

SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY AND PROCEDURE

Approved by:	Trustees of InCommon Foundation
Date reviewed:	19/12/2023
Date of next review	19/12/2024
Responsible person:	Sarena Shetty (DSL); Laura Macartney (Deputy DSL) Anthony Wheeler (Trustee lead for Safeguarding)

If you have witnessed a safeguarding incident, have a concern or if someone has made a disclosure to you, and you're not sure how to proceed, then contact our Designated Safeguarding Lead:

- DSL: Sarena Shetty
- sarena@incommon.org.uk
- 07515443383
- Out of hours contact: 07534743004

Or our Deputy Safeguarding Lead:

- Laura Macartney
- laura@incommon.org.uk
- 07515442704
- Out of hours: 07885462732

If the Designated Safeguarding Lead or Deputy aren't contactable, or the safeguarding concern relates to either one of them, contact the Designated Trustee for Safeguarding:

- Anthony Wheeler
- anthonyjwheeler@live.co.uk
- 07395788601 (9am - 5pm weekdays only)
- 07909790427 (weekends and after hours weekdays)

If you believe a child is at risk of immediate harm (see section 5)

- contact the DSL of the school immediately and provide information to inform their decision on whether to allow the child to go home
- Contact emergency services if appropriate
- Fill in an emergency report form and inform InCommon's DSL/ deputy DSL immediately who may contact social services

This policy sits alongside:

- A Safeguarding vulnerable adults policy
- A guidance document on safeguarding children and adults during InCommon's intergenerational activities
- A safer recruitment policy

1. Introduction

- a. InCommon Foundation exists to carry out our charitable objectives and bring generations together. Our projects involve working with children and young people.
- b. The purpose of this policy statement is:
 - to protect children and young people who receive InCommon's services from harm. This includes the children of adults who use our services
 - to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.
- c. This policy applies to anyone working on behalf of InCommon, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students.

2. Statement

- a. This policy is based on the guideline policy of the NSPCC. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from nspcc.org.uk/childprotection.
- b. We believe that
 - children and young people should never experience abuse of any kind
 - we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.
- c. We recognise that:
 - the welfare of children is paramount in all the work we do and in all the decisions we take

- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare
 - all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
 - some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
 - extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.
- d. We will seek to keep children and young people safe by:
- valuing, listening to and respecting them
 - appointing a nominated child protection lead for children and young people, and a deputy and a lead trustee/board member for safeguarding
 - adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
 - developing and implementing an effective online safety policy and related procedures
 - providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
 - recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
 - recording and storing and using information professionally and securely, in line with data protection legislation and guidance
 - sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions where appropriate
 - making sure that children, young people and their families know where to go for help if they have a concern
 - using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately

- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns

3. Recognising abuse

- a. InCommon recognises that there are different forms of abuse, including:
 - physical abuse, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
 - sexual abuse, including rape and sexual assault or sexual acts, online sexual abuse and child sexual exploitation
 - psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;
 - domestic abuse
 - neglect and acts of omission, including ignoring medical or physical care needs and emotional needs.
 - discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.
- b. InCommon will train our staff and volunteers to recognise different forms of abuse, based on the NSPCC guidance:
<https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

4. Disclosures of abuse

- a. Disclosure is the process by which children and young people start to share their experiences of abuse with others
- b. InCommon is committed to taking every disclosure of abuse seriously
- c. InCommon recognises that children and young people may disclose abuse in a variety of ways, including:
 - directly– making specific verbal statements about what’s happened to them
 - indirectly – making ambiguous verbal statements which suggest something is wrong
 - behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
 - non-verbally – writing letters, drawing pictures or trying to communicate in other ways.
- d. Children and young people are likely to face barriers to disclosure:
 - Some children and young people are reluctant to seek help because they feel they don’t have anyone to turn to for support.
 - They may have sought help in the past and had a negative experience, which makes them unlikely to do so again
 - They may also:
 - feel that they will not be taken seriously
 - feel too embarrassed to talk to an adult about a private or personal problem
 - worry about confidentiality
 - lack trust in the people around them (including parents) and in the services provided to help them
 - fear the consequences of asking for help
 - worry they will be causing trouble and making the situation worse
 - find formal procedures overwhelming
- e. InCommon team and volunteers should follow these principles when responding to disclosures:
 - show you care, help them open up: Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as ‘you’ve shown such courage today’ help.

