mentioned telephone numbers. Should a referral be made concerning the welfare of a child or children it is good practice to inform the parents/carers that a referral has been made. There are circumstances where that information may put the child at greater risk of harm, or in some instances of Domestic Violence could further harm the adult. The Learning Station Will take extra care in these cases and a professional judgement would be made about the best interest of the child and safety of the adult. Information is available on such circumstances and it may be useful to consult the London Child Protection Procedures which can be found at www.londonscb.gov.uk.

Young people in transition who are considered to be at risk of significant harm will be supported through the Children and Young Peoples service via the Safeguarding Children Protocols. Adult Services work jointly with the Children and Young People's Service to ensure that the young person is safeguarded and effective transition plans are in place.

Where a Child is Looked After by the Local Authority, and is in transition to Adult Services, The Looked After Children Procedures will run in parallel to the Transition planning. Any safeguarding issues will be worked jointly via the Children and Young People's Service and Adult Services. The young person (s) will be subject to children safeguarding protocols until that young person (s) is made safe. Once a child is over the age of 18 this procedure should then be followed. It should not be assumed that if a child or young person has been subject to child protection concerns they will automatically be considered as subject to safeguarding adult's procedures. Each case will be assessed in line with these procedures and risk properly identified and recorded with actions planned.

Vulnerable Adults Statement of the Rights

Abuse exists in various forms and can be perpetuated by one or more people. Whatever the abuse or the setting, abuse is not acceptable and is a violation of a person's basic human right. There are people living in Haringey and beyond who may be at greater risk of abuse because of their age, the nature of their disability or circumstances. Some adults are unable to live their life without the assistance of others. Each Adult living in Haringey and beyond has the right to receive support and live a life free of abuse and neglect. The Learning Station Safeguarding Adults Partnership has a Zero-Tolerance Policy to abuse. In no circumstance is abuse accepted or tolerated. The Learning Station will work with all agencies across Haringey and beyond in collaboration to ensure that this policy is adhered to.

Vulnerable Adults in Haringey and beyond have the right to:

- Safety and the provision of adequate care and support. Including protection from all forms of violence including physical punishment, intimidation, belittling, lack of respect, harassment and sexual assault.
- Independence.
- Make decisions about their own life, even if this may involve activities
- where there is an element of risk.

- The protection of the law, including the right to money and property that is legally theirs.
- Lead a life free from discrimination and have their own rights upheld regardless of ethnic origin, sexuality, impairment or disability, age and religion or cultural background.
- Privacy.
- Appropriate information about keeping themselves safe and exercising their rights.
- Advocacy and assistance in making decisions regarding their abuse, where their Mental Capacity would prevent them from fully participating in the investigations.
- Be involved in all necessary decision making in the event of abuse, including the right to decide how to proceed and who they decide to confide in.
- Decline the intervention of statutory organisations after having made an informed decision regarding their circumstances, where risk has been identified.
- Report any abuse and/or neglect and for that allegation to be recorded and taken seriously, including the right to call the police in circumstances where a crime has been committed.
- Bring a formal complaint under the relevant complaints procedures if they are not satisfied with the initial investigations.

Multi-agency statement of Commitment

All agencies and organisations that worked in partnership to develop the Multi-agency Safeguarding Adults Policy and Procedures (Known as 'NO SECRETS' Safeguarding Adults) in Haringey and adopted by The Learning Station are committed to making sure it is effective by:

