

Safeguarding of Adults Policy and Procedures

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Version Number: 14

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Signed off by: Katie Gutheim

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| Date last reviewed: | 25/06/2025 |
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| Policy consultation with: | Senior Operations Team Review during Safeguarding committee meeting in March 2025 Managers Forum |
| Legal Requirements: | <ul style="list-style-type: none"> • The Care Act 2014 • Care Quality Commission (Registration) Regulations 2009 Equality Act 2010 • The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 Human Rights Act 1998 • Mental Capacity Act 2005 • Safeguarding Vulnerable Groups Act 2006 UK GDPR • Protection of Freedoms Act 2012 (Disclosure and Barring Service Transfer of Functions) Order 2012 • Public Interest Disclosure Act 1998 • The Criminal Justice and Courts Act 2015 Section 20-25 Anti- |

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| | <p>social Behaviour, Crime and Policing Act 2014</p> <ul style="list-style-type: none"> • The Modern Slavery Act 2015 • The Counter Terrorism and Security Act 2015 Domestic Violence, Crime and Victims Act 2004 Serious Crime Act 2015 Section 76 • FGM Act 2003 <p>Sexual Offences Act 2003</p> <p>Data Protection Act 2018</p> | |
| CQC: | <p>Regulation 13: Safeguarding service users from abuse and improper treatment</p> <p>Regulation 20: Duty of Candour</p> <p>Regulation 12: Safe Care and Treatment</p> | |
| Other: | | |
| Related Policies: | Code of Conduct Policy and Procedure | Mental Capacity Policy |
| | Whistleblowing | HR related policies, i.g. Recruiting and Selection; Induction and Probation Policy and Procedure etc |
| | Supporting PWS with their finances Policy and Procedure | Sexual harassment Policy and Procedure |
| | Data Protection Policy and Procedure | Complaints Policy and Procedure |
| | Anti-Fraud Policy and Procedure | Duty of Candour Policy and Procedure etc. |
| <p>Scope:</p> <p>This policy applies to staff working in support services and all the people we support aged 18 and above. For policy and procedure covering children and young people aged under 18, see Child Protection Policy and Procedure. The following stakeholders may be affected by this</p> | | |

policy:

- Commissioners
- Local Authority
- NHS
- Outward staff
- Agency workers
- Contractors
- Visitors

Policy Equality Impact Assessed

Outward have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate lawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

| Version number | Amendments | Reviewed by | Date |
|----------------|--|--------------------|------------|
| 14 | Additional information in Sections: <ul style="list-style-type: none"> • CQC • Legal requirements • Scope • Relevant Policies • Policy Equality Impact assessed | Desislava Nikolova | 12/05/2025 |
| 14 | Policy was transferred into new format | Desislava Nikolova | 12/05/2025 |
| 14 | New paragraphs added, Re: PiPoT and Intersectionality | Desislava Nikolova | 12/05/2025 |
| 14 | Further reading library added | Desislava Nikolova | 12/05/2025 |
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This information can be made available in alternative formats, such as easy read or large print. Please contact 0208 980 7101 or email info@outward.org.uk.

1. Introduction and Purpose

1.1. This document sets out Outward's policy on safeguarding adults at risk and the steps we expect staff to take, where the people we support and others report abuse, in order to foster a safeguarding culture within the organisation. It sets out the key legislation and other guidance, including when to involve the police. **The Purpose** of this policy is to enable Outward employees working with adults at risk to be able to

recognize instances of abuse and address them quickly and effectively. This applies where a safeguarding concern is suspected or exists, regardless of whether the individual is a person receiving support from Outward or not. For example, it is applicable if we learn that a friend or sibling of a person we support is at risk.

- 1.2. The term 'staff' covers volunteers as well as paid employees. The term 'abuse' covers both harm and abuse. The term 'social services' is used throughout to describe the various local authority departments dealing with adults at risk.

2. Policy Statement

- 2.1. Outward regards the protection of adults at risk as fundamental to all that we do. We have a zero tolerance approach to all forms of abuse. Outward wants to achieve the best outcomes for People We Support who are at risk of abuse and part of a safeguarding concern and will seek to obtain the wishes of those affected and work to meet them. Everyone has the right to live their lives free from violence and abuse and any form of exploitation.
- 2.2. Outward requires a consistent, effective and immediate response to any matters giving grounds for concern. This may include for example, neglect and failure through omission to do something about a bruise or unexplained injury that a staff has seen on a People We Support, or an assault on a People We Support by another People We Support that they have witnessed, or unwitting abuse, such as staff shouting or raising voices at people we support.
- 2.3. Outward aims to ensure that all members of staff are equipped with the necessary information to prevent, reduce or remove specific risks; to effectively support the People We Support to recover from any abuse or neglect they have experienced; and to help them make the decisions they feel are right for them.
- 2.4. Outward is committed to developing and maintaining policies and procedures which can prevent incidents of abuse by ensuring:
- Recruitment and selection checks, such as photographic ID, right to work/remain, Enhanced DBS, employment history and reference checking are in place
 - All staff receive a comprehensive induction and probation, which includes information regarding Outward's policy on safeguarding, and

- All staff, regardless of their position in the organisation, receive training and understand how to recognise, prevent and respond to abuse.

2.5. For further information, read Outward's Recruitment and Selection Policy as well as Outward Induction and Probation Policy and Procedures

2.6. Outward is committed to working with partner agencies, such as the Care Quality Commission (CQC), the police and social services in responding to and preventing abuse, both actual and alleged, quickly and effectively.

2.7. Outward's policy is intended to meet the requirements of the Care Act 2014 and the policies of individual London Boroughs, as well as the London Multi-agency Adult Safeguarding Policy and Procedures which can be referred to as a guide. See Safeguarding Policy **appendix 13** - London Multi-Agency Adult Safeguarding Policy April 2019.