- take your time, slow down: Respect pauses and don't interrupt the child – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.
 - show you understand, reflect back: Make it clear you're interested in what the child is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.
- f. In addition, InCommon team and volunteers should take a non-biased approach

5. Acting on safeguarding incidents, suspicions or disclosures of abuse

- a. If InCommon team or volunteers have witnessed any incidents, have any concerns or receive a disclosure it is important to make accurate notes, usually by completing a safeguarding incident or concern form. This should include the child's details, and where possible the direct words said by everyone involved.
- b. There should always be the opportunity to discuss welfare concerns with and seek advice from colleagues, managers and other agencies, but:
- Never delay emergency action to protect a child
 - Always fill in an incident report form to record any concerns about a child's welfare, whether or not further action is taken, within 24 hours of the incident
 - Always record in writing discussions about a child's welfare.
 - At the close of discussion, always reach clear and explicit recorded agreement about who will be taking what action, or that no further action will be taken.
- c. The most likely action for InCommon on witnessing an incident, disclosure or suspicion of abuse will be a report made in writing shared with the child's school. Information sharing is a key way we safeguard children as we are unlikely to have the whole picture for the children and young people we work for.
- When we start working with a school, ask them whether they would like to have the school's DSL cc'd into all emails relating to safeguarding incidents/concerns. A school's DSL contact details should be available on their website.

- For low risk concerns or incidents (e.g. an inappropriate comment or sexual reference made by a child during a session), we should email this onto our lead contact at the school within 24 hours.
- For higher risk concerns or incidents (e.g. a comment suggesting abuse at home), we should email the school's DSL and cc our lead contact there. If you don't receive a response in 24 hours, follow this up. If you don't receive a response in 7 days, inform InCommon's DSL, who should make a referral to social services and tell the school they're doing this.
- For higher risk concerns or incidents that are serious and ongoing (e.g. a disclosure around abuse at home), email the school's DSL and your lead contact. If you don't receive a response in 24 hours, inform InCommon's DSL who should make a referral to social services and inform the school's DSL.
- For anything that suggests an immediate serious threat to the child's/another child's safety or wellbeing, or that a criminal act has taken place, inform InCommon's DSL who should make immediate contact with the school's DSL. It is likely that the child would disclose this to us at a session with school staff present, and we would usually follow the school's lead in responding. However if we cannot contact the school or are not confident that they will take appropriate action, then we should make an immediate referral to social services, emergency services and inform the school's DSL.

8.2 At all times action must proceed urgently.

8.3 A staff member or volunteer informed of abuse should remind the child that the charity cannot guarantee confidentiality where people are at risk of harm

8.4 Volunteers should consult with the staff member coordinating their service before taking any action.

8.5 Additionally, all action taken following a disclosure of abuse should be discussed in advance with a member of the management team.

8.6 In circumstances where a child declines to disclose, despite some work having been done towards disclosing, it may be necessary to report the alleged abuse without the service

user's agreement. In these circumstances, a service user must be notified in advance of the decision to report to social services.

- 8.7 Any staff member may report a disclosure of abuse to social services irrespective of the opinion of other staff.
- 8.8 It is important for staff and volunteers to make written records of any incidents or concerns that they have as soon as possible and if appropriate to include sketches of sites and sizes of injuries. It is also important to make a record of conversations with the vulnerable person using the same language the vulnerable person used especially names used for body parts or sexual acts.
- 8.9 Full written records must be maintained of all disclosures and actions following disclosure.

9. Making a Referral

- 9.1. Social services departments have been designated as the lead agencies with responsibility for coordinating a response to allegations or concerns of abuse.
- 9.2. Each of the company's managers has the responsibility of informing the relevant social services department of concerns over the abuse or neglect of children. Detailed referral arrangements may differ between localities and, therefore, managers should ensure that they have up-to-date referral information for their locality.
 - 9.2.1. Contact details for the relevant person should be available on the local authority's website, or via [this page](#) which lists the details for each borough.
- 9.3. Managers should work within the following timescales for reporting allegations or suspicions of abuse:
 - Immediate if the child is at risk of serious physical harm, or a serious criminal act has taken place, and evidence will need to be kept safe
 - Within 24 Hours if it relates to a specific incident which is, or may be still going on, or may happen again
 - Within 7 Days if it is a more general concern, which does not indicate immediate harm.