- Raising awareness that vulnerable adults can be subjected to abuse.
- Giving a clear message that preventing abuse from happening, or protecting a vulnerable adult from further abuse if abuse has taken place is everyone's responsibility.
- Making sure that Safeguarding Adults policies and procedures are widely available and easily understood, especially by those people they are designed to help.
- Promoting best practice to minimise abuse through the collaboration of all agencies/organisations.
- Making sure that all staff have sufficient knowledge and understanding of their roles and responsibilities in regard to The Learning Station's Safeguarding Adults Policy and Procedures through the relevant training for implementing the procedures in their work.
- Promoting the early recognition of abuse and prevention of further abuse.
- Making sure that there is consistent and effective response to any concerns, allegations or disclosure of abuse. Supporting staff in reporting and investigating allegations of adult abuse.
- Contributing towards Safeguarding adult's investigations, Strategy Meetings and Safeguarding plans.
- Making sure that, where intervention is necessary, staff pursue action in a way that causes the least disruption to the vulnerable adult's way of life.
- Preventing the risk of the abuse reoccurring.
- Recognising that adults identified as vulnerable have a right to confidentiality.
- Working in a preventative manner to protect vulnerable adults from abuse and/or neglect.
- Making sure that if during a Safeguarding Adults Referral or Investigation, any concerns about the safety and well-being of a child or young person arise these concerns should be referred immediately to the Children and Young People's Services in the area of residence as well as London Borough Of Haringey.

Scope

This policy and procedure applies to The Learning Station and staff working in: Adult, Culture and Community Services, Primary Care Trusts, Mental Health Trusts, The local, regional & national Police Services, The Legal Services, Care Quality Commission, The Probation Service, The Crown Prosecution Service, the Ambulance Service NHS Trust, the Fire and Rescue Services and contracted and independent providers of care.

These policy and procedures apply to all vulnerable adults, resident in the London Borough of Haringey and beyond, aged 18 and over.

Policy Framework

The Department of Health and Home Office issued the publication “No Secrets: Guidance on developing Multi-Agency Policies and Procedures to Protect Vulnerable Adults from Abuse” in March 2000. Haringey’s Safeguarding Adults Policy adopted by The Learning Station adheres to the contents of “No Secrets”.

Haringey & The Learning Station is currently working towards meeting the 11 standards set out in the Association of Director of Adult Social Services (ADASS): “A National Framework of standards for good practice and outcomes in Adult Protection work”. The 11 standards are:

Standard 1: To collaborate and establish a multi-agency partnership to in Safeguarding Adults work.

Standard 2: Accountability for and ownership of Safeguarding Adults work is recognised by The Learning Station organisation’s executive body.

Standard 3: The Safeguarding Adults policy includes a clear statement of every person’s right to live free from abuse and neglect, and this message is actively promoted to the public by the Local Strategic Partnership, the Safeguarding Adults Partnership including The Learning Station and it’s member organisations.

Standard 4: The Learning Station has a clear, well-publicised policy of Zero Tolerance of abuse within the organisation.

Standard 5: The “Safeguarding Adults” partnership oversees The Learning Station’s workforce development/training sub-group. The partnership has a workforce development/training strategy and ensures that it is appropriately resourced.

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Standard 6: The Learning Station Provides Information to all citizens seeking access and information about how to gain safety from abuse and violence, including information about the local Safeguarding Adults procedures.

Standard 7: The Learning Station has adopted the Haringey Safeguarding Adults policy and procedures describing the framework for responding to all adults “who is or may be eligible for community care services” and who may be at risk of abuse or neglect.

Standard 8: The Learning Station Has in place an internal set of guidelines, consistent with the local multi-agency “Safeguarding Adults” policy and procedures, which set out the responsibilities of all workers to operate within it.

Standard 9: The Learning Station Safeguarding Adults procedures detail the following stages: Alert, Referral, Decision, Safeguarding Assessment Strategy, Safeguarding Assessment, Safeguarding Plan, Review, Recording and Monitoring.

Standard 10: The Learning Station Would make the safeguarding procedures accessible to all adults covered by the policy.

Standard 11: The Learning Station in partnership explicitly includes service users as key partners in all aspects of the work. This includes building service-user participation into its membership, monitoring, development and implementation of its work; training strategy, planning and the implementation of their individual safeguarding assessment and plans.

Aims of the Policy

In Haringey and Beyond, the Haringey Safeguarding Adults Board is tasked with the responsibility of ensuring that vulnerable adults are free from abuse and neglect.

These policy and procedures is the framework by which the The Learning Station Care strategies are implemented across the borough and beyond. This policy does not stand alone and should be read in the context of other local operational procedures, the legislative framework and good practice requirements set out by regulators. The framework provides good practice guidance to local agencies that have a responsibility to investigate and take action when a vulnerable adult is believed to be suffering abuse.

