

Safeguarding Adults Policy

NATIONWIDE COMMUNITY LEARNING PARTNERSHIP C.I.C



Mandatory User Notes

The requirements in this document are mandatory. A controlled copy of the current version of this document can be found in Staff Essentials/Company Policies and Procedures/Safeguarding Policy inc Statement and is also accessible on the company website.

Before using or referencing this document, it is the user's responsibility to ensure that the hard or electronic copy in his/her possession is current. The document owner should be contacted for assistance and any feedback.

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04/09/24	00	Safeguarding Manager	Managing Director	GRC Manager

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00	Overall safeguarding policy separated into child & adult policies	All pages	04/09/24

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1. Purpose

1.1 The purpose of this document is to set out in a clear manner the company policy on Safeguarding Adults.

At NCLP we take the welfare of our customers, visitors and staff very seriously. We are committed to safeguarding and promoting the wellbeing of adults at risk, this is part of our

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ethos and is a commitment shared across our organisation. Our safeguarding policy and procedures are there to ensure we protect and support those at risk and enable them to work towards a better future. We have a duty to ensure that vulnerable adults in our care are protected from significant harm or abuse. The purpose of this policy is to provide clear instructions to people working within the organisation on how to effectively deal with safeguarding concerns. This policy aims to raise awareness and provide clear guidance on protecting our vulnerable adults from significant harm and all other forms of abuse including:

- Neglect (for vulnerable adults)
- Emotional abuse
- Domestic violence and abuse
- Sexual violence and abuse
- Physical abuse
- Radicalisation and extremism
- Bullying (including cyber-bullying)
- Online dangers
- Female genital mutilation
- Honour based violence
- Modern slavery and trafficking
- Criminal exploitation
- Financial abuse
- Discriminative abuse (including race and homophobic)

(the above list is not exhaustive; we regularly review and update this list in line with local and national risks that arise)

We understand our responsibility to provide a safe and nurturing environment where the wellbeing of our customers and workers is at the heart of all we do. We aim to treat people with respect and dignity and provide an open-door policy where concerns can be raised and dealt with confidentially and with the knowledge that they will be addressed.

2. Scope

This document applies to all operations and employees of NCLP.

3. Relationship with other policies

This Safeguarding Adults Policy should be read in conjunction with other policies and procedures covering Equal Opportunities and Diversity, Bullying and Harassment and including policies on Business Continuity and Crisis Response, Disciplinary Procedures, Confidentiality, Whistle Blowing, Professional Boundaries, Allegations Management and Recruitment of Ex-offenders.

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Line managers, human resources and occupational health must ensure that personal data, including information about safeguarding matters, is handled in accordance with the organisation's Data Protection Policy / GDPR.

4. Definitions

For the purpose of this document:

The term "The Company" refers to the NCLP (Gloucester) Ltd group of companies.

We work with adults either as clients of our services or as members of family units. Some of these adults may from time to time also be subject to actions or behaviour by others either in the family or the community that can cause them harm of some kind, these individuals are defined as "vulnerable adults".

The term "vulnerable adult" should also be taken to mean a person over 18 whom: is a user of community care services by reason of mental or other disability, age or illness; and is unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

The term "worker" applies to anyone engaged by the organisation to work, whether on a paid or voluntary basis.

The terms "vulnerable person", "vulnerable people", "vulnerable groups" and "vulnerable clients" should be taken to indicate vulnerable adults unless otherwise listed.

The term "Designated Safeguarding Lead (DSL)" refers to the nominated person who has overarching responsibility for all safeguarding concerns, this is the "Safeguarding Manager".

The term "Deputy Designated Safeguarding Lead (DDSL)" refers to the nominated person who has responsibility for safeguarding concerns in the DSL's absence.

5. Policy principles

All vulnerable people have a right to protection from abuse of all types and to expect that adults in positions of responsibility will do everything in their power to foster these rights. An adult should have the right to live in safety, free from abuse and neglect.

All allegations of abuse will be taken seriously and understood from the viewpoint of the victim.

Our guiding principles follow the trauma-based approach, through our work we seek to empower vulnerable groups by valuing their opinions, ensuring that they are aware of the choices that they can make in any given situation, and by responding to their rights to be involved in decisions about their future. This principle will always be exercised within a framework of protecting a vulnerable person from harm.

Because of the nature of our work, there may be a need to inform the vulnerable adults nominated next of kin. However, it must be borne in mind that it is the welfare of the vulnerable adult that is paramount. Where the vulnerable adult is our primary client, it is important that there is trust between them and The Company, however it must be clear that the interests of the vulnerable adult must take precedence if there are any protection issues. Where the

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vulnerable adult is the primary client, their interests must be considered separately from the interests of the next of kin.

The Company will work alongside the local authority and other partners, on a multidisciplinary basis to promote good practice and meet the objective of effectively protecting vulnerable groups.

The Company will work in partnership with Action for ACEs Gloucestershire to promote the understanding of ACEs (Adverse Childhood Experiences) and how this can impact heavily on their client's ability to achieve and enjoy positive mental health and well-being.

The Company will take into consideration the sensitive issues that may arise when working with people of differing race, religion, language, culture, gender, physical and mental abilities.

All workers should remember that duties to protect vulnerable groups apply to all adults, not just those with whom we have a direct relationship. This should be remembered when supporting our clients. We may become aware of protection issues for vulnerable people we have never met, e.g., a service user's child/children, parent, or sibling.

6. Guiding principles for working with vulnerable adults

6.1 Guidance and legislation informing the policies and procedures

Our policies and procedures are set in line with the following:

- Prevent Duty Guidance 2023
- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2018
- Safeguarding & Mental Capacity Act 2005
- Equality Act 2010
- Human Rights Act 1998
- Gloucestershire Safeguarding Adult Partnership in Working with Vulnerable People

6.2 The Company's aim is to:

- Promote their general welfare; and their right to enjoy positive mental health and well-being
- Recognise their rights as individuals and treat them with dignity and respect
- Provide a safe and welcoming environment where they can enjoy trusting relationships with our staff and their peers
- Consistently apply safe, fair and objective methods of selecting workers
- Plan activities involving their customers with care to minimise risks to their health and safety
- Raise awareness of the dangers to which vulnerable adults may be susceptible
- Develop appropriate procedures for responding to accidents, incidents and alleged or suspected harm

6.3 The following is a quick reference guide to appropriate behaviour when working with vulnerable people. All workers should:

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- Remember they are a role model and provide an example for those they work with to follow
- Bear in mind that some actions, no matter how well-intentioned, may be easily misinterpreted and so leave all parties vulnerable
- Be alert to any potential harm or inappropriate behaviour by vulnerable adult
- Respect individuals' rights to privacy
- Provide a safe space for vulnerable people to discuss any concerns they may have
- Speak to the Designated Safeguarding Lead (DSL) if they have concerns about an individual's safety

6.4 Workers should not:

- Be left alone for substantial periods of time with vulnerable adults. Where one-to-one work is necessary, they should inform another worker where they are going, with whom and for how long
- Permit abusive behaviour by others or engage in it themselves (e.g., ridiculing and bullying)
- Show favouritism to or become too closely associated with an individual. Nor should they get drawn into inappropriate attention-seeking behaviour (e.g., crushes)
- Allow or engage in suggestive remarks, gestures or touching of any kind, which could be misunderstood
- Jump to conclusions about others without checking facts
- Hesitate to share concerns on any of these matters with the Designated Safeguarding Lead (DSL)

Please refer to NCLP Professional Boundaries Guidance for full information

7. Raising awareness of dangers

Guiding principle: raise awareness of the dangers to which vulnerable people are susceptible.

7.1 Significant harm - types

Significant harm is generally described under the following headings and is usually referred to in the context of children and young people. For the purposes of this policy the following definitions are also applicable to abuse of vulnerable adults.

7.2 Neglect

Neglect can be defined as a situation in which the vulnerable adult suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from others and medical care. The threshold of significant harm is reached when the person's needs are neglected to the extent that their well-being and/or development are severely affected. We refer to the Gloucestershire Safeguarding Adults Board who are responsible to undertake an enquiry where there is a concern that an adult with care and support needs cannot protect themselves.

