POLICY, PROCEDURE AND GUIDANCE FOR SAFEGUARDING ADULTS

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1 POLICY STATEMENT

Definitions

In line with the Children Act 1989, we define a "**child**" or "children" as *anyone under the age of 18 years*.

In line with the Care Act 2014, we define an "**adult**" or "adults" as *anyone aged 18 years or older.*

The term "**young people**" refers to 16 to 25 year olds accessing akt's services or contacting us for support.

Aim

The purpose of this policy statement and procedure is to enable the Albert Kennedy Trust (akt) to ensure to the best of its ability that the young people who access its services are safeguarded from abuse. akt is committed to safeguarding all young people that come into contact with our work. We believe that all young people have an equal right to protection from abuse and neglect regardless of their age, race, religion, ability, gender, language, background or sexual identity.

Although akt does not have a responsibility and is not able to institute legal action to safeguard adults, it does have a duty to record and report adult safeguarding concerns, to run its services safely, and to build and nurture a safe culture within the organisation.

Introduction

akt provides advocacy and support to LGBTQ+ young people who are at risk of or experiencing homeless or living in a hostile environment, often after coming out to their parents, care givers and/or peers.

At its four regional centres across England, akt provides online and face-to-face services. At a national level, it also provides a digital support service across the UK. akt has traditionally worked with the 16-25 age group, and this remains its primary audience. However, our live chat service is sometimes accessed by children aged below the age of 16 years and adults over the age of 25 years. akt is aware that young people may hide their true age in order to access services, to protect their anonymity or for other reasons.

There may also be circumstances where concerns are raised for people outside of the 16-25 age group, for example through a disclosure about a young person's younger sibling or an adult family member who may have care and support needs.

1.1 The Legal Context of our Safeguarding Practice

akt takes account of relevant guidance and legislation to safeguard adults, and to support our staff and volunteers to work safely.

Most of akt's direct activities take place in England and the policy is written in accordance with relevant English legislation. Where our services extend beyond England into the rest of the UK, we ensure that we operate in accordance with the legislative framework of the nation in which we are operating.

Relevant legislation:

- **The Care Act 2014** Care Act 2014 (legislation.gov.uk)

- **The Care Act 2014 Care and Support Statutory Guidance** (specifically the safeguarding section of this) 40573_2902364_DH Care Guidance accessible pdf (publishing.service.gov.uk)
- **The Mental Capacity Act 2005** Mental Capacity Act 2005 (legislation.gov.uk)
- **Criminal Justice and Courts Act** (S33 - revenge pornography (18+) made an offence) Criminal Justice and Courts Act 2015 (legislation.gov.uk)
- **The Data Protection Act 2018 and GDPR** Data Protection Act 2018 (legislation.gov.uk)
- **The Human Rights Act 1998** Human Rights Act 1998 (legislation.gov.uk)
- **The Sexual Offences Act 2003** Sexual Offences Act 2003 (legislation.gov.uk)
- **The Protection of Freedoms Act 2012** Protection of Freedoms Act 2012 (legislation.gov.uk)
- **The Equality Act 2010** Equality Act 2010 (legislation.gov.uk)
- **The Domestic Abuse Act 2021** Domestic Abuse Act 2021 (legislation.gov.uk)

1.2 Safeguarding Adults - Underlying Principles

This policy statement defines an adult as anyone over the age of 18 and recognises that:

- an adult's wellbeing is at the heart of the care and support system under the Care Act 2014;
- the prevention of abuse and neglect is one of the elements identified as going to make up a person's wellbeing;
- some adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues;

- some groups of adults, such as those with disabilities or from minority ethnic backgrounds or experiencing poverty, can be excluded or suffer racism from mainstream services;
- working in partnership with adults, and, where appropriate, their parents, carers and other agencies, is essential in promoting welfare.

The Care Act 2014 stipulates that safeguarding duties apply to any adult who:

- has care and support needs, and
- is experiencing, or at risk of, abuse or neglect, and,
- as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Many of the adults whom akt supports may be vulnerable due to homelessness or rejection by their families. They may also have care and support needs related to issues such as disability, illness, capacity, mental health, substance misuse and trauma.

We enable our staff, volunteers and those who work with us to make informed and confident decisions that safeguard the children and adults we work with. We support them to take all suspicions and allegations of abuse, emotional abuse and neglect seriously. We expect everyone working with us (staff, trustees, volunteers, students on placement, and anyone working on behalf of akt) to have read, understood and adhere to this policy, guidance and related procedures.

1.3 How we implement and enact our policy statement

akt will endeavour to protect adults in its care. In order to do this, akt staff and volunteers will:

1. Value, listen to and respect adults, ensuring that we obtain their consent where possible unless 'vital interests' (as defined under GDPR) are at

stake, or the person has been assessed as lacking mental capacity (as defined in the Mental Capacity Act 2005);

2. Take leadership responsibility at senior board level and via a clear line of accountability for our safeguarding arrangements, including the appointment of a Designated Safeguarding Officer (DSO), a Deputy DSO and Safeguarding Leads;

3. Adopt this policy and adhere to our associated procedures and code of conduct and good practice for staff, volunteers, students on placement, and anyone else working on our behalf;

4. Develop and implement effective social media, communications and IT policies and related procedures;

5. Ensure that in all our digitally based services, we adopt high standards of safeguarding, commensurate with the standards used in our face-to-face services;

