


SAFEGUARDING ADULTS Corporate Policy


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Signed off by	<div></div> <div>Chief Executive</div>
Lead Person	Julie Cooke
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1. INTRODUCTION

- 1.1 Creative Support is committed to protecting adults and children from abuse (please also refer to our *Safeguarding Children and Young People* policy) and acknowledges that it has a duty of care to all service users, irrespective of the support they receive or the setting that they reside in
- 1.2 Creative Support's Safeguarding Adults policy applies to all employees of Creative Support, including bank workers, volunteers, students on placement, trustees and those undertaking official visits. The policy also applies to consultants and agency workers contracted to work for Creative Support.
- 1.3 We expect our suppliers and contractors working on our premises to have their own safeguarding policy and procedures or adhere to our own.
- 1.4 It is the responsibility of all Registered Managers and Senior Management Teams to ensure there are effective processes in place regarding adult safeguarding in their services for staff, students and volunteers to follow. This includes ensuring that all staff, students and volunteers, read and understand the applicable Local Authority Safeguarding Policy and Local Safeguarding Procedures. Senior Management teams also have a responsibility to ensure staff, students and volunteers have access to the relevant local authorities most up-to-date contact details.
- 1.5 All Creative Support staff have the responsibility to maintain professional boundaries between themselves and the people that they support so they can approach difficult situations professionally and effectively, safeguarding both themselves and others. This includes speaking respectfully, being honest and transparent with service users regarding their own boundaries and respecting theirs. It also includes carefully considering personal information that is shared with service users and asking for help from colleagues, especially when reaching the end of one's own competence.
- 1.6 The overall responsibility for Creative Support's arrangements to safeguard adults ultimately lies with the Chief Executive, the Lead for Safeguarding and Lead Manager for Health and Safety, in conjunction with the Board Lead Trustee for safeguarding.

2. POLICY STRUCTURE

- Who does this policy safeguard?
- Cross reference to Creative Support policies, procedures or protocols
- Legislation
- How do we support adults to keep themselves safe?
- Who abuses and neglects adults?
- Recognising abuse
- Types of abuse
- Procedure for reporting concerns regarding adults
- Mental Capacity Act 2005
- Whistleblowing
- Confidentiality
- Multi-agency co-operation
- Safe recruitment
- Staff training and supervision
- Organisational learning

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- Review and dissemination of policies

3. WHO DOES THIS POLICY SAFEGUARD?

3.1 This policy is intended to safeguard any adult who, according to the Care Act 2014:

- Is aged 18 or over; and
- Has needs for care and support (whether or not those needs are being met by the local authority); and
- Is experiencing, or at risk of, abuse or neglect; and
- As a result of those needs is unable to protect him or herself against the abuse or neglect or the risk of it.

4. CROSS REFERENCE TO CREATIVE SUPPORT POLICIES, PROCEDURES OR PROTOCOLS

- Safeguarding Children & Young People
- Duty of Candour
- Whistleblowing Mental Capacity Act
- Data Protection and Information Governance

5. LEGISLATION

5.1 **Creative Support's approach to safeguarding reflects statutory guidance and meets legislative and regulatory requirements.**


5.2 Creative Support's work is underpinned by The Human Rights Act 1998 which outlines and secures everyone's basic rights in law. The Human Rights Act 1998 is a key element of safeguarding as it requires respect for all humans so they can live their lives free from violence, abuse and exploitation. The law applies to everyone equally and provides an important means of protection for the most vulnerable in society. It endows a duty on public agencies to intervene proportionately to protect the rights of citizens. The articles most relevant to health and social care and safeguarding are;

- Article 2 – Right to Life
- Article 3 – Prohibition of Torture (freedom from degrading and inhumane treatment)
- Article 5 – Right to Liberty and Security

5.3 The Care Act (2014) and accompanying care and support statutory guidance also underpin Creative Support's Safeguarding Adults policy and informs our practice when working with local authorities and other agencies to protect adults at risk of abuse and neglect. Creative Support is committed to working in accordance with The Six Principles of Adult Safeguarding as set out in the Care Act 2014. This is achieved by maintaining a safeguarding culture which is person led and outcome focussed to ultimately enhance choice and control, while improving quality of life. The Six Principles include:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent without coercion, by helping them to choose the care and support that best enables them to meet their goals.

"I am asked what I want as the outcomes from the safeguarding process and this directly inform what happens."

