# Template Safeguarding Policy and Procedures

This document forms a template for organisations to compose a policy and procedure for Safeguarding vulnerable adults.

The document is divided into 3 columns:
1. Section heading: to clarify the sections of the policy and procedures
2. Explanation - why the section is there and what it should contain and some suggested wording which can be used.
3. Section content: Contains wording to be used in the policy and procedures with prompts to 'fill in the blanks' to allow personalisation of content

**Instructions:** Use the explanations and additional suggested wording in the middle column (explanatory notes) to help you complete the right hand column (section content) information. Then delete the middle column and any instructions/ explanations currently in blue on this template.

**Name of organisation: (insert name of organisation)**

| Section heading | Explanatory notes | Section content |
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| 1. **Introduction** | This section explains why the safeguarding policy is important to your organisation and what the policy aims to achieve.<br><br>In order to fully explain why the policy is relevant to your organisation, you will need to list the types of activities that you carry out that will bring you into contact with vulnerable groups e.g. delivery of services, involvement in residential activities, general contact.<br><br>Controlled activity includes e.g. ancillary roles –such as caretakers where there may be contact with vulnerable groups. Also includes administrators or trustees who can access data on vulnerable adults. | (Insert name of organisation) makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.<br><br>(Insert name of organisation) comes into contact with vulnerable adults through the following activities: (insert list of activities)<br><br>The types of contact with vulnerable adults will be (insert categories i.e. regulated and /or controlled)<br><br>This policy seeks to ensure that (insert name of organisation) undertakes its responsibilities with regard to protection of vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation's expectations. |
| 2. **Legislation** | This section is optional and refers to the principal pieces of legislation governing the application of this policy. | The principal pieces of legislation governing this policy are:<br>• Care Act 2014<br>• London Multi-Agency Adult Safeguarding Policy and Procedures |

| 3. Definitions | This section defines the term safeguarding. It also defines the terms protection, abuse and the main group covered by the policy. | Safeguarding is about embedding practices throughout the organisation to ensure the protection of vulnerable adults wherever possible and responding to circumstances that arise.<br><br>Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.<br>It can take a number of forms, including the following:<br>&bull; Physical abuse<br>&bull; Domestic violence and Domestic abuse<br>&bull; Sexual abuse<br>&bull; Psychological abuse<br>&bull; Financial or material abuse<br>&bull; Modern slavery<br>&bull; Discriminatory abuse<br>&bull; Organisational abuse<br>&bull; Neglect and acts of omission<br>&bull; Self-neglect<br><br>**Definition of Vulnerable Adults**<br>A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or abuse.<br>This **may** include a person who:<br>&bull; Is elderly and frail<br>&bull; Has a mental illness including dementia<br>&bull; Has a physical or sensory disability<br>&bull; Has a learning disability<br>&bull; Has a severe physical illness<br>&bull; Is a substance misuser<br>&bull; Is homeless |
| 4. Responsibilities | This section contains details of responsibilities at various levels of the organisation. The areas of responsibility are listed below. You will need to allocate these to the most suitable person/ group within your organisation. It is best practice to have a named person with a lead responsibility for safeguarding. This is usually a senior manager or trustee who can have authority to make decisions. | **All staff** (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.<br>We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices. |