6. Operate a 'safer' recruitment policy and procedure when appointing trustees, staff and volunteers. This includes the requirement for individuals to obtain criminal record checks from the Disclosure and Barring Service for eligible posts (renewable every two years) and the completion of all other elements of our recruitment procedure;

7. Record and store information promptly, professionally and securely, in line with the Data Protection Act 2018;

8. Share information about safeguarding and child protection with our workforce and trustees promptly, ensuring that staff are trained in safeguarding and supervised adequately, carry out their roles competently and that they work in an environment where they feel able to raise concerns and feel supported in their safeguarding role;

9. Ensure that adults are able to raise concerns where they exist and are aware of our policies on safeguarding and protecting children and adults;

10. Share concerns about adults appropriately and without delay with agencies and individuals who need to know, in accordance with our procedures for sharing information;

11. Ensure that staff, trustees, volunteers, and others working on behalf of akt are fully informed about the processes for dealing with concerns about possible abuse;

12. Adopt a clear policy around the management of allegations against members of our workforce and trustees;

13. Ensure that all members of our workforce and our Board of Trustees, and anyone working on behalf of akt know the name of the Designated Safeguarding Officer, their Deputy and their role;

14. Ensure that all members of our workforce and our Board of Trustees, and anyone working on behalf of akt understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the Designated Safeguarding Officer;

15. Create and maintain an anti-bullying environment, and ensure that we have a policy and procedure to help us deal effectively with any bullying that does arise (See – Code of Conduct and Bullying and Harassment Policy);

16. Ensure that we have effective complaints and whistleblowing measures in place;

17. Ensure that we provide a safe physical environment for our children, adults, staff and volunteers by applying health and safety measures in accordance with the law and regulatory guidance;

18. Ensure that we provide a safe digital environment for adults, within our centres, while using their own and/or akt devices. We do not currently use filtering controls on devices, as they prevent access to some helpful content for adults.

19. Ensure that we are aware of our regulators' and funders' expectations around our safeguarding practice and that we adhere to these;

20. Seek and take account of the views of the adult as much as feasibly possible, whilst also safeguarding their welfare and responding with appropriate haste to any situation where there is a serious, direct risk posed to a child or adult;

21. Work in a multi-agency context, to efficiently safeguard the child or adult;

22. Ensure that there are clear effective channels of communication between all staff, volunteers and service users;

23. Positively promote the rights of service users, volunteers, staff and trustees;

24. Support any person wishing to make an allegation;

25. Follow the law and statutory requirements that provides protection to akt service users, volunteers and staff.

This policy statement should be read alongside our policies and procedures on:

- Recruitment, induction and training
- akt Complaints Procedure against staff and volunteers
- Data Protection
- Privacy Policy
- Confidentiality Policy
- Code of Conduct for staff
- Code of Conduct for volunteers

- Communications and Representation Policy
- Anti-bullying and Harassment (including cyber-bullying)
- Whistleblowing and public interest disclosure
- Health and Safety Policy
- Lone working policy and procedure
- Digital Safeguarding Guidance
- Youth Engagement Safeguarding Guidance

We are committed to reviewing this policy and procedures annually, and updating our processes as appropriate.

This policy was last reviewed on 22nd September 2023

Signed: M Seal

Date: 18/10/23

2 akt Safeguarding team – roles and contact details

On a day-to-day basis Safeguarding Leads can be contacted at safeguarding@akt.org.uk.

Role	Main duties
Designated Safeguarding Officer (DSO)	Acting as akt's representative to oversee child and adult protection and safeguarding issues.
Deputy Designated Safeguarding Officer (DDSO)	Deputising for the DSO, including overseeing child and adult protection and safeguarding issues.
Safeguarding Lead	Dealing with day-to-day safeguarding concerns.
Safeguarding Lead	Dealing with day-to-day safeguarding concerns.
Staff Safeguarding Lead	Dealing with welfare concerns related to staff and volunteers.
Senior Trustee Lead for Safeguarding	Overseeing safeguarding strategy and ensuring akt's compliance with policy and legislation.

2.1 akt Safeguarding team – roles and responsibilities

akt's Designated Safeguarding Officer (DSO) is the person assigned as akt's representative in child and adult protection and safeguarding issues.

The akt Designated Safeguarding Officer has responsibility for:

- Overseeing the preparation and implementation of the child protection and vulnerable adults policy (safeguarding policy), ensuring it is regularly reviewed;
- Reporting concerns of abuse to the statutory authorities (Children or Adult Social Care or the Police);
- Ensuring that all members of the workforce, trustees, and anyone working on behalf of akt (including volunteers) are aware of and

understand our policies and procedures and the relevant multi-agency procedures for working with children and adults and keeping them safe;

- Being a point of contact within akt members of the workforce, trustees, and anyone working on behalf of akt (including volunteers) in relation to safeguarding adults and child protection;
- Being aware of local statutory safeguarding procedures and networks, including reporting to the Local Authority Safeguarding Officer (LADO) when required;
- Keeping informed and up to date on relevant changes in the law and national safeguarding guidance;
- Making decisions about whether to refer potential safeguarding and child protection situations to an investigating agency;
- It is not the role of akt or its Designated Safeguarding Officer to decide whether abuse has taken place or not. It is, however, our role to ensure that concerns are shared with appropriate agencies and relevant action taken.

