

# **Adult Safeguarding | Prevent Policy & Procedure July 2018**

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## 1. Policy Statement

### 1.1 The Safeguarding and Prevent Policies apply to all staff.

This includes senior managers and the board of trustees, paid staff, volunteers, commissioned partners, casual and agency staffs or anyone working on behalf of Active Luton

To this end, training will be provided for as part of induction and as set out in **Section 4**.

### 1.2 The purpose of the policy is to provide:

- Protection for all adults at risk who use Active Luton's services, facilities and venues.
- Guidance for staff and volunteers on procedures they should adopt in the event that they suspect an adult at risk may be experiencing or be at risk of harm.
- Guidance on how **Prevent** affects Active Luton and the procedures to adopt if there is risk of radicalisation or extremism.

## 2. Safeguarding Policy

**2.1** Active Luton believes that it is always unacceptable for an adult at risk to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all adults at risk by a commitment to practice which protects them.

**2.2** It is the duty of Active Luton to keep adults safe from harm and promote wellbeing (**Care Act 2014**)

This policy sets out Active Luton's arrangements to meet these duties, following the statutory guidance (**Statutory guidance to support local authorities implement the Care Act 2014**).

Active Luton also recognises and supports local agendas and priorities.

An adult at risk is defined as any person aged 18 or over and who is at risk of abuse or neglect because of their needs for care and support.

### 2.3 Active Luton recognises that:

- The welfare of the adult at risk is paramount.
- All adult's at risk – regardless of age, disability, gender or gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, sexual orientation or identity – have the right to equal protection from all types of harm or abuse.
- All venues used by Active Luton must be safe and secure and promote enjoyable and positive experiences.
- All staff must be aware of their responsibility to ensure the safeguarding of adults at risk.
- As an employer, recruitment processes are in place to ensure staff do not pose a risk of harm to adults at risk. Access to advice and support for safe recruitment is available for recruiting managers.

### 2.4 Active Luton will seek to safeguard adult at risk by:

- Ensuring safeguarding is the responsibility of all paid staff and volunteers
- Establishing professional and appropriate standards of code of conduct from all employees via the **Active Luton Code of Conduct**.
- Valuing, listening to and respecting adults at risk.
- Adopting adult at risk protection guidelines through procedures for staff and volunteers.
- Responding to all suspicions and allegations of harm speedily.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made.

- Providing appropriate training for staff and volunteers, as set out in **Section 4**.
- Sharing information and good practice about the protection of adults at risk with children, parents, staff and volunteers and sharing information about concerns with agencies that need to know, and involving parents and children as appropriate.
- Including safeguarding as an agenda item at meetings where appropriate

**2.5** All partners of Active Luton and those regularly hiring spaces from Active Luton who work with adult at risk are expected to have their own safeguarding guidelines in place, with a sufficient infrastructure to discharge the policy arrangements as set out in **Active Luton's Conditions of Hire**. Commissioned services and contractors who work with adults at risk are expected to have in place their own safeguarding guidelines and to behave in line with this policy, a copy of which must be held by Active Luton.

**2.6** Active Luton is committed to checking the safeguarding policy and procedure to reflect changes in legislation or guidance and undertaking a formal review every three years.

### **3. Prevent Policy**

**3.1** Active Luton recognises that, as an organisation, it does not have a duty as either a specified authority or partner of a local panel, as listed in **The Counter Terrorism and Security Act 2015**.

Active Luton is aware of and understands the risk of radicalisation in Luton and that it has a role in providing programmes and services that meet the needs of all communities in Luton and help to bring those communities together in safe and inclusive programmes

**3.2** In response to **The Prevent Strategy**, and in accordance with its own policies:

Active Luton will not permit its venues to be hired by any organisation that holds extreme religious, ideological or political views in ways that could undermine Active Luton's aims and objectives, or seek to exploit grievances or community tensions.

This position is expanded in Active Luton's Conditions of Hire.

### **4. Training**

**4.1 Everyone is responsible for safeguarding.**

**4.2** To this end, training will be offered to staff in order that they are aware of signs of abuse and how they should report any concerns.

For all staff, this will comprise:

- Reading the Safeguarding Adults at Risk Policy and Procedure at their induction and following any revision. A signed record of this will be kept.
- Following any substantive revisions, staff will be instructed and a secondary log will be completed to confirm understanding.

**4.3** Further training will be provided where there is an identified staffing need, which may include:

- E-learning modules via the LMS Training portal
- Additional training for designated Safeguarding Officers, enabling them to offer advice to staff.
- Safer recruitment training for managers, ensuring managers will always abide by Active Luton's recruitment practices.

**4.2** Training on spotting the signs of extremism and actions to take will be offered to staff, where there is an identified need.

