Adult Safeguarding Procedure

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Notes	HBXL Group is the parent company of House Builder XL Ltd which delivers Skills Bootcamps for the Department for Education and is an Approved Training Organisation for CITB. This document should be used in conjunction with: • HBXL Adult Safeguarding Procedure • HBXL Safer Recruitment Policy • HBXL Equality & Diversity Policy • HBXL Complaints, Appeals & Whistleblowing Policy • HBXL Prevent Policy • HBXL Staff Code of Conduct • HBXL Staff Handbook • HBXL Tutor Standards • HBXL Learner Behaviour and Disciplinary Policy • HBXL Learner Anti-Bullying and Anti-Harassment Policy

Introduction

HBXL Group is committed to providing a safe environment for everyone to participate in our organisation and its activities. These procedures must be followed in any circumstances where an adult is at risk of harm.

The procedure should be implemented with reference to HBXL Group Safeguarding Adults Policy and supporting information.

This procedure details the steps to be taken in responding to any concern that an adult involved in HBXL Group, or its activities, is at risk of or is experiencing harm.

The procedures have two main sections:

Section 1: Reporting concerns- **For everyone**

Section 2: What happens next – **For Designated Safeguarding Lead and organisational response**

The information is presented in flow charts with accompanying text. Please refer to both as the text contains more detail.

Glossary

For more details, please see the additional information sections of HBXL Group Safeguarding Adults Policy.

Adult – A person over the age of 18 (or as defined in relevant home nation legislation)

Adult at risk – Definition used in legislation (different in each home nation) for adults who the Local Authority has a responsibility to support to prevent them from experiencing (further) harm caused by abuse and neglect.

Abuse – A violation of a person's physical, emotional or mental integrity by any other person.

Case Management Group – A group created by an organisation to ensure the organisation carries out its role/s in individual cases of abuse or neglect AND to maintain an overview of the implementation of the organisation's safeguarding functions.

Harm – Damage done to a person's well-being.

MASH – Multi-Agency Safeguarding Hubs are used as a one point of contact/safeguarding referrals in some areas. Where they exist a referral to MASH benefits from the information held by and the expertise of various agencies e.g. Local Authority, Police and Health.

Mental Capacity – The ability to consider relevant information, make and communicate a decision.

Safeguarding – Work to prevent and to stop abuse and neglect.

Safeguarding Adult Team – A team set up to manage the safeguarding of adults at risk within an organisation or more commonly across a Local Authority district.

Safeguarding Adults Board (SAB) (England and Wales) / **Safeguarding Adult Partnership** (Northern Ireland) / **Adult Protection Committee** (Scotland) – A statutory body set up in line with national legislation. Statutory membership includes the Local Authority, Police and NHS. Representatives from the voluntary sector and of 'citizens' e.g. a representative from a disabled people's forum are often also included. Their role is to coordinate safeguarding work across the Local Authority district.

SECTION 1: REPORTING CONCERNS (FOR EVERYONE)

Reporting concerns about yourself

If you are in immediate danger or need immediate medical assistance, contact the emergency services 999.

If you are experiencing harm within HBXL Group, contact the Designated Safeguarding Lead, Joanna Mulgrew.

Designated Safeguarding Lead

Joanna Mulgrew, Managing Director, 0117 916 7871, joanna.mulgrew@hbxl.co.uk

In the DSL's absence, contact the Deputy Designated Safeguarding Lead, Olivia Woodhams.

Deputy Designated Safeguarding Lead

Olivia Woodhams, Skills & Quality Assurance Manager, 0117 916 7898, olivia.woodhams@hbxl.co.uk

If you would prefer, please contact another member of staff who will help you raise the issue to the Designated Safeguarding Lead.

If the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead is implicated, or you think has a conflict of interest, then report to the HBXL Chairman or other member of the HBXL Group Board.