In the DSO's absence, the **Deputy Designated Safeguarding Officer (DDSO)** can be contacted.
The akt Deputy Designated Safeguarding Officer has responsibility for:

- Providing support and guidance to staff dealing with safeguarding issues
- Providing the Secretariat function to the monthly safeguarding meeting
- Leading on quality assurance within the safeguarding team
- Making decisions on whether reported safeguarding incidents require escalation to the Local Authority
- Following up Safeguarding Alerts via Inform
- Developing safeguarding practice at akt, including devising and delivering training to staff and volunteers
- Ensuring the policies are up to date and reviewed accordingly
- Undergoing regular training and refresher training in safeguarding
- Deputising for the DSO and liaising with the LADO when required

On a day-to-day basis, **Safeguarding Leads** can be contacted.

The akt Safeguarding Leads have responsibility for:

- Providing support and guidance to staff dealing with safeguarding issues
- Making decisions on whether reported safeguarding incidents require escalation to the Local Authority
- Following up Safeguarding Alerts via Inform
- Developing Safeguarding practice at akt, including devising and delivering training to staff and volunteers
- Undergoing regular training and refresher training in Safeguarding

The **akt staff Safeguarding Lead** has responsibility for dealing with concerns for staff welfare.

The **akt Senior Trustee Lead for Safeguarding** has responsibility for overseeing safeguarding on a strategic level, ensuring akt's adherence to legislation, and approving changes and improvements to relevant safeguarding-related policies and procedures.

3 Policy and procedure guidance

The adults with whom akt works may experience any of the forms of abuse listed in this guidance and in the guidance that relates to abuse. However, it is worth noting that some LGBTQ+ adults are at additional risk of a number of forms of harm, including serious bullying, self-harm and mental health issues.

In addition, adults who face homelessness for whatever reason have already had their well-being compromised and are vulnerable to all the various risks that homeless people face in terms of health, poverty, becoming victims of crime, drug and alcohol misuse, and exploitation of various kinds. Adults involved with akt may also be involved in sex work and are vulnerable as a result. In addition, we also support adults who identify as Black, Brown, a

Person of Colour or another minoritised ethnicity, and we acknowledge that systemic racism continues to oppress, invalidate, and deeply affect their lives.

Our staff and volunteers must be particularly vigilant to these risks that many of our young adults face, as well as to the various other forms of abuse and neglect to which any adult may be subjected.

3.1 Understanding Adult Abuse

There are ten types of abuse, including:

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

Click on the link below to access information and advice on different types of abuse, how to spot the signs and what you can do to help keep vulnerable adults safe:

https://www.scie.org.uk/safeguarding/adults/introduction/highlights

It should be noted that the legislation and guidance make it clear that this list is not exhaustive and that those working with adults with care and support needs should be open to the possibility of other forms of abuse.

The Domestic Abuse Act 2021 regards children as victims of domestic abuse within their own right if they witness it (see or hear it). The definition of domestic abuse is abuse between **two people aged 16 or over** if they are 'personally

connected' (i.e. relatives, romantic partners, ex-partners, people with parental responsibility for the same child).

Only people over the age of 16 are eligible for a Multi-Agency Risk Assessment Conference (MARAC) referral if they are a high risk victim of domestic abuse. In high risk cases a MARAC referral can be sent without consent.

Please also note that if an adult aged 18+ is a high risk victim of domestic abuse and has care and support needs, a referral to the relevant local authority's Multi-Agency Safeguarding Hub (MASH) will need to be made alongside a MARAC referral.
In its work with adults, akt draws on a set of principles that reflect its approach to information sharing, including consent, capacity and confidentiality. These are:

- **Empowerment** – supporting the adult to make their own decisions and informed consent;
- **Protection** – support and representation for those in greatest need;
- **Prevention** – it is better to take action before harm occurs, including signposting to agencies that can help;
- **Proportionality** – a proportionate and the least intrusive response appropriate to the risk presented;
- **Partnership** – local solutions through services working with their communities;
- **Accountability** – accountability and transparency in delivering safeguardin

3.2 Specific factors relevant to safeguarding young adults as distinct from older people

- Children do not suddenly stop needing safeguards when they reach their 18th birthday – their legal status might change but independence is a gradual process that starts at birth and goes on well into adulthood.

- New challenges arise when a young person enters the adult world. This

is an exciting time for anyone but creates the potential for new risks and new areas of vulnerability. Many young adults are moving away from home for the first time or starting work or volunteer placements. Most are starting to take full control of their finances, and many are starting relationships with adult partners. Some are becoming parents or have additional, new caring responsibilities.

- Service providers, including akt, continue to have a duty of care to the people that use their services, even after they turn 18. However, adults who may have previously received health or local authority services (for example, those who have been 'in care' or 'looked after' by a local authority) may find that on attaining 18 years, these services are withdrawn, and they are in danger of 'falling through the net' and of being denied services they require on an ongoing basis.

- Some adults are 'at risk' or 'vulnerable' to a greater extent than most others due to issues already listed. These risk factors may exist singly or in combination, and, in some cases, could be triggered by or exacerbate the vulnerability of young adults who are already trying to deal with the normal pressures of young adult life; there may be complex causal pathways and relationships between some of the various factors, and the varying factors might not always be self-evident or visible.