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- **Prevention** – It is better to take action before harm occurs. Creative Support is committed to making the prevention of abuse one of the key priorities in all of its services, ensuring all sites have robust procedures in place for dealing with incidents of abuse where the prevention strategy has not been effective.

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

- **Proportionality** – The least intrusive response appropriate to the risk presented. While remembering that adults have the right to have their decisions respected, even if this involves taking risks, assessment of the individual’s capacity in relation to making decisions about a specific issue is essential to protect these rights.

“I am sure that the professionals will work in my interest and they will only get involved as much as is necessary.”

- **Protection** – Support and representation for those in greatest need. Immediately upon any concerns of possible abuse being raised, the safety of the individual or group must be the primary consideration. Staff should be alert to indications of possible abuse and understand how to raise any concerns appropriately.

“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. Creative Support will work closely with Local Authorities to provide an effective multi-agency approach to the prevention, detection and investigation of 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. All staff must work within the framework of the law, and safeguarding procedures should be seen as an integral part of working practices in all services.

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


5.4 Creative Support acknowledges and works in accordance with the Duty of Candour under regulation 20 of the [Health & Social Care Act](#) (2012), whereby we agree to work in an open and transparent way, providing information where it has been identified that a service user’s safety has been affected, or could have been affected, even if no harm has occurred, whilst in receipt of Creative Support services. *(Please also refer to our Duty of Candour policy)*

5.5 Other legislative or regulatory requirements referred to or underpinning this policy includes;

- [Mental Capacity Act](#) (2005)
- Safeguarding Vulnerable Groups Act 2006
- Disclosure and Barring Service 2013
- [Data Protection Act](#) (2018)

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- [General Data Protection Regulation](#) (GDPR) (2018)
- Making Safeguarding Personal (2014)

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6. HOW DO WE SUPPORT ADULTS TO KEEP THEMSELVES SAFE?

6.1 Creative Support is committed to empowering and enabling service users to keep themselves safe from harm and abuse. This is to be achieved through the following approaches:

- Promoting awareness of emergency services and how to access these, including reporting concerns directly to the police and local authority safeguarding services.
- Providing information in accessible formats to service users regarding their rights to self-determination, privacy, dignity and protection from all forms of abuse, including domestic violence and hate/mate crime. This may include information in large print, audio format, DVD, other languages, Braille etc. This should include supporting people to understand what constitutes abuse and unacceptable behaviour as well as how to report safeguarding concerns
- Ensuring that personal safety and safeguarding concerns are addressed in an open and supportive manner and forms part of the assessment of need, risk assessment, management plans and support plans.
- Promoting awareness of organisations which provide advocacy or specialist advice and support e.g. in relation to domestic violence or hate crime.
- Requesting the support of an Independent Mental Capacity Advocate (IMCA) where the person lacks the mental capacity to understand the safeguarding process and has a need for independent support. Under the Mental Capacity Act, 2005, the Local Authority has a duty to instruct an IMCA (Independent Mental Capacity Advocate) to support any adult who lacks capacity through the safeguarding process where certain conditions are met, or in the event of a SAR (Safeguarding Adult Review) Creative Support will ensure individuals involved in any safeguarding procedures receive the support to which they are entitled.
- Supporting people to understand the risks associated with social networking and internet usage.
- Raising awareness of 'stranger danger'.
- Developing safeguarding training, co-delivered with service users.
- Providing service users with information and advice about mate crime, 'stranger danger' and how to safeguard their personal finances.
- Working with other agencies to increase self-reporting of hate motivating incidents and crime.

7. WHO ABUSES AND NEGLECTS ADULTS?

7.1 The Care Act (2014) defines a Person in a Position of Trust (PiPoT) as anyone who works in a paid or unpaid capacity, including celebrities and people undertaking charitable duties, with adults with care and support needs. It is acknowledged that there are times when a person in a position of trust (PiPOT) can also abuse their position. *(please see Safeguarding Children and Young People corporate policy for further information)*

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- 7.2 Abuse may occur in any context or environment and may be perpetrated by any person, professional staff, care workers, volunteers, other service users, family, friends, neighbours or strangers. Abuse may be deliberate or unintentional, or result from a lack of knowledge.
- 7.3 Although often difficult to detect in a care setting, staff must always be alert to the possibility of abuse/exploitation from any source, especially where people are being supported to live a more independent life.
- 7.4 Staff must also be aware that the perpetrator could be another person in our care. It is well recorded that where this kind of abuse is ignored or not addressed, then the victims may experience mental ill health, low self-esteem, and may also go on to be perpetrators of abuse themselves.
- 7.5 Alleged perpetrators of abuse who are also at risk of abuse, should be assured of their right under the [Police and Criminal Evidence Act](#) (1984) (PACE) to the support of an 'appropriate adult' while they are being questioned by the police.