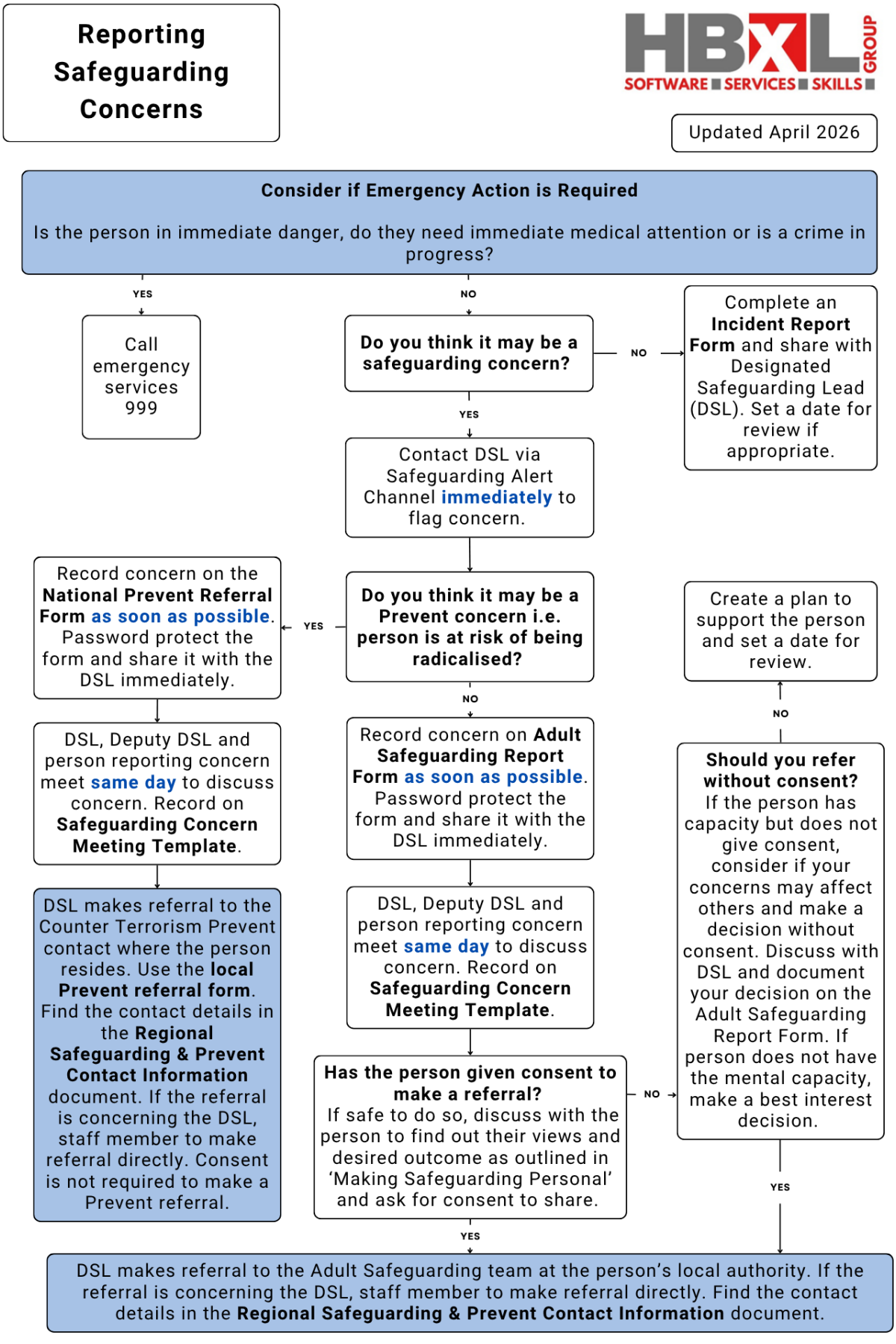
You can also contact the Police, Local Authority Social Care, your doctor or other organisations that can provide information and give help and support (see Appendix 2 for Other sources of support).