- An adult (or indeed anyone) who may be considered by others to be at risk, may not think of themselves as vulnerable, and may in fact feel insulted at being viewed in this way. It is, therefore, important to take into account the perceptions and feelings of adults whom you deem to be vulnerable but who prefer not to be placed in this category. Care and sensitivity should be used if you find that there are safeguarding concerns relating to them.

- Some adults at risk of abuse are also parents or carers and their children (or unborn children) and others in their care may also be at risk of abuse or harm.

4 Procedure for dealing with safeguarding concerns

4.1 How concerns about abuse might arise

There are a number of ways in which a member of staff or volunteer might become concerned that an adult is being abused or is at risk of harm:

- An adult discloses in their referral or during the triage and assessment process that they are facing abuse;
- An adult with care and support needs accessing akt's services may make an allegation against an akt staff member;
- An akt staff member or volunteer observes concerning behaviour by an adult;
- A young person accessing akt's services discloses that a vulnerable adult known to them is being abused;
- An akt staff member or volunteer witnesses an incident between two young people.

4.2 Responding to concerns about possible abuse (including **what to do in an emergency**)

In accordance with national child protection statutory guidance (Working Together 2018), and with multi-agency safeguarding procedures, **akt has a responsibility to report any potential safeguarding concerns and/or alleged abuse of a person under the age of 18 to a statutory agency**. Please see akt's Safeguarding Children policy for more guidance.

When working with an adult who we suspect may be being abused, we need to work to the principles of the Care Act 2014 and the associated Care and Support Guidance.

1. Safety is the priority

If anyone acting for, or employed by, akt has reason to believe that an adult may be suffering abuse or is at risk of abuse, then the safety and welfare of that adult, and any other child/young person/adult likely to be affected, is the paramount consideration in deciding what action needs to be taken.

2. Direct disclosures

If the concerns take the form of a direct disclosure by a child or adult, the staff member or volunteer should:

A. Listen carefully, giving the person undivided time and attention. Reassure the person that they have done nothing to deserve being abused and that reporting it demonstrates courage.
B. Use supportive non-verbal behaviour such as attentiveness, empathy and an avoidance of any language or gestures that may demonstrate shock, impatience or disbelief.
C. Aim to facilitate the disclosure in order to determine whether there is real cause for concern.
D. DO NOT cross-examine the person or investigate the disclosure. **The responsibility for undertaking any investigation lies with the relevant local authority**.
E. Inform the person that the concerns will need to be shared with the DSO.

3. Discussion with the Deputy DSO /DSL or Services Manager if required

The concerns should be discussed with the Deputy Designated Safeguarding Officer or Designated Safeguarding Lead if required. If the Deputy DSO is absent, or the disclosure is about a volunteer or staff member, then the Designated Safeguarding Officer should be contacted on the same day that the concerns emerge.

4. Making a record

Information concerning the disclosure, or any other child protection concerns or concerns about safeguarding, should be recorded on the same day, using the Safeguarding Alert feature on Inform (see this document for an instructional guide or the standard Reporting Template included below for those who don't have access to Inform).

The Safeguarding Alert should specify:

- The date and time of the or disclosure or emergence of the concern;
- The child's or adult's account (if available);
- Any physical or other signs of injuries noted, e.g. bruising;
- Any relevant background information;
- An assessment made by the staff member as to why the information given constitutes a child or adult protection concern (including risk to others as well as to the child or adult at the centre of the concern);
- What the child or adult would like to happen (if known)
- In the case of an adult, whether they have given consent to the information being shared outside the organisation;
- In the case of an adult, whether there might be issues of mental capacity to give consent to information sharing;
- In the case of an adult, whether they might be being coerced into withholding consent to information sharing;
- Whether there might be 'vital interests' at stake or a duty of care that might override the child or adult's decision to withhold consent to information sharing (see paragrap 7 below)
- Action already taken by the staff member
- Agreed next steps and who should be informed. This should include the staff member's manager within AKT

5. Sharing of record with DSO

The record should be completed on Inform and assigned to the Deputy/Designated Safeguarding Officer/Lead, also on the same day. If the

Reporting Template is used it should be marked confidential and emailed to the Deputy/DSO.

Making referrals when there are concerns about possible abuse or risk of abuse

Using the adult's current postcode, click this link to check which local authority you need to contact: https://www.gov.uk/find-local-council

6. In an emergency

If the personal safety of a child or adult is immediately threatened, it is vital that urgent action is taken as soon as possible on the same day. In the case of an adult, it will mean contacting 999 or the local authority's Adults Multi Agency Safeguarding Hub.

Please also note that if an adult over the age of 18 is a high-risk victim of domestic abuse and has care and support needs, a referral to the local authority safeguarding adults team will need to be made alongside a MARAC (Multi-Agency Risk Assessment Conference) referral.

7. Informing the person who is at possible risk and dealing with issues of consent

Whilst confidentiality is an important principle which enables people to feel safe when they share concerns, it is not an absolute right. For adults, consent from the alleged victim is needed in order to intervene or to share their information with external agencies and should always be sought from the adult by staff and volunteers unless it is not safe to do so. In non-emergency situations external reporting without consent should be at the discretion of the trained safeguarding leads who should decide if there are sufficient legal grounds to override consent. Please see supporting guidance: Safeguarding adults: sharing information | SCIE

If the person who is the subject of the concern is an adult and clearly capable of consenting to the action being taken, that consent must be given unless 'vital interests' (as defined in data protection legislation) are at stake or if there is a duty of care to pass on the information. These may be in situations where, for example:

- there is a risk to others;
- there is an immediate risk to the person themselves;
- the person is being coerced into withholding consent;
- or there is a likelihood that a crime is being committed.