2.8. This policy is based on the six principles of safeguarding which consists of:

- **Empowerment**- People being supported and encouraged to make their own decisions and informed consent
- **Prevention**- It is better to take action before harm occurs
- **Proportionality**- The least intrusive response appropriate to the level of risk presented
- **Protection**- Support and representation after harm has been identified
- **Partnership**- working in collaboration with local services to achieve the best outcomes
- **Accountability**- Everybody knows their rights and responsibilities in relation to safeguarding, and creating a culture of accountability and transparency.

3. Roles and Responsibilities

Failure to comply with this policy may be treated as misconduct and dealt with under Outwards Disciplinary procedures.

3.1. Outward Designated Safeguarding Lead (DSL)

Outwards DSL will:

- Oversee the role of the Area Managers (Adult or Childrens Safeguarding Leads) in relation to safeguarding
- Monitor and review Outwards' safeguarding policy, procedures and reporting
- provide strategic and organisational direction and governance in line with legislation and guidance
- Via the line management structure and in partnership with the learning and development lead, ensure that all staff are trained to the required levels
- Take the lead role in allegations against an Outward member of staff
- Be available for consultation and advice
- Work with the Outward executive team to manage threats to reputational risk arising from a safeguarding issue. The CEO will liaise with and update trustees as required

3.2. **Outward Adult Safeguarding Lead**

Outward's Adult Safeguarding Lead will:

- Ensure the policy is updated annually and staff are advised of changes to the policy
- Review Safeguarding referral forms and report findings and lessons learned to department meetings and the health and safety committee
- Check that appropriate actions have been taken within the timeframe set out
- Escalate to the DSL, or in their absence, the CEO any concerns that are raised regarding reputational risk
- Work with the DSL in the event that an allegation is made regarding an Outward member of staff, including, for example, liaising with the Local Authority Designated Officer (LADO)
- Be available for consultation and advice
- Chair the safeguarding panel quarterly

3.3. **Managers**

Managers will:

- Induct staff in the safeguarding policy
- Monitor the quality of record keeping within the service
- Support and advise their team around safeguarding matters

- Create a learning culture around safeguarding, for example, using case studies during team meetings, debriefing following incidents and providing effective supervision
- To promote open lines of communication with families and stakeholders, making sure they are able to raise concerns and to record and follow up on these promptly
- Act as the referring manager (internally and externally)
- Liaise with external professionals as appropriate
- Ensure all cases are managed in accordance with good practice and this policy
- Receive and record information regarding safeguarding concerns
- Ensure the Safeguarding, Incident and Accident (SIA) is received, completed accurately and fully and sent to the appropriate internal sources
- Consult with, inform or refer to statutory services (including CQC where necessary)
- Submit the referral to the appropriate statutory service within the timeframe set out by the Local Safeguarding Board
- Will ensure that each staff has in place safeguarding –staff supervision completed at least once each year
- Ensure staff receive refresher training every 2 years.
- Escalate safeguarding concerns to the safeguarding lead when they feel a safeguarding allegation has not been responded to appropriately within their line management structure
- Ensure follow up actions are completed such as updating support plans and risk assessments
- Ensure Duty of Candour Process is followed where applicable. Please, refer to Duty of Candour Policy and Procedure
- The above list is not an exhaustive list of all duties that manager have in order to assure that Regulation 13 is adhered to fully

3.4. Volunteers, Agency Workers and Front Line staff will:

- Be alert to signs and indicators that someone may be at risk of, or experiencing, abuse or neglect.
- Maintain clear and comprehensive records in people's files and on our new app Nourish that is due to be implemented
- Keep risk management plans and support plans up to date
- Complete clear, factual and comprehensive Safeguarding, Incident and Accident (SIA) forms within 24 hours

- Promote an awareness of abuse and provide support and guidance to the People We Support
- Engage openly and fully with training
- Maintain familiarity with this policy, re-reading from time to time as appropriate.

4. Prevention and Creating a Safeguarding Awareness Culture

4.1. Managers and staff can foster a safeguarding culture by promoting awareness, building knowledge and empower people we support to recognize abuse and neglect, how to keep themselves safe and how to report concerns. Support teams, led by management are responsible for promoting an awareness and understanding of safeguarding abuse and neglect among the People we Support taking person-centered approaches. Every effort should be made to ensure that as far as possible the People we Support are fully involved in decision-making; and where linguistic, sensory or other difficulties impede their involvement, reasonable steps are taken to overcome them.

Depending on the person's choice and preference, this could involve the sharing of posters, easy read leaflets, using videos, holding focused meetings with People we Support, either in groups or one-to-ones. Teams can source workshops and training on safeguarding adults at risk for the People we Support from external partners (such as local authorities) and Outwards coproduction team. Safeguarding information should be included in welcome packs provided to People we Support when they first receive support from on Outward service.

Relatives, friends and carers concerned about possible abuse of People we Support also have rights, which includes rights to information in accessible formats on how to make a complaint or raise a concern.

Staff should promote awareness and understanding of safeguarding and abuse to family members / others involved in the persons support and care. Stakeholders must be aware of who they can contact if they would like to discuss a concern.

4.2. Teams can create an open safeguarding culture by –

- Being prepared - By being prepared and knowing what help is available, staff can make a difference to people's safety and wellbeing.
- Keeping alert - Some People we Support will never reveal directly that they're being abused, no matter how close their relationships with the people around them. That

is why it is important to be alert for signs and symptoms and to act on any concerns staff may have.

For information about signs and symptoms of possible abuse, which could raise suspicions from staff, see Safeguarding Policy **appendix 10** on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.

- Reducing opportunities of harm – robust person-centered risk assessments that are shared with everyone involved in the persons support
- Knowing how to report (holding relevant forms) - each service should have for reference a copy of ‘London Multi-Agency Adult Safeguarding Policy and Procedures’ April 2019. This is located in the Safeguarding Policy section on the intranet **appendix 13** London Multi Agency Adult Safeguarding Policy April 2019.