These policy and procedures provide all The Learning Station staff and those working in voluntary, community, statutory and private agencies/organisation throughout the Borough and beyond the means to identify incidences of abuse and be able to respond in a way that safeguards that adult, in line with the good practice requirements.

Each agency has a responsibility to respond sensitively and coherently to reported incidents or allegations of abuse/neglect. It is imperative that there is a consistent approach across the Borough and beyond.

The primary aim is to prevent abuse, with the robust procedures, and preventative strategies being closely followed, dealing with incidents of abuse would be dealt with professionalism.

Categories Of Concern:-

Neglect:

This means that circumstances, such as a carer's failure to seek medical treatment for the vulnerable person, a carer's refusal to access social stimulation for the vulnerable person and similar, can constitute abuse

The persistent or severe neglect of a child which results in significant impairment of the child's / young person's health or development. e.g.

Failure to provide adequate food, clothing or shelter (including abandonment or exclusion from home)

Failure to protect from physical or emotional harm.

Failure to meet child's/ young person's basic emotional needs.

Failure to ensure adequate supervision.

Failure to ensure access to appropriate medical care.

Physical Abuse:

Can take many forms, inadequate or erratic physical care, emotional neglect, and abandonment, lack of boundaries and guidance, failure to protect a child from physical harm or danger, denial of medical care or treatment

Deliberate or intended injury to a child or young person. e.g.

Hitting shaking, throwing, burning, scalding, drowning, suffocating, or poisoning, physical intervention.

Deliberate inducement of an illness.

Sexual Abuse:

Actual or likely sexual exploitation. e.g.

Use of force or enticement to take part in sexual activity penetrative, or non – penetrative.

Involvement in non contact activities such as looking at or making abusive images.

Encouraging children to watch sexual activities.

Encouraging children to behave in sexually inappropriate ways.

Any sexual activity with a child under the age of 16. (with or without agreement)

Abuse of Trust

The Sexual Offences Act 2003, which makes it an offence for a person over 18 to have a sexual relationship with a child under 18 where the person is in a position of trust (e.g. teacher or any civilian or MOD personnel assisting with Service activities), even if the relationship is consensual.

Emotional Abuse:

Persistent or severe emotional ill treatment or rejection which adversely affects the child's/ young persons emotional and behavioural development. e.g.

Conveying to a child or a young person that they are worthless, unloved or inadequate.

Overprotection, limiting exploration and learning, preventing normal social interaction or imposing inappropriate expectations.

Causing a child or young person to feel frightened or in danger by the witnessing of violence towards another person whether domestic or not.

Significant harm

Significant harm is described as harm to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or unavoidable deterioration in, physical or mental health: and the impairment of physical, intellectual, emotional, social or behavioural development.

In the context of vulnerable adults the following outlines the main forms of abuse:

Physical abuse – including hitting, pushing, kicking, misuse of restraint or inappropriate sanctions

Sexual abuse – including sexual assault or acts to which the adult did not, or could not consent

Psychological abuse – including emotional abuse, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse, isolation or withdrawal from services

Financial or material abuse – including exploitation and pressure in connection to wills, property, inheritance or financial transactions

Neglect or acts of omission – including ignoring medical or physical care needs, withholding of medication or adequate nutrition and failure to provide access to appropriate health, social care or educational services

Discriminatory abuse – including racist, sexist and other forms of harassment

Policy Statement

This safeguarding policy recognises that every person has a right to live a life free from abuse and neglect, and the policy measures will uphold and protect that right. The Learning Station has a duty to act where they believe an adult is at risk of significant harm or a child is at risk

The policy refers to all children, young people and adults regardless of gender, ethnicity, disability, sexuality or religion.