7.3 Emotional abuse

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Emotional abuse occurs when a vulnerable adult's need for affection, approval, consistency, and security are not met. Examples of emotional abuse include:

- The imposition of negative attributes on a vulnerable adult, expressed by persistent criticism, sarcasm, hostility or blaming
- Emotional unavailability by the vulnerable adult's carer
- Unrealistic and/or inappropriate expectations of the vulnerable adult
- Failure to show interest in or provide age-appropriate opportunities for the vulnerable adult's cognitive and emotional development.
- Unreasonable or over harsh disciplinary measures
- Exposure to domestic violence
- Exposure to coercive control where one person who is personally connected to another, repeatedly behaves in a way which makes them feel *controlled*, dependent, isolated, or scared

7.4 Domestic violence and abuse

Domestic violence and abuse are defined as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in most cases by a partner or ex-partner, but also by a family member or carer. It is very common.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical abuse
- Sexual abuse
- Financial abuse
- Harassment
- Stalking
- Online or digital abuse

The Company work in close partnership with Gloucestershire Domestic Abuse Support Service (GDASS) and Multi Agency Risk Assessment Conferences (MARAC) to ensure referrals are made to support victims and their families. The DSL and DDSL are fully trained in the making referrals

[Support for professionals - Gloucestershire Domestic Abuse Support Service \(GDASS\)](#)

7.5 Sexual violence and abuse

- Sexual abuse occurs when a vulnerable adult is used by another person for his or her gratification or sexual arousal or for that of others. Examples of sexual abuse include:
- Exposure of the sexual organs or any sexual act intentionally performed in the presence of a vulnerable adult
- Intentional touching or molesting of the body of a vulnerable adult whether by a person or object for the purpose of sexual arousal or gratification
- Sexual intercourse with a child under 16 years old
- An adult/professional in a position of trust, or a family member having intercourse with a vulnerable adult
- Sexual exploitation of a vulnerable adult

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- This may also include non-contact activities, such as looking at, or in the production of sexual images, watching sexual activities, encouraging vulnerable adults to behave in sexually inappropriate ways, or grooming a vulnerable adult in preparation for abuse (including via the internet)

7.6 Positions of trust

As an employee of The Company, you are placed in a position of trust, which may include working with vulnerable adults, where the balance of power is not equal. It is against The Company Code of Conduct and Professional Boundaries Guidance for a worker to engage in a sexual relationship/activity with a service user.

The Company will take allegations against a worker very seriously and will follow the **NCLP Allegations Management Policy and Process**, whilst ensuring the victim is treated with dignity and respect.

Full information can be found:

NCLP Allegations Management Policy and Process
Professional Boundaries Guidance

7.7 Physical abuse

Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a vulnerable person. Examples of physical injury include:

- Shaking, smacking/striking, with or without a weapon, and burning including scalding or friction burns
- Use of excessive force in handling

7.8 Radicalisation and extremism

The current threat from terrorism and extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011). Vulnerable people are at risk of becoming radicalised to become involved in acts of terrorism. (**for full guidance see Section 9 Preventing Radicalisation**)

7.9 Bullying

Bullying can be defined as repeated aggression - be it verbal, psychological, or physical which is conducted by an individual or group against others.

Examples of bullying include:

- Teasing
- Taunting
- Threatening
- Hitting

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- Extortion
- Segregation, including malicious ignoring and non-involvement to belittle and undermine

Bullying may take place in any setting - in training, the home or in a work placement. Bullying can also take place online; this is known as 'Cyber-Bullying'. The more extreme forms of bullying would be regarded as physical or emotional abuse. Bullying can have a serious impact on a person's well-being and can lead to self-harm and suicide.

7.10 Online dangers

Use of ICT and the internet can pose a significant risk to vulnerable adults. There are many dangers relating to use of mobile phones and devices, social media and other communication platforms.

This can include:

- Cyber bullying
- Grooming and exploitation
- Sexting
- Pornography
- Privacy and security breaches
- Harmful content
- Radicalisation
- Risks from prolonged screen time
- Identity theft
- Financial exploitation / money mules

To help keep our clients safe from harm in the online world we offer training and education to promote and raise awareness of the dangers posed. We have an open-door policy where any concerns can be raised in a non-judgemental environment and can be dealt with sensitively and in line with company policy and procedures.

Please refer to **NCLP Online Safety & Filtering Policy** for more detailed information.

7.11 Honour based violence

Honour Based Violence (HBV) is a term used to describe violence committed within the context of the extended family which are motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim. Most victims of HBV are women or girls, although men may also be at risk.

Women and girls may lose honour through expressions of autonomy, particularly if this autonomy occurs within the area of sexuality. Men may be targeted either by the family of a woman who they are believed to have 'dishonoured', in which case both parties may be at risk, or by their own family if they are believed to be homosexual.

Common triggers for HBV include:

- Refusing an arranged marriage
- Having a relationship outside the approved group
- Loss of virginity
- Pregnancy
- Spending time without the supervision of a family member
- Reporting domestic violence

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- Attempting to divorce
- Pushing for custody of children after divorce
- Refusing to divorce when ordered to do so by family members

However, some families may resolve to abuse or kill a member on what would appear to be very trivial grounds. It is important to take clients fears of HBV seriously, even when it seems unlikely. Victims of HBV are more likely to underestimate the risks to their safety than overstate them and even if the 'offence' seems trivial to you, this does not mean it is trivial to his or her family.

7.12 Modern slavery & human trafficking

Modern slavery is a serious and brutal crime in which people are treated as commodities and exploited for criminal gain, this can be devastating for victims. The true extent of modern slavery in the UK, and indeed globally, is unknown. Increased awareness and reporting support law enforcement to tackle the perpetrators of modern slavery as well as protecting victims. It is your responsibility to be vigilant and recognise the signs that a customer or learner is being exploited in this way.

Types of modern slavery

Modern slavery takes many different forms in the UK. The prevalence of different types of modern slavery in the UK will vary by region and change over time, however currently there are four broad ways in which perpetrators may seek to exploit victims, which The Home Office research has further broken down into 17 distinct types. Full details on the 17 types of modern slavery, including case studies, are available on the www.gov.uk website under 'typology report'.

Understanding the different types can be crucial for staff involved in developing toolkits for frontline staff or the operational response for their organisation.

The four broad categories are below – in each case the victim may or may not additionally have been moved (trafficked), either from another country, or within the UK, to be exploited.

Labour exploitation

Labour exploitation usually involves unacceptably low pay, poor working conditions, or excessive wage deductions, but is not solely about this. In order to constitute modern slavery, there will also be some form of coercion meaning that victims cannot freely leave for other employment or exercise choice over their own situation. Where the perpetrator is taking advantage of a child or vulnerable person, an offence can be committed without the element of coercion.

Domestic servitude

Domestic Servitude typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay. The victim could be used in this way by their own family members or partner. Again, it is very difficult for them to leave, for example because of threats, the perpetrator holding their passport, or using a position of power over the victim.

Sexual exploitation

Victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation. Victims may be brought to the UK on the promise of legitimate employment or moved around the UK to be sexually exploited. In some cases, they may know they will be involved in sex work but are forced into a type or frequency they did not agree to. Victims are more commonly female but can also be male.

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Criminal exploitation

Criminal exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims could be coerced into shoplifting, pickpocketing, entering into a sham marriage, benefit fraud, begging or drug cultivation such as cannabis farming. Forced removal and trafficking of human organs is an additional category of modern slavery that occurs globally, however there have been no confirmed cases in the UK.

Illegal immigration offences

Where individuals agree to be brought to the UK illegally, but there is no intention to exploit or take advantage of them once they arrive, this is known as smuggling and is an immigration offence rather than modern slavery or human trafficking. These individuals are not victims, although they may be at increased risk of being exploited at a later date.

Victims of modern slavery can be men, women, or children. They can be British citizens living in the UK, EU nationals, or those from outside the EU. Victims of over 100 nationalities have been identified in the UK but the most common originating countries of potential victims are:

1. Albania
2. Vietnam
3. UK
4. Nigeria
5. China
6. Romania
7. Poland
8. Eritrea
9. India
10. Afghanistan

Signs to look out for

Victims of modern slavery can be found anywhere. There are certain industries where they are currently more prevalent, such as nail bars, car washes, agriculture and fishing, building sites and the sex industry. Other high-risk situations include when there is a need for a sudden injection of workers into the work force, such as seasonal staff or construction for a major event. However, victims may also pass-through transport hubs, health services and other public places or be found in private homes.

Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area -
Passport or documents held by someone else

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- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated, or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities
- Unwanted/underage pregnancy
- Inappropriate sexual behaviour
- Incoherent/changing account of events
- Repeating a story that you have heard elsewhere
- Unexplained eagerness to leave a safe space/to work
- Sexually transmitted diseases
- Missing episodes (especially from care – under 18s)
- Limited/sporadic school attendance (under 18s)

There are several indicators that can be signs that someone is a victim of modern slavery. Some of the key indicators are below. However, sometimes it will be a case of acting on your instinct that something is not right and using existing professional skills to talk to a potential victim and find out more information. None of these indicators in isolation or combination can give you complete certainty, however you do not need to be certain to report your concerns.

Any member of staff should report concerns of this nature through the safeguarding reporting process.

Additionally, the case should always be reported by one of the following methods:

- Phoning 999 if there is an immediate risk of harm
- Reporting to the police on 101 or the Modern Slavery Helpline on 0800 0121 700 if there is not an immediate risk of harm
- Using the National Referral Mechanism which can be found at:
<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

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7.13 Criminal exploitation (dangerous drug networks/ county lines)

Dangerous Drug Networks DDN's are drug dealing gangs who target vulnerable people in order to set up drugs distribution networks. These criminals are using extreme violence to establish a presence, displacing an existing drug supply chain and intimidating rivals, witnesses, and victims; this has resulted in local murders. DDN's exploit vulnerable teenagers and adults to become drug runners for their network. Early intervention and intelligence are key to safeguard and protect the vulnerable. Share information between agencies at the earliest possibility. The Company work closely with our partner agencies and sit on the county Multi-Agency Child Exploitation and Contextual Safeguarding (MACE) panel. We also have a direct Police Intelligence Reporting route, where concerns for vulnerable adults being exploited can be reported.

Some signs that could indicate criminal exploitation:

- New friends that have the potential to be a bad influence
- Behaving differently or out of character
- Developed a new attitude
- Unexplained injuries
- Continually late to appointments or non-attendance
- Continually tired
- New expensive possessions such as trainers, jewellery, mobile phone or designer clothes
- Become withdrawn
- Changes to their financial status that might make them vulnerable

7.14 Financial abuse

Financial abuse is another name for stealing or defrauding someone of goods and/or property. It is always a crime but is not always prosecuted. Sometimes the issue is straightforward, for example a care worker stealing from an older person's purse, but at other times it is more difficult to address. This is because very often the perpetrator can be someone's relative, or age/disability prejudice means that people assume it is not happening or that the vulnerable person is confused.

Financial abuse involves:

- Theft
- Fraud
- Exploitation
- Pressure in connection with wills, property, financial transactions, misuse or misappropriation of property, possessions, or benefits
- Deny money for food, transport, clothes etc. to attempt to isolate and control a vulnerable person

7.15 Discriminative abuse (including race and homophobic)

Discriminatory abuse is when someone picks on or treats someone unfairly because something about them is different, for example it may be:

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- Their clothes
- Their weight
- Their race or skin colour
- Their religion or culture
- Being a man or a woman
- Being a gay man or a lesbian woman
- Their age
- Their health or disability

8. Disclosure of a concern

Disclosure of a concern – See Annexe A for full reporting process

Informing

By issuing this policy and through its mandatory core training programme, The Company is keen to ensure (without creating unnecessary anxiety) that all relevant employees:

- Know the types of harm to which vulnerable adults are susceptible
- Are alert to behaviour, which suggests something may be wrong
- Can talk to someone if they become aware of anything, which causes them to feel uncomfortable
- Know how to deal with alleged or suspected harm

8.1 Disclosure

A disclosure is when a vulnerable adult tells someone that they have been or are being harmed or abused in some way. Staff should:

- Believe the vulnerable adult unless proven otherwise by a competent authority – always assume the vulnerable adult is being truthful
- Remain calm and do not ask leading questions
- Take the disclosure seriously, never underestimate the situation
- Do not minimise the incident
- Tell the vulnerable adult that he/she has done the right thing in telling you. **Never** promise to keep it a secret
- Reassure the vulnerable adult that no blame or guilt is his or hers. Vulnerable adults of sufficient age and understanding often have a clear perception of what needs to be done to ensure their safety and wellbeing. Most vulnerable adults feel loyalty towards those who care for them and have difficulty saying anything against them. Some may fear reprisals and will need a great deal of reassurance
- Write down exactly what was said to you using the vulnerable adult's **OWN** words immediately after disclosure. Remember to date and to sign the account, which should be passed onto the Designated Safeguarding Lead (DSL) as soon as possible after disclosure
- Tell the vulnerable adult what you will do with the information. Vulnerable adult's need to understand the extent and nature of their involvement and should be helped to understand the protection process
- **DO NOT** deal with the matter alone. Report it to the Designated Safeguarding Lead (DSL), it is vital you tell the vulnerable adult that you **must** do this

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- Personal information about vulnerable adults held by professionals is subject to a legal duty of confidence and should not normally be disclosed without consent of the subject. However, the law permits the disclosure of confidential information necessary to safeguard a vulnerable adult in the public interest; that is; the public interest in safeguarding vulnerable adults may override the public interest in maintaining confidentiality
- Seek support for yourself, advice and information on support services can be accessed via the DSL or DDSL

8.2 A vulnerable adult under threat

In a situation where a vulnerable adult is at immediate risk of harm the member of staff should:

- Respond to secure the safety of the vulnerable adult without placing themselves or others in danger
- Discuss the situation with their DSL or DDSL or if they are not available with a senior member of staff. If unavailable direct consultation with the appropriate local authority should take place and any steps taken should be reported to DSL as soon as possible. (all local authority contact details are listed at the end of this document)
- Record all details of the incident and what action they have taken
- If the situation is immediately dangerous, and there is concern about the immediate safety of a vulnerable adult, referral should be made to the police in the first instance.
- Where a vulnerable adult needs immediate medical assistance, this overrides all other considerations, and it must be sought immediately. In such situations doctors are able to provide emergency treatment to the vulnerable adult without carer consent. The worker concerned must tell the Doctor or medical staff if they have concerns over the nature of the injuries and vulnerable adult's ongoing welfare. The Company staff should refrain from diagnosing abuse unless the vulnerable adult has made a disclosure indicating such

8.3 A vulnerable adult for whom there is concern

- All staff have a responsibility to consult with their Designated Safeguarding Lead or another designated manager when they have concerns about the safety of a vulnerable adult. It is better to share a concern which may prove groundless than to wait for certainty, which may result in irreparable damage to the vulnerable adult
- Any worker who believes that they have seen possible evidence of abuse, who has concerns that a vulnerable adult may be at risk of significant harm, or to whom a vulnerable adult makes an allegation of abuse or possible abuse, must consult with their Designated Safeguarding Lead, or another designated manager immediately, and as a maximum within 24 hours of the concern or allegation coming to light. If this is not possible then the worker should consult directly with the appropriate local authority
- Where the concern raises questions about the immediate safety of the vulnerable adult, consultation with the Designated Safeguarding Lead, or directly with the appropriate local authority if a manager is unavailable, should be immediate
- Following consultation with the Designated Safeguarding Lead a decision will be reached on how to proceed. This will include deciding whether, when and how any concerns will be discussed with the vulnerable adult or carer and whether a referral

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to the appropriate statutory services is necessary. Faced with possible evidence of abuse or the risk of significant harm the DSL or relevant manager must take responsibility for ensuring that the appropriate person in the local statutory services is contacted and that the information is passed to them, giving the full context of the incident, any previous interventions, and any relevant information regarding the vulnerable adult's history

- Where a person has disclosed information about abuse or the risk of significant harm to a vulnerable adult, the DSL should ensure, as far as they are able to, that the "discloser" is kept informed about what will happen next. This will help to reassure them about what to expect
- Where there is already active involvement of the local authority in a case, and a worker has concerns about the welfare of a vulnerable person or where a vulnerable adult makes an allegation of abuse or possible abuse then a referral to the Local Authority should still be made including details of the active social worker and any discussions that may have taken place included in the form
- Confidentiality is not absolute secrecy; The Company operates a limited confidentiality policy regarding safeguarding vulnerable adults. All vulnerable adults receiving services from The Company will be informed of its limited confidentiality policy and the exceptions where a vulnerable adult's safety is at risk. No worker should ever give a guarantee of confidentiality to a vulnerable adult wishing to disclose abuse. The worker who receives such information should handle the situation sensitively and explain it is necessary to involve other agencies to protect the vulnerable adult. Although it is best avoided, the situation may arise where information has to be passed on without the vulnerable adult's agreement
- All contact with the local authority must be recorded. Referrals of possible abuse to the local authority via the phone must be confirmed in writing within 24 hours. Confirmation should include full details of evidence, action taken, and designations of people contacted

8.4 Concern

Inappropriate or unacceptable behaviour or communication, favouritism and negligence are examples of what may constitute a concern and must be reported in line with the **NCLP SVG Incident Reporting Process** (see annexe A for full process).