This should be kept in the office and be accessible to everyone. It is the responsibility of the service manager to obtain these policies and to keep blank copies of relevant local authority abuse notification forms. Not all local authority areas have these forms. Managers should contact their local social services to check. Some local authorities have an online reporting facility, others require telephone reports. Staff should make themselves familiar with the reporting procedure for their local authority. Please refer to Outward Intranet/ Care and Support/ Safeguarding of Adults for below :

- [Appendix 5. Hackney Safeguarding Adults Referral Form](#)
- [Appendix 6. Waltham Forest Safeguarding Adults Concern Form](#)
- [Appendix7. Enfield Safeguarding Adults Concern Form](#)

The Outward SIA (**appendix 1**) form should be used directly from the intranet, where possible, to ensure that it is the latest version.

4.3. **Safeguarding Training**

4.4. It is Outward’s responsibility to ensure they procure and provide to all of their employees the most current Safeguarding of adults training aiming to support staff to:

- Understand what safeguarding means and the responsibilities you have for safeguarding adults at risk.

- Understand why safeguarding adults training is important for everyone within your organisation.
- Have an awareness of which factors increase the likelihood of an adult being at risk from harm.
- Know about the different categories of abuse, plus the potential warning signs associated with each type.
- Understand how to respond appropriately to a disclosure from an adult in need and know what to do next.
- Have an awareness of the safeguarding process and know what happens after a referral is made

4.5. At the time of this policy review as of 2025 **each staff member working for Outward regardless of their role is required** to complete Safeguarding of adults online **mandatory training** every 2 years. Training will be delivered online and face to face.

4.6. Staff who report safeguarding issues should be given adequate levels of supervision and support. Members of staff also have the right to receive specific training, information and support to enable them to exercise their safeguarding responsibilities. They should also be able to access local authority ongoing and refresher training, both on safeguarding and local reporting procedures. Safeguarding training must be completed every two years.

4.7. As part of Safeguarding of adults Policy and Procedure 2024 review, we have implemented **Safeguarding of adults-Staff supervisions** (Please, refer to **Appendix 14** which can be found on the Outward Intranet as it follows:
<https://intranet.outward.org.uk/outward/policies-and-procedures/care-support.>)
By the time of this Policy review the expectation is that all of Outward's services would have done this type of supervision with each member of their team at least once. The aim of this supervision is to provide an ongoing assessment and close monitoring of each staff member's awareness and knowledge around safeguarding. This supervision is an excellent tool for managers to ensure they keep their team(s) up to date in this area and identify any gaps and issues requiring additional improvement actions such as additional training.

4.8. The Safeguarding of adults-staff supervision has to be completed during probation for new staff members and at least annually after that. The Safeguarding of adults

supervision can be done instead of regular one-to-one with staff and can be recorded on Select HR as one-to-one supervision.

Important note: Please, do not confirm new staff in post before this supervision was completed!!!!

5. Recognising different forms of abuse

5.1. Abuse can take many different forms. **The Care Act sets out 10 forms of abuse** which are listed below. This list is not exhaustive, but can be experienced by adults at risk of abuse. Abuse can include one or a combination of:

5.2. **Physical abuse**

This is defined as ‘non-accidental harm to a person caused by the use of force, which results in pain, injury, or a change in a person’s natural physical state’. It can include hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

In order to enable staff to make a record of any observed injuries on People We Support body, Outward have in place Body Charts. There is a **Body Chart- Male (Appendix 3)** from Safeguarding of Adults policy and Procedure) and **Body Chart- Female (Appendix 2)** from Safeguarding of Adults policy and Procedure). Staff to ensure they use the most current version of the Body Charts (to be found on the Outward Intranet)

5.3. **Sexual abuse**

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault and sexual acts to which the adult has not consented or was pressured into consenting.

Sexual exploitation involves situations, contexts and relationships where adults at risk receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) as a result of them performing sexual acts (and/or another/others performing such acts on them). Sexual exploitation affects men as well as women.

People who are being exploited may not always perceive such behaviours as exploitation. In all cases those exploiting the adult at risk have power over them by virtue of their position, gender, age, physical strength, intellect, economic situation or other resources. There is a distinct inequality in the relationship.

5.4. **Psychological / emotional abuse**

This is a form of abuse where an individual is subjected to threats of harm, isolation or seclusion from services, harassment or intimidation, as well as anything that alters the person's behaviour from the way they'd like to live and impacts negatively on their wellbeing.

This can include an absence of respectful interaction, bullying (online or off line), threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, stalking and verbal abuse. Examples of emotional abuse can including name calling, laughing at the person, treating the person like a child, ignoring them, blaming them for things when it's not their fault.

5.5. **Financial or material abuse**

This is defined as an individual's funds being used inappropriately by a someone else. This can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits, identity theft and 'cuckooing' (where criminals take over someone's home and use as a base to conduct criminal activities). Other examples of this can include a person having their money stolen, being forced to pay for other people's things, a person not having a say in how their money is spent.

5.6. **Neglect and acts of omission**

This is a failure to meet the person's basic physical and/or psychological needs and is likely to result in the serious impairment of their health or wellbeing.

This can include failing to provide adequate food, shelter and clothing, ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services in a timely manner, the withholding of the necessities of life such as medication or heating.

Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly where the adult at risk lacks the mental capacity to assess risk for themselves.

Indicators include pressure ulcers, which can be the result of neglect and may be raised as an adult safeguarding concern.

5.7. **Discriminatory abuse**

Discriminatory abuse is the unequal treatment of an individual based on age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.

5.8. **Self-neglect**

Self-neglect covers a wide range of behaviour, including neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not always prompt a section 42 enquiry. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

5.9. **Domestic abuse including Stalking, Female Genital Mutilation, Forced Marriage and "Honour-Based" Violence**

Domestic Abuse is defined by the Home Office as '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'

This can encompass but is not limited to psychological, physical, sexual, financial, and emotional abuse.

Honour Based Violence (HBV) is committed when families feel that dishonour has been brought to them. It will usually be a criminal offence and referring to the Police must always be considered. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Some victims of HBV may contact the Police or other organisations for help themselves. But many others are so isolated and controlled that they may be unable to seek help. Adult safeguarding concerns that

may indicate HBV include domestic abuse, concerns about forced marriage, enforced 'house-arrest' and missing person's reports.

