



Employment Learning and Skills Division

SAFEGUARDING ADULTS POLICY (INCLUDING PREVENT)

Adult Learning Service



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SAFEGUARDING POLICY (INCLUDING PREVENT)

Introduction

Employment Learning and Skills Division, Adult Learning Service recognises its duty toward safeguarding and promoting the welfare of adults at risk. This Policy should be read in conjunction with Halton Adult Safeguarding Board Policies: Northwest Safeguarding Adults Policy and Safeguarding Adults in Halton: Procedures 2020. Please also refer to Child Protection Policy 2022 and Low Level Concerns Policy 2022.

This policy has also been developed in accordance with the requirements of the Counter Terrorism and Security Act and Prevent Duty Guidance (2015) and Employment Learning and Skills Division, Adult Learning Service recognises the responsibility to protect adults at risk of radicalisation. Throughout the Curriculum, learners are encouraged to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

1. Purpose

- 1.1. To protect adults at risk at risk of abuse and neglect by having safeguarding procedures in place that reflect current legislation, guidance and best practice.
- 1.2. To provide a safe, inclusive and stimulating environment where learners feel supported and able to report or seek advice regarding any safeguarding concerns, relating to themselves or others.
- 1.3. To provide information and support in accessible ways to help learners/staff understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult.
- 1.4. To raise awareness of all staff of the need to safeguard adults at risk and of their responsibilities in identifying and reporting possible cases of abuse, radicalisation and extremism.
- 1.5. To develop a structured procedure followed by all members of the service in cases of suspected abuse, radicalisation and extremism.
- 1.6. To develop effective working relationships with all other agencies involved in safeguarding practice.

2. Scope

- 2.1. Safeguarding is everybody's responsibility and, as such, this policy applies to all staff and volunteers working on behalf of the Adult Learning Service. An allegation, disclosure or suspicion of abuse, or an expression of concern about abuse, could be made to any member of staff. Similarly, any member of staff may observe or suspect an incident of abuse and is required to report it to the designated Safeguarding Lead Officer. We have adopted a 'whole service approach' to tackling sexism and peer on peer abuse (including sexual violence and sexual harassment). Staff are encouraged be alert to peer on peer abuse (including sexual harassment) and learners can be confident that reports of such abuse will be believed, taken seriously and acted upon. Sexual violence or harassment will not be tolerated and will not be dismissed as 'banter'.

3. Roles and Responsibilities

- 3.1. All members of staff have a legal duty to report any disclosure, allegation or suspicion of abuse, to the Designated Safeguarding Lead or, in their absence, other Safeguarding Officer. This must be done immediately following the disclosure or suspicion is made or arises. A Cause for Concern form (Appendix 1) should also be completed and emailed directly to the Designated Safeguarding Lead who will maintain the Safeguarding Record.
- 3.2. The Designated Safeguarding Lead or other Safeguarding Officer has a duty to make a referral to Adult Social Care, whenever there is reason to suspect that an adult at risk is suffering, or likely to suffer, significant harm. If a child or children are linked to the referral, information will be shared with Halton Borough Council's Children's Social Care.
- 3.3. The consent of the abused person should be sought before a referral to Halton Borough Council Adult Social Care is made. However, there may be circumstances where there is a need to overrule their wishes. For example:
 - If the person is not making an informed decision or choice
 - If the adult at risk or others affected by the situation are in a life-threatening situation
 - If the adult at risk or other people are otherwise at risk
 - If a crime has been or may have been committed.