## 5. Safeguarding Procedure

### 5.1 How to recognise abuse and neglect

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect an adult at risk by inflicting harm, or by failing to act to prevent harm. Adults at risk may be abused in a family or in an institutional or community setting, by those known to them, or more rarely, by a stranger, for example via the internet. They may be abused by an adult or adults or by a child or children.

#### **Abuse can take many forms and may include those below (this is not an exhaustive list).**

This list is taken from Care Act 2014 / Luton Safeguarding Adults Board's leaflet, **Adult Abuse: See? Suspect? Report!** / [www.anncrafttrust.org](http://www.anncrafttrust.org)

#### **Types of abuse and neglect**

- **Physical abuse**
- Including hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions;
- **Sexual abuse** – including rape and sexual assault or sexual acts to which the adult has not consented 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 unreasonable and unjustified withdrawal of services or supportive networks;
- **Modern slavery**: This includes slavery, human trafficking and forced labour. It can include sexual exploitation (where a person is forced to perform sex acts against their will, for example as a sex worker or escort), criminal exploitation (where a person is forced to carry out criminal activity against their will) and domestic servitude (where a person is forced to carry out housework for little or no pay, their movements may also be restricted);
- **Exploitation** – either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain;
- **Financial or material abuse** – including theft, fraud, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits;
- **Neglect and acts of omission** – including ignoring medical 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;
- **Discriminatory abuse** – including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment
- **Institutional abuse** – including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment.
- **Female genital mutilation (FGM)** - is the partial or total removal of external female genitalia for non-medical reasons.
- **Bullying and cyberbullying** - can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

### 5.2 Responding to suspicions and concerns about an adult at risk

Staff should share their concerns immediately and a decision on how to proceed will be made. Phone the police on 999 if someone is in **immediate** danger.

- If the adult at risk is not in immediate danger, raise your concern at the earliest opportunity – certainly within the same working day – with a designated Safeguarding Officer

- Active Luton staff should refer to local safeguarding and risk policies and record concerns according to this protocol. For an example **Incident Form**, see **Appendix 1**.

### 5.3 What to do if a child or adult at risk makes a disclosure

If an adult at risk tells a member of staff about harm or abuse that they are suffering, or have suffered, that person should:

- Listen carefully and let the adult at risk tell them what has happened at their own pace, only asking questions for clarification.
- Remain calm and caring and avoid interrupting information.
- Not conduct an inquiry into what has happened.
- Avoid cross-questioning or leading questions.
- Establish very basic facts
- Not promise to keep it a secret but tell the adult at risk that the member of staff needs to share this information with others making it clear it will be shared with those who need to know and who can help.
- Reassure the adult at risk that they did the right thing.
- Speak immediately to a Safeguarding Officer or senior staff manager.
- Active Luton staff will follow local procedure for recording safeguarding and risk, and in seeking appropriate guidance on managing these incidents:
- Make a note of what was said using the **Incident Form (Appendix 1)** using the adult at risk's own words as soon as possible after the disclosing conversation and sign and date the record, forwarding this to the Safeguarding Officer.

### 5.4 What to do if a concern or disclosure relates to a member of staff

- All allegations of abuse or maltreatment of an adult at risk by an employee, volunteer, or trustee of Active Luton, must be taken seriously.
- **In all cases** in which it is alleged a member of staff, volunteer or board members has:
  - behaved in a way that has, or may have harmed, an adult at risk
  - possibly committed an offence against or related to an adult at risk
  - behaved towards an adult at risk in a way that indicates they may pose a risk of harm.

The Safeguarding Officer or most senior manager available **must be contacted immediately**

An Incident Report is to be completed and forwarded immediately thereafter to the Safeguarding Officer or senior manager.

- If the allegation (or concern) meets any of the criteria above it should be reported to the Local Adult Safeguarding team within Luton Borough Council within one working day via the following phone number and email:

**Email:** - [adultsafeguarding@luton.gcsx.gov.uk](mailto:adultsafeguarding@luton.gcsx.gov.uk)

**Phone:** 01582 547730 / 547563

- Advice will be sought from the Adult Safeguarding Team above, including when to inform the person about whom the allegation has been made.

## 5.5 Designated Safeguarding Officers for Active Luton

If one of the designated officers below is not available, concerns can be reported to a manager.

If none are available, concerns can be reported directly, as per the contacts listed in **Section 7**.

Carol Trower  
Workforce Development Manager  
Safeguarding Officer  
07796 302 820  
[Carol.trower@activeluton.co.uk](mailto:Carol.trower@activeluton.co.uk)

Carolyn Griffiths  
Resources Manager  
Safeguarding Officer  
07754 717 057  
[Carolyn.griffiths@activeluton.co.uk](mailto:Carolyn.griffiths@activeluton.co.uk)

## 5.6 Actions for the designated Safeguarding Officer when making referrals

The designated safeguarding officer will:

Receive staff concerns and those from members of the public visiting Active Luton sites.