8.5 Confession

A confession occurs when someone discloses that they have been involved in the abuse of a vulnerable adult. Confessions must be reported to the DSL unless there is immediate concern for the safety of the victim in such cases the police must be informed straight away

8.6 Allegation

An allegation occurs when someone reports specific unacceptable behaviour where a vulnerable adult has been harmed or abused in some way. Allegations must be reported to the designated staff. Please refer to the **NCLP Allegations Management Policy and Process**

8.7 Evidence

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- There may be some cases where a vulnerable adult presents on a single occasion with injuries that immediately arouse suspicion of abuse. In all such cases these injuries should be treated as potential evidence of abuse and should result in the case being reported to the adults safeguarding helpdesk as a referral for service.
- Examples of possible evidence of abuse may include physical and behavioural signs and signals, comments made by the vulnerable adult, or noticing a pattern from records. Reference should be made to the local authority's guidance on the "signs and signals" of possible abuse and risk factors as listed in the The Company's Guiding Principles for Working with Vulnerable Groups.

8.8 Abusers

- The perpetrator of abuse can be anyone who is in a position to exert power over a vulnerable adult
- Vulnerable adults are most often abused by those who are close to them, or who have direct care of them, that is, parents and other family members, or care givers. They may also be abused by strangers, or by professionals who may do so in the guise of 'helping'
- When a vulnerable adult has been abused the role of others in the household must be considered. Some will have been totally unaware of the abuse and may need support to help come to terms with it. Others may have co-operated with the abuse or have been coerced into accepting it
- All workers should be alert to any signs that a colleague, including employees of The Company and employees of other organisations, is behaving inappropriately in relation to a vulnerable adult. Any such suspicion should be discussed with the Designated Safeguarding Lead, who will consider it in light of these procedures. The DSL will decide where applicable, to follow our internal procedures or inform the agency to whom the colleague is attached
- All workers will be aware that to enter into a social relationship with any service user outside the boundaries of our service specifications is a breach of The Company's Code of Conduct, this is covered in The Company policy on Professional Boundaries and will be considered as gross misconduct
- Any personal relationship, sexual or otherwise, with a service user is considered gross misconduct under our policies and will instigate the **NCLP Allegations Management Process**

Please remember:

- The only professional qualified to diagnose whether a physical injury is the result of abuse, is a professionally trained medical practitioner. All workers should report their concerns but avoid diagnosing incidents as abuse
- It is your responsibility to report concerns, NOT to decide whether it is or is not abuse
- The Company advocates a 'no secrets' approach to the protection of vulnerable adults. If you are unsure about your suspicions discuss them with the DSL. It is better to report and be wrong than to stay quiet and have been right.
- Never promise to keep quiet about your concerns to a victim of abuse or the perpetrator of abuse
- The discovery or disclosure of abuse can result in the vulnerable adult experiencing very difficult emotions and can lead to them revisiting previous trauma. It is important

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that any decisions and referrals made are done so with the vulnerable adult at the centre of this process.

9. Preventing radicalisation

The Company has a wider safeguarding duty to prevent children and vulnerable adults from the risk of radicalisation and extremism. The Company has developed a PREVENT strategy detailed below to support the prevention of extremism and radicalisation [The Prevent Duty].

Any member of staff or learner at The Company who have any concerns regarding the issues identified within this guidance policy should report those concerns immediately and no later than the end of the working day to the designated safeguarding lead

Designated Safeguarding Lead – Kate Whereat Safeguarding Manager (Prevent & CIC Lead)

9.1 Introduction

The current threat from terrorism and extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the channel process (see below).

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

9.2 Equality, diversity and community cohesion

The company aims to guide our staff and learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our clients for life in modern Britain. We aim to encourage working towards a society with a common vision and sense of belonging by all. Community: a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in education and in the wider community.

9.3 National guidance and strategies

PREVENT is a key part of CONTEST, the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting, and protecting people who might be susceptible to radicalisation. The PREVENT strategy objectives are:

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- *Ideology*: respond to the ideological challenge of terrorism and the threat we face from those who promote it
- *Individuals*: prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- *Institutions*: work with sectors and institutions where there are risks of Radicalisation which we need to address

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately.

9.4 Vulnerability/risk indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that clients experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a learner, or their family may be vulnerable or involved with extremism:

- *Vulnerability Identity crisis*: Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- *Personal crisis*: Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- *Personal circumstances*: Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- *Unmet aspirations*: Perceptions of injustice; feeling of failure; rejection of civic life.
- *Criminality*: Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups
- *Access to extremist influences, as follows*:
 - Reason to believe that the young person associates with those known to be involved in extremism
 - Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence
 - Use of closed network groups via electronic media for the purpose of extremist activity experiences, behaviours, and influences
 - Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity/use of documents to support this

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- Experience of disadvantage, discrimination, or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status

More critical risk factors include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance/behaviour

9.5 Referral and intervention process - See Annexe C for full reporting process

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the person supports terrorism and/or extremism, must be reported to the named Designated Safeguarding Lead immediately and no later than the end of the working day. Where a person is thought to be in need or at risk of significant harm, and/or where investigations need to be carried out (even though parental consent may be withheld), a referral to the relevant social care agency should be made in line with the company safeguarding policy. However, it should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the channel process).

As part of the referral process, the Designated Safeguarding Lead will also send an electronic referral to the local Police Prevent Team using 101 (Ext 2802) and ask for the Counter Terrorist Security Advisor or via the Prevent Coordinator for their region (South West) this is currently: **Cheri Fayers** cheri.fayers@education.gov.uk

Local Police contacts:

101@gloucestershire.police.uk
simon.williams@gloucestershire.police.uk

9.6 Channel referrals process

Some concerns which are identified may have a security dimension to them, for this reason, it is important that liaison with the police forms an early part of all investigations. Gloucestershire Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the person.

9.7 Training

The Company will ensure that the Designated Safeguarding Lead (DSL) is suitably competent for this role and that all employees who work with clients receive PREVENT and CHANNEL awareness training to enable early identification of radicalisation and effective referral. The Company will ensure full risk assessments are carried out and action plans are in place to mitigate any risks.

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9.8 Access to all centres

The Company will ensure that all staff always wear photographic ID Badges. All visitors must be signed in and out of all sites and be asked to where a visitor's badge, which must always be visible. All staff are responsible for reporting any persons who are not wearing a badge immediately.

10. Working in partnership with local authorities

(See Annexe D for full list of contacts from the local authority)

The Company will have a **named Designated Safeguarding Lead (DSL)** who is responsible for developing and maintaining a formal link between the safeguarding partnership and The Company, the aim of which is to promote a clear understanding of accountability and procedures. The DSL will manage a team of safeguarding representatives.

Current named contacts:

- **Kate Whereat** – Safeguarding Manager, **Designated Safeguarding Lead (DSL)** (Senior Mental Health, Prevent & CIC Lead)
- **Jane Trehearne** – **Deputy Designated Safeguarding Lead (DDSL)**, Learner Support Supervisor
- **Zoe Price** – **Deputy Designated Safeguarding Lead (DDSL)**, High Needs Coordinator and SENCo
- **Lydia Thompson** – Employment Advisor/Wellbeing Officer
- **Jake Oldrey** - Employment Advisor/Wellbeing Officer

11. Training

Safeguarding vulnerable adults must form a part of staff induction, training, supervision and appraisal process.

Safeguarding vulnerable adults training is mandatory for all Company staff.

Designated staff within the organisation will undergo relevant safeguarding training

Designated staff within the organisation will undertake mental health training

Designated staff within the organisation will be responsible for the cascading of information and training to the workers within The Company. All staff will be given underpinning knowledge on safeguarding vulnerable groups and the mechanics of The Company's safeguarding vulnerable adult policy and procedures. This will be refreshed every 12 to 15 months

All clients accessing The Company's services will have access to safeguarding vulnerable adults' awareness information.

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12. Record keeping and sharing information

12.1 Any records must be kept accurate and factual. Paper based records relating to suspected, possible, or actual abuse must be signed and dated by the worker making the entry. When recording information workers must be sensitive to the fact it may be shared with the vulnerable adult and/or their carer.