10. Support to Staff and Volunteers

- 10.1. InCommon Foundation will support staff and volunteers in these circumstances. If the social services department need further involvement from staff or volunteers following a report of abuse, a member of the management team will discuss

with the social services department the nature of their needs and how they might be met.

11. Allegation of Abuse Made Against a Staff Member or Volunteer

11.1. Staff and volunteers may be subject to abuse allegations. The company will offer support in these circumstances, but the social services department will be assisted in their investigation and the disciplinary procedure may be implemented.

12. Confidentiality

12.1. Confidentiality is central to the work of InCommon Foundation, and all personal information should be handled according to the data protection policy. Widening confidentiality should occur where it is in the interest of a child or vulnerable adult at risk of abuse.

13. Preventing Abuse by Staff and Volunteers

13.1. It is important that any staff or volunteers who are likely to be working alone with vulnerable people are thoroughly vetted before being employed. At InCommon Foundation this means as well as references being checked there will also be a requirement for offences to be declared and a Disclosure and Barring Service check undertaken.

13.2. It should be noted that having a criminal record does not prevent someone from being recruited as a staff member or volunteer in all circumstances. Staff should seek the advice of their manager in cases of doubt.

13.3. It may be very hard for a worker to report a concern about a colleague to a line manager but, as with all the other difficulties people will come across, the safety and protection of a vulnerable person must be the priority in any decision that is made.

ADDENDUM: InCommon Online Safeguarding

InCommon takes our safeguarding responsibilities very seriously. Please ask to see our full safeguarding policies for protecting Children and Vulnerable Adults (covering e.g. Safer recruitment, disclosures). If you have any safeguarding concerns related to our programmes please contact Charlotte Whittaker (charlotte@incommon.org.uk// 07379050176). If you have any suggestions to improve our safeguarding please let us know.

KEY PRINCIPLES

- All contact between children and older residents should be **double observed:** by an InCommon facilitator on the call, and by a school trusted adult or parent in the same room as the child(ren) making the call.
- No participant contact information should be exchanged directly:
 - Name and Scheme/ School are the only identifying information to be exchanged, and we ask that children only share first names
 - Telephone numbers and email addresses should not be exchanged and will be hidden on Zoom calls
 - Children's addresses, and older people's flat numbers, should not be exchanged (all post should go via InCommon or via the school)
 - Where InCommon holds personal information about older people and families, we will process this safely and legally.
- Our facilitators are DBS checked and trained in safeguarding, including how to respond to online safeguarding risks. If necessary, facilitators should intervene to redirect or end the call, and follow up with both parties separately.
- Older people are recruited to take part in the programme, and asked to sign up to InCommon's volunteering code.
 - We do not DBS check older participants so they should never have unsupervised contact with children or young people, online or in person.
 - If older people behave in a way that is not in line with InCommon's code, InCommon facilitators will challenge this behaviour in an appropriate way; e.g. reminder about using

child-friendly language; warning or discontinuing involvement in the project for more inappropriate behaviour.

- We use Zoom to facilitate our calls - about 50% of the time the older person will join over audio only. We use appropriate Zoom safeguarding measures including:
 - New Zoom links sent each time
 - Links only sent directly to trusted participants and never shared online
 - Waiting rooms activated and only expected participants admitted
 - Small meetings - which allows close monitoring of participants, with InCommon hosts able to see all screens
 - Screensharing controls monitored by host
 - Private chat functions disabled
- Photo and video consent. We understand that photographs can pose a safeguarding risk for children. We ask that schools send out our permission letters and send these back to us, so we can compile photo consent and only use publicity photos of children with parental consent.

FURTHER SAFEGUARDING NOTES (AT SCHOOL)

- We ask that schools support our safeguarding by always having a school adult with the children while they make the InCommon call.
 - This adult should be able to hear what is going on, but does not need to be actively engaged in the activities
 - This will be covered in the welcome call with school contact
- InCommon's facilitator will lead the call and activity, and intervene as needed to ensure call content remains appropriate. If necessary, either the facilitator or the school adult can end the call.
- If any more challenging issues are covered (e.g. bereavement) in the call InCommon would follow up at the end of the call with the observing adult, to highlight this issue and make sure any appropriate follow-up was given to the children involved.
- For post exchange, we use postcards / unsealed envelopes and ask that teachers read through childrens' cards (to check no personal information is given out) and older peoples' cards (to check all content is appropriate) before sending or distributing.