If information is shared without consent, the adult should be informed of this and the reasons why, unless it is not safe to do so.

Verbal consent from an adult should be backed up with written consent unless this would delay the sharing of the information and/or cause unwarranted anxiety to the adult.

If there is a concern that the adult may lack the capacity to provide consent, the DSO should contact the local authority Adult Safeguarding team to seek expert advice; in addition, if it is perceived that the adult is at immediate risk, the emergency procedure (outlined above in point 6) should be followed straight away.

The adult who is the subject of the concern should be informed, whenever possible, about any action being taken on their behalf and what is likely to happen. If there is no immediate danger, it is advisable to give the young adult a little time to fully understand what action is being pursued and why, before proceeding. It is also important to operate in line with the principles of **empowerment, protection, prevention, proportionality, partnership and accountability**.

8. Making the referral

If the discussion with the DSO/Safeguarding Lead leads to a decision to make a referral to the local authority Adults Social Care team, then **this should be done within one working day of the decision being made**.

The referral should be made by the relevant akt staff member, their manager or a member of the Safeguarding team, over the telephone and followed up in writing within the same working day. Some local authorities have a standard online or downloadable referral form, and, if so, this should be used.

If the concern relates to any allegations or concerns about risk presented by a staff member, volunteer or third-party colleague, the procedure for dealing with this should be followed.

9. Multi-agency working

akt is committed a multi-agency approach for safeguarding children and adults. akt will engage with relevant Multi-Agency Risk Assessment Conferences (MARAC) proceedings and plans, and any other multi-agency response required to protect the adults we are working with.

akt will actively approach relevant external agencies to provide additional support to clients suspected of being the victim of abuse, and will seek to provide adults with independent advocates for additional support, where appropriate.

10. Escalation

If akt is not satisfied that a referral has been responded to appropriately or within the timescale set out in statutory guidance and multi-agency procedures, we will escalate our concerns using the processes set out in those multi-agency procedures. This normally means contacting senior management within the statutory agency to whom the referral has been made.

11. Logging and reviewing safeguarding alerts

All safeguarding for children and adults will be kept within In-Form. Records of incidents, concerns and investigations related to AKT staff will be stored securely on their staff file on Atlas. For concerns and information around people

not on our In-Form system, a shared folder within Sharepoint will be used to store information safely and will include:

- details of the incident/concern;
- action taken in response to the incident;
- the outcome.

Reviews of all reported safeguarding incidents take place at least annually, and include services committee and board scrutiny. The findings of reviews inform our future safeguarding practice.

4.3 Dealing with allegations or concerns about possible risks of abuse presented by a staff member, trustee or volunteer

akt will not tolerate abuse by staff or volunteers in any form. Any allegation or concern that a member of staff or volunteer may present a possible risk of abuse, will be fully investigated in accordance with akt's procedure set out below.

akt will also report any safeguarding concerns about adults or children who are related to staff working with akt, where we have concerns that abuse may be taking place.

'Consent' by an adult is not viewed by akt as either a defence or excuse for abuse.

Staff and volunteers should report and record concerns that relate to other staff members, volunteers or trustees

1. Any staff member, who receives an allegation or believes that a colleague may be behaving in way which presents a risk to children or adults, or infringes the Code of Conduct, or may have presented a risk to children or

adults in the past, should immediately (i.e. within 24 hours) tell the DSO or, in their absence, the Deputy DSO.

2. Record the facts as you know them on the standard Recording Template and give a copy to the DSO. (Note: the DSO should also ensure that a copy is retained confidentially within the safeguarding incident log and on the individual's Atlas file).

Remember: if the behaviour of a staff colleague, trustee, partner, agency staff, volunteer or anyone working on behalf of akt causes you concern:

- Do not ignore your concerns
- Do not confront the person about whom you have concerns
- **Do** discuss your concerns with akt's Designated Safeguarding Officer or, in their absence, the Deputy DSO
- Do not delay in passing on concerns to someone who is in a position to take them forward
- Do not worry that you may have been mistaken. It is better to have discussed it with someone with the experience and responsibility to make an assessment, and you will not be penalised for any concern raised in good faith, even if it turns out to be unsubstantiated

In the case of allegations against or concerns about a staff member, trustee or volunteer, an investigation may have three related strands:

1. If the allegation reaches the threshold of actual or potential abuse of an adult the matter should be referred to Adult Social Care who will coordinate an investigation and examine the risk to any child or young person involved or potentially involved
2. Where circumstances warrant it, there may be a police investigation into a possible crime; this may need to take precedence over an internal investigation
3. If it appears that allegations may amount to misconduct or gross misconduct, akt's disciplinary procedures should be invoked. should be invoked.

It is essential that the information about the alleged abuse or risk is dealt with

appropriately under each of these strands of investigation. The fact that a prosecution is not possible does not mean that action to safeguard the adult is not necessary or not feasible. For example, an allegation may relate to prohibited behaviours or a breach of akt's code of conduct. Even if these behaviours or concerns about risk may not lead to action on the part of Adults Social Care, they should, if they are an employee or volunteer of akt, still be investigated and managed under akt's disciplinary procedures.