Forced Marriage is a term used to describe a marriage in which one or both parties are married without their freely given consent or against their will. A forced marriage differs from an arranged marriage in which both parties consent to the assistance of a third party in identifying a spouse. In a situation where there is a concern that an adult is being forced into a marriage that they cannot consent to, there will be an overlap between action taken under the forced marriage provisions and adult safeguarding processes. If an adult safeguarding concern is raised about HBV or forced marriage, Police should be contacted as urgent action may need to be taken and they (in co-ordination with other relevant specialised organisations) have the necessary expertise to help manage the risk.

Female Genital Mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is most often (but not always) performed on girls before they reach puberty. It is also known as female circumcision, cutting or Sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is dangerous and a criminal offence.

Children may suffer significant harm by seeing or hearing the ill treatment of others. It is important to be mindful of any exposure to domestic abuse, even where they are not the immediate victims.

5.10. **Organisational or Institutional abuse**

This is the collective failure of an organisation to provide an appropriate or professional service. It can include failure to ensure people are safeguarded and it may be part of the accepted culture of an organisation, built in through informal practices or systems. Examples of this are lack of choice about bedtime, meals, denial of privacy, undue restraint, lack of stimulus and recreational activity, not having free access to available communal areas, general neglect and poor professional practice.

5.11. **Modern slavery**

This is when people are forced to work against their wishes with no choice about what they do or where they live for very little or no money. This encompasses

slavery, human trafficking, forced labour and domestic servitude. This also includes criminal exploitation and is often seen in examples of 'county lines', forced benefit fraud, or organised gangs of pick-pocketers, cannabis cultivation, shop-lifting and the buying and selling of illegal items online (such as combat knives).

5.12. In addition to the 10 forms of abuse listed in the Care Act, the Multi Agency (Pan London) Adult Safeguarding Policy and Procedures states that the following may constitute a crime and should be reported to the Police:

5.13. Hate Crime

The Police define Hate Crime as 'any incident that is perceived by the victim or any other person to be racist, homophobic, transphobic or due a person's religion, belief, gender identity or disability'. It should be noted that this definition emphasizes the perception of the victim or witness and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence.

5.14. Mate Crime

This is when vulnerable people are befriended by members of the community in order to exploit or take advantage of them. This is not technically a criminal act but the Police do encourage it to be reported and they will take a decision on whether a criminal act has been committed.

5.15. Radicalisation

This is comparable to other forms of exploitation and is, in itself, recognized as a form of harm. The process is a form of 'grooming' to attract people to a belief in radical ideology, political or religious, to inspire new recruits to the cause and embed extreme views.

5.16. Any or all of these types of abuse may be perpetrated as a result of deliberate intent, negligence or ignorance.

5.17. For information about signs and symptoms of possible abuse, which could raise suspicions from staff, see Safeguarding Policy **appendix 10** on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.

6. Responding to suspected or actual abuse: consent requirements

6.1. Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances.

6.2. **There is no such thing as complete confidentiality.** When we refer to ‘consent to share information’ we mean consent to share outside of Outward. All information and any concerns MUST always be shared with line manager and followed up with a SIA report.

People we Support must be advised of this at the start of their relationship with Outward.

6.3. Outward acknowledges that it is often difficult for anyone to make a disclosure of abuse as the consequences can have a profound impact on the person, their family, friends and support networks. It can therefore, be difficult to obtain consent for a referral to be made to statutory services.

6.4. Reassurance and appropriate support may help to change their view on whether it is best to share information. Staff should consider the following and:

- Explore the reasons for the adult’s objections – what are they worried about?
- Explain the concern and why you think it is important to share the information
- Tell the adult with whom you may be sharing the information with and why
- Explain the benefits, to them or others, of sharing information – could they access better help and support?
- Discuss the consequences of not sharing the information – could someone else come to harm?
- Reassure them that the information will not be shared with anyone who does not need to know
- Reassure them that they are not alone and that support is available to them.

6.5. There are a number of circumstances where staff can reasonably override such a decision, including:

- The adult lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act.
- When it is an emergency or life-threatening situation
- Other people are, or may be, at risk, including children
- Sharing the information could prevent a serious crime (The Department of Health defines this as ‘murder, manslaughter, rape, treason, kidnapping, child abuse or other cases where individuals have suffered serious harm’)
- A serious crime has been committed
- Where the alleged abuser is another person Outward is supporting
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference (MARAC)
- When an Outward worker OR any other professional is implicated
- Where you are required to do so by a court order
- There is reasonable evidence to believe that the person may be under duress or is being coerced (for example in cases of modern slavery, domestic abuse or other exploitation).

6.6. In such circumstances, it is important to keep a careful record of the decision making process. Staff should seek advice from managers in line with the policy before overriding the adult’s decision, except in emergency situations. Managers should make decisions based on whether there is an overriding reason which makes it necessary to take action without consent and whether doing so is proportionate because there is no less intrusive way of ensuring safety.

6.7. Where staff feel that a safeguarding concern has not been responded to appropriately by the Manager, they must escalate their concerns to the Area Manager or senior manager on call (out of hours). Please also refer to the whistleblowing policy for more information.

6.8. If members of staff suspect that something is wrong, abuse may not be something they want to consider – especially if the suspect is family or a friend, a colleague or another person we support – and their initial reaction might be to dismiss their suspicions or try to prove they are not true.

6.9. Not all cases of abuse will involve sexual, physical, severe mental or emotional abuse, but rather neglectful, inappropriate and/or unprofessional care or practice. It is essential that staff remain as alert to disclosures and observations of this nature, as well as those of a sexual or physical nature, and report to a line manager **as soon as possible or at least within three hours**.

In addition, staff should report any concerns regarding a child or anyone else involved in any of our services being abused by a person we support. If necessary, staff should refer to the Whistleblowing Policy and Procedure and the Child Protection Policy and Procedure.