Any decision to overrule the wishes of the allegedly abused person should be recorded on the Cause for Concern form, with the reasons for such a decision.
- 3.4. The welfare of the person concerned, including the welfare of any other adults at risk or children who may be at risk, must always take precedence over confidentiality. Therefore, these procedures must be followed, irrespective of any request to maintain confidentiality.
- 3.5. The Designated Safeguarding Lead and Safeguarding Officers must complete safeguarding training relevant to their role. This level of training must be updated at least every two years, with further online safeguarding training to be accessed on an annual basis.
- 3.6. All staff must be given a copy of the Safeguarding Policy including Prevent, the Low Level Concerns Policy and Child Protection Policies immediately upon starting work as part of their induction.
- 3.7. The Governing Body will undergo safeguarding training specific to their role and responsibilities at induction and subsequently every three years. A summary of safeguarding cases and pertinent safeguarding issues e.g. low level concerns will be reported to the Board of Governors on a termly basis, or sooner in the event of serious or repeated incidents. All reporting to the Board of Governors will be anonymised and will contain enough detail to allow appropriate scrutiny and oversight.
- 3.8. Safer Recruitment Procedures will include:
 - at least one member of every recruitment panel having completed approved Safer Recruitment training
 - appropriate DBS checks completed for staff

- 3.9. Staff will ensure that they understand the definitions of abuse (see Appendix 2), are alert to common indicators of possible abuse and neglect and know who to report their concerns to.

4. Procedures

- 4.1. Staff will report any safeguarding concerns to a Safeguarding Officer without delay and in a timely fashion. Verbal reporting of concerns will then be followed up in writing as soon as possible but always within 24 hours. All staff are encouraged to think 'It could happen here.'
- 4.2. Staff will ensure that they record their concerns using the standard Cause for Concern Form (Appendix 1) clearly noting the difference between fact and opinion and where the information has come from. The voice of the adult at risk will be made clearly evident.
- 4.3. Staff will ensure that concerns relating to an adult at risk remain confidential and are only shared with the Safeguarding Officer.
- 4.4. Staff will ensure that they complete Basic Awareness in Adult Safeguarding training at least every three years and will attend further training as appropriate. This includes training regarding the Prevent Duty which will be completed online every two years and refreshed annually.
- 4.5. The Safeguarding Officer will consider the information they have received, will determine what action should be taken and record the outcome of this decision making process. The Safeguarding Officer may contact Adult Social Care for advice, if unsure as to whether a referral is appropriate.
- 4.6. Where responding to peer on peer abuse chronological and developmental ages of everyone involved will be considered alongside any difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability.
- 4.7. Where a referral is made The Safeguarding Officer will complete the online Safeguarding Adults Alert Form in as much detail as possible relating to the concern, to enable Adult Social Care to react in a timely way. This referral form must be completed and submitted to Adult Social Care within a maximum of 48 hours but sooner when requested. (Where a referral is made out of office hours it will be reported to the Emergency Duty Team)
- 4.8. The Designated Safeguarding Lead will keep detailed, accurate and secure written records of both referrals to Adult Social Care and Cause for Concern forms that do not result in a referral.

5. Prevent Duty

- 5.1. The Adult Learning Service understands that those involved in terrorism may seek to exploit and manipulate vulnerable people of all ages and try to involve them in activity in support of terrorism.

This exploitation and radicalisation is viewed as a safeguarding issue and will follow the same procedure.

- 5.2. The Single Point of Contact (SPOC) for Halton Borough Council is Mike Andrews. The Lead Officer for Safeguarding (including Prevent) within the Employment, Learning and Skills Division is the Quality and Learner Experience Manager (DSL). A Cause for Concern relating to radicalisation or extremism will be reported to the SPOC by the Lead Officer for Safeguarding (including Prevent). In the absence of the Lead Officer for Safeguarding, concerns will be reported by the dealing Safeguarding Officer. Relevant agencies (including Police) will be linked in to ensure that vulnerable people are appropriately supported and risk assessed through the Channel process and procedures.

6. Allegations Management – Please also see Low Level Concerns Policy

- 6.1. It is essential that any allegation of abuse made against a member of staff or volunteer is dealt with fairly, quickly and consistently to provide effective protection for the adult at risk and at the same time support the person subject to the allegation.
- 6.2. Any individual who has concerns or receives information in which it is alleged that a member of staff/volunteer has:
- behaved in a way that has harmed or may have harmed an adult at risk;
 - possibly committed a criminal offence against or related to an adult at risk; or
 - behaved toward an adult at risk in a way that indicates s/he is unsuitable to work with adults at risk

must report the matter, without delay, to the Divisional Manager or Designated Safeguarding Lead.