Where a worker has concerns about possible significant harm to a vulnerable adult, the concerns must be clearly recorded using the Safeguarding Incident Report Form and discussed with the Designated Safeguarding Lead, or if they are not available, with the named Deputy Designated Safeguarding Lead. The incident report form should be forwarded to the DSL who will record the incident.

The only professional qualified to diagnose whether a physical injury is the result of abuse is a professionally trained medical practitioner. The Company as an organisation and its workers should report their concerns but avoid diagnosing incidents as abuse.

It is the responsibility of professionals to report concerns, NOT to decide whether it is or is not abuse.

The Company is committed to openness in our work with clients, however in some instances, where sharing information with relatives may put vulnerable adults at risk, access will be restricted, and advice should be sought from the appropriate local authority. Sharing of information between practitioners and partner organisation's is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of vulnerable adults at risk of abuse or neglect.

The GDPR and Data Protection Act 2018 do not prohibit the collection and sharing of personal information. They provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them. Never assume sharing is prohibited – it is essential to consider this balance in every case. You should always keep a record of what you have shared.

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk. Where a decision to share information without consent is made, a record of what has been shared should be kept.

12.2 Requests for information from a professional body such as the police or adult safeguarding board.

Where The Company receives a request from the police or adult safeguarding board for information as part of safeguarding enquiries, workers should follow the guidelines below

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- If contacted by phone workers will take contact details and refer the query to the Designated Safeguarding Lead who will manage disclosure of the information in line with the limited confidentiality policy
 - Relevant information should be shared on a “need to know” basis, within the context that the welfare of the vulnerable adult is paramount and overrides issues of confidentiality
 - The Designated Safeguarding Lead will clarify with the requesting agency, where appropriate, whether consent of the vulnerable adult has been given for the enquiry, and if not, agreement should be reached on whether it is appropriate to seek consent prior to sharing information
 - Information shared will be recorded. The records should indicate whether the vulnerable adult’s consent was obtained to share this information, and if not the reason for this should be recorded
-

13. Discussing concerns with vulnerable adults and carers

Discussing concerns with the vulnerable adult or carers involved can assist in clarifying the explanation for any injuries or other possible indicators of abuse. Where the explanation is unsatisfactory an honest response, such as advising of the need to discuss this with the appropriate local authority can help prepare the vulnerable adult or carers for any further assessment.

After discussing concerns with the vulnerable adult and carers, the worker should consult again with their DSL, and a decision will be made as to whether their remains a basis for concern and what further action, if any, needs to be taken. Where consultation with the vulnerable adult or carers alleviates concerns, this should be recorded, and it is likely that no further action will be necessary.

The local authority should be contacted before contact with the carer and advice sought, where:

- A vulnerable adult has made an allegation of abuse by the carer
- There is evidence of possible violence from one or both carers
- The allegation concerns a professional or volunteer working with the vulnerable adult.

14. Investigation

During investigation workers must be aware that it is their role to support the local authority in this process by providing accurate information. It is our role to observe and record incidents and not to investigate or evaluate evidence. Inappropriate lines of investigation may jeopardise evidence should a case go to court.

If, following an adult safeguarding referral, the DSL is dissatisfied with the local authority proposed action, or decision not to investigate, they must discuss this with the Managing Director. The Managing Director may judge it necessary to contact a senior manager within

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the local authority to advocate further action, instigating where necessary the “Escalation Policy”

15. Support for clients and staff

The Company will ensure that victims of abuse are supported at the time of crisis and on an on-going basis. Where we are unable to provide this support, ourselves we will endeavour to refer clients to appropriate support agencies.

The Company acknowledges that abuse and supporting the vulnerable adult can be traumatic and emotionally draining. It often stirs up feelings of anger, guilt and disgust for the workers involved. Support will be offered to staff through supervision with their line manager and DSL where appropriate the DSL will make referrals to external support agencies such as counselling and in-work mental health support.

16. Conduct of employees

All workers must always abide by The Company’s Code of Conduct and Professional Boundaries Guidance.

Workers should not form social relationships outside of our service specification. Workers should not take clients, to their homes, or give out their personal telephone numbers, or add clients as ‘friends’ on personal social media accounts. To do so may be viewed as a disciplinary matter. Workers should only have their work mobile and email available to clients during the companies usual working hours 8.45am to 4.45pm (unless approved by a senior manager)

Workers should not have more favoured or less favoured clients. Every user should be treated equally.

Any inappropriate behaviour towards workers by a client should be recorded, and if this behaviour was witnessed by others this should be recorded.

Workers should avoid giving lifts to clients, except to assist in the provision of support services, or as part of organised activities and should be adequately risk assessed.

Workers should not enter a close relationship, physical, emotional, or sexual, with any of our clients. This will be viewed as a disciplinary matter.

Workers must never threaten or physically punish a client. Any use of corporal punishment is not permitted. This will be viewed as a disciplinary matter.

The term corporal punishment should be taken to include punching or pushing in the heat of the moment in response to violence from The Company’s clients. It does not prevent a worker from taking necessary physical action where any other course of action is likely to fail to avert the immediate danger of personal injury to the client, the worker or another person, or the immediate danger to property.

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Transporting clients

All drivers should have read The Company Safeguarding Adults Policy.

All journeys for clients should be carried out with the knowledge of the driver's line management.

Seat belts should be worn, the driver should have adequate insurance and the vehicle should be road worthy.

Drivers should not spend unnecessary time alone in a vehicle with a service user. If a service user wants to talk to a driver about something and has waited till other passengers have been dropped off, the driver should explain that it is not convenient to talk. Then arrange to meet with the service user at a location where there can be other adults around. (remember, a service user may want to talk about an abusive situation).

The Company considers, having checked drivers (application form, interviews, references etc.), it is reasonable to expect that they may be left alone with a service user for short periods e.g., dropping off the last passenger. In all cases a discussion should take place as to the most suitable member to be dropped off last and plan routes accordingly.

The Company does not suggest two staff members in a vehicle as this itself does not guarantee protection for a service user – there have been incidents where staff have acted together and two adults in a vehicle with one passenger could be of less protection.

Look at instances where it may be unwise for a particular driver to transport a service user (e.g. where they have had a disagreement that day or where a member has a 'crush' on a driver) and arrange for someone else to do the transportation.

To be read in conjunction with The Company Professional Boundaries Guidance

17. Allegations management

How to deal with allegations of abuse against staff working with vulnerable adults

18.1 KEY PRINCIPLES:

If you manage or supervise staff working with vulnerable adults:

- Ensure all staff know to whom to report concerns or allegations i.e., the Designated Safeguarding Lead, supervisor or leader
- Refer to Adults at Risk Procedures [Safeguarding Adults Board - Safeguarding Adults in Gloucestershire](#) throughout the process
- Ensure no action is taken that may undermine or jeopardise a police or social care investigation, particularly in the early stages of the process; under no circumstances should the company start an investigation
- For incidents involving clients over 18 liaise with social care adult helpdesk
- Consider the advice, guidance and training you give to The Company staff, including during recruitment and induction, about expectations of behaviour and safe practice

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18.2 If you are a Company staff member working with vulnerable adults:

- Make sure you know to whom you should report any concerns or allegations about a colleague or any other adult working with the client
- Report concerns or allegations as soon as possible, do not hold on to information however trivial or insignificant it may seem
- Make sure you follow The Company codes of practice and always uphold professional boundaries

18.3 INITIAL ACTIONS:

By any person receiving an allegation or having a concern:

DO

- Treat the matter seriously and keep an open mind
- Inform your Designated Safeguarding Lead or senior manager immediately, or their deputy or other manager/supervisor if the senior manager is unavailable or is the subject of the allegation
- Make a written record of the allegation or concern as soon as possible after receiving information or observing behaviour that causes concern, including the date, time, person/s involved and what was said or observed. Sign and date this record and forward it to your designated manager

DO NOT

- Attempt to investigate or deal with the situation yourself
- Make assumptions, offer alternative explanations or diminish the seriousness of the alleged incident/s
- Keep the information to yourself or promise confidentiality
- Discuss the allegation or concerns with anyone other than those defined in The Company, or adults at risk procedures for managing allegations against staff

By the Designated Safeguarding Lead:

DO

- Follow the advice of the Gloucestershire Safeguarding Adults Board and act in a timely manner and follow due process
- Inform the person reporting the allegation or concern what action you will take, in accordance with procedures and with regard to information sharing protocols
- Contact the appropriate authority within one working day of receipt of allegation
- Obtain written details of the allegation from the person reporting the incident/s (see above)
- Countersign and date the written details on receipt and keep secure
- Maintain a written record of any discussions (with whom), action taken, decisions made (with reasons), including dates, times etc and keep secure
- Collate any information you have about the vulnerable adult and the person against whom the allegation has been made e.g. address, dates of birth, previous concerns etc. and any potential witnesses
- Maintain confidentiality
- Help all parties understand the process

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- Be prepared to attend multi-agency meetings to be an active member of the support team set up for the vulnerable adult

DO NOT

- Act alone or disregard Gloucestershire Safeguarding Adults Board and The Company's procedures
- Dismiss, disbelieve, or minimise the allegation or concern on the basis of your knowledge or opinion of the member of staff/volunteer concerned or the vulnerable adult
- Investigate the incident, interview, or discuss with the member of staff, vulnerable adult concerned, potential witnesses, unless advised to do so by the appropriate authority or a strategy meeting
- Inform carers of the vulnerable adult until advised to do so by the Gloucestershire Adults Safeguarding Board or a strategy meeting
- Automatically suspend or dismiss the member of staff without seeking further advice

See NCLP Allegations Management Policy and Process for further information.