HBXL Group will follow the procedure in this document. If you do not think your concerns are being addressed in the way that they should be, please contact the HBXL Chairman or a member of the HBXL Group Board.

At all stages you are welcome to have someone who you trust support you and help you to explain what happened and what you want to happen.

It is of upmost importance to HBXL Group that you can take part in our activities safely and we will take every step to support you to do that.

Reporting concerns about others: Flowchart for Everyone



Reporting concerns about others

You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them.

You should not keep safeguarding concerns to yourself. If you have concerns and/ or you are told about possible or alleged abuse, poor practice or wider welfare issues you must contact the HBXL Group Designated Safeguarding Lead immediately via the Safeguarding Alert Channel.

If the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead is implicated, or you think has a conflict of interest, then report to the HBXL Chairman or other member of the HBXL Group Board.

If you are concerned about harm being caused to **someone else,** please follow the guidance below.

It is not your responsibility to prove or decide whether an adult has been harmed or abused. It is however, everyone's responsibility to respond to and report concerns they have.

If someone has a need for **immediate medical attention** call an ambulance on 999.

If you are concerned someone is in **immediate danger** or a **serious crime** is being committed, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.

Remember to be **person centred/make safeguarding personal**. If it will not put them or you at further risk, discuss your safeguarding concerns with the adult and ask them what they would like to happen next. Inform them that you have to pass on your concerns to your Designated Safeguarding Lead. **Do not** contact the adult before talking to your Designated Safeguarding Lead if the person allegedly causing the harm is likely to find out.

Remember not to confront the person thought to be causing the harm.

Responding to a direct disclosure

If an adult indicates that they are being harmed or abused, or information is received which gives rise to concern, the person receiving the information should:

- Take it seriously.
- Stay calm.
- Listen carefully to what is said, allowing the adult to continue at their own pace,
- Be sensitive.
- Keep questions to a minimum, only ask questions if you need to identify/ clarify what the person is telling you.
- Reassure the person that they have done the right thing in revealing the information.
- Ask them what they would like to happen next.
- Explain what you would like to do next.
- Explain that you will have to share the information with HBXL Group Designated Safeguarding Lead.
- Ask for their consent for the information to be shared outside the organisation.
- Make an arrangement as to how you/the Safeguarding Lead can contact them safely.

- Help them to contact other organisations for advice and support (e.g. Police, Domestic Abuse helpline, Victim Support -see Appendix 2).
- Act swiftly to report and carry out any relevant actions.
- Record in writing what was said using the adult's own words as soon as possible.

It is important **not** to:

- Dismiss or ignore the concern.
- Panic or allow shock or distaste to show.
- Make negative comments about the alleged perpetrator.
- Make assumptions or speculate.
- Come to your own conclusions.
- Probe for more information than is offered.
- Promise to keep the information secret.
- Make promises that cannot be kept.
- Conduct an investigation of the case.
- Confront the person thought to be causing harm.
- Take sole responsibility.
- Tell everyone.

Responding to a Prevent concern

If an adult indicates that they or someone else are at risk of being radicalised, the person receiving the information should follow the guidance under 'Responding to a direct disclosure'. Safeguarding learners who may be susceptible to radicalisation into terrorism is no different from other types of safeguarding harms, many of which are interconnected. The person receiving the information should avoid investigating or confronting the individual directly.

Record keeping

Complete an HBXL Adult Safeguarding Report Form (see Appendix 1) **as soon as you can**. A Word document version of the HBXL Adult Safeguarding Report Form can be found in the Learner Management System (One Drive) within:

1. Skills Academy General > 1. Safeguarding Concern > 1. Start Here for Safeguarding Concern

Describe the circumstances in which the concern came about and what action you took/ advice you gave.

It is important to distinguish between things that are facts, things that have been observed or over-heard and opinions, in order to ensure that information is as accurate as possible.

If someone has told you about the harm or abuse, use the words the person themselves used. If someone has written to you (including by email, message) include a copy with the form.