Note, a safeguarding concern will always exist where a member of staff is observed to subject, or is accused of subjecting an adult at risk to any abusive behaviour.

Staff can report verbally in the first instance or via the simple low level concerns form, an example of which can be found in Appendix 5. Where a concern is provided verbally, the Divisional Manager/DSL will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion.

- 6.3. The Divisional Manager will, as appropriate, consult with Social Care to determine:
- if there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or;
 - whether immediate action to protect an adult at risk is required.
- 6.4. Preliminary enquiries should be minimal to establish the facts of the allegation if these were not established or were unclear at the time the original concern was raised, i.e. date, time, place of any alleged incident, any witnesses and other relevant factors.

- 6.5. When an allegation is made a number of inter-related elements will exist (Safeguarding, Criminal Investigation, Disciplinary, Complaints). HBC Adult Social Care will therefore have the key role in co-ordinating the relevant elements and ensuring that all subsequent stages of the adult at risk Protection Procedures are followed.
- 6.6. Staff do not need to be able to determine in each case whether their concern is a low level concern, or if it is not serious enough to consider a referral to Social Care or LADO, or whether it meets the threshold of an allegation. Once staff have shared what they believe to be a low level concern, that determination should be made by the Divisional Manager/DSL and responded in line with this Policy and with the Low Level Concerns Policy.

7. Whistleblowing

- 7.1. Adult Learning Service acknowledges that adults at risk cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, which may include the attitude or actions of colleagues.
- 7.2. Halton Borough Council's Whistleblowing Policy is there to support individuals who raise concerns and outlines a clear and accessible procedure for doing so.
- 7.3. All concerns will be treated in confidence and every effort will be made not to reveal the identity of the person making the allegation if they so wish (subject to any legal requirements or decisions). This cannot be guaranteed however if a person needs to come forward as a witness. For example, if a hearing is needed, either by law, or under a Council procedure, the employee disclosing the concern may be required to give evidence.

Appendix 1: Cause for Concern Form

EMPLOYMENT, LEARNING AND SKILLS

SAFEGUARDING CAUSE FOR CONCERN FORM

Part 1 – to be completed by reporting Officer	
Date of issue/incident:	
Name of client/customer:	
Date of birth (if known)	
Course Code (if applicable):	
Name of child(ren) at risk (if applicable):	
Outline of incident/concern and any initial action taken (<i>include names of any alleged abusers and relationship to adult at risk if known</i>):	
Has the Adult at risk consented to this information being shared? What does the Adult at risk want to happen?	
Any observations to support cause for concern (E.g. Description and location of any visible bruising etc...)	
REPORTED TO:	TIME/DATE:
NAME OF REPORTING OFFICER:	SIGNATURE:

Part 2 – to be completed by Designated Safeguarding Officer/Senior Manager

Agreed action and reason(s), including names of any officers (Police and/or Social Services) who has provided advice and/or to whom report is to be addressed

Action follow-up (e.g. debrief to staff/learner)

Any changes to policy/procedures as a result?

Name:

Signature:

Date closed:

GUIDANCE NOTES:

1. If someone expresses a concern about abuse, discloses abuse or makes an allegation of abuse to you
 - Take reasonable steps to ensure the adult is in no immediate danger
 - Seek emergency help (first aid; medical treatment; police involvement) if there are immediate risks to health or safety
 - DO NOT confront the person alleged to have caused harm
 - DO NOT destroy or disturb articles that could be used in evidence
 - Inform a Line Manager or other Senior Manager immediately
 - Make a record, as soon as possible, of what the person is saying, using their own words and use this to complete the Safeguarding Cause for Concern Form.

(See: Guidance for Staff p.63, Safeguarding Adults Procedures 2020)

2. Once a decision has been made to report an incident, issue or concern, the information the Safeguarding Officer will be expected to give to Social Services and / or the Police is as follows:
 - Personal details of the alleged victim (name, date of birth, address, racial origin, language spoken and current whereabouts if known).
 - Who you are, how you are involved and your contact details.
 - What happened, where and when?
 - Details of the alleged abuser (name, date of birth, address, language spoken, current whereabouts if known) including their relationship to the person being referred.
 - Details of any witnesses to the alleged abuse (name, contact details and how they are connected to the situation e.g. colleague).
 - Whether there are any other people involved, including children, who may be at risk.
 - Details of other agencies involved and the nature of their involvement (if known).