6.10. The deliberate withholding of information by staff cannot be defended on the grounds of confidentiality as non-disclosure may impact on the future safety and security of the individual. In legal terms, 'a duty' means that failure to report suspicions constitutes breaking the law.

6.11. **Responding to suspected acts of abuse**

Do not think:

Consider:

Remember:

What happens if I'm wrong?

What if I'm right?

We report CONCERNS, not certainties.

You do not need evidence to raise a concern

If you have a safeguarding concern, seek immediate advice from a service manager, area manager or safeguarding lead.

6.12. **Staff must:**

6.13. Complete a Safeguarding Incident and Accident (SIA) form if advised to do so by the manager.

- 6.14. This should be submitted to the manager and the quality team before the shift is finished. Consent is NOT needed to record a concern internally within Outward.
- 6.15. If it is out of hours where regular managers are not available contact the manager on call or senior manager on call for advice.
- 6.16. **Managers must:**
- 6.17. Raise the safeguarding concern in the relevant local authority (check each authority for their preferred referral route) within 24 hours.
- 6.18. Notify the CQC without delay if the person supported is receiving a CQC regulated service. Use the Notification Form to notify CQC for allegations of abuse concerning a person who uses the service Safeguarding Policy **appendix 4** on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.
- 6.19. Obtain consent to notify next of kin (if any) to update about the safeguarding concern unless the next of kin is the alleged perpetrator and reason for the raised concerns.
- 6.20. Only notify CQC if the person's support is regulated under CQC. Duty of Candour policy will also need to be followed and the person supported should be sent a letter detailing what Outward has done to address the safeguarding issues.
- 6.21. **Responding to abuse where there is an "Immediate" physical threat**
- 6.22. **Staff Must:**
- 6.23. Call emergency services if there is an immediate danger, emergency or the person needs urgent medical treatment,.

- 6.24. Call the line or on-call manager as soon as emergency services have been informed.
- 6.25. Complete a Safeguarding Incident and Accident (SIA) form.
- 6.26. Submit the SIA to the manager before the shift is finished. Consent is NOT needed to record a safeguarding incident internally within Outward.
- 6.27. Ensure the PWS's safety and well-being is closely monitored at all times. Manage any immediate risks. Provide ongoing reassurance and encouragement to the adult at risk
- 6.28. Ensure ongoing communication to the team
- 6.29. Be part of Lessons learned practices and endeavour future improvements

Managers Must:

- 6.30. Consider and risk assess the threat and put measures in place to prevent further harm if possible
- 6.31. Raise a safeguarding alert in the relevant local authority (check each authority for their preferred referral route) immediately.
- 6.32. Notify the CQC without delay where this is required. Use the Notification Form for allegations of abuse concerning a person who uses the service Safeguarding Policy **Appendix 4** on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.
- 6.33. Only notify CQC if the person's support is regulated under CQC. Duty of Candour policy will also need to be followed and the person supported should be sent a letter detailing what Outward has done to address the safeguarding issues.

6.34. Be aware of retaining forensic evidence – see Safeguarding Policy **appendix 11** ‘Guide to Preserving Evidence of Abuse’ on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.

6.35. Be aware that the relevant medical authority will make a decision about whether a medical examination can be carried out on someone who is unable to give their consent.

Responding to a disclosure of abuse where there is “No Immediate” physical threat

6.36. **Staff Must:**

6.37. Read Safeguarding Policy **Appendix 12** ‘Disclosures Dos and Don’ts’ on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.

6.38. Discuss the courses of action available with the person at risk and agree a course of action that is personal to them. Ask the person for their consent to make a referral.

6.39. Inform the line or on-call manager of the alleged abuse.

6.40. Complete a Safeguarding Incident and Accident (SIA) form.

6.41. Complete a visible body chart if the person at risk shows any visible injuries – see Safeguarding Policy appendix 2 Body Chart (Female) and appendix 3 Body Chart (Male) (<https://intranet.outward.org.uk/outward/policies-and-procedures/care-support> and attach to the Safeguarding Incident and Accident Form.

6.42. Submit the SIA to the manager before the shift is finished. Consent is NOT needed to record an allegation or incident internally within Outward.

6.43. Where the line manager is the person alleged to have caused harm, staff should report concerns to the next senior manager, and so on up the line of management.

- 6.44. Staff should not confront or interview the person alleged to have caused harm. Rather, they should focus on the safety and support needs of the person at risk who we are supporting.
- 6.45. Ensure the PWS's safety and well-being is closely monitored at all times. Manage any immediate risks. Provide ongoing reassurance and encouragement to the adult at risk
- 6.46. Ensure ongoing communication to the team
- 6.47. Be part of Lessons learned practices and endeavour future improvements

Managers must:

- 6.48. Determine whether there is a cause for concern.
- 6.49. Be familiar with the factors which may allow consent to be overridden taking into account the person's wishes and note what outcomes they want to achieve from the safeguarding.
- 6.50. Raise the safeguarding alert in the relevant local authority (check each authority for their preferred referral route) immediately.
- 6.51. Inform the Outward area manager.
- 6.52. Notify the CQC without delay where this is required. Use the Notification Form for allegations of abuse concerning a person who uses the service Safeguarding Policy appendix 4 on the Outward intranet: <https://intranet.outward.org.uk/outward/policies-and-procedures/care-support>.
- 6.53. Only notify CQC if the person's support is regulated under CQC. Duty of Candour policy will also need to be followed and the person supported should be sent a letter detailing what Outward has done to address the safeguarding issues.