The safeguarding of learners is crucial and all learners are entitled to learn in a safe, healthy and supportive environment:

- Providing a safe environment in which all learners including children and vulnerable adults can learn in line with the Health and Safety policy;
- Identifying children and vulnerable adults who are suffering, or likely to suffer significant harm; and
- Taking appropriate action to see that such children and vulnerable adults are kept safe at the Service.
- Safe recruitment procedures are in operation and all appropriate checks including CRB are carried out on staff and volunteers who work with children and vulnerable adults;
- There are procedures for dealing with allegations of abuse against members of staff and volunteers that comply with locally agreed inter-agency procedures and the guidance in this policy document;
- Senior members of the Services are designated to take lead responsibility for dealing with child and vulnerable adult protection issues, providing advice and support to other staff, liaising with the appropriate agencies;
- Staff, especially tutors are actively involved in promoting safeguarding with learners through the curriculum and other activities such as induction and reviews;

Work Experience

The Services are committed to safeguarding children on work experience. In November 2004, the DfES issued supplementary guidance on work experience to their document Safeguarding Children in Education. The guidance takes into account the diversity of work experience placements and the safeguards that may need to be in place where young people under 18 years (i.e., defined as a child) are involved. All work-experience placements are risk assessed for safeguarding purposes.

This guidance refers to work experience placements lasting more than 10 to 15 days, deemed to be long-term placements.

All staff have a responsibility, and are expected to

- Have a professional relationship and the boundaries of the staff member/ children and vulnerable adults relationship should be observed at all times;
- Recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, young people and vulnerable adults;
- Respond appropriately to disclosure by a child, young person and vulnerable adult, of abuse;
- Not engage in inappropriate behaviour with learners i.e. behaviour which is an abuse of power, position or relationship;
- Keep physical contact to a minimum. Where there is physical contact this must be in accordance with teaching and learning requirements;

1. Ensure that Service procedures are followed;
 2. Be vigilant to the indicators of abuse and to refer concerns to the Designated Persons;
 3. Be aware that Staff cannot keep confidential a disclosure of abuse and must refer the matter on to the head of Service; and
- Understand safe practice in carrying out their duties and comply with Service procedures with regard to risk assessments, safety and security.

Allegations Against Staff/Volunteer

If allegations are made against staff, the Services will:

- Act upon any allegation against a member of staff as outlined in the procedure
- Protect staff who discloses information regarding abuse by colleagues towards learners in accordance with the Council's whistle blowing policy.

Concerns and complaints by learners

- The Learning Station recognise that listening to children and vulnerable adult is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child or vulnerable adult will be listened to, and acted upon in order to safeguard his/her welfare.
- The Learning Station will ensure that the person making the complaint is informed, not only about the action the Centre will take but also the length of time that will be required to resolve the complaint. The Centre will also endeavour to keep the child or vulnerable adult regularly informed as to the progress of his/her complaint.

PROCEDURES AND RESPONSIBILITIES – ANY STAFF MEMBER

The procedure route will depend upon the urgency of the situation and whether it is merely a suspicion of abuse or an actual disclosure.

Suspicion of Abuse (if abuse is suspected but there has been no disclosure.)

1. Ask casual open questions about the nature of the concern e.g. bruises, marks, change in behaviour etc. "Can you tell me about..."
2. Believe the child/ young person or vulnerable adult and reassure them that they were right to talk to you.
3. Record the facts and conversation in writing immediately afterwards using the exact words spoken not implied. Sign and date the report (it may be required as evidence.)
4. Report the suspicion to the Designated Person responsible for Child Protection or the Manager. The Designated Person/ manager will inform the social worker, safeguarding officer and/ or police and C.Q.C.
5. The manager would immediately inform the social worker and the safeguarding officer of any concerns.

Disclosure

1. Allow the child /young person or vulnerable adult to talk – ask only open questions e.g. "Can you tell me more about..." Do not press for detail, put forward your own ideas or use words that the child has not used themselves.
2. Stay calm and reassuring.
3. Do not make promises that cannot be kept e.g. confidentiality – tells the child/young person or vulnerable adult that you will have to tell someone else who will be able to help.