The DSO, in consultation with the individual's manager and senior management in akt, should inform the Local Authority's Social Care officer or team responsible for managing allegations (can be known as a LADO) within one working day if there is a concern about possible risk or an allegation made against a member of staff, trustee, volunteer, or anyone else involved with akt. The discussion with the LADO (or similar officer) will, if necessary, initiate a multi-disciplinary approach to the concerns/allegations.

If an individual is removed from regulated activity with children or adults (or would have been removed if they had not left) because the person is considered by akt to pose a risk of harm to vulnerable adults, akt is obliged to make a referral to the Disclosure and Barring Service.

Any member of staff who is charged or questioned in connection with a criminal offence against a child or adult receiving a service from akt, or another child or adult, may be suspended or removed from normal duties. Any volunteer will be withdrawn from duties. This may remain in place until the outcome of any criminal proceedings is known or until the police eliminate the person from their enquiries or drop the investigation.

Staff about whom there are concerns should be given information to help them understand the concerns expressed, the processes being invoked and be informed of the outcome of any internal investigation and the implications for disciplinary processes. The internal investigation should be completed as quickly as possible, consistent with its effective conduct. In any case involving a criminal investigation, the decision as to when to inform the suspect of the allegations should always be jointly agreed between the police and other relevant agencies.

Adults who have been allegedly harmed by a member of staff or volunteer should be offered support and kept informed about the progress of the investigation (subject to police requirements and the need to respect confidentiality in relation to the alleged perpetrator). Subject to consent where the concern an adult support should also be offered to parents and carers, dependants of an adult who has allegedly been harmed by a member of staff or volunteer working for akt. They should be given information on any concerns, advised on the processes to be followed and informed of the outcomes, except in circumstances when the allegations involve the parent/carer directly. Professional advice should be sought as to what can be said to parents/carers.

All enquiries into allegations will be overseen by the DSO, Lead Trustee for Safeguarding, and CEO (they will agree the division of responsibility on a case-by-case basis). The lead person for the enquiry will liaise with police, Social Care, the Disclosure and Barring Service (if necessary), and other interested parties, and attend relevant meetings as required, keeping staff informed as appropriate.

4.4 Recruitment and training of staff and volunteers

akt recognises that our most important asset in fulfilling our aims and objectives as an organisation is our workforce. We therefore aim to recruit the best people possible to work with children, young people and young adults, and to build a safe organisational culture in which our staff and volunteers are well managed, and feel supported in raising concerns.

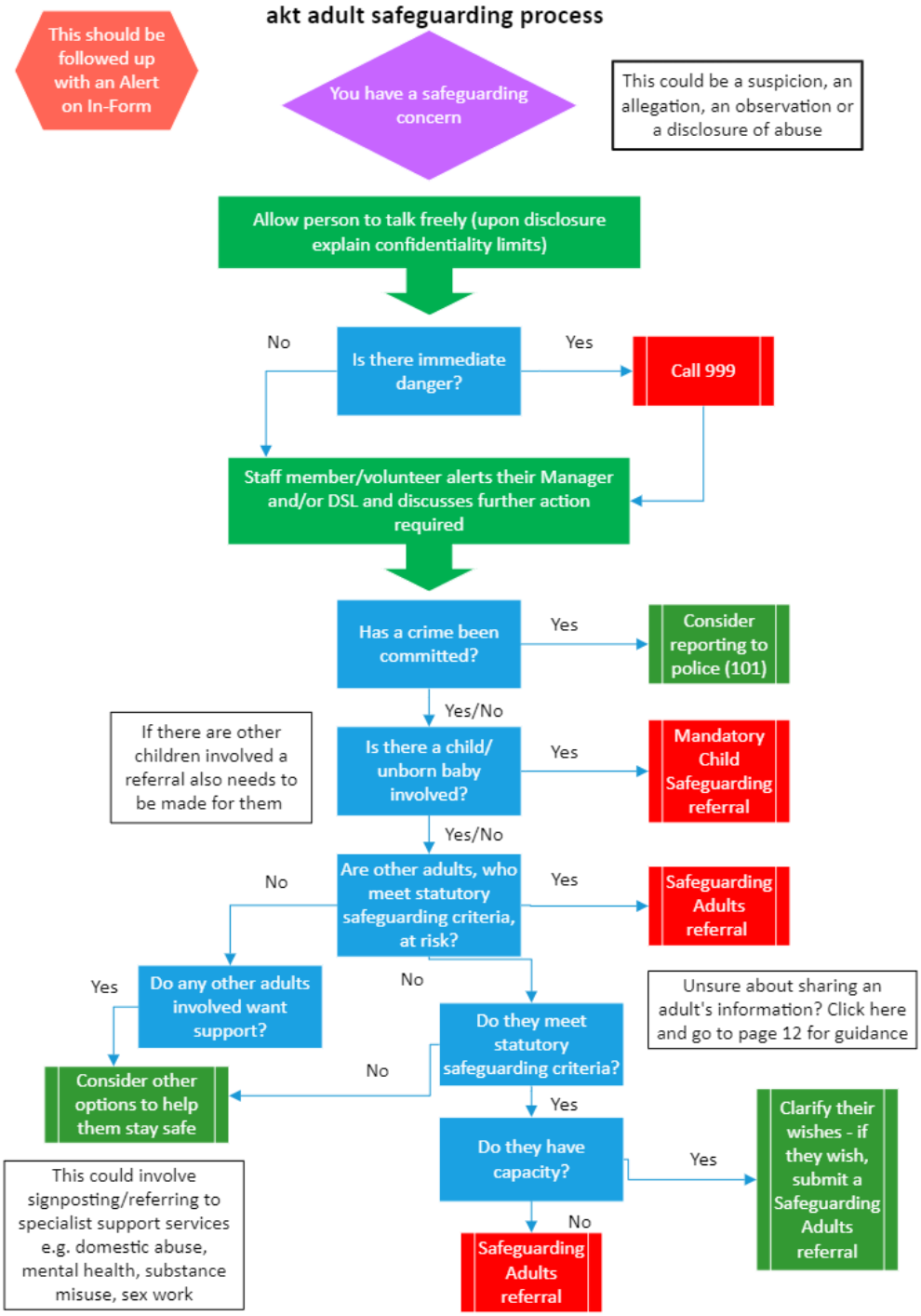
Our search to recruit the best people possible includes taking all reasonable steps to ensure that unsuitable people and those with an interest in harming children and young adults, are prevented from working with children/adults at AKT.