8. RECOGNISING ABUSE

- 8.1 Staff should be aware that some adults, especially older people, may not be aware that they are being abused: for example, when they become dependent on care staff, family members or neighbours and may be fearful of asserting themselves in case things get worse.
- 8.2 Abuse can happen as a result of neglect, through poor professional practices as well as relationships based on a power imbalance. These could be isolated incidents, regular or ongoing pervasive ill treatment.
- 8.3 Some Adults at risk may disclose that they are being abused or make suspicious comments which may indicate they are being abused. On occasion these assertions may overlap with physical signs and indicators of abuse, however this may not always be the case.
- 8.4 Staff need to be aware that some cases of abuse will constitute a criminal offence. Adults in need or receipt of community care services are entitled to the protection of the law. The responsibility for taking the lead on any investigation of a crime rests with the police. Decisions regarding prosecution are the responsibility of the Crown Prosecution Service. The early involvement of the police is essential when there is reason to believe that a crime has been committed.


9. TYPES OF ABUSE

- 9.1 Abuse and neglect can take many forms and multiple forms of abuse may occur to one person or groups of people. It is important for staff to look beyond single incidents or breaches in standards to underlying patterns of harm. Staff should not be constrained in their view of what constitutes abuse or neglect. The circumstances of an individual case should always be considered. The Care and Support statutory guidance of the Care Act 2014 identifies 10 types abuse – these are;
- 9.2 **Discriminatory Abuse** – Discrimination on the basis of race, gender, sexual orientation, age disability or religion. A crime that is motivated by hatred towards a specific group is treated as a hate crime. Also included in this category are forced


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marriage or 'honour-based' violence when values, beliefs or culture result in a misuse of power that denies opportunities to some individuals or groups (see 9.13 for further information)

- 9.3 **Domestic Abuse including Violence** – Domestic abuse, forced marriage and 'honour-based' violence are included in the above, depending on the actual nature of the abuse. Domestic abuse is any incident of threatening behaviour, violence or abuse between two adults who are or have been intimate partners or family members regardless of gender identity or sexual orientation.
- 9.4 **Financial or Material Abuse** – The misuse or misappropriation of a person's funds, property or possessions. This includes theft, fraud or deception. Using a person's finances or belongings to the advantage of the perpetrator; i.e. using coercion so someone alters their will, transfers ownership of property or transfers large sums of money to benefit the perpetrator. Financial abuse includes not returning change from items bought on behalf of the adult at risk or the collection of loyalty points or special offers.
- 9.5 **Modern Day/Contemporary Slavery** – Refers to the institutions of slavery that continue to exist in the present day. These include:
- Bonded labour: people become bonded labourers after falling into debt and being forced to work for free in an attempt to repay it. Many will never pay off their loans, and debt can be passed down through the generations.
 - Forced labour: where people are forced to work, usually with no payment, through violence or intimidation. Many find themselves trapped, often in a foreign country with no papers, and unable to leave.
 - Descent-based slavery: where people are born into slavery because their families belong to a class of "slaves" within a society. The status of "slave" passes from mother to child.
 - Trafficking: the transport or trade of people from one area to another and into conditions of slavery.
- 9.6 **Neglect Abuse** – Resulting from acts of omission or commission, which result in a failure to provide access to appropriate health or social care resulting in risk to the independence, welfare and wellbeing of the adult; ignoring medical, emotional or physical care needs. Withholding the necessities of life, such as medication, food, warmth, access to medical treatment, personal care or activities.
- 9.7 **Organisational/Institutional Abuse** – Abuse that occurs in an institutional setting such as a care home or day centre that is caused by the imposition of routines or work practices that reflect the needs of the institution and staff rather than those of the people using the service. This can include inadequate regard for privacy and dignity, authoritarian or negative staff attitudes, low staffing levels, high staff turnover, lack of staff supervision and training, poor communication and poor record keeping. It can also include poor environmental standards and no evidence of people being involved in any person-centred planning of their support, the failure of professionals to act on suspected abuse/crimes, poor care or neglect in services, resource shortfalls or service pressure that leads to service failure and culpability as a result of poor management systems/structures.