| | Key responsibilities at various levels are: | **Additional specific responsibilities** |
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| | • The policy is in place and appropriate (usually trustee responsibility) | Trustees have responsibility to ensure: (insert aspects) |
| | • The policy is accessible (usually delegated to SMT by trustees) | SMT have responsibility to ensure: (insert aspects) |
| | • The policy is implemented (usually delegated to SMT or lead officer) | The Designated Senior Manager /lead officer is (insert name). |
| | • The policy is monitored and reviewed (usually delegated to SMT or lead officer) | This person's responsibilities are: (insert responsibilities from job/role description) |
| | • Liaison with and monitoring the Designated Senior Manager work (usually by SMT or trustees) | |
| | • Sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented (usually  trustees through overall budget process and SMT on allocation of those resources) | |
| | • Promoting the welfare of vulnerable adults (usually Designated Senior Manager) | |
| | • Ensure staff  (paid and unpaid) have access to appropriate training/information  (usually the Designated Senior Manager) | |
| | • Receive staff concerns about safeguarding and respond to all seriously, swiftly and appropriately (usually Designated Senior Manager or SMT in their absence) | |
| | • Keep up to date with local arrangements for safeguarding and CRB (usually Designated Senior Manager) | |
| | • Develop and maintain effective links with relevant agencies. [You may wish to list these- e.g. through attendance at strategy meetings, initial case conferences, core groups. (usually Designated Senior Manager) | |
| | • Take forward concerns about responses (usually Designated Senior Manager) | |
| | SMT can mean the most senior person paid or unpaid within your organisation. Support from trustees within smaller organisations is essential. | |

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| | Within organisations, it is inevitable that there will be other policies which link with the Safeguarding policy and this demonstrates how safeguarding is embedded within the organisation. Policies which may be listed are:<br>• Whistleblowing –ability to inform on other staff/ practices within the organisation<br>• Grievance and disciplinary procedures – to address breaches of procedures/ policies<br>• Health and Safety policy, including lone working procedures, mitigating risk to staff and clients<br>• Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory<br>• Data protection (how records are stored and access to those records)<br>• Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose<br>• Staff induction<br>• Staff training<br><br>There are various aspects which should be more explicitly detailed within the Safeguarding Policy. These relate to:<br><br>**Recruitment** – the following good practice recruitment processes should be followed<br>• Providing the following safeguarding statement in recruitment adverts or application details – 'recruitment is done in line with safe recruitment practices.'<br>• Job or role descriptions for all roles involving contact with vulnerable adults will contain reference to safeguarding responsibilities.<br>• There are person specifications for roles which contain a statement on core competency with regard to vulnerable adult protection/ | The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include: (insert list)<br><br>**Safe recruitment**<br>(Insert name of organisation) ensures safe recruitment through the following processes: (insert processes)<br><br>**Disclosure and Barring Service and Recruitment**<br>The organisation helps employers make safer recruitment decisions and prevents unsuitable people from working vulnerable groups.<br><br>In order to avoid DBS gaps, the organisation will (insert methods) In addition to checks on recruitment for roles involving contact with children/ vulnerable adults, for established staff the following processes are in place (insert processes)<br><br><br>**Service delivery contracting and sub contracting** (insert statement if relevant) |

safeguarding
- Shortlisting is based on formal application processes/forms and not on provision of CVs
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with vulnerable adults. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts.
- No formal job offers are made until after checks for suitability are completed (including DBS and 2 references).

Organisations will ensure that their established staff and roles are regularly reviewed through e.g.
- A 3 year rolling programme of re-checking DBS's is in place for holders of all identified posts.
- Existing staff (paid or unpaid) who transfer from a role which does not require a DBS check to one which involves contact with children / vulnerable adults will be subject to a DBS check.

**Service delivery contracting and sub contracting.**
This section is relevant to organisations who may sub contract work, be sub contracted to provide services, or draw in sessional staff. A typical statement might be:
- 'There will be systematic checking of safeguarding arrangements of partner organisations
- Safeguarding will be a fixed agenda item on any partnership reporting meetings.
- Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non compliance procedures'.