18. Limited confidentiality and procedure

19.1 Introduction

Confidentiality is essential within any organisation and, due to the nature of the services we provide, The Company is, at times, privileged to some very confidential information. This guidance document has been produced in line with The Company's and Gloucestershire Safeguarding Adults Board policies and procedures. Under the stated guidelines there can only be a guarantee of limited confidentiality.

The principle of this policy is to establish confidentiality as a right and set clear guidelines for The Company to ensure good practice. Where records and information relating to learners and staff are kept, The Company's will need to be clear **why** this information is held and **who** needs to have access to it.

Confidentiality can mean different things to different people, The Company has a policy of 'limited' confidentiality, where information is shared and restricted to certain people in the team, rather than kept by one individual; or where The Company's procedures dictate that information will be shared with relevant statutory bodies. The disclosure of information to external agencies by The Company will be in line with local authorities' policies on sharing information for the protection of vulnerable adults.

Discussion on issues of confidentiality will be encouraged in team meetings, staff training and in supervision; the purpose of this is to increase the staff team's understanding of limited confidentiality.

19.2 Breaches of policy

Breaches in confidentiality may jeopardise the wellbeing of staff and learners.

When working with vulnerable adults it is essential to create a trusting relationship on which some forms of counselling and advisory work depend. However, vulnerable adults should think very carefully before making certain types of disclosures and be aware that a limited confidentiality policy is operational.

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Breaches in confidentiality, which are contrary to the terms of this policy, may be subject to disciplinary proceedings or in the case of learners, a withdrawal of services.

Staff will be subject to disciplinary proceedings if the following occurs:

- Confidentiality is broken inappropriately
- Inappropriate use of data held by The Company
- Disclosure of client or staff details to unauthorised parties

19.3 General principles

Disclosure: The ultimate reference point for deciding who should be informed of a piece of confidential information should be the individual concerned.

Informed consent: It should be stressed that consent should be informed consent i.e., the reasons for sharing/not sharing information should all be discussed with an individual.

19.4 Personnel and administration

All staff will be given a copy of the confidentiality policy as part of their induction. The implications of the policy for their work will be explained.

Personnel files and other confidential staff records will be kept in a locked cabinet for which the HR manager is the only key holder, in line with good practice guidelines in regard to DBS procedures.

Job application forms, job interview records and job monitoring forms are confidential to The Company. The interview panel will hand in all papers at the end of interviews.

References - when references for new employees are requested, it will be made clear that the references will be available only to the staff member concerned, otherwise they will be confined to the line manager/director and members of the interview panel.

Supervision - with the exception of disciplinary action, information discussed in supervision will be confidential to the people concerned in the meeting and the supervisor's line manager.

General office - the centre manager is responsible for ensuring that all staff keep to the office systems procedure. This entails being clear about who has access to what information, that filing cabinets and key boxes are locked when the office rooms are not staffed.

IT - The Company is registered under the Data Protection Act 2018

Individuals have the right to:

- be informed if information is held on her/him
- have access to such information within 40 days
- where appropriate to have it corrected or erased
- exemptions:
- mailing lists
- pay details
- statistics, providing persons cannot be identified
- information acquired from statutory agencies, which may cause harm to that individual or another

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- Confidential information stored on disc will be kept in a secure and locked cabinet. Where information is erased on computer for reasons of confidentiality, it must also be erased on all back-up discs and copies

19.5 Clients

Any information held on clients will be confidential to members of the staff team. They will have access to their own files through appointment with their advisor/support worker. All files are kept secure and destroyed after the appropriate contractual time specified.

Records Kept

- Information regarding application details, references, next of kin, previous address, contact numbers etc and on-going correspondence between The Company and any client will be kept in the client's file
- Age, gender, disability, racial/ethnic origin, referral source, date of departure, training offered and given, how long using The Company's services, reasons for leaving, where moved on to, criminal record and other support needs (where appropriate)

The Company may give information to housing benefit departments when this has been authorised by a client.

The following guidelines should be adhered to: -

- Service user records in hard copy should be kept in, a locked cabinet with access denied to unauthorised parties
- Service user records in electronic copy should have access denied to unauthorised parties by use of password protection for logging onto the system for details
- Data should be kept in line with the Data Protection Act 2018 and UK GDPR
- The Company's clients should be informed of the limited confidentiality policy in place through induction
- Any information discussed with clients should be kept confidential unless disclosure is necessary under The Company safeguarding vulnerable adults policies and procedures
- Telephone numbers and addresses of workers and clients are strictly confidential and should never be disclosed

Information should never be given out over the telephone unless: -

- You are certain that you are aware of whom you are speaking to
- You return the call so that you are aware of whom you are speaking to

Clients should never be discussed outside company business hours and only to authorised colleagues in connection with legitimate service user business during business hours.

Through support and advice work with clients, notes and records may be kept, however, the following is to be noted.

If a worker receives a contentious or difficult unsolicited disclosure and is asked to keep it to themselves, they will need to make clear that staff may need to share information with their Designated Safeguarding Lead and that it is possible for staff to:

- Refuse to agree to a contract of absolute confidentiality
- Not to continue a conversation if they feel that it may be heading to an area of

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disclosure that they are unhappy to take on board. Wherever possible, consent is sought to share this information

Discussions with services users should include the following:

- The Company operates a limited confidentiality policy and that information shared is confidential unless it is felt that either the service user themselves or anyone else is at risk
- Do not promise that you would not disclose the information to other agencies, do explain the reporting procedure for The Company and why you may have to disclose information

Records are kept on a database in line with the Data Protection Act 2018 and UK GDPR. Learners are expected to respect the rights of other clients in regards personal information on each other. A breach of confidentiality by a service user about another service user may be viewed as harassment and may be seen as cause for a withdrawal of services.

Clients are expected to respect the rights of staff to confidentiality.

Clients taking part in media events must not disclose a project address or names of other clients for public information. They will be clearly informed that they are not obliged to take part in any media events if they do not wish to do so.

19.6 Contractual paperwork

All paperwork will be considered confidential. This includes all paperwork generated by The Company to aid in contractual compliance as well as paperwork completed by staff to demonstrate good practice in contract compliance.

Any member of staff distributing or lending such paperwork to external non-contractual agencies without prior approval from The Company's senior management may be subject to disciplinary proceedings.