- 6.54. Contact the Police if it is suspected that a criminal offence has been committed. This can be done by phone.
- 6.55. Send the Outward SIA Form to Quality@outward.org.uk
- 6.56. Inform the person at risk's next of kin of safeguarding concerns, ONLY if the person has consented to this, AND if the next of kin the person is not implicated.
- 6.57. Notify the Commissioning Team in local authorities where this is requested. Managers should follow any local serious incident reporting procedures.
- 6.58. Carry out a risk assessment within 24 hours of a safeguarding concern being raised. This should consider the immediate health/welfare needs of the person at risk and those of any other adults at risk, including the person who is alleged to have caused harm if they are a person who is supported by Outward.
- 6.59. Note that where the person alleged to have caused harm is another person we support, duty of care obligations continue for this person and they may need even more support than before.
- 6.60. Carry out a thorough risk assessment to establish the likelihood that the person alleged to have caused harm will commit further abuse of the person at risk or to others.
- 6.61. Consider interventions for reducing this risk. Where the two parties share a home and there is an ongoing risk that cannot be managed by the service, social services will need to provide alternative accommodation pending a long-term solution.
- 6.62. Perpetrators will, in most cases, continue to be supported by Outward to recognise their behaviour and assisted to develop strategies to change this behaviour. This will involve linking with a range of specialist agencies, landlords and the police to agree an action plan. People we support should also be made aware of the implications of their behaviour and the potential consequences in terms of their tenancy.

6.63. Where there appears to be no cause for concern, the manager must discuss this with an area manager and agree a course of action, which must be documented.

7. When the senior management team must be informed

7.1. Call the Area Manager and email the SIA form to them within 24 hours if there are any incidences:

- In which a member of staff is implicated as a possible abuser or implicit in abuse
- In which the police are involved
- In which the people we support are at serious and/or immediate risk
- Which suggests bad practice and so has the potential to undermine Outward's reputation
- Alerts concerning physical/sexual abuse
- Alerts deemed serious enough to warrant escalation to the senior management team.

7.2. The Area manager must inform the relevant Director and update on actions taken.

7.3. The HR manager and HR director must be informed if the alleged perpetrator is an Outward staff member.

8. Responding to allegations/ concerns of abuse by an Outward staff member

Anyone who becomes aware of any concern or allegation that could indicate abuse by a member of staff must report it immediately to their Manager or Area Manager (or on call manager out of hours). The Area Manager will inform the Outward Safeguarding Adults Lead.

- 8.1. Reports will be taken seriously and thoroughly investigated. Outward acknowledges that this can be distressing and stressful for all involved and will support all parties throughout the process.
- 8.2. All staff raising concerns or making a disclosure, in good faith, about a colleague, will be fully supported and protected.
- 8.3. If allegations arise during a disciplinary proceeding, the safeguarding procedure will take precedence and other procedures will be suspended whilst any statutory safeguarding investigation is completed.
- 8.4. The staff member against whom allegations have been made will be given copies of this policy, kept informed throughout the process as appropriate and be reminded of Outward's Employee Assistance Programme.
- 8.5. Such concerns might arise if a staff member:
- Behaves in a way that has harmed or may harm a child or adult at risk; (including acts of omission and failures to act)
 - Commits a criminal offence against or related to a child or adult at risk;
 - Behaves towards a child or adult at risk in a way that indicates s/he may be unsuitable to work with these groups.
- 8.6. Primary consideration must be given to supporting the child or adult at risk or the person making the allegation and, if necessary, in reaching a decision about suspension and disciplinary action being taken. In such cases, suspension will be used as a neutral act which is designed to protect both the child or adult at risk and staff member.

The process:

- 8.7. The Outward Safeguarding Adults Lead must immediately inform the Director of Care and Support who has lead organisational responsibility for safeguarding children and adults at risk.

- 8.8. The relevant manager (Area Manager) will determine if the allegation threshold is criminal, constitutes abuse (including negligence), or contravenes Outward or any other professional code of conduct and whether to immediately report the matter to the Police and/or the Local Authority.
- 8.9. The Local Authority Adult Safeguarding Manager or the Local Authority Designated Officer (LADO) must be involved from the outset.
- 8.10. The LADO is available to discuss any concerns and to assist in deciding whether a safeguarding referral should be made and/or what immediate management action should be taken to protect an adult at risk (or any children who may be in contact with staff at the service or elsewhere). The LADO is not the investigating officer, but will provide advice and guidance on the management of the investigation. The LADO should be approached prior to a decision on suspension.
- 8.11. The Director of Care and Support may delegate responsibility to the Adult Safeguarding Lead but must oversee the process and holds ultimate responsibility for it being reported. The Adult Safeguarding Lead, in consultation with the Director of Human Resources, will also assess if suspension and/or disciplinary procedures should be applied.
- 8.12. The Director of Care and Support will undertake or delegate any follow up actions requested by the Police or the LADO to the relevant Area manager / Team Manager.
- 8.13. If there is the possibility of a criminal investigation, then the Police and the Commissioner (if required by contract) must be consulted **before the person who is the subject of the allegation is informed**. This will enable consideration of any previous allegations known to the authorities.
- 8.14. The Directors will decide whether to instruct Human Resources to inform Outwards insurers.
- 8.15. Disciplinary procedures may be suspended at the request of the Police or social services if there are concerns that internal investigations and procedures may impede a statutory or criminal investigation, which is why advice must be sought from the local authority prior to HR action.

- 8.16. If an adult at risk or child protection investigation results in no further action, Outward reserves the right to address the issue through its internal disciplinary or capability procedures. Dependent on the outcome, it will report findings of serious misconduct to the Disclosure and Barring Service (DBS) and any professional body the staff member may belong to.
- 8.17. Where the staff member leaves prior to conclusion of an investigation or disciplinary action relating to a safeguarding issue, the investigation must be completed (in their absence if necessary). Findings will be recorded on their personnel file and referred to the DBS if appropriate.
- 8.18. Detailed information about the case will be restricted to the Adult Safeguarding Lead, the Director of Care and Support, The Director of Human Resources and the CEO, and the relevant statutory authorities.