— Contact and take advice from the following:

**The Police** in an emergency

**Public Protection Unit Support Team – Bedfordshire Police**

**The Adults Safeguarding Team** if the concern relates to an adult at risk

— Following advice, make a decision as to how to proceed.

— Ensure that telephone referrals are followed up in writing within 24 hours. This should be acknowledged within another 24 hours and if this does not happen the designated officer must, within three days, check that the information has been received.

— Ensure procedures on making referrals and confidentiality are followed.

— Ensure forms for recording incidents are completed and correctly stored in a central locked cabinet for **six years** with the Resources Manager.

## 5.7 Confidentiality considerations

The Safeguarding Officer and all other staff involved will:

— Ensure that the right of an adult at risk to protection takes precedence over both his/her right to confidentiality and that of his/her parents right to confidentiality.

— Ensure confidentiality, so that names of an adult at risk, or staff involved in incidents are not revealed.

## 5.8 Sharing information and involving parents/carers and children appropriately

The Safeguarding Officer and all other staff involved will:

- Seek advice from a senior manager and the Safeguarding Officers when in doubt. Explain to adult's at risk what and how information will be shared unless this could put the adult at risk at increased risk or undermine the detection of a serious crime.
- Always put the welfare of the adult at risk as the overriding consideration.
- Whenever possible respect the wishes of an adult at risk who do not give consent but still share information where there is sufficient need to override the consent.
- Ensure that information shared is accurate and only shared with people who need to see it.
- Store information securely.
- Always record the reason for decisions.

## 5.9 Taking images of adults at risk

Adults at risk have the right to privacy and to be safeguarded from the inappropriate use of images. No photographs of adults at risk will be taken without the written consent (**Appendix 2 /3**).

A Public Notice will be displayed in all areas where events are being undertaken and photography is taking place (**Appendix 4**).

## 6 Prevent Procedure

### 6.1 How to recognise signs of radicalisation or extremism

Prevent Training to be delivered to Managers and all key staff.

#### **What to do if you are concerned about signs of radicalisation or extremism**

- Phone the police on 999 if there is immediate danger.
- If there is no immediate danger, raise your concern at the earliest opportunity – certainly within the same working day – with a Safeguarding Officer or manager.
- Record your concern in a written report. For an example incident form, see **Appendix 1**.

## 7 Contacts

### 7.1 In an emergency, contact the Police on 999

### 7.2 For an unsupervised adult at risk in an Active Luton venue

Phone the Police on their local number 01582 401212

### 7.3 For safeguarding concerns about adults at risk

Contact the Multi-Agency Safeguarding Hub (MASH) in the first instance on:

01582 547653 (Luton)

0300 123 4043 (Hertfordshire)

Out of Hours, contact the Emergency Duty Team on

0300 300 8123 (Luton)

0300 123 4043 (Hertfordshire)

Email: [mash@luton.gcsx.gov.uk](mailto:mash@luton.gcsx.gov.uk)

Email : [protectedreferrals.cs@hertfordshire.gov.uk](mailto:protectedreferrals.cs@hertfordshire.gov.uk)

Bedfordshire Police Specialist Public Protection enquiries – 01234 846960

#### **7.4 For concerns raised about a staff member**

Contact the Adult Safeguarding Team within Luton Borough Council:

**Email:** [adultsafeguarding@luton.gov.uk](mailto:adultsafeguarding@luton.gov.uk)

**Phone:** 01582 547730 / 547563

#### **7.5 For concerns that someone is at risk regarding radicalisation or terrorism**

Contact Prevent Team at Bedfordshire Police on 01582 473048 on 473040

Email: [preventengagement@bedfordshire.pnn.police.uk](mailto:preventengagement@bedfordshire.pnn.police.uk)

Appendix 1 Incident Report Form



**Incident Report Form**

Issue 3

**THIS FORM MUST BE COMPLETED IN CAPITAL LETTERS USING BLACK / BLUE INK**

<b>Centre / Department:</b>						
<b>Staff member completing the form:</b>						
<b>Date of Completion:</b>						
<b>Definitions</b>	<b>Near Miss</b>	A near miss is an unplanned event that did not result in injury, illness, fatality or damage – but had the potential to do so. Only a fortunate break in the chain of events prevented an injury, illness, fatality or damage.				
	<b>Dangerous Occurrence</b>	<b>Dangerous occurrences</b> are certain, specified near-miss events that <i>may</i> need to be reported under RIDDOR. Examples include: <ul style="list-style-type: none"> <li>• The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;</li> <li>• The collapse of scaffolding over 5m</li> <li>• The accidental release of any substance which could cause injury to any person.</li> </ul>				
<b>Incident Type</b>	<input type="checkbox"/> <b>Near Miss</b>	<input type="checkbox"/> <b>Involving Emergency Services</b>	<input type="checkbox"/> <b>Damage to Property or Equipment</b>	<input type="checkbox"/> <b>Violence or Aggression</b> <small>Potential RIDDOR</small>	<input type="checkbox"/> <b>Discriminatory</b>	<input type="checkbox"/> <b>Dangerous Occurrence</b> <small>Potential RIDDOR</small>
	<input type="checkbox"/> <b>Other</b> <small>(Specify in your statement below)</small>					
	<b>The following must be reported to the Shift Leader / Responsible Person immediately:</b> <ul style="list-style-type: none"> <li>• Damage to property and equipment</li> <li>• Emotional or physical harm to staff</li> <li>• Acts of Violence or Aggression</li> <li>• Acts of Discrimination</li> </ul>					
<b>Potential RIDDORS must be reported to the Department Head who will notify the Health &amp; Safety Manager</b>						
<b>What Happened?</b>	<b>Date</b>	/	/	<b>Time</b>	:	am / pm
	<b>Precise Location in building</b>					
	<b>Describe what happened</b> <small>(If required, please continue overleaf)</small>					
<b>Witnesses</b>	<b>Name</b>				<b>Name</b>	
	<b>Address</b>				<b>Address</b>	
	<b>Contact No. ☎</b>				<b>Contact No. ☎</b>	
	<b>E-mail ✉</b>				<b>E-mail ✉</b>	

## Appendix 2

### Photography / Video Consent Form

Name of photographer / videographer: \_\_\_\_\_

Name of Event: \_\_\_\_\_

Name of the person  
to be photographed / filmed: \_\_\_\_\_

Description of the person  
to be photographed / filmed: \_\_\_\_\_

#### Hereby agrees to have their photograph taken.

In accordance with the Data Protection Act 1998 and current General Data Protection Regulations (GDPR)

I agree that:

(Please tick to agree)

- These images **may be used in printed publications or on digital media** produced by Active Luton and its partner organisations and for promotional and advocacy purposes.
- If Active Luton uses images/ video on digital media, I understand that **websites can be seen throughout the world** and not just in the United Kingdom, where UK law applies.
- These images / media may be used **indefinitely from the date of signing or until notified by you.**
- Active Luton will **not alter these images to falsely represent you.**
- Active Luton **will not include details or full names** (which means first name and surname) of any person, in an image on our on digital media or in printed publications, without good reason. For example, we may include the full name of a competition prize winner if we have their consent. However, we would not include the full name of a model used in promotional literature.
- Active Luton **will not include personal e-mail or postal addresses**, or telephone or fax numbers, on our website or in printed publications.

\*I am the person named above / \*I am the parent or guardian of the person named above (\*Please delete the options that do not apply)

PRINT NAME:

Your signature: \_\_\_\_\_ Date: \_\_\_\_\_

Your address: \_\_\_\_\_  
\_\_\_\_\_



**Photography Approval Form**  
Issue 2

This section must be completed in full in all cases where an external party (such as School or Kidz Around Party organiser) wishes to take photographs on premises operated by, or at events organised, by Active Luton.

<b>Activity</b>			
<b>Facility</b>		<b>Activity Area(s)</b>	
<b>Date</b>		<b>Time</b>	
<b>Name of Photographer</b>			
<b>Name of Subjects to be Photographed</b>			
<b>Relationship to Subjects</b>			
<b>Reason for Photography</b>			

**Photographer's Declaration:**

"I confirm that permission has been sought from all participants (or the parent/ legal guardian of all participants under the age of 18) and that consent has been granted in all cases for photography to take place as described above. I understand that permission is granted only for the date/ time specified above, in the areas described and subject to any conditions stated below and that Active Luton or its employees reserve the right to rescind this permission at any time."

<b>Name</b>		<b>Signature</b>		<b>Date</b>	___/___/___
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This section must be completed by a member of Active Luton Staff.

**Restrictions/ Conditions (complete as appropriate):**

"I hereby grant permissions for the above named person to take photographs as described above and subject to the stated conditions/ restrictions."

<b>Name</b>		<b>Position</b>		<b>Date</b>	___/___/___
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# PUBLIC NOTICE

Please be aware that this event will be photographed on behalf of Active Luton.

By attending this event you are giving your consent that any pictures taken can be used in future projects.

These images may be used in printed publications or on digital media produced by Active Luton and its partner organisations and for promotional and advocacy purposes.

If you are concerned or do not wish to be included in any images, please see the photographer or a member of staff.

## Active Luton