The Company will assess when a situation necessitates breaching confidentiality. Confidentiality is rarely broken. The type of instances in which confidentiality may be breached are as follows:

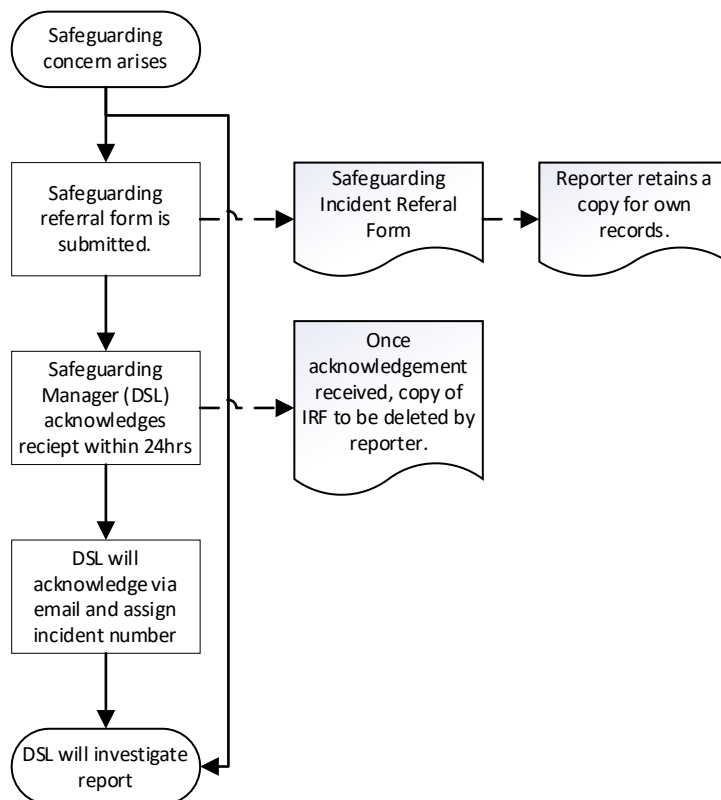
If a client poses a serious risk to themselves or others. In these instances, The Company may give information to statutory/emergency services. E.g., Police, appropriate local authority departments or to a housing agency or support agency.

Information will be provided to the Police and where relevant insurance companies, when crimes have been committed against staff, clients and property.

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ANNEXE A Safeguarding Incident Reporting Process

Step	Process	Responsible
1	A safeguarding/prevent concern arises, seek advice from a member of the Safeguarding Team	Staff
2	A Safeguarding Incident Referral Form is submitted. This is sent password protected, via email to katew@NCLPyouth.co.uk . This must be submitted within 48hrs. The person reporting must ensure that this form is fully completed with no information missing.	Staff
3 & 4	The Safeguarding Manager (DSL) shall acknowledge receipt within 24hrs. The DSL shall acknowledge receipt via email and assign an incident number. On receipt of the acknowledgement, the reporter shall delete the copy of the form held by them. A note of the safeguarding incident number shall be held on the customer's file.	DSL
5	The DSL will assess the incident and provide the required support.	DSL



Note: You will find all relevant paperwork, processes, and any safeguarding guidance located in the NCLP Cloud Safeguarding Folder

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Annexe B

NCLP Freshdesk

As part of our online safety policy, NCLP have a filtering system in place, which restricts access to harmful content and other sites that are deemed unsuitable for use whilst in attendance at a NCLP centre. At times the filters can fail to work, so we expect staff to be observant and to report any incidents where there is a breach. Please see below for our process.

- If a learner/customer uses any PC or laptop in any of our centres, it is the responsibility of the staff member to monitor the learner/customers activity
- If a learner/customer is observed accessing a prohibited site (see Prohibited Sites List) or any other harmful content, the staff member should ask the customer to step away from the device and record details of what has been accessed i.e. website address
- If the learner/customer shuts down the site before the staff member has a chance to view it, the staff member should make a note of the time, date and device no. and what they have witnessed
- The learner/customer should then be restricted from using the PC/laptop
- The information should then be logged on Freshdesk [Sign into : NCLP \(freshdesk.com\)](https://freshdesk.com)
- This should be logged under 'safeguarding and Prevent' Please give as much detail as possible

Prohibited Sites

- Any social media sites
- Any site with harmful content
- Any sites promoting alcohol, tobacco or narcotics
- Any sites containing violence, profanity or obscenity
- Any sites containing weapons, explosives, pyrotechnics
- Any gambling sites
- Pornographic material
- Any sites promoting extremist material
- Any sites promoting suicide or self-harm
- Any site encouraging hate speech or bullying
- Gaming sites

This list is not exhaustive. If you feel a website is not suitable and you are concerned about what you have seen, please report it.

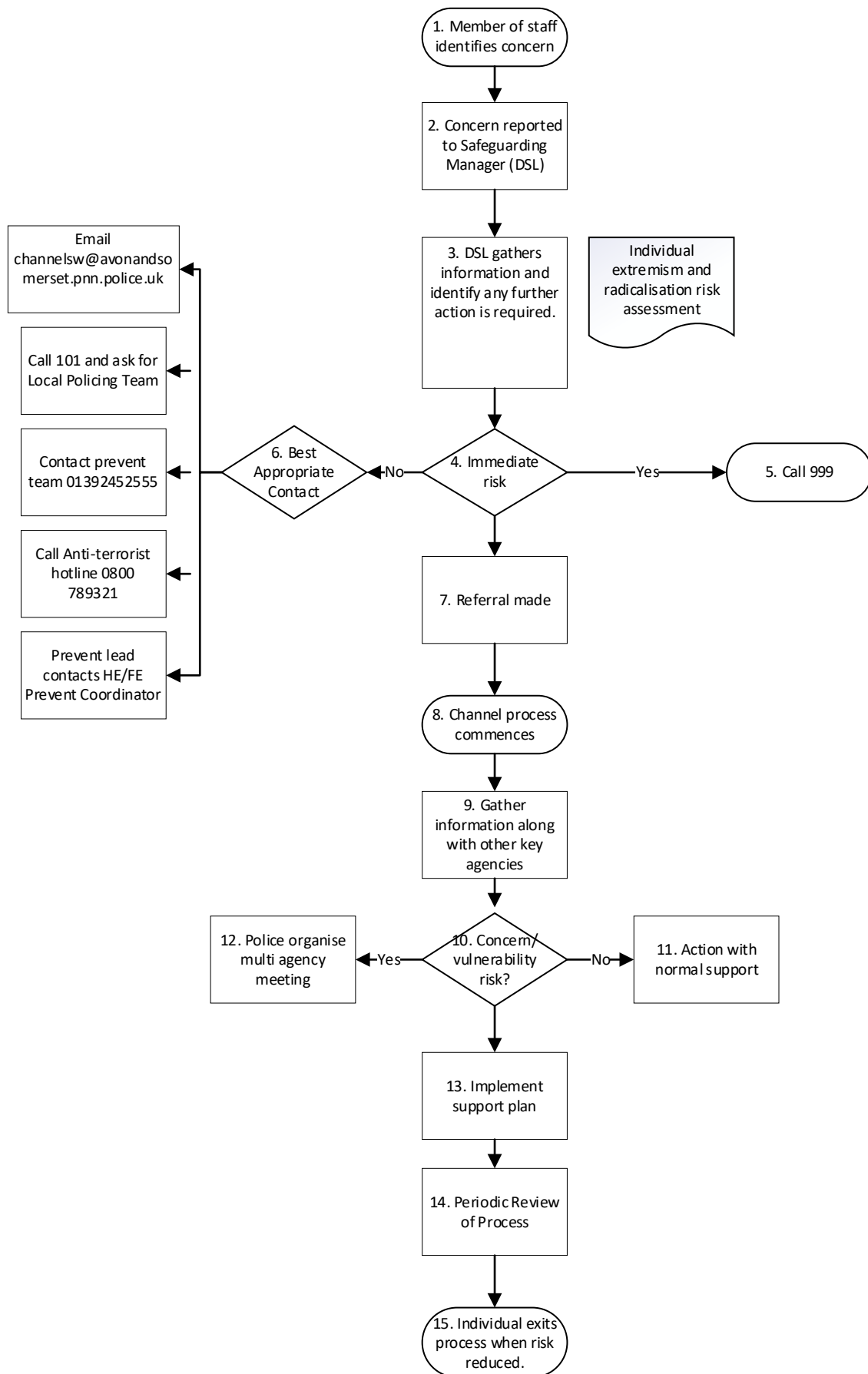
Annexe C Prevent & Channel Process

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This is the NCLP process flow for reporting a concern of a vulnerable individual. It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is the process which aims to show you the steps to follow. If you have any questions on this process, please contact the NCLP Safeguarding Manager.

Step	Process	Responsible
1	Staff member identifies concern	Staff
2	Concern is reported to the Safeguarding Manager/DSL Via the Safeguarding Incident Reporting Process	Staff
3	DSL gathers more information where possible and identifies what further action is required. The Individual extremism and radicalisation risk assessment is to be used to assess risk. This is the document that I have attached, it is not referenced and hasn't been reviewed since Aug 23, so I will need to review it.	DSL
4	The findings of the assessment will determine if there is an immediate risk. The outcome leads you to action 5 or 6.	DSL
5	DSL will contact the Police via 999	
6	The DSL will take the most appropriate action based on the individual case	DSL
7&8	Once the referral has been made the case enters the Channel process	DSL
9/10	Further information gathering takes place with NCLP and other key agencies that the individual is involved with. Consider if there are shared concerns between partners and if there is a vulnerability to radicalisation.	DSL
11	Based on no concern or vulnerability risk action continues with normal support.	DSL
12	If there is a risk, then the Police will organise a multi-channel meeting which will be made up of key partners. The meeting will be chaired by Gloucestershire County Council.	Police
13	Following the meeting and considering the findings, a bespoke support action plan shall be developed and implemented	External agencies
	Note: It is important to remember that consent is gained with the individual to be part of channel support and intervention.	Info
14	The support plan shall be regularly reviewed, and channel partner members shall work together to review progress and reduce risks	DSL and partners
15	The individual will exit the channel process when all partner agencies feel that the vulnerability to radicalisation has been significantly reduced. Once a referral has exited the process, it will be reviewed at 6 and 12 month periods. If concerns remain, the individual can be re-referred.	Info

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Annexe D

Useful Contact details

Organisation	When to contact	Contact Number
Gloucestershire's LADO (Local Authority Designated Officer)	Reporting abuse allegations/concerns against professionals (members of staff and other professionals)	01452 426994 amadmin@gloucestershire.gov.uk
Children and Families Helpdesk (Social Services)	Making a child welfare referral. Urgent referrals by phone, where a child is at risk of significant harm. For a general referral where there is a concern for the welfare of a child a MARF (Multi Agency Service Request Form) should be completed via the portal	Mon-Fri 9am to 5pm: 01452 426565 childrenshelpdesk@gloucsetershire.gov.uk Report a child protection concern Gloucestershire County Council Out of hours: 01452 614194
Child Line	IAG	0800 1111
NSPCC	IAG	0808 800 5000
Police Control Room	Non-emergencies	101

Adult Services 18 Years +

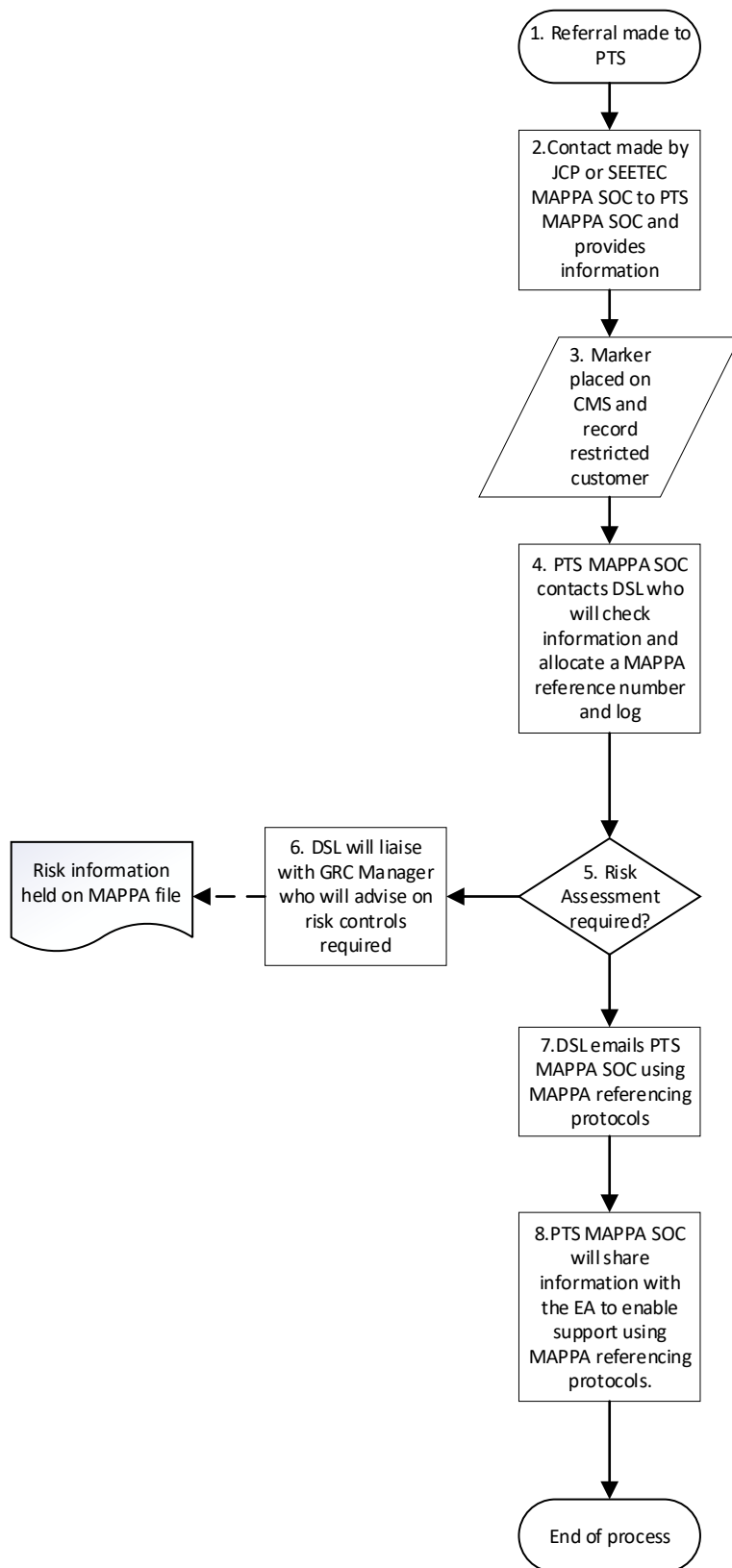
Organisation	When to contact	Contact Number	Name/post
1. Adult Helpdesk (Social Services)	Reporting welfare concerns	01452 426868 socialservicesenq@gloucestershire.gov.uk www.gloucestershire.gov.uk/gsab/	Duty Social Worker

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Annexe E MAPPA Process

Step	Process	Responsible
1	Referral made to NCLP	Reporter
2	If JCP or Seetec are aware the customer is MAPPA, their nominated MAPPA SOC will contact NCLP MAPPA SPOC and provide the information verbally.	Reporter
3	A marker will be put on CMS and the customer record will be restricted.	NCLP MAPPA SPOC
4	NCLP MAPPA SPOC will contact the Safeguarding Manager (DSL), who will check information with partner agencies such as Police and Probation. The Safeguarding Manager (DSL) will allocate a MAPPA reference number and log information in a secure file.	NCLP MAPPA SPOC DSL
5	A decision on whether a risk assessment is made by the DSL/GRC Manager	DSL
6	The DSL will liaise with the GRC Manager to assess the risk and advise on any control measures required. This information shall be held in the secure MAPPA file.	DSL GRC Manager
7	Once all the information is obtained the DSL shall send an email to the NCLP MAPPA SPOC using the MAPPA reference number and the customer initials only. This email will advise on any risk assessments, required control measures, the customer restrictions and any reporting requirements.	DSL
8	The NCLP MAPPA SPOC will share this information with the employer advisor to support them in their work with the MAPPA customer. The MAPPA reference number should be used in any communication regarding the MAPPA customer.	NCLP MAPPA SPOC

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ANNEXE F Filtering Process

At NCLP our filtering software is in place to restrict access to websites that are deemed unsafe, include harmful content or are not conducive to the learning environment. It is the responsibility of the staff member to request that a website is unblocked and allow adequate time for this to happen (3 working days) This process should be followed at all times.

Step	Process	Responsible
1	The staff member should be familiar with the website they would like to unblock, and have clear reasons for the request, the SVG manager will take all of this into account when assessing the suitability of the website and how safe it is for our learners. The staff member should have this evidence ready to submit	Requester
2	The requester shall access Freshdesk as follows. Sign into : NCLP (freshdesk.com) • Select: "New Support Ticket" • Subject: "Filtering" • Site: Your Centre • Issue: Safeguarding & Prevent • Query: Safeguarding • Type: Request for unblocking • Description: Include the web address and reasons for unblocking. Example could be that class are undertaking a project.	Requester
3	Assess the suitability of the website. If the safeguarding manager deems the website unsuitable it will not be unblocked, a reason for this decision will be provided to the requester. All staff should note that learners use of IT should be monitored	Safeguarding Manager
4	Request made to IT Department to unblock the web link	Safeguarding Manager
5	IT Department unblock the web link and close the ticket. A notification is sent to the requester that the action is complete and ticket closed	IT Department
6	Action completed and requester informed (via Freshdesk)	



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