9. What happens next: Local authorities' responsibilities to make enquiries

- 9.1. After an Outward manager has reported any safeguarding concern, the local authority is duty bound, if the concern meets the threshold, to make further, proportionate, enquiries under Section 42 of the Care Act and make sure that as the lead agency, enquiries are carried out.
- 9.2. A Section 42 enquiry must take place if there is reason to believe that abuse or neglect is taking place or is at risk of taking place, and the local authority believes that an enquiry is needed to help it to decide what action to take to support and protect the person in question. The particular circumstances of each individual case will determine the scope of each enquiry, as well as who leads it and the form it takes.
- 9.3. The local authority might decide that another organisation should carry out the enquiry, but the local authority will retain overall accountability. The local authority

must satisfy itself that the organisation will meet agreed timescales and follow-up actions. Whatever form the enquiry takes, the following must be recorded:

- Details of the safeguarding concern and who raised it
- The views and wishes of the adult affected, at the beginning and over time, and where appropriate the views of the family
- Any immediate action agreed with the adult or their representative
- The reasons for all actions and decisions
- Details of who else is consulted or who the concern is discussed with
- Any timescales agreed for actions
- Sign-off from a line manager and/or the local safeguarding lead or designated adult safeguarding manager.

9.4. Non-statutory enquiries (known as ‘other safeguarding enquiries’) may also be carried out or instigated by local authorities in response to concerns about carers, or about adults who do not have care and support needs but who may still be at risk of abuse or neglect and to whom the local authority has a wellbeing duty under Section 1 of the Care Act 2014.

9.5. There may be instances where Outward receive concerns from a third party this could be from a local authority or health professional or another partner agency. Professionals from these agencies may raise allegations of safeguarding directly with the local authority. Managers should respond to these enquiries by providing feedback information directly to the local authority concerning the safeguarding allegation and complete any SIA or CQC notification that may be required. If the incident has already been raised as an incident and not a safeguarding internally this can be flagged as a safeguarding directly in the performance monitoring workbook. Managers should risk assess and check if the person supported support plan needs to be updated to address any areas of support that maybe missing from their plan.

9.6. Where social services organise a strategy meeting, they will invite all relevant agencies, including the police if a criminal offence has been committed. The meeting will be coordinated by a Safeguarding Adults Manager within the care management team. Strictly, the strategy meeting should take place within five days of the initial concern and it can be via telephone at first. (The local authority must make whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the case. The enquiry should establish whether and what action needs to be taken to prevent or stop abuse or neglect).

- 9.7. This meeting should co-ordinate all the facts and assign people or agencies to investigate the allegation and consider risk. A framework should be agreed and an action plan drawn up. The welfare and safety of the person at risk will be assessed, along with the support needs of the person alleged to have caused harm if this is another person that Outward are supporting. The local authority will follow 'Making Safeguarding Personal' approaches that will seek to establish the outcomes that the person at risk wants in relation to the safeguarding.

10. The Investigation

- 10.1 The investigation should take place within 13 days of the initial referral and should involve all the people nominated at the strategy meeting. Full and accurate records must be kept throughout the investigation, and these should be passed on to all the relevant agencies on completion of the investigation.

Where Outward is nominated to investigate, a manager or senior manager will be identified as the investigating officer and they will complete the actions detailed at the strategy meeting. The investigator would not be the manager involved in the incident/allegation.

- 10.2. The investigating officer is responsible for liaising with social services and, if they are involved, the police.

- 10.3. Where the investigating officer finds there is possible misconduct by staff, they will advise a senior manager and Outward Human Resources in line with disciplinary procedures.

- 10.4. See on the intranet – Human Resources – Disciplinary Policy for Investigations Procedure and Investigation Guidelines

11. Case Conference

Once the investigation is completed, a case conference will be held. All parties involved in the strategy meeting will attend and outcomes from the investigation will be discussed. Further action will be agreed as will ongoing support and a monitoring package for the person we support and the person alleged to have caused harm (if also

supported by Outward). Checks should be made at this point with the person at risk who we are supporting (as part of 'Making Safeguarding Personal approaches') to consider if their initial outcomes have been met. Risk assessment for the person at risk would be revisited.

- 11.1. If the allegation is unfounded, a report will be filed by social services and Outward and any further incidents or issues will be closely monitored.

12. Post Event Review and Monitoring Lessons Learned

- 12.1. Reflecting after a safeguarding incident has been resolved can be invaluable to help develop best practice. Any of the senior management team can arrange for a post event review of a safeguarding incident to identify any themes and consider lessons learned from the event. For incidents where this analysis applies, a suitably skilled manager should be appointed to carry out the review.
- 12.2. All safeguarding incident forms will be reviewed by the manager and an area manager will be informed. The quality team will log all safeguarding reports.
- 12.3. Quarterly meetings will be held through the safeguarding board meeting; where senior management and quality team managers review reports, analyse data, find trends and consider lessons learned, with a view to improving processes and so reduce the number of safeguarding incidents.
- 12.4. Safeguarding data will also be reviewed by area managers at patch team management meetings and/or one-to-one supervision meetings. It will be a key performance indicator to be discussed at quarterly meetings of the operations committee. An annual report on safeguarding will be prepared by the quality team for the operations committee, and the key performance indicator for staff training will be reviewed at performance meetings.
- 12.5. Managers are expected to discuss safeguarding incidents and staff performance in relation to these in supervision and appraisals and at service level team meetings with frontline staff.

13. Involving the Police

- 13.1. Adults at risk are entitled to the protection of the law in the same way as any other member of the public, and some instances of abuse will constitute a criminal offence. The sort of behaviours which may constitute criminal offences are assault, whether physical or psychological, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.
- 13.2. Alleged criminal offences differ from all other non-criminal forms of abuse in that the responsibility for investigation invariably rests with the police. Accordingly, when complaints about alleged abuse suggest that a criminal offence may have been committed, it is imperative that the matter should be referred to the police urgently. Criminal investigation by the police takes priority over all other lines of enquiry.
- 13.3. The first concern must be to ensure the safety and wellbeing of the person we support. However, in situations where there has been or may have been a crime, and the police have been called, it is important that forensic and other evidence is collected and preserved. The police will attend the scene, and agencies and individuals can play an important part in ensuring that evidence is not contaminated or lost. Therefore, staff should secure the scene by, for example, locking the door; try not to disturb the scene, clothing or footwear, have limited contact with the victim if at all possible as this can destroy evidence; and preserve any blankets used to comfort the victim and all containers, documents, locations, etc. For further information see Safeguarding Policy **appendix 11 Preserving evidence of abuse.**
- 13.4. Evidence may be present even if staff cannot see it. If in doubt, staff should contact the police and ask for advice.
- 13.5. Staff should also ensure that the urgent medical and welfare requirements of the person we support are met; preserve any potential forensic opportunities and record verbatim the disclosure made by the person we support; consider immediately reporting to the police (on 999) any sexual activity that is not freely consented to before conducting any internal investigation or interview.