4. Believe the child/young person or vulnerable adult but do not apportion any blame to the perpetrator. (It may be someone they love)
5. Reassure the child/young person or vulnerable adult that they were not to blame and they were right to talk to you.
6. Ask the child/young person or vulnerable adult if they have told anyone else.
7. Keep an open mind.
8. Record the conversation and facts verbatim in writing immediately afterwards (writing notes during the interview may put undue pressure on the child/young person). Sign and date the report (it may be required as evidence).
9. Establish details of full name, D.O.B. address and names of parents/guardians or Carers.
10. The date and time of the conversation, and a brief outline of what may have happened, when, and to whom (remember siblings under 18 may be involved and at risk too)
11. Report to the Manager who will then contact the Social Services Department and the LADO immediately to report the concern. He/ she will also keep the social worker updated of any new developments.

Staff should not investigate concerns or allegations themselves, but should report them immediately to the Designated Senior Person in accordance with the procedures: telephone and completing the appropriate Alert Form

Once alerted to the situation the Designated Person or Designated Staff must report the matter to the relevant child and adult safeguarding agencies in the local authority, whether or not s/he feels that this action is justified in the particular circumstances of the case.

Learners over 18

There is no need to report the abuse to any outside agency unless there is a risk to others aged fewer than 18, in which case it must be reported to the Designated Senior Person.

A learner over 18 may wish to involve the police. Staff should be supportive in this situation and guide the student towards appropriate support services.

RECOGNITION OF POSSIBLE ABUSE:

It is extremely difficult to determine if abuse has occurred. The Learning station staff including Volunteers should look carefully at the behaviour of their children and young people or vulnerable adults and be alert for significant changes. The Learning Station Management staff, care staff, including Volunteers should be aware that children and young people may exhibit any of the following without abuse having occurred:

Disclosure.

Non accidental injury, bruising or marks.

Explanation inconsistent with injury.

Several different explanations for an injury.

Reluctance to give information about an injury

A sudden change in behaviour – aggression, extroversion, depression, withdrawn.

Attention seeking

Hyperactivity

Poor attention

Appear frightened of parents or family members

Abnormal attachment between parent and child

Indiscriminate attachment

Hyper alertness.

Reduced response.
Frozen watchfulness.
Nightmares.
Anxiety/irritability.
Abdominal pain/headaches.
Poor self esteem.
Poor peer relationships
Act in an inappropriate way for age
Over sexualised play/talk or drawings.
Excessive or inappropriate masturbation
Self harm/eating disorder
Frequent visits to the toilet (urinary infection)

Confidentiality

The Data Protection Act 2018 sets out the guidelines by which each agency should maintain confidential information.

The Data Protection Act 2018 supplements the General Data Protection Regulation (GDPR) and includes a new category of child abuse data, defined as physical injuries (non-accidental), physical and emotional neglect, ill treatment and sexual abuse. This came into effect on 25th May 2018. The Act allows all organisations to process data for safeguarding purposes lawfully and without consent where necessary.

This covers situations where a child may be at risk of significant harm due to neglect or abuse and also applies to referrals made to the local authority for any child considered to be a 'child in need'. The Learning Station has in place a set of protocols and procedures on how staff should handle confidential information that is sensitive and not in the public domain.

It is imperative that staff share and exchange relevant information in order to progress a vulnerable adult enquiry or investigation in certain circumstances. The information shared is done so in order to safeguard a vulnerable adult from potential abuse. That information is however shared between agencies that are involved in that persons care, or involved in safeguarding that individual. The information should still be treated as confidential and is still covered by data protection.

The Learning Station will whenever possible obtain the consent of the individual concerned before sharing any information about that person. This will preferably be in writing and is dependent on that individual having the mental capacity to consent to disclosure. There may be circumstances in which it is necessary to disclose information without consent of the individual concerned. This may be necessary in the public interest, where a failure to disclose information may expose an individual or others to significant risk of serious harm or to prevent criminal activity.

The Learning Station and Its Staff will be careful when providing information and will take care to distinguish between fact, observation, allegation and opinion. It is important that should any information exchange be challenged, in respect of a breach of confidentiality or, for example, as a breach of the Human rights Act, the information can be supported by evidence.