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- 9.8 **Psychological/Emotional Abuse** – The use of threats, intimidation, harassment, control, coercion, verbal conduct including swearing, persistent ignoring/isolation, emotional blackmail, offensive/demeaning remarks, cyber-bullying or any other behaviour that causes distress. It includes the denial of basic human and/or civil rights such as choice, self-expression, privacy and dignity.
- 9.9 **Physical Abuse** – Resulting from acts of omission or commission on the part of others, causing pain, injury or impairment. This can include hitting, slapping, scratching, pushing, shaking or withholding care or medication or essential treatment. Physical abuse includes:
- Bodily assaults - burns, bruises, abrasions, fractures, wounds.
 - Bodily impairment – malnutrition, dehydration, failure to thrive.
 - Medical/Healthcare Maltreatment – over/under medicating, denial of medical attention or treatment, irregular or inadequate provision of healthcare.
- 9.10 **Self-Neglect** – Defined as, “a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care services offered to them” (Skills for Care). Self-neglect can be considered as a safeguarding issue if there is considerable amount of omission or commission by someone else. Safeguarding alerts can be made if a service user is severely neglecting themselves or their environment, refusing support or will not engage with services, in line with the provisions of the [Care Act](#) (2014).
- 9.11 **Sexual Abuse** – Direct or indirect involvement in sexual activity to which the adult did not or could not consent, or was pressed or coerced into giving consent. This includes inappropriate looking, use of sexualised language or innuendo, use of pornographic material, being made to witness sexual acts, sexual harassment, inappropriate touching, penetration or attempted penetration. Sexual abuse also includes the use of technology such as mobile devices, mobile phones, tablets, the internet and social media. Any sexual exploitation of adults is a form of sexual abuse, and any suspicions should be reported to the police. This can involve exploitive situations, contexts and relationships where adults at risk receive ‘something’ (e.g. gifts, money, affection, food, accommodation, drugs, alcohol, cigarettes) as a result of performing, and/or others performing on them, sexual activities. Sexual exploitation can occur through the use of technology without the person’s immediate recognition – this can include being persuaded to post sexual images on the internet/mobile phone with no immediate payment or gain, or being sent such an image by the person alleged to be causing harm. In all cases those exploiting the adult at risk have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. It appears that adults with learning disabilities are particularly vulnerable to being targeted by perpetrators of this kind of abuse.
- 9.12 There are other additional types of harm that are not included in The Care Act, but they are also relevant to safeguarding adults. These include;
- 9.13 **Forced marriage and ‘honour-based’ violence** – A forced marriage is a marriage in which one or both spouses do not (or in the case of adults with learning or physical disabilities cannot) consent to the marriage and duress is involved. The terms ‘honour crime’ or ‘honour based violence’ or ‘izzat’ embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder. The person can be punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes


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to be the correct code of behaviour. In going against this code of behaviour, in the view of the family the person is showing that they have not been properly controlled to conform, and this is to the 'shame' or 'dishonour' of the family.

- 9.14 **Hate Crimes** – Any incident that is perceived by the victim or any other person to be racist, homophobic, biphobic, transphobic or due to a person's religion, belief, gender, identity or disability. This can include physical assault, verbal abuse as well as incitement of hatred against a particular person or group of people
- 9.15 **Mate Crime** – Is defined by when someone 'makes friends' with a person and goes on to abuse or exploit that relationship. The founding intention of the relationship, from the point of view of the perpetrator, is likely to be criminal. The relationship is likely to be of some duration and, if unchecked, may lead to a pattern of repeat and worsening abuse.
- 9.16 **Radicalisation** – Adults at risk can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups or organisations or, increasingly, through the internet. This can put a person at risk of being drawn into criminal activity and has the potential to cause significant harm. Creative Support work with people who may be prone to exploitation. The UK Government's [Prevent Strategy](#) (2011), which is a key aspect of safeguarding, outlines the commitment to be made by the health/care sector in ensuring that threats of this kind are understood and responded to.
- 9.17 **Cyber Bullying** - Cyber bullying is defined by a person using technology to harass, threaten, embarrass or generally target another person with the intention of humiliating and isolating them. Cyber bullying can include various types of bullying including impersonating someone and posting inappropriate content as the victim, cyberstalking, posting derogatory comments about someone online, sharing private information online about someone in order to publically humiliate them. The main difference between cyber bullying and traditional face-to-face bullying is that it can be done anonymously and they use technology as a means to do it.