FURTHER SAFEGUARDING NOTES (AT HOME)

- In the event of school closures, InCommon will contact any parents/guardians who have given their contact details and expressed interest in continuing contact during school closures.
- If a Parent/Guardian would like their child to take part, we will hold a welcome call, covering some safeguarding guidelines:
 - Asking for a family adult to stay in the room during the call
 - Asking them to remind their child not to share personal information
 - Asking them to let us know if they have any concerns
- In limited circumstances, we may allow parents and older people to continue a post exchange directly - each decision to do this will be risk-assessed and only facilitated where both parties have expressed desire to exchange post, and where a parent/guardian is actively involved in the project and can monitor contact with their child.

HANDLING RISKS OR CONCERNS

- Safeguarding concerns related to a child will be noted by InCommon and if necessary passed to the class teacher / safeguarding lead of their school by InCommon within 24 hours.
- Safeguarding concerns related to an older person should be recorded by InCommon team on the call and if necessary passed to safeguarding contact of Housing Association by InCommon within 24 hours.
- Sarena Shetty is nominated DSL for InCommon and Laura Macartney is Deputy DSL. They should be notified of any safeguarding concerns and will advise on actions to be taken.

SAFEGUARDING ADULTS AT RISK POLICY AND PROCEDURE

Approved by:	Trustees of InCommon Foundation
Date reviewed:	19/12/2023
Date of next review	19/12/2024
Responsible person:	Sarena Shetty (Designated Safeguarding Lead); Laura Macartney (Deputy Designated Safeguarding Lead); Anthony Wheeler (Trustee lead for Safeguarding)

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- DSL: Sarena Shetty
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Or our Deputy Safeguarding Lead:

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If the Designated Safeguarding Lead or Deputy aren't contactable, or the safeguarding concern relates to either one of them, contact the Designated Trustee for Safeguarding:

- Anthony Wheeler
- anthonyjwheeler@live.co.uk
- 07395788601 (9am - 5pm weekdays only)
- 07909790427 (weekends and after hours weekdays)

If someone is at immediate risk of serious physical harm (see section 9 for more details):

- Contact emergency services if appropriate
- Contact the DSL or deputy DSL immediately
- Fill in an incident report form
- The DSL/deputy will contact social services immediately to make a referral
 - Search 'adult social services X borough' for details

This policy sits alongside:

- A Safeguarding children and young people policy
- A guidance document on safeguarding children and adults during InCommon's intergenerational activities
- A safer recruitment statement

This policy applies to

1. Statement

- 1.1. InCommon Foundation considers it the duty of staff and volunteers to protect vulnerable adults with whom they come into contact from abuse.

2. Introduction

- 2.1. InCommon Foundation is involved in providing services for a wide range of people. Some of these people are likely to be 'vulnerable adults.'
- 2.2. This policy is based on sections 42 to 46 of the Care Act 2014 on adult safeguarding.
- 2.3. The charity has obligations to strive to protect vulnerable adults whom it may believe to be abused or at risk of abuse or neglect.
- 2.4. The policy and procedures have been developed to assist staff and volunteers in acting on reported or suspected abuse.
- 2.5. Depending upon the nature of particular services or the requirements of particular funders or partner agencies, the policy and procedures may be supplemented by local procedures.

3. Definitions and aims

3.1. The aims of adult safeguarding are to:

- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- stop abuse or neglect wherever possible
- safeguard adults in a way that supports them in making choices and having control about how they want to live
- promote an approach that concentrates on improving life for the adults concerned
- raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect
- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult
- address what has caused the abuse or neglect

3.2. The safeguarding duties apply to a vulnerable or 'at risk' adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

3.3. The Care Act defines six key principles underpinning all adult safeguarding work which should underpin our safeguarding at InCommon:

- **Empowerment**

People being supported and encouraged to make their own decisions and informed consent.

'I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.'

- **Prevention**

It is better to take action before harm occurs.

'I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.'

- **Proportionality**

The least intrusive response appropriate to the risk presented.

'I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed.'

- **Protection**

Support and representation for those in greatest need.

'I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.'

- **Partnership**

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

'I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.'

- **Accountability**

Accountability and transparency in delivering safeguarding.

- 'I understand the role of everyone involved in my life and so do they.'

4. InCommon's safeguarding aims

4.1. InCommon's safeguarding work aims to prevent abuse from taking place, and to make enquiries quickly and effectively and take appropriate action where abuse is taking place or is suspected.

4.2. InCommon will work together with all community partners to safeguard adults we work with

5. The Prevention of Abuse.

5.1. The Care Act recognises different types of abuse:

- physical abuse, including assault, hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
- sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting;
- psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;
- financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
- Modern slavery including slavery, forced labour and human trafficking and situations where traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating; and
- discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.
- Organisational abuse, including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result

of the structure, policies, processes and practices within an organisation.

- Neglect and acts of omission including: ignoring medical, emotional or physical care needs; failure to provide access to appropriate health, care and support or educational services; the withholding of the necessities of life, such as medication, adequate nutrition and heating
- Self-neglect, including a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

6. Responsibilities of Staff and Volunteers

- 6.1. Paid staff and volunteers have a responsibility to be aware and alert to signs that all is not well with a vulnerable person. However, they are not responsible for diagnosing, investigating or providing a therapeutic response to abuse.
- 6.2. It is important to keep an open mind and consider what is known about the vulnerable person and his or her circumstances.
- 6.3. Staff and volunteers primarily have a responsibility to pass on concerns to a member of the management team and complete an accurate written record.

7. Disclosure of Abuse from Adults at risk

- 7.1. If a vulnerable person discloses that they are being abused or any service user discloses that they are involved in abuse of a vulnerable person, action should continue as in Section 9. All action must proceed urgently and without delay.

8. Suspicion of Abuse

- 8.1. There may be circumstances when a volunteer or member of staff suspects that a vulnerable adult is being abused or neglected.

8.2. It is vital that anyone who suspects a vulnerable adult is being neglected or abused discusses the situation immediately with his or her line manager or another member of the management team. Action should continue as in Section 9.

9. Action on suspicion or disclosure of abuse

- 9.1. At all times action must proceed as urgently as possible
- Always fill in an incident report form for any concerns about a vulnerable adult's welfare, whether or not further action is taken - this should be within 24 hours of the incident
 - Inform the DSL (or alternative contacts) and send them the report as soon as possible, and discuss next steps with the DSL before taking any further action
 - Always record in writing discussions about a vulnerable adult's welfare
 - At the close of discussion, always reach clear and explicit recorded agreement about who will be taking what action, or that no further action will be taken.
- 9.2. A staff member or volunteer informed of abuse should remind the service user that the charity cannot guarantee confidentiality where a vulnerable person is at risk of abuse or further abuse.
- 9.3. Additionally, all action taken following a disclosure of abuse should be discussed in advance with a member of the management team or Safeguarding Trustee. Safeguarding concerns will be shared at trustee meetings and trustees will be alerted of anything more significant that needs action or attention between meetings.
- 9.4. Our actions following a suspicion or disclosure of abuse will depend on the nature of the abuse:
- 9.5. If the abuse is historic (happened 50+ years ago), we fill in an incident form. As there is no present threat to the person's welfare, we do not need to report further, unless the adult would like us to.
- 9.6. If the disclosure or suspicion is ongoing, but not posing an immediate threat to the person's safety or is not a criminal act (e.g. suspicions of hoarding or disclosure of challenging family dynamics), we would fill in an incident report form and ask the adult's permission to escalate to the relevant safeguarding body

- This would be the manager of the housing scheme and the DSL of the housing provider, which should be available on their website
 - This should be done in 24 hours, and followed up if no response is received
 - If no response is received after 7 days, follow up and see whether the the adult would like us to escalate to their local adult social services team (available on the LA's website or through this database)
 - If the adult does not want this case to be escalated to any level, we do not escalate further at this point, and support the adult to take steps they feel comfortable with whilst monitoring the case internally with follow-up actions. If the case progresses and the impact on the adult becomes more significant, follow 9.5 below
- 9.7. If the disclosure or suspicion is ongoing, and may pose a risk to the person's safety or be a criminal act (e.g. disclosure of financial/emotional abuse, suspicions of violence), we fill in an incident form and ask for the adult's permission to escalate to the relevant safeguarding body
- This would be the adult social services team (available on the LA's website or through this database)
 - We should also ask for the person's permission to raise with the scheme manager and DSL of their housing provider
 - This should be done within 24 hours, and followed up if no response is received
 - If the adult does not want this case to be escalated to any level, we have to make it clear that we have a responsibility to escalate to social services if they are considered vulnerable (but we do not need to escalate to their housing provider if they don't want us to). We should inform the adult that we are escalating before we inform social services and take whatever steps we can to maintain a positive relationship with the adult and support them to make any other decisions they feel comfortable with.
 - We should ask the adult if they'd like us to contact emergency services, but we are not required to if they don't give us permission
- 9.8. If the disclosure or suspicion is ongoing, and someone is at risk of serious physical harm, or a serious criminal act has taken

place (e.g. evidence of serious physical violence), we fill in an incident form and ask for the adult's permission to escalate to

- The adult social services team (available on the LA's website or through this database)
- The emergency services (call 999 in an emergency, or report to 101 for any other type of crime).
- We should also ask for the person's permission to raise with the scheme manager and DSL of their housing provider
- This should be done immediately, and followed up within 24 hours if no response is received
- Even if the adult does not want this case to be escalated to any level, we have to make it clear that we have a responsibility to escalate to the adult social services and emergency services if they are considered vulnerable (but we do not need to escalate to their housing provider if they don't want us to). We should inform the adult that we are escalating before we inform social services, and take whatever steps we can to maintain a positive relationship with the adult and support them to make any other decisions they feel comfortable with.

9.9. Any staff member may report a disclosure of abuse to social services irrespective of the opinion of other staff.

9.10. It is important for staff and volunteers to make written records of any incidents or concerns that they have as soon as possible and if appropriate to include sketches of sites and sizes of injuries. It is also important to make a record of conversations with the vulnerable person using the same language the vulnerable person used especially names used for body parts or sexual acts

9.11. Full written records must be maintained of all disclosures and actions following disclosure.

10. Supporting adults who would not be classified as 'at risk'

10.1. An at-risk adult is defined by The Care Act 2014 as someone who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

- 10.2. InCommon may work with adults who would not be considered at risk, but we still have a responsibility to promote their safety and wellbeing
- 10.3. If an adult who is not at risk discloses abuse, or there is a suspicion of abuse and they would like to escalate the concern, then we should support them to contact emergency services.
- 10.4. If an adult who is not at risk discloses abuse, or there is a suspicion of abuse and they would not like to escalate the concern:
- The DSL should consider whether the adult is affected by the at risk criteria in 10.1
 - If they are not affected by the criteria in 10.1, and the adult is not at immediate risk of harm, then we do not escalate further without their permission. Fill in an incident report form and monitor the case internally at InCommon, and support the adult as much as possible to access appropriate help and services.
 - If they are not affected by the at-risk criteria, and the adult or another individual is at immediate risk of serious harm, then we call emergency services (999).
 - If we suspect they do fall into the at risk criteria (e.g. they have an unmet/undiagnosed care or support need), then we suggest they undertake a needs assessment with their Local Authority.
- 10.4.■.1. If the adult doesn't want to undertake a needs assessment, then we respect their decision not to have a needs assessment and we continue to monitor the case internally.
- 10.4.■.2. If you suspect the adult lacks the capacity to make this decision for themselves, follow the guidance in section 13

11. Making a Referral

- 11.1. Social services departments have been designated as the lead agencies with responsibility for coordinating a response to allegations or concerns of abuse.
- 11.2. The DSL (and alternative contacts) has the responsibility of informing the relevant social services department of concerns over the abuse or neglect of vulnerable adults. Detailed referral

arrangements may differ between localities and, therefore, managers should ensure that they have access to up-to-date referral information for their locality.

- 11.3. Managers should work within the following timescales for reporting allegations or suspicions of abuse:
 - Immediate if the vulnerable person is at risk of serious physical harm, or a serious criminal act has taken place, and evidence will need to be kept safe
 - Within 24 Hours if it relates to a specific incident which is, or may be still going on, or may happen again
 - Within 7 Days if it is a more general concern, which does not indicate immediate harm.

12. Filing a report and monitoring cases internally

- 12.1. It is the responsibility of the staff member/volunteer who witnessed the incident or raises the concern to fill in an incident report form saved in Drive > Programme > Safeguarding > Safeguarding and incident report forms > Relevant person's form
- 12.2. These should be filled in within 24 hours, using an ad verbatim account as far as possible, and then sent to the DSL
- 12.3. The DSL should suggest next steps and further action to take
- 12.4. Further actions should be monitored and filled in when completed by the responsible person for those actions (e.g. the partner lead would email the housing association DSL)
- 12.5. A case is considered open when a report form is filled in X person's folder
- 12.6. If all actions have been taken and there are no further actions to take, then the case is considered closed
- 12.7. If the case needs to be monitored on an ongoing basis then we note this in further actions and consider it closed when DSL decides no further actions are to be assigned and completed
- 12.8. We would decide to keep a case open and monitor it internally if:
 - There is a persistent
 - There is a disclosure of ongoing abuse
 - There is a concern/suspicion of ongoing abuse
- 12.9. We should fill in a separate report form for each separate concern or incident that occurs within an ongoing case

- 12.10. If an open case no longer needs to be monitored then we would consider it closed and move it to the X year cases folder and consider it closed

13. Assessing capacity
 - 13.1. We must always assume a person has capacity unless it is proved otherwise
 - 13.2. We must take all practicable steps to enable people to make their own decisions
 - 13.3. their own decisions
 - 13.4. We must not assume incapacity simply because someone makes an unwise decision
 - 13.5. Always act, or decide, for a person without capacity in their best interests
 - 13.6. Carefully consider actions to ensure the least restrictive option is taken
 - 13.7. We need to have valid reasons to question whether or not someone has capacity to make their own decisions (e.g. a serious brain injury or cognitive impairment). If you are unsure whether this is the case or not, discuss with the DSL.
 - 13.8. In the event that we do assess someone's capacity, our first step is to perform this 2 -stage test:
 - Stage 1: Does the person have an impairment of the mind or brain (temporary or permanent)? If yes, then
 - Stage 2: Is the person able to:
 - 13.8.■.1. Understand the decision they need to make and why they need to make it?
 - 13.8.■.2. Understand, retain, use and weigh information relevant to the decision?
 - 13.8.■.3. Understand the consequences of making, or not making, this decision?
 - 13.8.■.4. Communicate their decision by any means (i.e. speech, sign language)?
 - 13.8.■.5. Failure on one point will determine lack of capacity
 - 13.9. If we're supporting someone who is lacking capacity, we should consider whether they have given someone Power of Attorney, or whether they have an advocate. Refer to the [MCA Code of Practice](#) for further information.

14. Support to Staff and Volunteers

- 14.1. InCommon Foundation will support staff and volunteers in these circumstances. If the social services department need further involvement from staff or volunteers following a report of abuse, a member of the management team will discuss with the social services department the nature of their needs and how they might be met.
 - 14.2. The InCommon team will be supported by the designated safeguarding leads and the trustee lead for safeguarding and will if necessary seek external advice.
15. Allegation of Abuse Made Against a Staff Member or Volunteer
 - 15.1. Staff and volunteers may be subject to abuse allegations. The charity will offer support in these circumstances, but the social services department will be assisted in their investigation and the disciplinary procedure may be implemented.
16. Confidentiality
 - 16.1. Confidentiality and respect for privacy is central to the work of InCommon Foundation and building trusting relationships. Confidentiality should be maintained whenever possible. If it is necessary to widen confidentiality to protect a child or vulnerable adult from harm, this should be done appropriately and usually after informing the people involved of the intended action.
17. Preventing Abuse by Staff and Volunteers
 - 17.1. It is important that any staff or volunteers who are likely to be working alone with vulnerable people are recruited through a safer recruitment process. At InCommon Foundation this means as well as references being checked there will also be a requirement for offences to be declared and a Disclosure and Barring Service check undertaken.
 - 17.2. It should be noted that having a criminal record does not prevent someone from being recruited as a staff member or volunteer in all circumstances.

- 17.3. It may be very hard for a worker to report a concern about a colleague to a line manager but, as with all the other difficulties people will come across, the safety and protection of a vulnerable person must be the priority in any decision that is made.