Once complete, submit to the HBXL Group Designated Safeguarding Lead **immediately**.

Be mindful of the need to be confidential at all times.

This information must only be shared with your Designated Safeguarding Lead and others that have a need to know –e.g. to keep the person safe whilst waiting for action to be taken.

System for storing information

The Safeguarding Adults Report Form and any other evidence (emails, messages) should be stored securely and separately from general records. The information should be shared only with those who need to know it to take appropriate action.

Follow the process below to store the information securely:

1. Once you have completed the Safeguarding Report Form Word document, password protect the document.
2. Save the password-protected HBXL Adult Safeguarding Report Form in the Learner Management System (One Drive) within:
   1. Skills Academy General > 1. Safeguarding Concern > 2. Individual Learner Concern Records
3. Notify the DSL via email that the report has been placed in the folder and provide the password for the document.

The DSL will move and store the records in a secure Adult Safeguarding folder within the Learner Management System.

Safeguarding records will be stored chronologically and in a separate folder for each individual. Records will only be stored for as long as necessary. The DSL will only keep what's necessary and according to the law.

Allegations against members of staff

In the event of an allegation against a member of staff, HBXL Group will follow the complaints procedure outlined in HBXL Complaints, Appeals and Whistleblowing Policy and, if required, the Disciplinary Procedure outlined in the HBXL Staff Handbook.

This process will apply to all staff working within the HBXL Skills Academy, if they have, or there is an allegation that they have:

- Behaved in a way that has harmed, or may have harmed a vulnerable adult and/or
- Possibly committed a criminal offence against or related to a vulnerable adult and/or
- Behaved towards a vulnerable adult in a way that indicates that they pose a risk of harm and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with vulnerable adults – this also includes behaviour that may have happened outside of the HBXL Skills Academy, that might make an individual unsuitable to work with vulnerable adults. This is known as transferable risk.

Allegations against members of staff should be reported to the HBXL Skills Academy Lead and Designated Safeguarding Lead, Joanna Mulgrew or Deputy Designated Safeguarding Lead, Olivia Woodhams.

If the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead is implicated, or you think has a conflict of interest, then report to the HBXL Chairman or other member of the HBXL Group Board.

Safeguarding concerns should be recorded on the HBXL Adult Safeguarding Report Form. For low-level concerns, a record should be made on the HBXL Incident Report Form (see Appendix 1). Records should be kept and stored following the process detailed under “Recording a concern about others”.

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the HBXL Staff Code of Conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the HBXL Skills Academy to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with learners
- having favourites
- using inappropriate sexualised, intimidating or offensive language.

It is important that all low-level concerns about members of staff are reported to the Skills Academy Lead. It helps ensure that staff consistently model HBXL Skills Academy's values/code of conduct and helps keep everyone safe. It also protects staff from potential false allegations or misunderstandings.

Information about a complaint against a member of staff will be stored in the employee's personnel file. A record of conversations and/or other documents compiled during the process will be recorded along with the outcome.

Reporting a Prevent concern

If you suspect that a learner, colleague or visitor may be at risk of radicalisation or being drawn into extremism, you should:

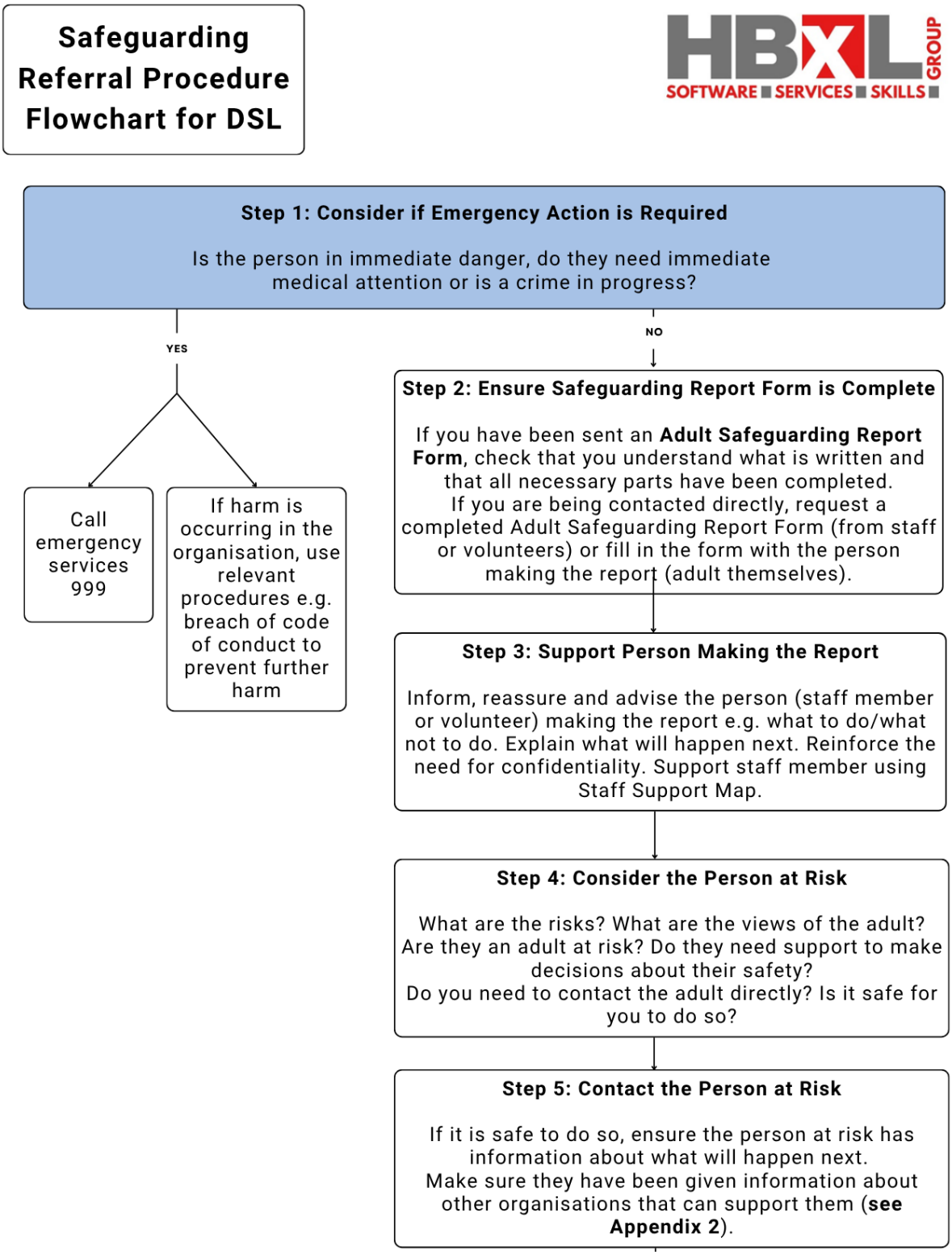
- Record what you have seen or heard. Make contemporaneous notes including dates, times, who was present, and exactly what was said or done.
- Complete the National Prevent Referral Form (see Appendix 1) and save the form following the process described in "System for storing information" above.
- Report the concern immediately to the Designated Safeguarding Lead (DSL)
- Do not share the concern widely. Maintain confidentiality. Only those who need to know (DSL, Deputy DSL, or senior manager) should be informed.

SECTION 2: WHAT HAPPENS NEXT?

Organisational Response: Safeguarding Referral Procedure Flowchart for DSL

Once a concern has been passed to the HBXL Group Designated Safeguarding Lead, they will coordinate the HBXL Group Safeguarding Adults Procedure:

Steps 1-5 **Initial Response** (as soon as you receive the Safeguarding referral)



Steps 6- 14 **Taking Action**

Step 6: Consult and Decide

As needed, consult Case Management Group. Local Authority/the Police and decide which one or more of the following actions need to be taken.

Step 7	Step 8	Step 9	Step 10	Step 11
If a serious crime is suspected, contact the police.	If you believe there is an adult at risk, make a safeguarding adults report to the Local Authority.	If you believe there is an adult at risk of radicalisation, make a Prevent referral to Counter Terrorism Police.	If harm is suspected of being caused within HBXL Group e.g. by an employee, subcontractor or volunteer, report to relevant manager.	Consult with and inform the adult.
Criminal enquiry, investigation proceedings	Safeguarding adults process led by LA	Prevent process led by CT Police.	Organisation takes short term steps within relevant policy to prevent harm e.g. suspend employee	Organisation decides who will maintain regular contact with the adult/s who have been at risk of harm

Step 12:
Take advice from other agencies and coordinate actions taken by HBXL Group with those of other agencies. Attend and contribute to Adult Safeguarding strategy meetings.

Step 13:
Hold Case Management Meeting to coordinate actions by HBXL Group.

Possible outcomes	Possible outcomes	Possible outcomes	Possible outcomes	Possible outcomes
• Criminal caution or conviction • Police referral back to organisation • Referral to Independent Barring Board • Unsubstantiated - no further action	• LA enquiries triggered • Adult support to make safeguarding personal • Other adults at risk identified • Multi-agency meetings to co-ordinate actions • New/changed care and support and protection • NOT an adult at risk - information and advice provided	• Channel Panel review of case • Adoption into the Channel Programme • Low risk or not terrorism-related - no further action • Referral to other forms of support	• Informal resolution • Education and training • Formal warning • Dismissal • Role conditions applied • Contract ended • Referred to Independent Barring Board • Unsubstantiated - no further action	• Adult receives information about the process • Adult supported to have their views and experience heard • Adult supported to gain support from other agencies • Adult continues to participate in training

Step 14:
Recording and reporting. Ensure decisions made, actions taken and outcomes are logged and reported.

The Designated Safeguarding Lead will keep clear records of decision making, actions taken, and the outcomes achieved. They will also collect feedback from the adult.

The Designated Safeguarding Lead, where appropriate, in consultation with the Case Management Group, will take the following actions:

Immediate response

Ensure any **immediate actions** necessary to safeguard anyone at risk have been taken. If the risk is said to be due to the behaviour of an employee or other person involved in the organisation/activities use the relevant procedures (e.g. breach of code of conduct, breach of contract, disciplinary or grievance procedures) to prevent that person making contact with the adult being harmed.

If you have been sent an **Adult Safeguarding Report Form**, check that you can understand what is written and that all the necessary parts have been completed. If you are being contacted directly by a member of staff or a volunteer, request that they complete an Adult Safeguarding Report Form if they have not already done so (see Appendix 1) as soon as possible. If the report is being made by the adult themselves or a member of the public fill in the safeguarding report form yourself gaining the details with the person contacting you.

Meet with the Deputy DSL and person reporting the concern face-to-face, on the day the report is made, to review the safeguarding concern. Use the **Safeguarding Concern Meeting Template** to record decisions made and rationale.

Inform, reassure, and advise the **person making the report**. Explain what to do/what not to do. Explain what will happen next. Reinforce the need for confidentiality. Refer to the Staff Support Map for prompts on how to support a staff member reporting the concern.

Consider what is known about the situation, what the risks are, what is known of **the views of the adult**, whether they have given their consent to the report being made and whether they might be considered to be an 'adult at risk'. Find out whether the person making the report believes the adult has the mental capacity to make decisions about what safeguarding actions they want to be taken (they are not expected to assess this, only provide their opinion). Decide if you need to **contact the adult** to get more information, determine their wishes, or explain what actions you need to take.

Ensure that the **adult has been given information** about the process and what will happen next. Ensure that they have been provided with information about other organisations that can support them (see Appendix 2). **ONLY do this if you have a known safe way of contacting them.**

Taking action

In all situations, you should ensure those in your organisation who can act (within their remit) to prevent further harm have the information to do so. This includes supporting the person at risk. Depending on the situation you may need to pass information to and work together with other organisations such as the Police and the Local Authority safeguarding team.

Consult and Decide If necessary, consult with Case Management Group and with the Local Authority/the Police and decide which of the following actions need to be taken.

Contact the police (where the crime took place) if

- a serious crime has been committed.
- a crime has been committed against someone without the mental capacity to contact the police themselves.
- the adult has asked you to make a report to the Police on their behalf because they are unable to themselves.

Make a referral/report to the Local Authority Safeguarding Adults Team or Multi-Agency Safeguarding Hub (MASH) (where the adult lives) if you believe they may be an **adult at risk AND**

- the adult appears not to have the mental capacity to make decisions about their own safety and well-being.
- the risk is from a person employed or volunteering in work with adults with care and support needs.
- there are other 'adults at risk' (e.g. another family member, another club member or other people using a service).
- the adult at risk lives in Wales or Northern Ireland (no consent required).
- the adult at risk lives in England or Scotland and they have asked you to make a report or have given their informed consent to you making it.

If a child is at risk, you must also make a child safeguarding referral to the Local Authority. This includes all situations where there is domestic abuse within the household where the child lives.

If you are unsure whether or not to make a referral/report you can ask for advice by contacting the Local Authority Safeguarding Adults Team/Multi-agency Safeguarding Hub and discuss the situation with them without disclosing the identity of the adult or the person who may be causing harm

Use policy and procedures to stop harm within the organisation
If the person who may be causing harm is a person involved in HBXL Group in whatever capacity inform the Chairman or member of the board, as appropriate.

Decide what policy and procedures the organisation will use to decide which actions will be taken e.g. breach of code of conduct, disciplinary procedures, breach of contract.

Agree what short-term arrangements can be put in place to enable the adult, who may be being harmed, to be able to continue participating in the organisation.

The arrangements made must respect the rights of the person who may be causing harm and must be consistent with the relevant policy and procedures.

If statutory agencies are involved **work together** with them to agree the next steps. g. the Police may need to interview an employee before a disciplinary investigation is conducted.

Attend and contribute to any safeguarding adults strategy or case meetings that are called by the Local Authority.

If statutory agencies say that they will not be taking any action in relation to a referral this should not stop HBXL Group taking internal steps to safeguard the adult. E.g. the Police may decide not to pursue a criminal investigation where there is an allegation against an employee, but the organisation should still follow its disciplinary procedure.

Decide who in the organisation will **maintain contact with the adult** to consult with them, keep them informed and make sure they are receiving the support they need.

Unless advised not to by the Police or Local Authority, and only if there is a safe way to do so, contact the adult to let them know about the actions you have taken and the outcomes so far. Find out if the actions taken are working, what matters to them, what they would like to happen next and what outcomes they want to achieve.

Convene a **Case Management Group meeting** to coordinate actions internally to your organisation:

- share information about what has happened with those within HBXL Group who have a role in safeguarding the adult.
- share the views of the adult.
- share any actions being taken by the Police/Local Authority.
- agree who will coordinate between HBXL Group and other agencies.
- decide what actions HBXL Group will take.

These actions can include:

- Use of internal procedures such as breach of code of conduct/disciplinary procedures to address any behaviour that may have caused harm.
- Reporting any employee or volunteer found to have caused harm to the Disclosure and Barring Service.
- Communication with the adult about the safeguarding process, offering support to the adult and making any arrangements needed for them to continue their involvement with the organisation.
- Ensuring senior managers are updated as needed.
- Coordinate action by HBXL Group.
- Case Management Group meeting must be **recorded** so that decision making is transparent, and actions agreed are followed. **Follow up meetings** should be held as necessary until the actions needed are complete.
- Ensure **records are complete and stored securely**. Collate monitoring information, including feedback from the person who was at risk of harm and **report to senior management team/ the Board as requested**.

Supporting staff affected by the safeguarding concern

Staff and volunteers involved in the safeguarding case will be offered support, using HBXL's Adult Safeguarding Staff Support Map as a prompt.

Support may include, but is not limited to, the following:

- Emotional debrief on day of disclosure
- Guidance with procedure, referral process, documentation and next steps
- Removal from direct involvement with the case, if appropriate
- Supervision session with DSL
- Peer support and reassurance
- Offer of counselling or mental health support
- Training refresh
- Ongoing and long-term supervision
- Case review participation
- Team debrief

Further information and useful contacts

Policies, procedures and supporting information are available on the HBXL website: https://skillsacademy.hbxl.co.uk/policies/

Designated Safeguarding Lead:

Joanna Mulgrew, Managing Director, 0117 916 7871, joanna.mulgrew@hbxl.co.uk

Deputy Designated Safeguarding Lead:

Olivia Woodhams, Skills & Quality Assurance Manager, 0117 916 7898, olivia.woodhams@hbxl.co.uk

SECTION 3: APPENDICES

Appendix 1 – Reporting Forms

Download the relevant reporting form using the links below:

HBXL Adult Safeguarding Report Form

HBXL Incident Report Form

National Prevent Referral Form

Word document versions of each form can be found in the Learner Management System (One Drive) within the following folder:

1. Skills Academy General > 1. Safeguarding Concern > 1. Start Here for Safeguarding Concern

Appendix 2 – Sources Of Information and Support

ACTION ON ELDER ABUSE

A national organisation based in London. It aims to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.
Tel: 020 8765 7000
Email: enquiries@elderabuse.org.uk
www.elderabuse.org.uk

ANN CRAFT TRUST (ACT)

A national organisation providing information and advice about adult safeguarding.
Tel: 0115 951 5400
Email:Ann-Craft-Trust@nottingham.ac.uk
www.anncrafttrust.org

MEN'S ADVICE LINE

For male domestic abuse survivors
Tel: 0808 801 0327

NATIONAL LGBT+ DOMESTIC ABUSE HELPLINE

Tel: 0800 999 5428

NATIONAL 24 HOUR FREEPHONE DOMESTIC ABUSE HELPLINES

England

Tel: 0808 2000 247
www.nationaldahelpline.org.uk/Contact-us

Scotland

Tel: 0800 027 1234
Email: helpline@sdafmh.org.uk
Web chat: sdafmh.org.uk

Northern Ireland

Tel: 0808 802 1414
www.dsahelpline.org
Twitter: www.twitter.com/dsahelpline
Facebook: www.facebook.com/dsahelpline

Wales

Llinell Gymorth Byw HebOfn/ Live free from fear helpline
Tel: 0808 8010 800Type Talk: 18001 0808 801 0800
Text: 078600 77 333

RAPE CRISIS FEDERATION OF ENGLAND AND WALES

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.
Email: info@rapecrisis.co.uk
www.rapecrisis.co.uk

RESPOND

Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities and training and support to those working with them.
Tel: 020 7383 0700 or
0808 808 0700 (Helpline)
Email: services@respond.org.uk
www.respond.org.uk

STOP HATE CRIME

Works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.
24 hours service:
Telephone: 0800 138 1625
Web Chat: www.stophateuk.org/talk-to-us/
E mail: talk@stophateuk.org
Text: 07717 989 025
Text relay: 18001 0800 138 1625
By post: PO Box 851, Leeds LS1 9QS

SUSY LAMPLUGH TRUST

The Trust is a leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.
Tel: 020 83921839
Fax: 020 8392 1830
Email: info@suzylamplugh.org
www.suzylamplugh.org

VICTIM SUPPORT

Provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.
Tel: 0808 168 9111
www.victimsupport.com

WOMEN'S AID FEDERATION OF ENGLAND AND WALES

Women's Aid is a national domestic violence charity. It also runs a domestic violence online help service.
www.womensaid.org.uk/information-support