10. PROCEDURE FOR REPORTING CONCERNS REGARDING ADULTS


- 10.1 Where there is a reasonable suspicion that a criminal offence may have occurred, this must be reported to the police who will determine if it is a criminal matter and who would then be responsible to investigate. It is the responsibility of the police to investigate criminal matters and make a decision about any subsequent action in the first instance. **The police must always be contacted about criminal matters by either calling 999 or the non-emergency police enquiry line, 101. Request other emergency services as appropriate.**
- 10.2 Staff must ensure the adult is safe and supported. If the adult appears to be in immediate physical danger, then staff must take practical measures to reduce the danger without endangering themselves. This may involve moving them or others away from any danger
- 10.3 All staff have a duty to report concerns or allegations of abuse to their line manager and to make a safeguarding referral to the Local Authority in adherence with the Local Authority Safeguarding procedure.
- 10.4 A key role of all Creative Support staff is to RECOGNISE, RESPOND, RECORD AND REPORT.

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- 10.5 Various Safeguarding referral methods are accepted by Local Authorities. These usually consist of Local Authority Safeguarding referral forms, making a referral over the phone by calling the appropriate Local Authority Adult Social Care number, emailing the Local Authority and in some cases, using their online portal. Some Local Authorities may ask for the incident report to be sent to them instead. Most Local Authorities provide an Emergency Duty Service for the purpose of making a safeguarding referral.
- 10.6 If the concern arises out of hours, Creative Support's local on call or the Duty Manager at head office should be contacted.
- 10.7 The person reporting the concern must record full details of the safeguarding referral, the person with whom they spoke; the date, time, advice given and action taken. All details and full referral documents should be submitted to the Creative Support Lead for Safeguarding, via email to safeguarding@creativesupport.co.uk
- 10.8 Where allegations of abuse have occurred within a service registered with the Care Quality Commission, it is essential for the Registered Manager to complete a notification form and submit it to the CQC via e-mail. The latest forms are available on the CQC website.
- 10.9 It is important that concerns are documented as promptly as possible and always before the end of a shift using an Incident Report. The record should state the nature of the concerns, why and how these concerns arose. If reporting a specific incident, give all relevant information, e.g., date, time and location of incident, names of witnesses. In all cases this must state who the concern was reported to, what advice was given and what action has been taken. This record must state the date, the time, and be signed.
- 10.10 Failure to record concerns could hamper the subsequent investigation and may expose the victim to further risk of abuse. Serious delays or omissions in reporting could be regarded as negligent.
- 10.11 Once the adult has been immediately safeguarded, managers should complete an Adult at Risk Initial Protection Plan. This will communicate to others as appropriate, what the concerns are as well as the actions taken to Safeguard the person from further abuse or neglect

11. MENTAL CAPACITY ACT 2005

- 11.1 The [Mental Capacity Act](#) (2005) provides a statutory framework to empower and protect people who lack capacity to make decisions for themselves; and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters. All decisions taken in the adult safeguarding process must comply with the Act.
- 11.2 Where possible it is good practice to gain individual consent from the adult, however, if the person does not want to act, consent is not necessary where there is an overriding duty to act. (For example in situations where there is a likelihood of the perpetrator abusing others or if gaining consent would put the person at further risk). Where consent is not given, advice should be sought.
- 11.3 Where an adult does not have the mental capacity to make decisions about protection from abuse, action should be taken to protect them. Any such action must be proportionate to the level of risk and take any knowledge of the person's previously expressed wishes into account.

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12. WHISTLEBLOWING

- 12.1 All Creative Support services have access to a clear management structure which staff can use if they feel unable to report concerns to their direct line manager. Creative Support also has clear lines of reporting for whistleblowing concerns if staff feel their concerns have not been responded to appropriately or where the perpetrator is a superior.
- 12.2 Creative Support provides a safe, open and confidential environment where staff are enabled to escalate their concerns to members of the executive team or the CEO if they have any safeguarding concerns, including concerns about the behaviour of another Creative Support employee.
- 12.3 If there is reason to believe that a manager is a perpetrator, or is the individual against whom allegations are being made, it is imperative that the concern is not discussed directly with them and that the allegation should in this case be reported in the first instance to a member of the Executive Team. If the concerns arise out of hours, staff should contact the Duty Manager within Creative Support.