See akt's Recruitment Policy and Safer Recruitment Policy for more details.

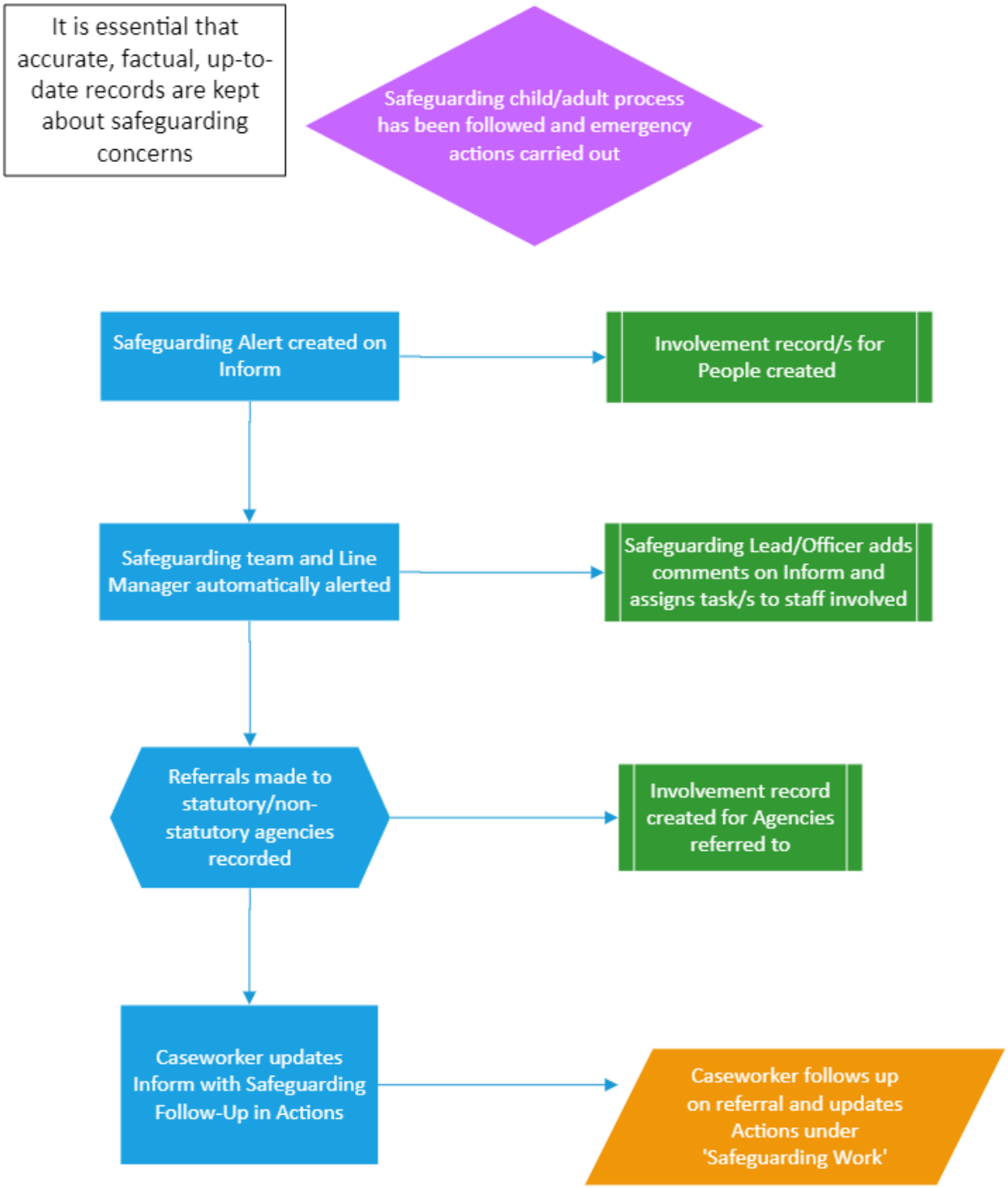
All staff, and volunteers will undergo safeguarding training as part of their induction at a level consistent with their role; this will be refreshed every year for Services staff and Designated Safeguarding Leaders and every two years for all other staff. All AKT services staff will complete the basic level training for safeguarding adults, offered by the relevant Local Safeguarding Board(s).