You may not have all of this information but please give all the information you *do* have when making a referral.

3. When you and/or your manager make a decision to refer to Social Services and/or the Police, you must record this, together with the reason(s) why/why not. It is important to note that not all alerts will become referrals, for example, where there is no abuse, or the person requires signposting to another service or a review of their current care. Wherever possible, actions following an alert or disclosure should comply with the expressed wishes of the adult at risk and any decision to overrule these wishes must be recorded.

USEFUL CONTACT NUMBERS:

Police:	Emergency –	999
	Non-emergency	101
HBC Adult Social Care		0151 907 8306
HBC Emergency Duty Team		0345 050 0148
Halton Domestic Abuse Service:		0300 111 1247
Rape & Sexual Assault Support Centre:		01928 477980
Action on Elder Abuse Helpline:		0808 808 8141
Respond (supporting people with learning disabilities):		0207 383 0700

Appendix 2: Definition of Terms

‘Vulnerable Adult’ and ‘Adult at Risk’

The definition of “vulnerable adult” originated in the 1997 Consultation Document “Who Decides?” ‘No Secrets’ was then published as government guidance for developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse. Introduced in 2000 it encouraged organisations to work together to protect vulnerable adults from abuse.

This has now been replaced with the new definition from the Care Act (2014) and the correct terminology is ‘Adult at Risk’ (of harm). The Care Act 2014 makes it clear that abuse of adults links to circumstances rather than the characteristics of the people experiencing the harm. Labelling groups of people as inherently ‘vulnerable’ is seen to be disempowering.

Safeguarding Adults at Risk

As an organisation we have a duty to ensure that the welfare of all adults is ensured. As part of this, we also need to understand when to implement safeguarding adults reporting procedures.

“Adult safeguarding” is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities.’ – Care Act 2014

Safeguarding duties apply to an adult who meets these criteria:

- has needs for care and support (whether or not the local authority is meeting any of those needs) **and;**
- is experiencing, or is 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

This may include for example, people with:

- a mental health problem or mental disorder including dementia , or people on the autistic spectrum
- a physical disability
- a sensory impairment
- a learning disability
- who are frail and who are experiencing a temporary illness

This list is not exhaustive.

Adult Abuse

Abuse is when someone does or says something that hurts, upsets or frightens another person and that person is not able to stop it happening. It might happen on purpose or the person doing it might not realise

it is wrong or causing harm, but both are still wrong and it should not happen. If you think something is wrong, talk to someone.

Abuse can be caused by anyone:

- A partner or relative
- A friend or neighbour. Sometimes a person can pretend to be a friend so they can abuse a person, this is called Mate Crime
- A carer, this can be someone who is paid or a volunteer
- Someone in a position of trust
- A stranger

Types of Abuse:

Physical abuse is when someone physically hurts another person. It could include:

- hitting , slapping, kicking, shaking or pushing
- force feeding
- misusing medication
- throwing things at someone

Financial or material abuse is when someone takes something that belongs to someone else without asking or makes that person give them things. It is when someone does not let another person use their money how they want to use it. It can include:

- internet scamming
- fraud
- misuse of property, possessions or benefits
- pressure or control with financial affairs or wills

Neglect is when a person does not get the help they need and their medical, emotional or physical care needs are ignored. It could include:

- being left alone when the person doesn't want to be
- being left hungry or thirsty
- not getting help with medication
- not seeing a doctor when the person wants to
- not being helped with personal care or using the toilet
- failure to provide educational services

Sexual abuse/violence is when someone is made to do sexual things that makes them feel sad, angry, frightened or they do not like or understand. It can include:

- unwanted touching

- rape
- sexual assault
- sexual acts that a person has not given consent to or was pressured into consenting
- pressure to look at sexual images
- when someone talks about sex to a person when they don't want them to
- being subject to sexual innuendo or harassment