Refer to Creative Support's *Whistleblowing* policy for more details.

13. CONFIDENTIALITY


- 13.1 Creative Support recognises that there will be circumstances in which it is necessary to share confidential information.
- 13.2 The [Care Act](#) (2014) sections 42-46 and Chapter 14 of the statutory guidance replaces No Secrets and puts it on a statutory footing. Section 45 of the Act ('Data Sharing') and Chapter 14 of the statutory guidance on information sharing and record keeping state that:
- Whenever a complaint or allegation of abuse is made, the organisation should keep clear accurate records of all action taken.
 - Staff should be given clear direction on what information is recorded, including;
 - What information do staff need to know in order to provide a timely response to the adult concerned?
 - What information do staff need to know in order to keep adults safe under the organisation's duty to protect people from harm?
 - What information is not necessary?
 - What is the basis for any decision to share (or not share) information with a third party?
- 13.3 In accordance with Creative Support's *Data Protection and Information Governance* policy, data on our service users will be shared with Local Authorities/SABs when it is requested, pursuant to Article 9(2)(h) of the General Data Protection Regulation (GDPR), i.e. that the processing of such data is necessary for the provision of health or social care.

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- 13.4 Information sharing must be in line with the principles and rules of fairness, confidentiality and data protection when making records available to those adults affected by, and subject to, an enquiry.
- 13.5 If the alleged abuser is receiving care and support themselves, then information about their involvement in an adult safeguarding enquiry, including the outcome, should be included in their records.
- 13.6 There may be exceptions to the disclosing of information. If in doubt, always seek advice.

14. MULTI-AGENCY CO-OPERATION

- 14.1 Section 6 of the [Care Act](#) (2014) describes a general duty to co-operate between the Local Authority and other organisations providing care and support. This includes a duty on the Local Authority itself to ensure co-operation between its adult care and support, housing, public health and children's services. Section 7 of the [Care Act](#) (2014) provides a new ability to request co-operation from a relevant partner or another Local Authority, in relation to an individual case. The Local Authority or relevant partner must co-operate as requested, unless doing so would be incompatible with their own duties or have an adverse effect on the exercise of their functions.
- 14.2 It is the responsibility of the Local Authority where the alleged abuse has occurred to coordinate any safeguarding work, to determine whether or not abuse has occurred, and whether the alleged abuse meets the threshold for initiating Section 42 Safeguarding Adults Enquiries (Section 42, [Care Act](#) 2014); to progress to an investigation or a Safeguarding Strategy meeting, and to agree the measures needed to protect the adult.
- 14.3 In the event that a safeguarding concern progresses to an investigation or a Strategy Meeting, that Creative Support is invited to attend, the lead Operational Manager for the service will prepare a Safeguarding Strategy Report for the meeting and will personally attend to ensure that Creative Support's contribution is taken into account. The report must contain relevant factual information relating to the concerns/allegations, including the original safeguarding referral form/professional concerns form. The lead Operational Manager may in some circumstances delegate the preparation of the report and/or attendance at the meeting to another senior colleague where appropriate, but remains responsible for its contents and for the contribution to the meeting. The lead Operational Manager must ensure that Creative Support receives a copy of the minutes of the Safeguarding Strategy Meeting, that these are carefully reviewed and that any inaccuracies or omissions are communicated promptly in writing to the Chair of the meeting.
- 14.4 The purpose of the strategy meeting is to share available information, agree the conduct and timing of any investigation and agree what immediate action is needed to safeguard the adult, collate a protection plan and determine if legal action is required. It is also an opportunity to ensure all relevant agencies involved with the person are informed of any significant outcomes to prevent the adult from being placed further at risk.
- 14.5 No effective adult safeguarding process can work unless those concerned are committed to the concept of multi-agency and multi-professional working. All the agencies involved should have the wellbeing, rights and safety of the adult as the first priority.
- 14.6 When someone with care and support needs dies as a result of neglect or abuse and there is a concern that the Local Authority or its partner agencies could have done more

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to protect them, then the Local Authority via its Safeguarding Adults Board (SAB) is responsible for undertaking a Safeguarding Adults Reviews (SAR).