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| **5. Communications training and support for staff** | **Induction:** Ways to include safeguarding issues during induction include:<br>• Discussion of the Safeguarding Policy (and confirmation of understanding)<br>• Discussion of other relevant policies<br>• Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence)<br>• Initial training on safeguarding including: safe working practices, safe recruitment, understanding of the alerter guide for adult safeguarding<br>You may wish to refer to formally assessing new members of staff's competence in applying safe practices (e.g. during probation period)<br><br>**Training:**<br>You will need to list the types of refresh training for staff. For those working with adults try links to training specifically for voluntary, independent and private sectors.<br><br>**Communications** – typical mechanisms for enabling effective discussion of safeguarding issues between staff will vary according to size of the organisation but might include safeguarding as a regular agenda item across:<br>• team meetings<br>• SMT meetings<br>• Board meetings<br>• One to one meetings (formal or informal),<br>• clinical supervision<br><br>Other aspects to highlight in the communications section might be<br>• Participation in multi agency safeguarding procedures and meetings in order to be involved in adult protection procedures<br>• Participation in joint visits | (Insert name of organisation) commits resources for induction, training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding<br><br>**Induction** will include (insert processes)<br><br>**Training**<br>All staff who, through their role, are in contact with vulnerable adults will have access to safeguarding training at an appropriate level. Sources and types of training will include: (insert list)<br><br>**Communications and discussion of safeguarding issues**<br>Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice: (insert list)<br><br>**Support**<br>We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include: (insert mechanisms) |

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| | • Provision of a clear and effective reporting procedure which encourages reporting of concerns.<br>• Encouraging open discussion (e.g. during supervision and team meetings) to identify and barriers to reporting so that they can be addressed.<br>• Inclusion of safeguarding as a discussion prompt during supervision meetings/ appraisals to encourage reflection<br>• Some organisations will have a safeguarding representatives team. If so it should be referred to in this section.<br>• How staff are reminded about policies and procedures (refresh sessions etc)<br><br>**Support** – typical support mechanisms would include:<br>• Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with.<br>• Seeking further support as appropriate e.g. access to counselling.<br>• Staff who has initiated protection concerns will be contacted by line manager /DSM within a certain timescale e.g. 1 week). | |
| **6. Professional boundaries** | This section covers aspects such as relationships with adults and the areas will be dependent on the type of work carried out with vulnerable people. Typical areas to include and suggested rules are as follows:<br><br>• **Giving and receiving gifts from adults**: A typical statement would be '(Insert name of organisation) does not allow paid or unpaid staff to give gifts to or receive gifts from adults. However gifts may be provided by the organisation as part of a planned activity'. | Professional boundaries are what define the limits of a relationship between a support worker and a client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.<br><br>(Insert name of organisation) expects staff to protect the professional integrity of themselves and the organisation.<br>The following professional boundaries must be adhered to: (insert rules)<br><br>The following policies also contain guidance on staff (paid or unpaid) conduct: (list policies) |

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| • **Staff contact with user groups.** A typical statement would be: 'Personal relationships between a member of staff (paid or unpaid) and a vulnerable adult who is being provided with support is prohibited. This includes relationships through social networking sites. It is also prohibited to enter into a personal relationship with an adult who has been a provided with a service over the past 12 months.'<br><br>You may also wish to include statements about the following:<br>• Use of abusive language<br>• Response to inappropriate behaviour / language<br>• Use of punishment or chastisement<br>• Passing on service users' personal contact details<br>• Degree of accessibility to service users (e.g. not providing personal contact details)<br>• Taking family members to a client's home<br>• Selling to or buying items from a service user<br>• Accepting responsibility for any valuables on behalf of a client<br>• Accepting money as a gift/ Borrowing money from or lending money to service users<br>• Personal relationships with a third party related to or known to service users<br>• Accepting gifts/ rewards or hospitality from organisation as an inducement for either doing/ not doing something in their official capacity<br>• Cautious or avoidance of personal contact with clients<br><br>You should also refer to other relevant policies which provide guidance e.g. Code of conduct, e-safety, computer misuse.<br><br>There should be a statement about declaring actual or potential interests (e.g. discussing them with line manager or Designated Senior Manager). If you | If the professional boundaries and/or policies are breached this could result in disciplinary procedures or enactment of the allegation management procedures |

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| | have a Conflict of Interests Policy in place, refer to this document. | |
| 7. Reporting | The simplest way to communicate your process is via a simple flow chart/ bullet point list. You can adjust the one shown below to demonstrate your processes.<br><br>Communicate your concerns with your immediate manager<br><br>↓<br><br>Seek medical attention for the adult if needed<br><br>↓<br><br>Discuss with adult<br>.<br>Obtain permission to make referral if safe and appropriate<br><br>↓<br><br>If needed seek advice from Adult Social Service/Access and Response<br><br>↓<br><br>Complete the Local Authority Safeguarding Incident Report Form if required and submit to the local authority within 24 hours of making a contact<br><br>↓<br><br>Ensure that feedback from Camden Council Adult Social Care is received and their response recorded.<br><br><br>Camden Council, Adult Social Care has a process for reporting and this must be adopted.<br><br>If the immediate manager is implicated, then refer to their line manager or peer. | The process outlined below details the stages involved in raising and reporting safeguarding concerns at (insert name of organisation).<br><br>Insert process |
| 8. Allegations Management | There should be a stated process for dealing with allegations against any professional or volunteer working for any organisation.  Any member of staff | (Insert name of organisation) recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation. |

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| | (paid or unpaid) from (insert name of organisation) is required to report any concerns in the first instance to their line manager. [You may refer to making a written record at this stage e.g. 'A written record of the concern will be completed by (insert - the individual /line manager/ safeguarding manager/ peer)].<br><br>Second step- contact local authority for advice. In Camden Council this can be done via contacting the Access and Response team 0207 974 4000<br>Third step – follow the advice provided | The process for raising and dealing with allegations is as follows: (Insert process – either the simple step 1, 2 and 3 or the full local authority process)<br><br>(Insert name of organisation) recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the ISA referral guidance document http://www.isa-gov.org.uk/PDF/ISA%20Referral%20Guidance%20%20V2009-02.pdf |
| 9.  Monitoring | The safeguarding aspects which would typically be monitored would include:<br>• Safe recruitment practices<br>• DBS checks undertaken<br>• References applied for new staff<br>• Records made and kept of supervision sessions<br>• Training – register/ record of staff training on child/ vulnerable adult protection<br>• Monitoring whether concerns are being reported and actioned<br>• Checking that policies are up to date and relevant<br>• Reviewing the current reporting procedure in place<br>• Presence and action of Designated senior manager responsible for Safeguarding is in post | The organisation will monitor the following Safeguarding aspects: (insert list) |
| 10.  Data Protection and Sharing information | This section refers to measures in place to ensure that information is managed and accurately and confidentially recorded. | Information will be gathered, recorded and stored in accordance with the following policies (insert policies e.g. Data Protection Policy, Confidentiality Policy).<br><br>All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. However, information will be shared on a need to know basis only, as judged by the Designated Senior Manager. |

|  |  | All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets. |
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| **11. Conflict resolution and complaints** | This section also refers to how people may make complaints to your organisation (following the established complaints procedures). | Conflicts in respect of safety of vulnerable adults will be taken forward by (insert title of person- e.g. Designated Senior Manager). |
| **12. Communicating and reviewing the policy** | Some organisations make it clear to service users what its duty is – e.g. a statement to customers about safeguarding arrangements may be produced and displayed on the website. There may be an agreement with each adult or a pack produced which explains the safeguarding arrangements. The Complaints Policy/Procedure could be referred to which outlines how adults can make a complaint about the service.<br><br>This section also states the review period for the policy, checking it is still appropriate and making changes as necessary. Reviewing once a year is good practice but the policy should also be reviewed if there are changes in circumstances or legal requirements. | (Insert name of organisation) will make clients aware of the Safeguarding Policy through the following means (insert measures)<br><br>This policy will be reviewed by (Insert title of person/ group responsible), every (insert number) years and when there are changes in legislation. |