Information Sharing

As outlined above, The Learning Station will Share confidential information with the consent from the person providing it, or to whom it relates. Confidential information can be shared without

consent if this can be justified to be in the public interest. A clear record will be logged and maintained whenever information is shared; outlining the reasons the information was shared.

The Learning Station in good practice will share concerns that may arise with the individual concerned and their carer(s), and to obtain the consent of the individual to share the information with other agencies pertinent to that individual's care. There will be exceptions, where sharing that information may further jeopardise that individual's safety, or place them or other individuals at risk. If informing or sharing the concerns with the individual impedes the investigation, then it is appropriate not to share that information. A decision taken by The Learning Station and its staff not to share information or obtain consent from an individual to share information that is about them, should not be taken lightly and must be done to safeguard that adult or in the interest of public protection. The Learning Station will discuss and agree with a manager/senior manager in the agency and will always be recorded and evidenced on the service user's records. The Data Protection Act 2018, which London Care Homes t/a The Learning Station are registered with, allows personal data to be processed without the consent of the individual, when the processing is for the prevention or detection of a crime. "No Secrets" also suggests that sharing personal or sensitive information regarding a service user, ideally informed consent should be sought, but if this is not possible and other vulnerable adults are at risk, it may be necessary to override this requirement.

How IT usage is monitored

The Learning Station must ensure that it is able to safeguard all users of its ICT systems. Our approach is to implement safeguards within the College, and to support staff and learners to identify and manage risks. We believe this can be achieved through a combination of security measures, training and guidance and implementation of our associated policies. In furtherance of our duty to safeguard learners, we will do all that we can to make our learners and staff stay 'e-safe' and to satisfy our wider duty of care.

In order to do this, we collect and monitor the following information:

- Learners names, date of births and contact address'
- their workplace address' and details (where applicable)
- Activity and usage of learners online learning accounts
- Usage of our website
- Communication with learners and staff through email/online learning platform.
- Learner progress and observations

Where concerned that there may be an e-safety incident, this will be reported to the centre's designated safeguarding officer in the same manner as the reporting of any other safeguarding concern. They can then determine if the matter should be reported to the statutory authorities or other appropriate agencies

A public interest to share information can arise in cases:

- Where there is evidence that a child, young person or adult is suffering, or at risk of, significant harm.
- Where there is reasonable cause to believe that a child, young person or adult is suffering, or at risk of significant harm.
- To prevent significant harm to children and young people or serious harm to adults.
- With legal staff for court proceedings
- With the police in the detection or prevention of crime.

Shared information must be adequate, relevant and not excessive in relation to the purpose for which it is held and must be held no longer than is necessary for that purpose. The Learning Station has a clear policy on responsibly maintaining records on work with safeguarding adult cases which states the purpose of holding, the format and their destruction.

This policy seeks to set out the proper level and line of communication to be adhered to when any partner agency seeks to obtain from another agency confidential information concerning clients and records

Roles of individual Haringey agencies

The Haringey Safeguarding Adults Board MUST:

- Include representatives from Haringey Adult Services, Haringey PCT, the Police, the Voluntary and Private Sectors and The Probation Service.
- Meet quarterly. The meeting must be chaired by the Assistant Director, Adult Services London Care Homes Ltd T/A The Learning Station.
- Oversee the development and approval of multi-agency policies and procedures in respect of Safeguarding Adults.
- Establish systems to monitor and review Safeguarding Adults policies and procedures and ensure these are promoted across all Haringey agencies.
- Ensure the publication and distribution of documentation to support the Vulnerable Adult Process and increase public awareness of abuse and neglect of Vulnerable Adults.
- Identify and secure funding to support the implementation of the Vulnerable Adult Process.
- Ensure that the Safeguarding Adults Policies and Procedures reflect the needs of all communities in Haringey.
- Ensure links with other areas of policy and good practice guidance, both locally and nationally.
- Ensure the development and implementation of the training strategy.
- Oversee the development of research links to ensure that information is available on current practice and trends which can support service improvements.
- Oversee and be informed by the monitoring of referrals and outcomes of allegations of abuse to the Department of Adult Social Care. To ensure that this information is used to promote good practice and to respond to government and other bodies requests for reports on activities.
- Ensure the development and implementation of serious cases Multi-agency review system and to ensure that agencies implement all recommendations arising from these reviews.
- Produce an annual report on Safeguarding Adults work in Haringey.

Haringey Adult services

Haringey Adult Services MUST:

- Investigate allegations of abuse
- Liaise with advocacy services
- Complete needs assessments for vulnerable people and their carers.
- Contribute to Strategy Meetings and Case Conferences as per these procedures as lead agency, where appropriate.

Safeguarding adult manager

The Haringey Safeguarding Co-ordinator within Adult Services MUST:

- Co-ordinate the Safeguarding Adults Policy
- Contribute to Safeguarding Adult investigations and casework as per these procedures
- Monitor and record the outcome of each Safeguarding Adults referral
- Maintain the Safeguarding Adults Register
- Co-ordinate Serious Case Reviews
- Co-ordinate the Multi Agency Risk Management and Assessment Procedures (MARMAP)
- Collate and report to the Department of Health, CQC and other national policy makers all relevant information monitored under this policy.
- Produce an annual report.

Lead Roles

The Haringey Multi-Agency policy that has been adopted by The Learning Station identifies distinct roles in the Safeguarding of Vulnerable Adults in each individual organisation and their roles in the procedures. This is a statutory role that The Learning Station would uphold and identifies with. The Learning Station would arrange regular training for staff in safeguarding adults' policies & procedures.

- The lead should be responsible for ensuring the agency has an up to date Safeguarding Adults Policy and that it is accessible to staff and is in line with Haringey's Multi-Agency Policy and Procedures.
- Ensure that training is available at the different levels for relevant staff.

Co-operate with the audit process and participate fully in the Safeguarding Adults Board Meetings.

- Produce an annual report for their agency's own management Board.
- Be at a senior level in their respective organisation to ensure that Safeguarding Adults policy and practice is owned at the highest level within each organisation.

Adult Services as the lead investigator

The lead investigating agency (which is usually the Local Authority The placing authority and or Haringey, Adult Services) is responsible for:

- Organising any Strategy Meetings, Review Meeting or Safeguarding Plan Meetings
- Co-ordinating the investigation of any allegation or suspicion that a vulnerable adult is subject to abuse
- Acting as the contact point for collating any information about the victim and the perpetrator of abuse and the circumstance surrounding the alleged incident (s) of abuse.
- Taking the lead in deciding who should be interviewed, at what time and how, ensuring Achieving Best Evidence protocols are followed.
- Deciding who would be the most appropriate person to carry out the investigations at the Strategy Meeting. It is the role of Adult Services to ensure that the process of the investigations follows the agreed Multi-Agency Policy and Procedures.
- Sharing information with other relevant agencies within legal and professional restraints where investigations are carried out by other agencies.
- NO Agency Will take action (except in an emergency) without first consulting the lead agency.

Police as lead investigator

When the Police are the Lead Agency it is important to remember that:

- Where the police decide to investigate a crime in relation to the alleged abuse of an adult, the police shall act as the lead agency in the conduct of the investigation.
- No action should be taken in relation to the investigation without their agreement. This applies to all other investigations, including disciplinary and investigations carried out by CQC or Adult Services.
- All investigations involving the police are governed by the legal requirements of PACE (the Police and Evidence Act, 1984). This means that all police enquiries have to conform to certain standards in terms of interviewing practice, the involvement of appropriate adults and the collection and analysis of evidence.
- The Police can advise other agencies on the likely impact of PACE requirements.
- It is crucial to the success of the criminal prosecution of an abuser that the Police are involved at the earliest possible stage.
- Where the Police are involved in the investigation in view of a possible prosecution they will take responsibility for leading their own investigation and all activities linked to the collection of evidence. Where this is the case, it will be important for the Social Worker/ Care Manager, Team Manager and the police officer to work together to coordinate the overall investigation.
- In the case of the Police being the Lead Agency the responsibility of setting up Strategy Meetings and Case Conferences should fall with the Police.

Other agencies as lead investigator

When another agency is the lead agency it may be:

- Appropriate for an agency that is outside of Adult Services to carry out the investigation because:
- The alleged abuse occurred in a health-based service or on a hospital site and an Assistant Director (or equivalent) has agreed that the allegation is investigated by hospital or health staff under their Serious Untoward Incident Procedures.
- The incident of abuse requires specialist knowledge for example identification of non-accidental injury or allegations of financial abuse by a council employee.
- The level of abuse is minor and can be properly addressed by staff from another agency e.g. a domiciliary care provider investigating a minor allegation against a care worker.
- The vulnerable adult is more likely to confide in other professionals who they trust.
- The Learning Station And its Manager understand that the agreed safeguarding assessment strategy may:
 1. Involve another agency taking the lead. The most common scenario is where the police may lead the safeguarding assessment with a criminal investigation. On other occasions, it could be a regulatory or commissioning body, where they may decide that the concerns are so serious they will investigate within their remit.
 2. We would include one or more strands of actions within our remit, for either a complaints investigation or a disciplinary investigation.
 3. Takes precedence over any other internal investigations.

Duties and responsibilities of the designated person.

An allegation is made against a member of his/her own staff?

The manager will need to balance:

- supporting the abused person
- supporting all the staff
- supporting the investigation of the event
- being fair to the alleged staff member

The Learning Station will always take allegations seriously however; we would always treat all allegations as such. Evidence would be required to substantiate that which was alleged to have taken place, actually did.

We would take immediate relevant action and use our organisation's disciplinary procedures where this will protect service users, the alleged perpetrator and allow a fair investigation to be conducted.

The Learning Station would take disciplinary action on staff if employed directly otherwise it is the responsibility of the employing agency or organisation. Suspension is a neutral act that may be necessary as an immediate protection plan. The member of staff is innocent until proven otherwise. The suspension of the staff member is to ensure that he/she is protected, while still enabling a full investigation or safeguarding assessment to take place.

The Learning Station Staff subject to disciplinary procedures must be made aware of their rights, and, if suspended, should be given an outline of the reasons for that action in line with those procedures. However, the details of the allegation should not be discussed with them until the multi-agency assessment strategy has been agreed.

The Learning Station staff member must be advised to seek union or legal advice and should have access to support networks. Even if another agency, such as the police, is leading the investigation, The Learning Station will endeavour to meet its responsibilities as an employer and keep the member of staff or their representative informed in accordance with confidentiality.

A The Learning Station manager could also seek advice from their relevant regulatory body or legal services as appropriate.

Allegations against a member of staff

What is the duty and responsibility of the designated person?

Senior Managers must be informed of any concerns reported as per local procedures.

Role of staff and volunteers

The duty of a member of staff or volunteer when suspicions or allegations of abuse are reported to them

The Learning Station Staff and volunteers all have a duty of care to report any allegations or suspicions of abuse to their line manager as soon as possible. These concerns must be reported to a line manager, even if the service user is reluctant for them to do this, or asks them not to do so. The Learning Station would make the service user aware that any member of staff or volunteer is not able to maintain information regarding alleged abuse a secret.

There may be occasions when a member of The Learning Station staff is unable to go directly to their line manager because that line manager may be implicated in the allegations. In such situations, members of The Learning Station staff or volunteers may need to use their organisations whistle blowing procedures, or inform a senior manager At The Learning Station

about the alleged abuse. Staff or volunteers will not disclose this information directly to their line manager if the allegation of abuse implicates their line manager.

Any concerns about abuse occurring in a regulated care setting must be directed to a regulatory body such as the Care Quality Commission independently. In parallel if there are suspicions that a crime has taken place the police should be notified.

This may be take place when:

- They have concerns that their manager or proprietor/tress may be implicated.
- They have grounds for thinking that the manager or proprietor/tress will not take the matter seriously or act appropriately to protect service users.
- They fear intimidation or have immediate concerns for their own or for a service user's safety.

Designated Safeguarding Officer:

Turhan Ismail

Deputy Safeguarding Officer:

Esther Abe