- 14.7 When a SAR is undertaken, this must be attended by a Creative Support Senior Manager. As an agency involved in the provision and/or delivery of care and support, there will be an expectation to provide an Independent Management Report (IMR) detailing a chronology of events and the level of involvement Creative Support had with the deceased person.

15. SAFE RECRUITMENT

- 15.1 In order to prevent and minimise abuse from occurring, the following safe recruitment and safety standards will be adhered to:

- Safe recruitment policies are followed for all staff, including volunteers. Creative Support ensures that all individuals who are employed or volunteer to work with adults and children are subject to enhanced DBS checks, including the Children's and Adults' Barred Lists.
- All references, including a reference from the last employer, are taken and received before formal offers of employment are made in writing. All reasonable efforts to check the references are bona fide and genuine are taken.
- The Criminal Records Bureau and the Independent Safeguarding Authority (ISA) merged in 2012 to form the Disclosure and Barring Service (DBS). This means there is a single organisation dealing with checks and barring decisions.
- Employers are required to make referrals to the DBS about individuals they believe to pose a risk of harm to at risk groups. There is a referral guidance document available from the DBS at www.gov.uk/government/publications/dbs-referrals-form-and-guidance. It is an offence for employers to employ anyone who is barred under the scheme.
- For individuals who have convictions and/or cautions (having fully disclosed them) a decision regarding their suitability to work with adults and/or children will be made by the Service Director responsible for Human Resources, as per the *Recruitment and Selection* policy. As a registered body working on behalf of the Disclosure and Barring Service we fully comply with the standards of the [Data Protection Act](#) (2018) and [EU General Data Protection Regulation](#) (GDPR).
- In response to the Lampard report into lessons learned from the investigations into concerns relating to Jimmy Saville, Creative Support staff will ensure that visits by celebrities, VIPs and other official visitors are safely and well managed and that visitors are supervised at all times.
- All staff members are issued with identity badges, which they must carry at all times. These are also renewed every 2 years, and must be handed in when an employee leaves the employment of Creative Support.
- All staff will receive annual safeguarding training. Staff will receive regular supervision, and safeguarding supervision where appropriate.

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16. STAFF TRAINING & SUPERVISION


- 16.1 All Creative Support employees will be given clear guidance and training on safeguarding, and will be required to sign to say they have read this Safeguarding Adults policy. Staff will also familiarise themselves with the Local Authority safeguarding procedures.
- 16.2 During their corporate induction, staff will undertake internal safeguarding training. Staff must then refresh their safeguarding training annually either via e-learning or through classroom-based training. New staff who have not worked in a health and social care setting will complete the Care Certificate, which includes a module on safeguarding. Managers will complete safeguarding training as part of their managers' induction and are required to refresh this annually. Staff are also encouraged to attend any Local Authority safeguarding training available to them locally.
- 16.3 Senior staff will be supported to undertake further safeguarding training relevant to their role, such as a level 3 Certificate in safeguarding.
- 16.4 Attendance, knowledge and competency levels will be regularly audited through the supervision and appraisal procedures, through local monitoring, and training databases used by the organisation.

17. ORGANISATIONAL LEARNING

- 17.1 Safeguarding statistics, scenarios, feedback and learning from cases is shared with the Senior Executive Team, the quality committee as well as at monthly Social Care Governance meetings.
- 17.2 An overview report inclusive of safeguarding themes is shared with the board lead for safeguarding during board safeguarding oversight meetings. Creative Support and its board of trustee's work together to safeguard and promote the wellbeing of adults, identifying and promoting good practice from the learning
- 17.3 At Creative Support we take responsibility for organisational learning, and implement changes to practice as a result of audits, complaints, safeguarding section 42 investigations and Safeguarding Adult Reviews (SARs). We also seek feedback from adults about their experience and identify what has worked well and what could be improved.

18. REVIEW AND DISSEMINATION OF POLICIES

- 18.1 Creative Support's Safeguarding Adults policy is reviewed annually and the latest version of the policy is available to view and download in the password protected area of the Creative Support website at <https://www.creativesupport.co.uk/staff-area/policies/>
- 18.2 Creative Support staff can also access their Local Authority Safeguarding policies and procedures for their geographical area on the Councils Adult Services Website.

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