- 13.6. Sexual relationships or inappropriate sexual behaviour between a member of staff and a person we support are always abusive and will lead to disciplinary proceedings. A sexual relationship between the person we support and a care worker is a criminal offence under Sections 38–42 of the Sexual Offences Act 2003.
- 13.7. There may be safeguarding referrals that involve sexual innuendo or remarks that will not result in a criminal investigation. However, all referrals that indicate any form of sexual abuse require a risk assessment, intelligence gathering and appropriate information sharing with relevant partners.

14. Safeguarding People We Support Finances

Outward recognises the need to have in place systems and processes which protect the people we support from possible financial (or material) abuse from people who may support them with their financial matters. For information about safeguarding finances, see Outward’s Customer Finances policy and procedure and the Newlon Group Anti-Fraud Policy.

15. Management of Allegations Against People In Position of Trust (PiPoT)

A relationship of trust is one in which one person is in a position of power or influence over the other person because of their work or the nature of their activity. Any allegation against a person who works with adults with care and support needs must be reported immediately to Outward HR team: HRAdmin@outward.org.uk or to the Director of Care and Support- Katie Gutheim: KGutheim@outward.org.uk

When an allegation is made against a PiPoT, Outward will refer this to the relevant London borough as part of the safeguarding process.

Where the person alleged to have caused the harm or neglect is a volunteer or a member of a community group, Outward must work with adult social services to support any action under this policy.

Where the person alleged to have caused the harm is a neighbour, a member of the public, a stranger or a person who deliberately targets vulnerable people, the Person We Support at risk should receive the services and support that they may

need. In all cases, issues of consent, confidentiality and information sharing must be considered.

16. Applying Intersectionality in Safeguarding of adults Policy and Procedures

Intersectionality is an analytical framework for understanding how groups' and individuals' social and political identities result in unique combinations of discrimination and privilege. Examples of these intersecting and overlapping factors include gender, caste, sex, race, ethnicity, class, sexuality, religion, disability, physical appearance, and age. **These factors can lead to both empowerment and oppression.**

While race, class, gender and gender identity, disability status, ethnicity, sexual orientation, nationality, migration status, and faith continue to be important markers of inequality, and often increasingly so, they have predominantly been addressed separately.

The idea of 'intersectionality' is to focus on the ways that they operate simultaneously and shape one another.

For example, some Person We Support may face challenges not only because they are a "woman" but also because they are a "woman of colour". They could have a different experience if they are "only a woman" or "only a woman of colour"

Intersectionality it helps explain that we can't fully understand someone's experience by looking just one part of their identity.

One example of intersectionality is how a "female Person We support of colour" is treated differently in comparison to a "Male Person We Support", a "Male Person We support of Colour", another "White Female we Support " etc. This person's experience of discrimination could be totally different just because of their gender and race for example.

Another example is with an individual who is disabled and a wheel-chair bound. This individual is also part of the LGBTQ community so they may face any different treatment and even discrimination due to their physical disability and sexual orientation.

16.1. **Strengths of applying Intersectionality into our Policy and Procedure:**

- -Helps us understand People We Support's experiences much better
- -Encourages Empathy
- -Allows us to shape better Policies and Procedures and address the needs of those who are frequently overlooked
- -By looking at the whole picture we can create more effective solutions that consider all aspects of human's identity

Outward is committed into applying Intersectionality into dealing with future safeguarding cases.

Training will be provided for managers and staff in order to raise awareness in regards to this new addition to our Safeguarding of Adults Policy and Procedure

17. **References/Further Reading**

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<https://www.gov.uk/government/publications/nhs-prevent-training-and-competencies-framework/nhs-prevent-training-and-competencies-framework>
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18. Implementation of the Policy

Via Quarterly Safeguarding reviews; Managers Forum; Policy Review Forum; Intranet, Workplace; CQC Managers Forums; Annual safeguarding review reports; Staff supervisions, Staff safeguarding supervision, Team Meetings etc.

19. Appendices

AP1: Outward's Safeguarding, Incident and Accident Form (SIA)

AP2: Female Body Chart

AP3: Male Body Chart

AP4: CQC Notification Allegation of Abuse About a Person Who Uses the Service

AP5: Hackney Safeguarding Adults Referral Form

AP6: Waltham Forest Safeguarding Adults Concern Form

AP7: Enfield Safeguarding Adults Concern Form

AP8: Safeguarding Flow Chart- No immediate risk or danger

AP9: Safeguarding Flow Chart-Immediate risk or danger

AP10: Signs and Symptoms of Abuse

AP11: Preserving Evidence of Abuse

AP12 Disclosures Do's and Don'ts

AP13: London Multi Agency Adult Safeguarding Policy April 2019

AP14: Safeguarding of adults-Staff supervision

20. General Data Protection Regulations Statement

Outward is committed to compliance with the General Data Protection Regulations and the Data Protection Act 2018. It requires all staff and partners to respect confidentiality and data subjects' rights in line with its policies and procedures.

To ensure compliance with the Regulations staff must ensure that any personal information digitally produced or processed as part of these procedures is appropriately filed within an approved relevant filing system with role-based access control.

Whilst processing paper documents, including those from third parties, these documents must be stored in secure lockable cabinets. Records will be kept for as long as they are needed to meet the operational needs of Outward, together with legal and regulatory requirements. Where there is a deviation from this principle, the reasons for this must be recorded.

A detailed breakdown of retention and deletion of records can be found in Outward's Record Management and Retention Policy.

When disposing of documents containing personal data this should be done via confidential waste.

Please refer to Outward's Data Protection Policy and Procedure for more information.