All staff and volunteers who will be working with children and adults should complete a DBS application form for a check at the highest level for which they are eligible.

Appendix 1 – Adult Safeguarding flowchart including emergency actions



Appendix 2 – Safeguarding Reporting Procedure for In-Form – click here to see how to create a Safeguarding Alert



Appendix 3 – Safeguarding Reporting Template for those without access to In-Form

Restricted Information

This form should only be completed by those who do not have access to In-Form whenever an issue or concern has arisen that needs reporting regarding a child or adult.

TRY AND FILL FORM OUT AT THE TIME OF THE INCIDENT WHERE POSSIBLE.

Date	
Time	
Name of person reporting	
Position at akt	
Contact details of person reporting	
Adult's details	
Name	
Address	
Date of birth	
Contact details (phone number/email address)	
Reason(s) for report including names and details where known **What are you worried about?**	

Details of Alleged perpetrator(s)	
Name	
Address	
Are they also known to akt?	
Action(s) taken by person reporting	
Is the adult aware of your concerns and action taken?	
Has the adult been asked to consented to a safeguarding referral?	
If no, why not?	
Who else has been informed of these issues?	
Report received by akt DSO/Deputy DSO/Safeguarding Lead	**Name:** **Signed:** **Date:**
Action(s) taken by akt safeguarding team	

PLEASE ENSURE A COPY OF YOUR COMPLETED REPORT IS SENT TO THE DESIGNATED SAFEGUARDING OFFICER OR DEPUTY DESIGNATED SAFEGUARDING OFFICER

Appendix 4 – Basic principles in reacting to suspicions, allegations and/or disclosures

What To Do	What Not To Do
Stay Calm.	Don't panic. Don't over-react. It is extremely unlikely that the person is in immediate danger.
Listen, hear and believe.	Don't probe for more information. Questioning may affect how the disclosure is received at a later date.
Give time to the person to say what they want. Re-assure and explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed.	Don't make assumptions, don't paraphrase and don't offer alternative explanations. Don't promise confidentiality to keep secrets or that everything will be ok (it might not).
Act immediately in accordance with the procedure in this policy.	Don't try to deal with it yourself.
Record in writing as near as verbatim as possible what was said as soon as possible.	Don't make negative comments about the alleged abuser.
Report to the lead member of staff.	Don't gossip with colleagues about what has been said to you.
Record your report.	Don't make a child or young person repeat a story unnecessarily.

Appendix 5 – Responding to concerns about possible abuse: visual guidance

1. **Safety is the priority!**

The safety and welfare of children, young people and adults is the paramount consideration in deciding what action needs to be taken.

2. Direct disclosures

A. Listen carefully

B. Use supportive body language and don't act shocked

C. Facilitate the disclosure to determine if there is real cause for concern

D. DO NOT cross-examine or investigate

E. Inform the person that the concerns will need to be shared with a DSO

3. Discussion with Deputy DSO/Safeguarding Lead or Services Manager

- Concerns should be discussed on the same day as the disclosure was received
- If the disclosure is about a volunteer this should be shared with the Designated Safeguarding Officer

4. Making a record

- A Safeguarding Alert should be raised on Inform (see Appendix for flowchart of process)
- Reporting template in Appendix should be used by those without access to Inform
- The Alert/Report should contain all details of disclosure including who is involved, why it's a safeguarding concern, wishes of the YP and action already/to be taken

5. Sharing record with DSO

- The Safeguarding Alert on In-Form will automatically be sent to the DSO once saved
- The Safeguarding Report form should be email to the DSO/Deputy and marked as Confidential

6. In an emergency

If the personal safety of a child or adult is immediately threatened, it is vital that urgent action is taken as soon as possible on the same day.

This could mean calling 999 or making an urgent referral to the Local Authority's Child or Adult Multi-Agency Safeguarding Hub (MASH)

Use this link to check which Local Authority you need to contact: https://www.gov.uk/find-local-council

7. Informing the person at risk and asking for consent

- Where possible you should always ask the child, young person or adult for consent before making a referral
- You should also inform them of what is likely to happen once a referral is made
- If you believe that someone is at immediate risk of harm then you can breach confidentiality and make a referral without consent
- Where consent is needed this should be given in writing

8. Making the referral

- If a safeguarding referral is required this should be done within one working day of the decision being made
- The referral should be made over the phone and followed up in writing the same day - some LAs may ask you to complete a referral form
- If the concern relates to a staff member, volunteer or third party then the DSO will follow the procedure and may report the concern to the Local Authority Designated Officer (LADO)

9. Multi-agency working

- AKT is committed to working in a multi-agency approach to safeguarding children and young people
- Well will engage with relevant multi-agency proceedings and plans required to protect the children and young adults we are working with.
- We will actively connect children and young people with external specialist support and independent advocates where appropriate.

10. Escalation

- If AKT is not satisfied that a referral has been responded to appropriately or within the statutory timescale, we will escalate our concerns.
- In the case of referrals involving children and young people under the age of 18, AKT may also consider using the NSPCC Helpline to support the referral and escalation process.

11. Logging and reviewing Safeguarding Alerts

- Safeguarding concerns about young people are stored securely on In-Form
- Concerns about staff are stored securely on Atlas
- A secure folder on Sharepoint is used to store concerns about other parties
- Board reviews of all reported safeguarding incidents take place at least annually and inform future practice