Psychological or emotional abuse is when someone is made to feel sad, afraid or not important. It can happen anywhere including on the internet or phone. It can include:

- calling names, verbal abuse
- being made fun of, humiliated
- blaming a person for things that are not their fault
- ignoring or depriving
- threats or intimidation
- controlling
- cyber bullying

Discriminatory abuse is when someone is treated badly because they are seen as different to others; this is sometimes called Hate Crime and can include:

- racism
- sexism- sexuality or gender identity
- abuse related to the way someone talks, their religion or age
- acts based on a person's disability
- harassment

Modern Slavery is when someone is forced to work with little or no pay, or threatened with violence if they do not work. It can include:

- human trafficking
- forced labour
- domestic servitude

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members regardless of gender or sexuality. It usually happens in a person's own home and it could include:

- psychological
- physical

- sexual
- financial abuse
- what is known as 'honour' based violence

Self-neglect is when someone might come to harm if they do not look after themselves. It covers a wide range of behaviours where a person fails to care for their own personal hygiene, physical or emotional health or surroundings and it could include:

- not getting enough food, water or heat
- not taking medication or getting medical care that is needed
- not accepting help or support that is necessary to stay safe
- not looking after personal hygiene
- unsafe, hazardous living condition
- hoarding

Organisational abuse is abuse caused by an organisation and is abuse or neglect of an adult by people in a setting or service where the adult is living or using; for example, a care home, hospital or service provided in a person's own home. It could include:

- neglect
- poor practice
- mistreatment of a regime

Extremism

Extremism is defined in the Counter Extremism Strategy 2015 as "the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist." Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Peer on Peer Abuse (including Sexual Violence and Sexual Harassment)

Peer on peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. This includes:

- Bullying (physical, name calling, homophobic, etc., including cyber bullying)
- Gender based violence
- Sexually harmful behaviour, including 'upskirting' and sexting

This abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, culture, sexual identity, disability, special educational needs or other differences and can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim.

Appendix 3 – Good Practice

If an adult at risk makes a disclosure of abuse to you:

You should:

- Listen and keep calm. Do not interrupt
- You **MUST NOT** promise the adult at risk that you will keep the matter confidential. Explain to them who you will need to tell and why
- Keep questions to a minimum, as your role is not to investigate. If you need to ask questions in order to ascertain whether this is a safeguarding concern, ensure they are open questions
- Make a record of what has been said immediately afterwards in words used by the adult at risk and yourself to the best of your memory.
- Note anything about the adult at risk which is connected i.e. any visible injuries including the position and description, the demeanour of the adult at risk i.e. crying, withdrawn etc.
- Clearly indicate whether fact, opinion or third party information
- Report the matter immediately to a Safeguarding Officer

You should not:

- Ask leading questions or press for details
- Rush the adult at risk
- Examine the adult at risk
- Investigate
- Promise confidentiality
- Summarise or use your own words to describe events
- Delay sharing the information with a Safeguarding Officer

If in doubt seek advice from a Safeguarding Officer

Appendix 4 – Useful Contacts

Adult Learning Services

Designated Safeguarding Lead	Kelly Arrowsmith	0151 511 8453 / 07788977307
Safeguarding Officers	Steph Bartlett	0151 511 7788/ 07786197563
	Siobhan Saunders	0151 511 8382/ 07825521372
	Lynsey Carr	0151 511 7547
Prevent Lead (Adult Learning)	Kelly Arrowsmith	0151 511 8453 / 07788977307

Halton Adult Social Care

Adult Social Care services	0151 907 8306
Emergency Duty Team	0345 050 0148
Integrated Adult Safeguarding Unit	0151 511 8555

[Online Safeguarding Adults Alert Form](#)

In an Emergency i.e. the adult at risk is in immediate danger, please call 999

Appendix 5 – Low Level Concern Form

Employment, Learning and Skills



Low Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Halton Adult Learning’s staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and date

Details of Concern

Name of Staff Member:

Concern:

Signed:

Name:

Date and Time:

Received by:

Date:

Time: