

CLIN 06

Safeguarding Adults and Children Policy

Policy applicable to:

NHS Guildford and Waverley CCG	✓
NHS North West Surrey CCG	✓
NHS Surrey Downs CCG	✓

Policy number	CLIN 06
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Approved by	Quality Committees
Name of originator/ author	Amanda Boodhoo Associate Director for Safeguarding Surrey Wide
Owner (director)	Clare Stone, Executive Director of Quality for Surrey Heartlands CCGs
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Working together as the Surrey Heartlands Clinical Commissioning Groups

Guildford and Waverley CCG | North West Surrey CCG | Surrey Downs CCG

Version control sheet

Version	Date	Author	Status	Comments / changes since last version
1.0	03/01/2017	Amanda Boodhoo	Approved	
2.0	25/10/2017	Amanda Boodhoo	Approved	<ul style="list-style-type: none"> • Point 5 - NHSE role and responsibility removed • Points 5.1, 5.2, 5.3 updates to reflect Surrey Heartlands governance structure • Point 5. 6 – Surrey wide CCG team roles and responsibilities updated • Point 5.7 - Examples of work with providers to support the safeguarding of adults at risk and children is in Appendix 3 • Point 7 Local and National Safeguarding Issues moved to App 8 • Point 7.5 Link to Multiagency Statutory Guidance for the conduct of DHR's • Point 7.7 Link to G&W Intranet page on Statutory and Mandatory Training • Point 8.8 E-Safety removed • Point 8.8 Engagement with SSAB & SSAB removed and included in Point 5.3 • Points 8.9, 8.10, 8.11, 8.12 removed • Appendix 2 Safeguarding Team Contact Details updated • Links to local, national and statutory guidance, SSCB and SSAB policies and procedures updated
3.0	01/11/2018	Amanda Boodhoo		<ul style="list-style-type: none"> • Updated: • key legislation and guidance, including new adults intercollegiate document • Amended managing allegations to include new term of '<i>people in positions of trust</i>' • Contact details updated • Under Roles & responsibilities (children)Included paragraph

Version	Date	Author	Status	Comments / changes since last version
				<p>from Working together regarding new arrangement for 'safeguarding partners'</p> <ul style="list-style-type: none"> • Included section on child death review • Amended - Surrey Heartlands as the host and explanation added regarding arrangement

Equality statement

The Surrey Heartlands' CCGs aim to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. We take into account the Human Rights Act 1998 and promote equal opportunities for all. This document has been assessed to ensure that no employee receives less favourable treatment on the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity.

Members of staff, volunteers or members of the public may request assistance with this policy if they have particular needs. If the member of staff has language difficulties and difficulty in understanding this policy, the use of an interpreter will be considered.

We embrace the four staff pledges in the NHS Constitution. This policy is consistent with these pledges.

See next page for an Equality Analysis of this policy.

Equality analysis

Equality analysis is a way of considering the effect on different groups protected from discrimination by the Equality Act, such as people of different ages. There are two reasons for this:

- to consider if there are any unintended consequences for some groups
- to consider if the policy will be fully effective for all target groups

Title of Policy: Safeguarding Adults and Children’s Policy	Policy Ref: CLIN 06
Assessment conducted by (name, role): Amanda Boodhoo, Surrey wide Associate Director for Safeguarding	Start date for analysis: Finish date: 01.11.18
Give a brief summary of the policy. Explain its aim. All staff in the CCG. The aim is to ensure that the CCG’s uphold all elements of safeguarding adults, children and young people legislation and ensure staff are aware of their responsibilities to safeguard and promote the welfare of adults, children and young people	
Who is intended to <u>benefit from</u> this policy? Explain the aim of the policy as applied to this group. All CCG staff. Adults, children and young people residing in Surrey Heartlands CCG areas Explain the aim of the policy as applied to this group. This policy aims to ensure that no act or omission by Guildford and Waverley CCG, Surrey Downs CCG and North West Surrey CCG as a commissioning organisation, or via the services it commissions, puts adults at risk, children and young people at risk and rigorous systems are in place to proactively safeguard adults at risk, children	
1. Evidence considered. <i>What data or other information have you used to evaluate if this policy is likely to have a positive or an adverse impact upon protected groups when implemented?</i> Legislation, national and local guidance. Lessons from local and national Serious Case Reviews, Safeguarding Adults Reviews and DHR’s.	
2. Consultation. <i>Give details of all consultation and engagement activities used to inform the analysis of impact.</i> No	
3. Analysis of impact <i>In the boxes below, identify any issues in the policy where equality characteristics require consideration for either those abiding by the policy or those the policy is aimed to benefit, based upon your research.</i>	

<i>Are there any likely impacts for this group? Will this group be impacted differently by this policy? Are these impacts negative or positive? What actions will be taken to mitigate identified impacts?</i>	
a) People from different age groups (Age)	<p>No adverse impact. Older people, children and young people can be at greater risk of abuse and harm. To mitigate this, the CCG works closely with commissioned providers, primary care and local authorities to ensure risks have been highlighted and mitigated.</p> <p>Under the collaborative hosting arrangements for safeguarding the Surrey CCGs have an integrated approach to safeguarding to ensure that adult, children, young people and those entering transition into adulthood are able to access appropriate support</p>
b) People with disabilities (Disability)	No adverse impact. People with sensory disability need to be able to access information in different ways e.g. via Braille, audio text, large font, black on yellow background etc. The CCG undertakes to provide this policy in the format required on request. The policy ensures that adults, children and young people at risk and those with disabilities are safeguarded
c) Men and women (Gender or Sex)	No adverse impact. Policy ensures that all vulnerable people are safeguarded against gender/ hate crimes
d) Religious people or those with strongly held philosophical beliefs (Religion or belief)	No adverse impact. Policy ensures adults, children and young people at risk are safeguarded against religious abuse and hate crimes/incidents and risk of radicalisation. Cultural blindness is the incapacity to comprehend how specific situations may be seen by individuals belonging to another culture. Subsequently there is a risk that the behaviour of those adults, children and young people, at risk, might become normalised. These risks have been mitigated and are highlighted within this policy and safeguarding adults and children training.
e) People from black and minority ethnic groups (Race)	No adverse impact. Policy ensures all staff are aware of the need to safeguard all adults, children and young adults at risk of harm and abuse.
f) People who have changed gender or who are transitioning to a different gender (Gender reassignment)	No adverse impact. It is recognised that transgender adults and young people can experience barriers to services. It is important that this equality group feel able to raise safeguarding concerns and to ensure such situations are resolved. The policy ensures that concerns are dealt with confidentially and securely. Safeguarding training addresses the different forms of abuse and provides resources on how these should be reported.
g) Lesbians, gay men, bisexual people (Sexual orientation)	No adverse impact. Policy ensures that all staff are aware of the need to safeguard all adults, children and young people against hate crimes/incidents.
h) Women who are pregnant or on maternity leave (Pregnancy and maternity)	No adverse impact. Policy ensures that all staff are aware of the need to safeguard adults, children and young people against hate crimes/ incidents. The same applies to fathers taking paternity leave.

i) People who are married or in a civil partnership (Marriage and Civil Partnership)	No adverse impact predicted from this policy. The Policy aims to ensure that all staff are aware of the need to safeguard all adults, children and young people against hate crimes/incidents.
j) Carers	
If any negative or positive impacts were identified are they valid, legal and/or justifiable? Please detail.	
<p>4. Monitoring- <i>How will you review/monitor the impact and effectiveness of your actions?</i></p> <p>There is a Safeguarding Adults and Children standing item at each CCG Quality & Clinical Governance Committees meeting that provides regular assurances to the Governing Bodies demonstrating how Surrey Heartlands CCG's are discharging its safeguarding responsibilities. There is no formal process in place that monitors the impact on protected groups. The safeguarding dashboard is reported on within the Annual and 6 month Interim Board Report.</p>	
5. Sign off	
Lead Officer:	
Date approved:	

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1. Introduction and Policy Objective

Safeguarding is central to the quality of care (NHS Outcomes Framework 2016/17) particularly:

Domain 4: Ensuring people have a positive experience of care.

Domain 5: Treating and caring for people in a safe environment and protecting them from avoidable harm.

Safeguarding is firmly embedded within the wider duties of all organisations across the health system but there is a distinction between providers' responsibilities to provide safe, high quality care and support, and commissioners' responsibilities to assure themselves of the safety and effectiveness of the services they have commissioned.

This policy represents the safeguarding responsibilities for all Clinical Commissioning Groups (CCG's) within Surrey to ensure effective discharge of their duty to improve the health of the whole population which includes safeguarding and promoting the welfare of adults and children at risk.

All adults and children have the right to live lives free from abuse and neglect. CCG's have particular responsibilities to safeguard the local population who may be unable to protect themselves from abuse or neglect.

NHS Guildford and Waverley CCG are part of the Surrey Heartlands partnership, and is the host CCG for safeguarding children and adults including looked after children arrangements on behalf of the Surrey CCG collaborative. They work closely with other CCG's in Surrey to ensure that all commissioned services deliver high quality, safe effective care and that all organisations commissioned or contracted to provide services will in the discharge of their functions, have regard to the duty to safeguard and promote the welfare of adults and children at risk.

Safeguarding is everyone's responsibility. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the wellbeing, views, wishes and beliefs of adults and children is promoted within safeguarding arrangements.

2. Legislative Framework / Core Standards

The corporate responsibilities for Safeguarding Children are explicit and are predominantly informed by legislation and national directives. The CCG is required to fulfil its legal duties under the Children Act 1989, and Section 11 of the Children Act 2004 and The Care Act (2014).

The following key guidance and legislation informs how the CCG will discharge its function and duties to safeguard and promote the welfare of adults and children and young people and should be read in conjunction with Surrey Safeguarding Children

Board Procedures Manual (SSCB) and Surrey Safeguarding Adults Board Procedures Manual (SSAB)

This policy sets out arrangements for safeguarding and promoting the welfare of our population. It should be read in conjunction with the following:

Children and Young People:

- Children Act (1989)
- Children Act (2004)
- Children and Social Work Act (2017)
- Care Act (2014)
- Working Together to Safeguard Children (2018)
- Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework (2015)
- Promoting the Health and Well-being of Looked After Children - statutory guidance (2015)
- Safeguarding children and young people: roles and competences for health care staff, Intercollegiate Document (2019)
- Looked after children: Knowledge, skills and competences of health care staff Intercollegiate Role Framework (March 2015)
- Surrey Safeguarding Children Board Procedures
- Children and Families Act (2014)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- General Data Protection Regulation (GDPR) & Data Protection Act (2018)

Adults

- Care Act 2014.
- Care and Support Statutory Guidance (Chapter 14 – Safeguarding)
- Mental Capacity Act (MCA) (2005)
- Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework (2015)

- Safeguarding adults: roles and competences for health care staff, Intercollegiate Document (2018).
- Deprivation of Liberty Safeguards (2009)
- Surrey Safeguarding Adults Board Procedures

[Links are provided in Bibliography](#)

Principles

Effective safeguarding arrangements in every local area should be underpinned by the following key principles:

Children and Young People:

A co-ordinated approach - Safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part.

A child-centred approach to safeguarding: Everyone should follow the principles of the Children Acts 1989 and 2004 - that state - The child's welfare and needs are paramount – A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families. *(Working Together to Safeguard Children, HM Government 2018)*

Adults:

The Government has issued a policy statement on adult safeguarding which sets out six principles for safeguarding adults for use by statutory bodies, including health and other agencies for both developing and assessing the effectiveness of their local safeguarding arrangements. The principles represent best practice and provide a foundation for achieving good outcomes:

- **Empowerment** - presumption of person led decisions and consent.
- **Protection** - support and representation for those in greatest need.
- **Prevention** of harm or abuse.
- **Proportionality** and least intrusive response appropriate to the risk presented.
- **Partnerships** - local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** and transparency in delivering safeguarding.

The CCG will embrace the six principles of safeguarding as a thread of good practice running through all activities when discharging its duties at all levels of the organisation.

3. Scope

This policy aims to ensure that no act or omission by the CCGs as a commissioning organisation, or via the services it commissions, puts a service user at risk; and that the robust systems are in place to safeguard and promote the welfare of children and to protect adults at risk of harm and sets out a framework to underpin monitoring of safeguarding arrangements across the health economy.

This Policy is applicable to all staff employed by the Surrey Heartlands CCGs (permanent and temporary) working in any location who may come into contact directly or indirectly with children and pregnant women and those working in settings whose main client / patient is an adult. The key principles are also applicable to all services commissioned by the CCGs.

Where a CCG is identified as the lead commissioner it will notify associate commissioners of a provider's non-compliance with the standards contained in this policy or of any serious untoward incident that has compromised the safety and welfare of a child / vulnerable adult resident within the population.

4. Definitions

The definition of safeguarding is necessarily broad as there is a wide range of risks of abuse or neglect that can result in harm to children and adults, details can be found in Appendix 1.

Children and Young People:

For the purpose of this Policy a child (including the unborn) is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout.

- Safeguarding and promoting the welfare of children is defined as:
- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes

Adults:

For the purpose of this Policy an 'adult' is defined as a person who is aged 18 or over

Adult Safeguarding is about protecting a person's right to live in safety, free from abuse and neglect. It is the promotion of the welfare of individuals and refers to the activity that

is undertaken to protect specific adults who are at risk of harm or abuse as described in the Care Act 2014, which came into effect in April 2015 and which may affect an individual at different times during their lives.

An adult at risk (previously referred to as a vulnerable adult), is defined as an adult who:

Has needs for care and support (whether or not the local authority is meeting any of those needs); and

Is experiencing, or at risk of, abuse or neglect; and

As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse and neglect” (Care Act 2014)

An adult at risk may be a person who:

- is frail due to age, ill health, physical disability or cognitive impairment, or a combination of these
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol

Neglect and abuse may occur within individual’s homes and communities. Neglect and abuse may also occur through care provided by regulated health and social care services.

5. Roles and Responsibilities

The CCGs as commissioners of local health services need to assure themselves that the organisations from which they commission have effective safeguarding arrangements in place and does so in accordance with ‘Safeguarding Vulnerable People in the NHS - Accountability and Assurance Framework’ (2015) which clearly sets out the safeguarding roles, duties and responsibilities of all organisations commissioning NHS health and can be accessed at: <https://www.england.nhs.uk/wp-content/uploads/2015/07/safeguarding-accountability-assurance-framework.pdf>

Fundamentally the role of the CCGs are to work with others to ensure that services are in place to respond to children and adults at risk or who have been harmed, and delivering improved outcomes and life chances for the most vulnerable. The CCGs

must demonstrate appropriate systems are in place for discharging statutory duties in terms of safeguarding. These include:

Children:

CCGs are one of the statutory safeguarding partners and the major commissioners of local health services. They are responsible for the provision of effective clinical, professional and strategic leadership to child safeguarding, including the quality assurance of safeguarding through their contractual arrangements with all provider organisations and agencies, including from independent providers. All staff and managers should be aware of those responsibilities as outlined in *Working Together to Safeguard Children* (HM Government 2018) and specifically:

The CCGs have a duty under **Section 11 of the Children Act 2004** to ensure the following:

- a clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children
- a senior board level lead with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility for the organisation's/agency's safeguarding arrangements
- a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services
- clear whistleblowing procedures, which reflect the principles in Sir Robert Francis' Freedom to Speak Up Review and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed
- clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies
- arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners
- A designated professional lead for safeguarding. Designated professional roles should always be explicitly defined in job descriptions and they should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively
- safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check
- appropriate supervision and support for staff, including undertaking safeguarding training

- creating a culture of safety, equality and protection within the services they provide

In addition:

- Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role
- Staff should be given a mandatory induction, which includes familiarisation with child protection responsibilities and procedures, which are followed if anyone has any concerns about a child's safety or welfare, and
- All professionals should have regular reviews of their practice to ensure they improve over time
- Develop clear policies for dealing with allegations against people who work with children in line with the requirement of the local safeguarding children board and statutory guidance
- A bi-annual audit of the health economy's safeguarding arrangements and Section 11 responsibilities is undertaken by Surrey Safeguarding Children Board.

Adults:

Under the **Care Act 2014** the lead for adult safeguarding is the Local Authority, with a multi-agency approach, whereby health services are required to investigate and act to prevent harm.

The core purpose of adult care and support is to help people to achieve the outcomes that matter to them in their life. People have complex lives and being safe is only one of the things they want for themselves.

CCGs are also required to demonstrate that they have appropriate systems in place for discharging their statutory duties in terms of safeguarding

5.1 The Governing Bodies and Committees

The Chief Executive Officer of the CCGs is the Accountable Officer with responsibility for ensuring that the health contribution to safeguarding and promoting the welfare of vulnerable adults and children and young people is discharged effectively across the local health economy through the CCGs' commissioning arrangements.

Within the CCGs, this role is supported through the Safeguarding Lead Director, the Safeguarding Associate Director and Designated professionals. The CCGs' Board will regularly receive information relating to:

- Safeguarding performance of commissioned services

- Serious Case Reviews, Safeguarding Adults Reviews and Domestic Homicide Reviews from The Surrey Safeguarding Children Board and the Surrey Safeguarding Adult Board
- Local and national safeguarding issues
- Reports and papers regarding any specific issues requiring Board approval or decision.

5.2 Directors and Managers

The Chief Executive has overall responsibility to ensure that the CCGs must comply with all legal, statutory and good practice guidance requirements in relation to Safeguarding Adults and Children. The Chief Executive delegates operational responsibility for Safeguarding Adults and Children to the CCGs' Executive Director of Quality.

5.3 Executive Director of Quality

The Executive Director of Quality takes strategic leadership for safeguarding arrangements. As the Executive Lead for safeguarding, the Executive Director of Quality and will provide line management for the Associate Director of Safeguarding who will liaise with other senior members of the CCG and service providers as required. The Executive Lead for safeguarding adults and children meets regularly with the Associate Director for Safeguarding to review child and adult safeguarding.

The Executive Lead for safeguarding ensure Surrey CCG's are represented at the Full Board of the Surrey Safeguarding Children Board and the Surrey Safeguarding Adults Board to ensure the designated professional expertise is effectively linked into the safeguarding arrangements.

5.4 All Deputy Directors and Heads of Departments

The Deputy Directors and Heads of Department of the CCGs within their service areas/teams are responsible for ensuring that all staff act in accordance with the CCG's Safeguarding Policy, the Surrey Safeguarding Adults and Children Board Procedures and Guidance. Deputy Directors and Heads of Department should advise the Executive Director of Nursing, Quality and Safeguarding on any risk issues in relation to safeguarding adults and children.

5.5 All Staff and GP Member Practices

All CCGs' staff, whether clinical or non-clinical have the responsibility to ensure they adhere to the Surrey Safeguarding Adults and Children's Board Procedures and any policies and guidance laid down to ensure compliance.

The CCGs are required to ensure that it clearly identifies the standards expected from its staff members with regard to ensuring the safety and welfare of adults, children and young people is promoted. Staff members employed or contracted who do **not** directly deliver services to individuals, in circumstances where they identify a concern around

the safety and welfare of an adult, child or young person, are expected to ensure that they act in accordance with the SSAB and SSCB Procedures, statutory and national guidance.

All managers are to ensure their staff are aware of, and adhere to, the Safeguarding Policy. They are also responsible for ensuring that all staff are updated with regards to any changes in the Safeguarding Policy

All employees of the CCGs, partner practices and contracted support services e.g. CSU, must be mindful of their responsibility to safeguard adults and children.

GP practices must have a lead for safeguarding children and a lead for safeguarding adults who must work closely with the CCGs' Named GP and Safeguarding Children Designated Professionals to address quality issues in relation to safeguarding children. GP practices must maintain an up to date list of staff training in relation to safeguarding. GPs must ensure that they contribute effectively to children in need of support or protection, including provision of reports for child protection conferences.

5.6 Surrey Wide CCGs Safeguarding Adult and Children Team

Designated and Named Nurses and Doctors are in post as required by legislation and statutory guidance to offer professional safeguarding expertise and advice across the health economy and includes the following:

- Provide advice to ensure the range of services commissioned by Surrey CCG's take account of the need to safeguard and promote the welfare of children.
- Provide advice on the monitoring of the safeguarding aspects of Surrey CCG contracts.
- Provide advice, support and clinical supervision to the named professionals in each provider organisation.
- Provide skilled advice to the SSCB and SSAB on health issues.
- Play an important role in promoting, influencing and developing relevant training, on both a single and inter-agency basis, to ensure the training needs to health staff are addressed.
- Provide skilled professional involvement in child safeguarding processes in line with SSCB and SSAB procedures.
- Review and evaluate the practice and learning from all involved health professionals and providers commissioned by Surrey CCGs, as part of Serious Case Reviews, DHR, SAR and serious incidents.
- Inform the SSCB and SSAB of any relevant serious incidents where social care has not been involved.

- Designated professionals will require specific safeguarding supervision.

Designated Professionals Contact Details (Appendix 2)

Designated Doctor Safeguarding Children

The role of the Designated Doctor for safeguarding children is delivered via a Service Level agreement with – Ashford & St. Peters Hospital.

Designated Professionals for Children Looked After

The Designated Doctor and Nurse for Children Looked After provide a strategic lead in the health aspects of children in care. The role of Designated Doctor for Children Looked After is delivered via a service level agreement with Surrey and Borders Partnership Mental Health Trust.

Designated Paediatrician for Unexpected Child Deaths

The role of doctor for unexpected death in childhood is delivered via a service level agreement with Surrey and Borders Partnership Mental Health Trust.

Designated and Named GP Safeguarding Children

The Named GP works closely with the CCGs to ensure through this role local practices are supported to develop effective safeguarding children arrangements.

Designated MCA (Mental Capacity Act) Lead

The CCGs have a Designated MCA lead who is responsible for providing support and advice to clinicians in individual cases and supervision for staff in areas where these issues may be particularly prevalent and/or complex.

The CCGs have designated the role of MCA Lead to the Designated Nurse Safeguarding Adults who also have a role in highlighting the extent to which their own organisation, and the services that they commission, are compliant with the MCA through undertaking audit, reporting to the governance structures and providing or securing the provision of training.

5.7 Providers

NHS Trusts, Foundation Trusts and Private Healthcare Providers

All provider health organisations are required to have effective arrangements in place to safeguard adults and children and to assure themselves, regulators and their commissioners that these are working. Key examples of health work to support the safeguarding of adults at risk and children are outlined in Appendix 3

6. Procedure

All staff and volunteers, whatever the setting, have a key role in preventing abuse or neglect occurring and in taking action when concerns arise. Findings from Serious Case Reviews and Safeguarding Adults Reviews have sometimes stated that if professionals or other staff had acted upon their concerns or sought more information, then death or serious harm might have been prevented.

Where an adult at risk or child is experiencing, or at risk of being abused, neglected or where an adult may be being harmed by others usually in a position of trust, power or authority, this must always be reported immediately. The concern may arise by:

- a direct disclosure by the adult
- a concern raised by staff or volunteers, others using the service, a carer or a member of the public
- an observation of the behaviour of the adult, of the behaviour of another person(s) towards the adult at risk or of one adult towards another

If you think that someone you know, adult, child or young person, is being abused or is at risk of abuse you must inform a Manager of the organisation, and your Line Manager and/or the Designated Nurses for Adults or Children who are responsible for advising on concerns of abuse within the CCGs.

It is not for staff or volunteers to second-guess the outcome of an enquiry in deciding whether or not to share their concerns.

All CCGs' staff and all NHS Commissioned provider services **MUST** adhere to this policy in conjunction with Surrey Safeguarding Adults Procedures information and guidance, and Surrey Safeguarding Children Manual procedures, accessible via the following links:

Surrey Safeguarding Children Board Procedures Manual

<http://surreyscb.procedures.org.uk/>

[Surrey safeguarding adults multi agency procedures, information and guidance](https://www.surreycc.gov.uk/social-care-and-health/contacting-social-care/surrey-safeguarding-adults-board/surrey-safeguarding-adults-board-information-for-professionals/surrey-safeguarding-adults-multi-agency-procedures-information-and-guidance)

<https://www.surreycc.gov.uk/social-care-and-health/contacting-social-care/surrey-safeguarding-adults-board/surrey-safeguarding-adults-board-information-for-professionals/surrey-safeguarding-adults-multi-agency-procedures-information-and-guidance>

The Surrey MASH is the single point of contact for reporting concerns about the safety of a child, young person or adult at risk. It aims to improve the safeguarding response for children and adults at risk of abuse or neglect through better information sharing and high-quality and timely responses. Contact details are available in **Appendix 4**.

If you are concerned that you have not been believed or taken seriously refer to the CCGs' Raising Matters of Concern (Whistleblowing) Policy or:

Surrey Safeguarding Children Board Interagency Escalation Policy and procedure accessible at; <http://surreyscb.procedures.org.uk/sktp/complaints-and-disagreements/inter-agency-escalation-policy-and-procedure/#s1451>

Surrey Safeguarding Adult Board Interagency Escalation Policy and Procedure at: https://www.surreycc.gov.uk/data/assets/pdf_file/0005/91643/SSAB-Inter-Agency-Escalation-Policy.pdf

6.1 MCA

Adults who lack capacity

The Mental Capacity Act 2005 (MCA) provides a statutory framework which empowers and protects people aged 16 or over, who may lack capacity to make decisions for themselves. The MCA clearly states that there is a presumption of mental capacity unless an assessment of capacity shows otherwise. Adults who have capacity have the right to make their own decisions irrespective of how unwise that may appear to others. However, staff will need to be aware of the safeguarding implications around MCA and how this relate to situations where the person may lack capacity, and unable to protect themselves, therefore, at risk of harm and abuse.

Staff must ensure that any systems and processes in place demonstrate that the rights of people who lack capacity are protected and there is evidence of an MCA assessment completed and any care implemented should be in the person's best interest.

Therefore, under the MCA decisions will need to be made on the person's behalf if they lack capacity

6.2 The Deprivation of Liberty Safeguards (2009) (DoLS)

DoLS was introduced to protect a person who refuses care and treatment and has been deemed to lack capacity under the MCA. Therefore, staff will need to be aware that these provisions require a more detailed assessment, to determine if the person meets the criteria for a Deprivation of Liberty Safeguard (DoLS) authorisation. The DoLS authorisation will require more restrictive interventions to be implemented to protect the person. 11 However, prior to doing this, the rights of the person need to be protected and any restrictive treatment deemed to be in their best interest should demonstrate that the least restrictive options were considered first before applying for a DoLS authorisation.

6.3 Duty of Candour

The Care Act 2014 sets out that the CQC registration requirement places a duty on providers to be open with patients and their families about failings in their care. The CCGs will ensure that service specifications, invitations to tender, service contracts and

service level agreements promote dignity in care and adhere to local multiagency safeguarding policies and procedures

The Duty of Candour requires all health and adult social care providers registered with the Care Quality Commission (CQC) to be open with people when things go wrong. The regulations impose a specific and detailed duty on all providers where any harm to a service user from their care or treatment is above a certain harm threshold. The Duty of Candour is a legal requirement and CQC will be able to take enforcement action when it finds breaches. Details can be accessed at:

http://www.cqc.org.uk/sites/default/files/20150327_duty_of_candour_guidance_final.pdf

Additional Guidance on **Mental Capacity Act** and the **Deprivation of Liberty Safeguards** is available on the Surrey County Council website, details of which can be accessed via the following links:

<https://www.surreycc.gov.uk/social-care-and-health/care-and-support-for-adults/information-for-professionals-partners-and-providers/understanding-the-law/mental-capacity-act-2005-deprivation-of-liberty-safeguards>

<https://www.surreycc.gov.uk/social-care-and-health/care-and-support-for-adults/information-for-professionals-partners-and-providers/understanding-the-law/mental-capacity-act-2005-deprivation-of-liberty-safeguards/deprivation-of-liberty-safeguards-team-and-submission-of-dols-forms>

7. Safeguarding Within Commissioning Arrangements

In accordance with the principles of Clinical Commissioning, the CCGs maintain a robust scheme of contract and quality monitoring of all services provided by organisations commissioned by the CCGs. They also have clinical governance processes in place that inform the scheme of contract and quality monitoring.

The CCGs as a commissioner will:

Ensure commissioning arrangements work in co-operation with Local Authority, NHS England and link to the priorities of the Surrey Safeguarding Children Board (SSCB) and the Surrey Safeguarding Adults Board (SSAB)

Ensure there is a senior commissioning lead for children and young people to ensure their needs are at the forefront of local planning and service delivery.

Ensure that clinical governance arrangements are in place to assure the quality of services commissioned by the CCGs.

Commission secondary health care for looked after children, including those placed outside of the borough.

7.1 Contract Monitoring

The CCG as a commissioner will:

- Ensure through Safeguarding adult and children standards in all CCG contracts with commissioned services that health services and healthcare workers contribute to multi-agency safeguarding working
- Involve the Designated Professionals in contract monitoring meetings, at least annually, for appropriate children and family health services
- Include the requirement for sharing information with CCGs and the SSCB and SSAB regarding Safeguarding arrangements and Outcome Frameworks in all commissioning arrangements, contracts and/or service level agreements
- Ensure that Designated Professionals have been consulted on all relevant contracts and service level agreements.
- Provide assurance regarding safeguarding arrangements across the CCG's and includes: annual and 6-month interim reporting including safeguarding children and adult dashboard and exceptions reporting.
- For safeguarding children as outlined in 'Working Together (2018)' CCGs will be the major commissioners of local health services and will be responsible for safeguarding quality assurance through contractual arrangements with all provider organisations.
- The safeguarding children and adults dashboard will be used as a tool to provide commissioners with assurance that providers are compliant with their safeguarding responsibilities, it will ensure that there is both quantitative and qualitative data available which demonstrate how providers are moving towards an outcomes based focus. (Table 1)

Table 1 - Safeguarding in Health Outcomes Framework

<ul style="list-style-type: none">• Leadership and Workforce• Training• Safeguarding Supervision• Partnership Working• Responding to Wider Social Issues, Vulnerable Groups of Children and adults at risk• Serious adults and children Incidents SCR, Case Reviews, DHR• Adult Issues and Early Help

7.2 Annual Reporting

The CCG, all NHS Trusts or Foundation Trusts and Community Providers are required to publish an annual report of safeguarding children and adults and it is expected that the following will be included:

Table 2 - Annual Report components

<ul style="list-style-type: none">• Safeguarding Structure and Governance• SSCB and SSAB Participation

- Education & Training
- Safeguarding Children and Adult Supervision
- Clinical Governance & Risk Management
- Compliance with CQC Regulations
- Section 11
- Employment Practice
- Policies & Procedures
- Mental Capacity Act (MCA) 2007 including Deprivation of Liberty
- SSAB and SSCB Priority areas
- Safeguarding Activity

Table 3 - CCG Safeguarding children and adult reporting schedule

Date presented:	Report	
1st January	Safeguarding Children, Adults and Looked after Children Exceptions Report	
1st March	Safeguarding Children, Adults and Looked after Children Exceptions Report	
1st May	Looked After Children Six month update to the annual report	Safeguarding Children and Adults Annual Report
1st July	Safeguarding Children, Adults and Looked after Children Exceptions Report	
1st September	Looked after Children Annual Report	Safeguarding Children and Adults Exception Report
1st November	Looked After Children Exceptions Report	Safeguarding Children and Adults six month update to the annual report

7.3 Safe Recruitment

The CCG has a duty to ensure that safe recruitment processes are complied with and will act in accordance with the NHS employers regulations, including the Safeguarding Vulnerable Groups Act (HM Government, 2006), SSCB and SSAB procedures and the local HR recruitment policies.

7.4 Supervision

Supervision supports, assures and develops the knowledge, skills and values of an individual worker and provides accountability for decision-making. High quality supervision is the cornerstone of effective working with all children and young people and adults and supervision is delivered to Named professionals and adult safeguarding

leads within Surrey Health provider organisations by the appropriate Designated professional.

As single subject experts, peer-to-peer supervision is vital to ensuring Designated Professionals continue to develop their practice in line with agreed best practice. Designated Professionals are required to attend supervision meetings regularly.

The appropriate designated professionals provide supervision for named professionals and adult safeguarding leads. As part of this supervision process evidence submitted through the dashboard, annual assurance and accountability framework and section 11 can be triangulated and assurance sought. A Supervision contract will be agreed between the Designated and Named professionals / adult safeguarding lead.

7.5 Serious Case Reviews, Safeguarding Adults Reviews Domestic Homicide Reviews and Case Reviews

The CCG has a statutory duty to work in partnership with the Surrey Safeguarding Children Board, The Surrey Safeguarding Adults Board and/or any other Safeguarding Children Board

Serious Case Reviews

A serious case review (SCR) takes place after a child dies or is seriously injured and abuse or neglect is thought to be involved. It looks at lessons that can help prevent similar incidents from happening in the future. They are not inquiries into how a child died or was seriously harmed, or into who is culpable. These are matters for coroners and criminal courts, respectively, to determine as appropriate. Nor are SCRs part of any disciplinary inquiry or process relating to individual practitioners, the process is detailed in the Surrey Safeguarding Children Board (SSCB) Serious Case Review and Learning Review Practice Guidance and Tool Kit (2016) <http://www.surreyscb.org.uk/wp-content/uploads/2016/06/SCR-process-March-2016.pdf>

Appendix 5 illustrates the Serious Case Reviews process for children

Safeguarding Adult Reviews

A Safeguarding Adult Review (SAB) is carried out when an adult dies as a result of abuse or neglect whether known or suspected or it is known or suspected that the adult has experienced serious abuse or neglect, and there is concern that partner agencies could have worked more effectively to protect the adult, the process is detailed in the 'SSAB Procedure for Safeguarding Adult Reviews and Multiagency Reviews 2015' https://www.surreycc.gov.uk/_data/assets/pdf_file/0006/47148/020315-SSAB-SAR-Protocol-final.pdf

Whether a SAR or SCR the appropriate Designated Safeguarding Professional will inform relevant agencies including the Care Quality Commission (CQC) and NHS England Regional Team when a Review is commissioned.

Appendix 6 illustrates the Safeguarding Adult Review Process

Commissioners responsibilities

As part of the process includes:

- All IMRs commissioned across the health economy will be submitted to the commissioners of service. Designated professionals will have a role in quality assuring on behalf of the CCG.
- The CCG will ensure that Designated professionals are given sufficient time and necessary support to contribute to the review process.
- The Designated professionals, on behalf of the commissioners, review and evaluate the practice of all involved health professionals. Designated professionals also have an important role in providing guidance on how to balance confidentiality and disclosure issues to ensure an objective, just and thorough approach to identifying lessons in the IMR.
- The CCG must ensure that the reviews, and all actions following the review, are carried out according to the timescale set out by the local safeguarding children board (LSCB) Strategic Case Review Group scoping and terms of reference.
- The SSCB Strategic Case Review Group and health and safeguarding sub-group will monitor the progress of identified recommendations and supporting action plans.

Case Reviews

Where the circumstances of a case are not appropriate for a Serious Case Review but warrant further investigation of safeguarding arrangements a Case Review may be undertaken. The purpose of the case review is similar to the serious case review processes in that it enables agencies and individuals to learn lessons and improve the way in which they work both individually and collectively to safeguard and promote the welfare of children. As with a Serious Case Reviews the lessons learned from a Case Review should also be disseminated effectively, and the recommendations should be implemented in a timely manner so that the changes required result, wherever possible, in children being protected from suffering or being likely to suffer harm in the future.

Domestic Homicide Review (DHR)

Statutory guidance places a duty on Community Safety Partnerships to make arrangements for Domestic Homicide Reviews. Health bodies are required to participate in these as requested (NHSE 2015).

DHR's are statutory reviews commissioned in response to deaths caused through domestic violence. They are subject to the guidance issued by the Home Office in 2006 under the Domestic Violence Crime and Victims Act 2004. The basis for the domestic homicide review (DHR) process is to ensure agencies are responding appropriately to

victims of domestic abuse offering and/or putting in place suitable support mechanisms, procedures, resources and interventions with an aim to avoid future incidents of domestic homicide and violence (SSAB 2016).

When victims of domestic homicide are aged between 16 and 18, there are separate requirements in statutory guidance for both a child Serious Case Review (SCR) and a Domestic Homicide Review (DHR). Where such reviews may be relevant to SAR (for example, because they concern the same perpetrator), consideration should be given to how SARs, DHRs and SCRs can be managed in parallel in the most effective manner possible so that organisations and professionals can learn from the case (Care Act 2014).

<https://www.gov.uk/government/collections/domestic-homicide-review>

Action Plans and Monitoring of Action Plans

For health services there are at least three points at which concerns about the conduct of safeguarding arrangements may result in actions for improvement being identified. These are;

- At a time after the first notification of the case is made, usually but not exclusively, by way of responding to the report of a Serious or Adverse Incident;
- Following completion of the IMR and / or the Health Overview report and; on publication of the recommendations of the final SCR report.

Providers are required to submit copies of action plans arising from all safeguarding concerns including IMR, SI's and Adverse Incidents to the relevant CCG. These will be subject to initial scrutiny by the appropriate designated professionals, who will provide advice regarding implementation for contract monitoring purposes.

Providers are also required to report progress against SCR, CR, and IMR action plans to the SSCB and SSAB on request. Progress against all safeguarding action plans will be routinely monitored by SSCB and SSAB Health and Safeguarding sub-group meeting.

7.6 Child Death Review (Statutory requirement)

The death of a child is a devastating loss that profoundly affects all those involved. The process of systematically reviewing the deaths of children is grounded in respect for the rights of children and their families, with the intention of learning what happened and why, and preventing future child deaths.

Revised statutory guidance *Working Together to Safeguard Children* (2018) replaces the requirement for LSCB's to ensure that child death reviews are undertaken by a child death overview panel (CDOP) with the requirement for "child death review partners" (consisting of local authorities and any CCG's for the local area) to make arrangements to review child deaths. The statutory responsibilities for child death review partners are set out in *Working Together to Safeguard Children* (2018).

The contact details for Surrey Wide CCG Designated Dr and Specialist Nurse for child deaths can be found in **appendix 2**.

7.7 People in positions of trust (formerly Managing Allegations against People who Work with Children and Adults at Risk)

Managing allegations against people who work with children and adults is a requirement of *Working Together to Safeguard Children (2018) (children)* and *The Care Act 2014 (adults)*

The procedure for managing allegations against people who work with children and adults at risk applies to a wider range of allegations than those in which there is reasonable cause to believe a child or adult at risk is suffering, or likely to suffer, significant harm. They also apply in cases where allegations indicate someone is unsuitable to continue to work or volunteer with children and adults at risk in his/her present position, or in any capacity.

The procedures for managing allegations should be read in conjunction with relevant policies of SSCB and SSAB and the CCG. In particular, the Human Resources Business Partner will be responsible for ensuring consistency with the CCG Disciplinary and Capability Policy and where appropriate will support the senior managers.

SSAB, Protocol for responding to concerns about a Person in a Position of Trust (PiPoT) Responsibilities, guidance and procedure for all SSAB partner agencies and their contracted service providers is available at:

https://www.surreycc.gov.uk/_data/assets/pdf_file/0006/91914/SSAB-Position-of-Trust-Protocol-ver2.pdf

SSCB, Dealing with Allegations Against People Who Work with Children is available at: <http://www.surreyscb.org.uk/professionals/dealing-with-allegations-against-people-who-work-with-children/>

These procedures are complementary to, and do not replace, any CCG policies and procedures in relation to governance and risk. Where appropriate, adverse Incidents and serious incident reporting will take place in accordance with policy.

In relation to children the CCG have designated the Associate Director for Safeguarding as the Senior Manager to whom allegations or concerns about employees and contractors such as Primary Care providers. In relations to adults the Designated Nurse Safeguarding Adults should be contacted. **Contact details are in Appendix 7.**

7.8 Safeguarding Training

All health organisations have a legal duty under Section 11 of the Children Act 2004 to ensure that their staff, and staff employed by services they commission to deliver health services, are trained to be alert to potential indicators of abuse and neglect of children, and to be able to respond appropriately to their role in addressing such concerns for the care and safety of a child.

The safeguarding training framework details what training and competences is expected of all healthcare staff in order to safeguard adults, children and young people. All Safeguarding training is consistent with the *Intercollegiate Document Safeguarding Children and Young people: roles and competences for health care staff* (2019), and *Working Together* (HM Government 2018), *Looked after children: Knowledge, skills and competences of health care staff Intercollegiate Role Framework* (March 2015) and *Safeguarding Adults: Roles and competences for health care staff – Intercollegiate Document* (2018).

The training for safeguarding adults is underpinned by The Care Act 2014. This guidance requires statutory, voluntary and independent sector agencies to work together to produce policy, guidance and training about working with adults in need of safeguarding, including Mental Capacity Act and domestic abuse competencies.

It is the responsibility of managers to evaluate the different roles within their organisation at the recruitment stage to determine the level of safeguarding adults and child training that is commensurate with the job role. Adherence to the levels will be reviewed through the Performance and Development Review process (PDR).

PREVENT

CCGs and providers of commissioned services must ensure that healthcare staff receive Prevent awareness training appropriate to their role using the NHS England Prevent Training and Competences Framework.

Prevent is part of existing safeguarding responsibilities for the health sector, not an additional responsibility. Healthcare workers have the opportunity to refer vulnerable individuals for support in a pre-criminal space by:

- Recognising adults at risk, children and young people who may be at risk of radicalisation
- Working in partnership to reduce risk and protect the individual and
- Providing adequate and necessary support as part of a proportionate multi-agency response to any concerns.

The role of PREVENT Lead for the CCG's is delivered by the County wide Safeguarding Nurse Advisor for Adults & Children. **Contact details in appendix 2**

See Appendix 8 for local and national safeguarding issues for children and adults.

7.9 Assurance and Governance

Assurance will be required by the SSCB and SSAB that **all** staff have been trained to an appropriate level in safeguarding adults, children and young people. In order to provide assurance to the CCG, all commissioned/contracted services will record information including:

- Numbers of staff requiring each level of training as stated in Roles and Competencies for Health Care Staff: Intercollegiate Document 2019, Looked

after children: Knowledge, skills and competences of health care staff
Intercollegiate Role Framework (March 2015) and Safeguarding Adults: Roles
and competences for health care staff – Intercollegiate Document (2018).

7.10 Dissemination and Implementation of Policy

This Policy will to be circulated to all staff within the CCG. It will also inform the contracting process with commissioned services. The policy will be included in the documents library on the intranet.

7.11 Approval and Ratification Process

The Policy will be approved by the individual CCG Quality and Patient Safety Lead and ratified by the Clinical Commissioning Governing Body.

7.12 Policy Review

This policy will be subject to a routine annual review, and will also be subject to alteration if required through the creation of additional national policy, legislation or guidance and / or local guidance. If revised, all stakeholders will be alerted to the new version. The review will be conducted by the Safeguarding adult and children team.

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Appendix 1 – Definitions

Children

Child protection

Is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or likely to suffer significant harm.

Child in need

Children who are defined as being 'in need' under section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child who is disabled. The critical factors to be taken into account in deciding whether a child is in need under the Children Act 1989 are:

- What will happen to a child's health or development without services being provided
- ;and the likely effect the services will have on the child's standard of health and development

Children in need under section 17 may be assessed by children's services in relation to their special educational needs, disabilities, or as a carer, or because they have committed a crime. A section 17 assessment should also be undertaken for children whose parents are in prison and for asylum seeking children.

Significant Harm

Some children are in need of protection because they are suffering, or likely to suffer significant harm. The Children Act (1989) section 47 places a duty on a Local Authority children's service to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer significant harm. It identifies significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the child.

What is Abuse and Neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely by a stranger. They may be abused by an adult or adults or another child or children. Forms of abuse are:

- **Physical abuse:** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to child.

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities including prostitution whether or not the child is aware of what is happening.
- **Neglect:** persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
- **Emotional abuse:** persistent emotional maltreatment of a child such as to cause severe and persistent adverse effect on the child's emotional development. This includes a child witnessing or seeing the ill-treatment of another.

Looked After Children

In England and Wales the term 'looked after children' is defined in law under the Children Act 1989. A child is looked after by a local authority if he or she is in their care or is provided with accommodation for more than 24 hours by the authority.

The term 'looked after children and young people' is generally used to mean those looked after by the state, according to relevant national legislation which differs between England, Northern Ireland, Scotland and Wales. This includes those who are subject to an interim care order, care order (The Children Act 1989 section 31, 38) or temporarily classed as looked after on a planned basis for short breaks or respite care. The term is also used to describe 'accommodated' (The Children Act 1989, section 20) children and young people who are looked after on a voluntary basis at the request of, or by agreement with, their parents. We refer to these children as 'children in care'.

The term 'looked after children' includes unaccompanied asylum seeking children, children in friends and family placements, and those children where the agency has authority to place the child for adoption. It does not include those children who have been permanently adopted or who are on a special guardianship order.

The Children (Leaving Care) Act 2000 states that a Care Leaver is someone who has been in the care of the Local Authority for a period of 13 weeks or more spanning their 16th birthday. CCG's should ensure that there are effective plans in place to enable Looked After Children aged 16 – 17 to make a smooth transition into adult hood. (Dfe DH 2015)

Young carers

Young carers are children and young people who assume important caring responsibilities for parents or siblings, who are disabled, have physical or mental ill health problems, or misuse drugs or alcohol.

Adults

Abuse occurs in many forms and can occur in any relationship. It may result in significant harm of the person subjected to it. Abuse or neglect can take many forms

and the circumstances of the individual case should always be considered. It can include the following examples:

- **Neglect and acts of omission:** such as 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
- **Physical Abuse:** such as assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions
- **Psychological Abuse:** such emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Sexual Abuse:** such as rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting
- **Domestic Abuse:** which includes psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.
- **Forced Marriage:** when one or both spouses do not consent to the marriage. This differs from an arranged marriage, which has been consented to by both parties.
- **Financial or Material Possessions:** such as theft, fraud, internet scamming, 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.
- **Discrimination:** includes forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion
- **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.
- **Civil Rights:** denial of the right to be treated with dignity and respect, freedom of speech and movement.

- **Hate Crime:** defined as any crime that is perceived by the victim, or another person, to be due to a person's race, religious belief, gender identity or disability. This is based on the perception of the victim or another person and is not reliant on evidence.
- **Mate Crime:** when someone has faked a friendship in order to take advantage of a vulnerable person, committed by someone known to the victim, either for a long time or a more recent friendship.
- **Female Genital Mutilation (FGM):** a procedure that involves the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons.
- **Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. 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.
- **Self-neglect:** this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Appendix 2 – Contact Details Surrey Wide CCG Safeguarding Children and Adults Team

Surrey Wide CCG

Associate Director for Safeguarding Children and Adults / Designated Nurse Safeguarding Children

Amanda Boodhoo

Email: amanda.boodhoo@nhs.net

Mobile: 07799622327

Surrey Wide CCG

Designated Nurse for Safeguarding Adults

Helen Blunden

Email: Helen.blunden@nhs.net

07894 599133

Surrey Wide CCG

Deputy Designated Nurse for Safeguarding Children / Designated Nurse Looked after Children

Linda Cunningham

Email: lindacunningham2@nhs.net

Mobile: 07748111917

Surrey Wide CCG

Deputy Designated Nurse for Safeguarding Children / Designated Nurse Looked after Children

Rachel Redwood

Email: Rachel.redwood@nhs.net

Mobile: 07827663746

Surrey Wide CCG

Deputy Designated Nurse for Safeguarding Children

Sharon Hammond

Email: sharon.hammond3@nhs.net

Mobile: 07833 407832

Surrey Wide CCG

Safeguarding Adults and Children Business Manager

Lisa Parry

Email: lisa.parry1@nhs.net

Mobile: 0750 0990623

Surrey Wide CCG

Safeguarding Adults and Children Business Support

Anna Miles

Email: anna.miles3@nhs.net

Mobile: 07500 953839

Surrey Wide CCG

Surrey Wide CCG Safeguarding Children and Looked After Children Administrator

Karen Overington

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Tel: 07920 831879

Surrey Wide CCG

Designated Doctor Safeguarding Children

Dr Kate Brocklesby

Tel 01932 722329 Fax 01932 723151

Email: kate.brocklesby@asph.nhs.uk

Surrey Wide CCG

Designated GP Safeguarding Children and Adults

Dr Tara Jones

Email: Tara.jones@nhs.net

Mobile: 07768 252202

Surrey Wide CCG

Named GP Safeguarding Children

Dr Sharon Kefford

Email: Sharon.kefford@nhs.net

Mobile; 07768 107210

Surrey Wide CCG

Designated Doctor for Child Death Reviews

Dr Paul Wright

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Tel: 01737 768511 ext. 6863

Surrey Wide CCG

Specialist Nurse for Child Death Reviews

Nicola Eschbaecher

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Email: n.eschbaecher@nhs.net

Surrey Wide CCG

Safeguarding Nurse Advisor for Adults and Children

Noreen Gurner

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Mobile: 07471-142048

Surrey Wide CCG

Safeguarding Nurse Advisor for Adults and Children

Rebecca Eells

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Mobile: 07392 273318

Surrey Wide CCG

Designated Doctor for Looked After Children

Dr Sharon Kefford

Email: sharon.kefford@nhs.net

Mobile: 07768 107210

Surrey Wide CCG

Co-ordinator for Looked After Children

Angela Heather
Email: angelaheather@nhs.net
Tel: 07714956298

Appendix 3 – Safeguarding Arrangements within NHS Trusts, Foundation Trusts and Private Healthcare Providers

All provider health organisations are required to have effective arrangements in place to safeguard adults at risk and children and to assure themselves, regulators and their commissioners that these are working.

Key examples of health work to support the safeguarding of adults at risk and children include:

- Identifying children and families who would benefit from early help. This requires all professionals, including those in universal services and those providing services to adults with children, to understand their role in identifying emerging problems and to share information with other professionals to support early identification and assessment
- Routine enquiry regarding domestic abuse in adult setting
- Assessment of impact of adult health problems on children in the household i.e. needs of young carers

Specific arrangements

- Adhere to National, local SSCB, SSAB policies and procedures
- A Board executive lead for safeguarding who takes responsibility for governance, systems and organisational focus on safeguarding adults at risk and children.
- Named Doctor and Nurse safeguarding children (Named Midwife for maternity services) and a Lead Professional for safeguarding adults at risk who have a key role in promoting good professional practice within their organisation, and provide advice, expertise and training strategy within their organisation.
- All providers are required to have an MCA lead who is responsible for providing support and advice to clinicians in individual cases and supervision for staff in areas where these issues may be particularly prevalent and/or complex
- Safe recruitment including compliance with the Disclosure and Barring system; job descriptions which reflect requirements for staff to have due regard for safeguarding and promoting the welfare of children and adults at risk.
- A Named Senior Officer (NSO) must be identified who will lead on allegations against staff working with adults at risk and children.
- Have a training strategy and plan in place informed by a training needs analysis with regard to safeguarding, safe recruitment and specific areas of need such as domestic abuse, child sexual exploitation, FGM and Prevent. Evidence of the effectiveness of all training delivered must be evaluated. The training

programme must comply with the safeguarding children training levels in the Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff intercollegiate document (2019), Looked after children: Knowledge, skills and competences of health care staff Intercollegiate Role Framework (March 2015), Safeguarding Adults: Roles and competences for health care staff – Intercollegiate Document (2016). and NHS England Prevent Training & Competency Framework .

- Arrangements for the provision of safeguarding adults and children supervision for staff to promote good practice. Named and Lead professionals must access safeguarding supervision from the appropriate CCG Designated Safeguarding Professionals.
- Inform appropriate Designated Nurses or Doctor of any serious incidents involving adults at risk and children and confirm that the incident has been reported in accordance with the NHS England and CCG requirements.
- Comply with the SSCB SSAB and Designated Nurse requests for information or reports in relation to serious case reviews, Safeguarding Adults Reviews or other multi agency reviews
- Work with the Designated Professionals SSAB and SSCB in developing and implementing an audit programme to provide evidence of improved outcomes for adults at risk and children.
- Ensure staff understand their responsibilities in identifying and respond to risk factors in abuse or neglect

Appendix 4 – Multi-Agency Safeguarding Hub (MASH)

The Surrey Multi-Agency Safeguarding Hub (MASH) is the single point of contact for reporting concerns about the safety of a child, young person or adult at risk. It aims to improve the safeguarding response for children and adults at risk of abuse or neglect through better information sharing and high-quality and timely responses.

The Surrey MASH achieves this by co-locating agencies. It brings together Surrey County Council social care workers for both children and adults, early help services, health workers and police as well as a vast array of virtual partners across Surrey. Its aim is to identify need, risk and harm accurately to allow timely and the most appropriate intervention.

Phone number: 0300 470 9100

Internal email name: Surrey MASH/CAE/SCC

Secure email: ascmash@surreycc.gov.uk Adults

csmash@surreycc.gov.uk Children

Fax: 01483 519862

The MASH will operate Monday to Friday from 9am to 5pm.

Surrey County Council Emergency Duty Team (Out of Hours Service)

PO Box 473, Guildford Surrey GU4 7ZL Telephone: 01483 517898

Fax: 01483 517895 Minicom: 01483 517844

Textphone 07968 833626 Email: edt.ssd@surreycc.gov.uk

Surrey Police

You can contact the police using the non-emergency number, 101, or in an emergency where the safety of a child, young person or adult is at immediate risk, dial 999.

RAIS – Referral, Assessment and Intervention service

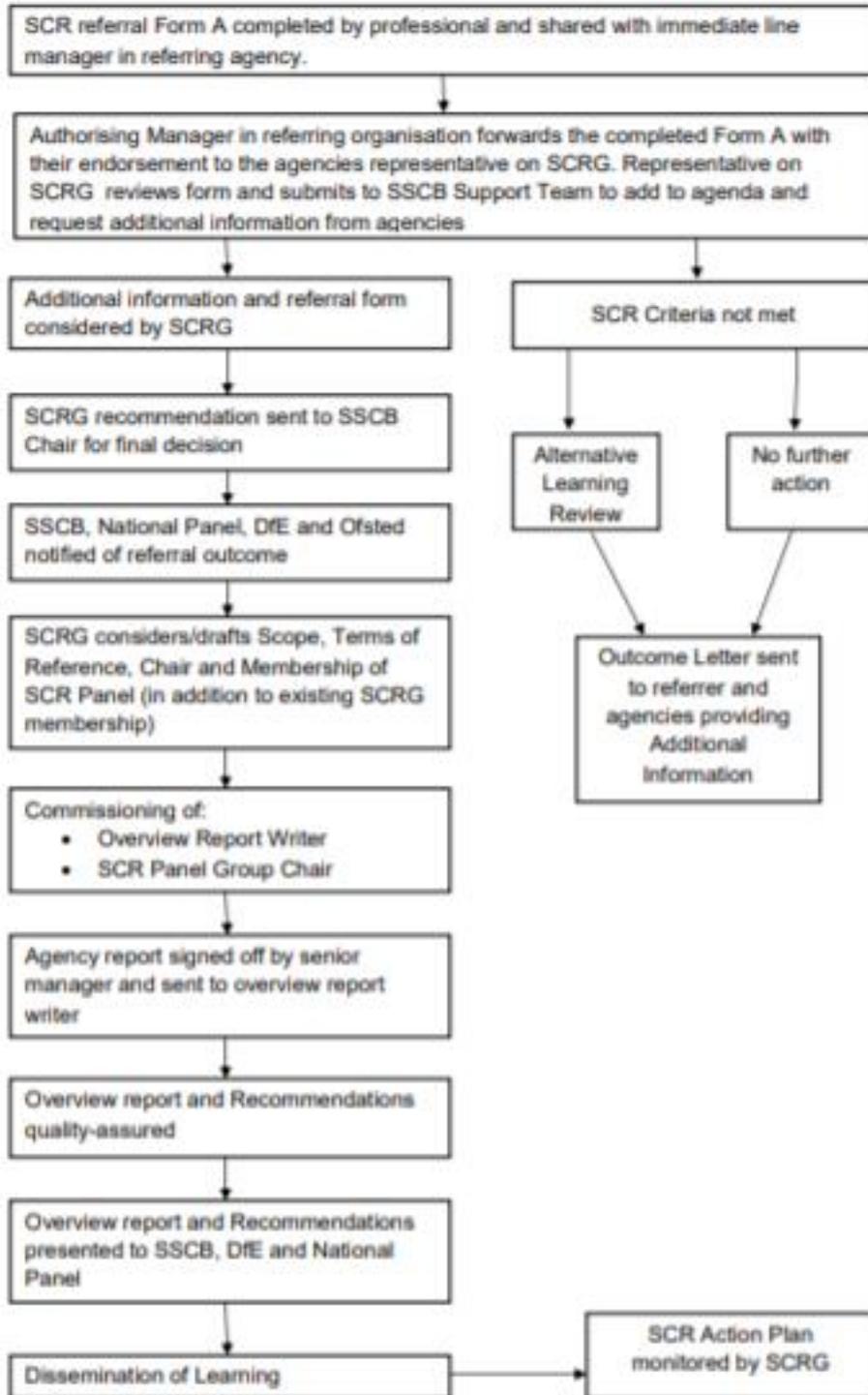
NB The telephone numbers and email addresses for the Children’s Social Services RAIS will be replaced by the MASH for reporting a concern about a child. The RAIS numbers will continue to operate for contacting a specific social worker, but will no longer be advertised as a way to report a safeguarding concern for a child or young person.

North East area Spelthorne, Elmbridge and Epsom & Ewell	0300 123 1610*
South East area Mole Valley, Reigate & Banstead and Tandridge	0300 123 1620*

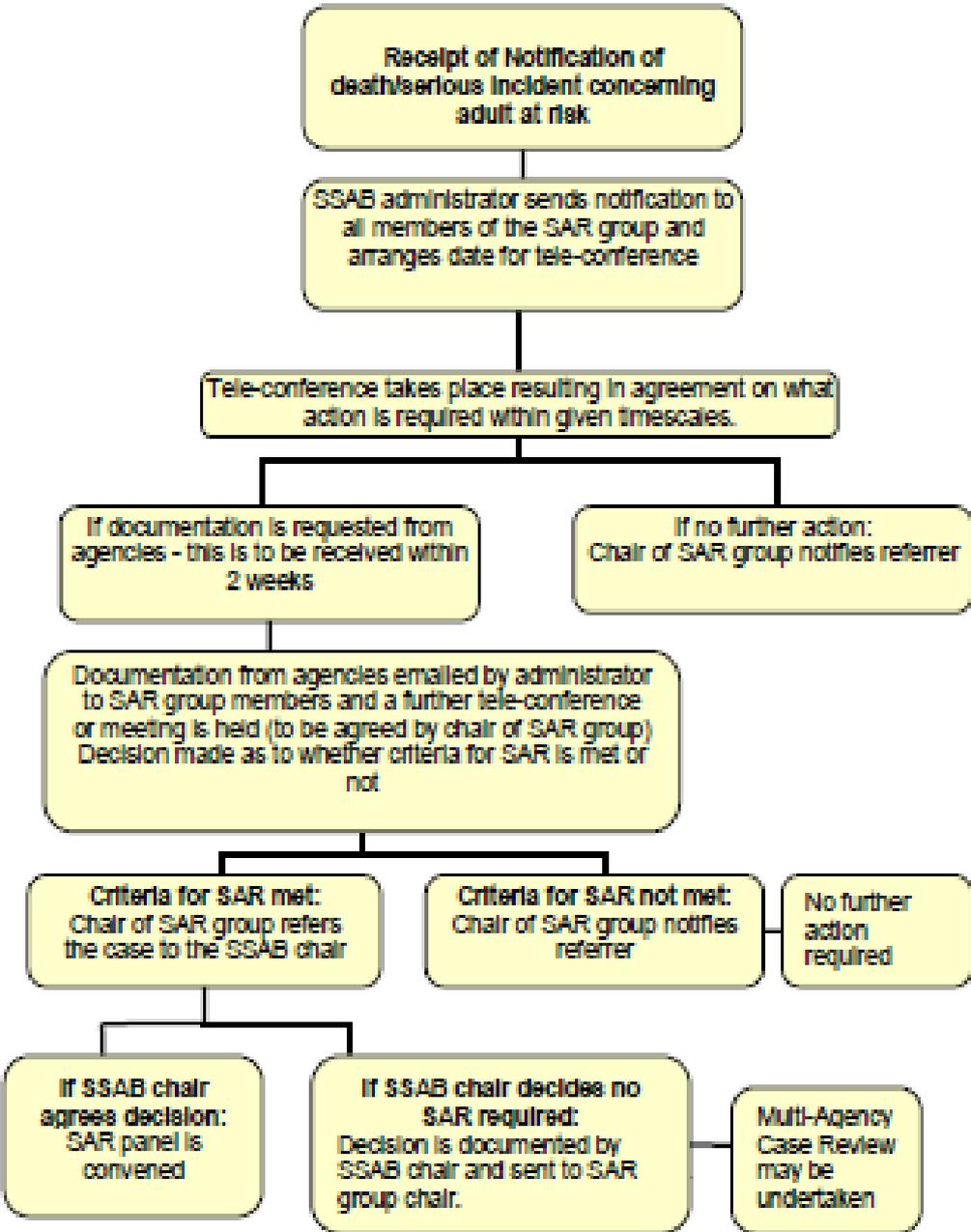
North West area Runnymede, Surrey Heath and Woking	0300 123 1630*
South West area Guildford & Waverley	0300 123 1640*

Appendix 5 – Serious Case reviews Process

SCRG Referral Process Flowchart



Appendix 6 – Safeguarding Adult Review Process:



Appendix 7 – Managing Allegations against People who Work with Children

Senior Manager to whom allegations or concerns should be reported to

Amanda Boodhoo Associate Director of Safeguarding

amanda.boodhoo@nhs.net

Mobile: 07799622327

Deputy Senior Manager to whom reports should be made in the absence of the designated senior manager or where that person is the subject of the allegation or concern

Linda Cunningham Deputy Designated Nurse Safeguarding Children

Lindacunningham2@nhs.net

Mobile: 07748111917

Designated Nurse for Safeguarding Adults

Helen Blunden

Email: Helen.blunden@nhs.net

07894 599133

Local Authority Designated Officer (LADO)

Allegations consultations

Phone number: 0300 470 9100

Internal email name: Surrey MASH/CAE/SCC

Email: mash@surreycc.gov.uk

Secure email: mash@surreycc.gcsx.gov.uk

The MASH operates Monday to Friday from 9am to 5pm.

Surrey County Council Emergency Duty Team (Out of Hours Service)

PO Box 473, Guildford Surrey GU4 7ZL Telephone: 01483 517898

Fax: 01483 517895

Minicom: 01483 517844

Textphone 07968 833626

Email: edt.ssd@surreycc.gov.uk

Appendix 8 – Local and National Safeguarding Issues for Children and Adults

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse. There is increasing awareness nationally and locally of the risks posed to children from sexual exploitation, missing from care person does not recognise the coercive nature of the relationship and does not see himself or herself as a victim of exploitation. Local arrangements for reducing the risk of CSE include the Risk Management Meetings (RMM) These meetings are held to share information and intelligence to develop a detailed profile of CSE in Surrey. The CCG representation is provided through the Designated Doctor for Safeguarding Children and Designated Nurse Looked After children.

CCG's will also need to ensure that its commissioned services have in place effective arrangements to identify and support young people at risk of CSE. The CCG's identified lead officer for CSE is the Designated Doctor for Safeguarding Children.

Further information on CSE and can be accessed on the SSCB website:

[http://www.surreyscb.org.uk/professionals/guidance-protocols /home/education and trafficking](http://www.surreyscb.org.uk/professionals/guidance-protocols/home/education%20and%20trafficking). A common feature of CSE is that the child or young

Female Genital Mutilation

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM is an illegal practice that causes significant physical, mental and emotional harm.

In March 2015 the Department of Health published "Commissioning Services to support women and girls with Female Genital Mutilation" sets out some elements that make up a successful and safe service to support women and girls with female genital mutilation (FGM)

Mandatory Reporting duty for FGM came into force as of 31st October 2015 as part of the Serious Crime Act 2015. All regulated health and social care professionals and teachers in England and Wales have a duty to report 'known' (visually identified or verbally disclosed) cases of FGM in under-18s to the police. The duty will not apply in relation to at risk or suspected cases, or in cases where the woman is over 18. In these cases, professionals need to follow existing local safeguarding procedures. A Department of Health leaflet has been developed that professionals can use with patients and or families, to help when discussing making a report to the police. Please click on the link to view FGM mandatory reporting resources <https://www.gov.uk/government/publications/fgm-mandatory-reporting-in-healthcare>

On the 1st April 2016 the government published new national statutory multiagency guidance on FGM. Please click on the link to for full details statutory multi-agency guidance on FGM <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>.

Domestic Abuse – Coercive Control

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: Psychological physical sexual financial emotional

The Serious Crime Act 2015 (the 2015 Act) received royal assent on 3 March 2015. The Act creates a new offence of controlling or coercive behaviour in intimate or familial relationships (section 76). The new offence closes a gap in the law around patterns of controlling or coercive behaviour in an ongoing relationship between intimate partners or family members. The offence carries a maximum sentence of 5 years' imprisonment, a fine or both. Further information can be accessed at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/482528/Controlling_or_coercive_behaviour_-_statutory_guidance.pdf

To protect adults who experience domestic abuse and their children will require inter-agency working and information sharing. The use of Multiagency Risk Assessment Conference (MARAC) process should be part of the multi-agency working framework. The MARAC is an information sharing process that focuses on developing safety planning for adults assessed to be at high risk of domestic violence. The CCG will need to ensure that arrangements are in place across the health economy to support the work of MARACs.

The CCG recognises that staff may experience domestic abuse in their personal relationships and will take steps to provide support and onward referral in accordance with the Domestic Abuse Support for Staff Workforce Policy

Prevent

Contest is the UK's counter-terrorism strategy that aims to reduce the risk we face from terrorism so that people can go about their lives freely and with confidence. The Prevent strategy is one work stream within this agenda and it aims to stop people becoming terrorists or supporting terrorism. Prevent is different from the other work streams as it operates in the pre-criminal space. Prevent is about supporting and protecting those people that might be susceptible to radicalisation, ensuring that individuals are susceptible to radicalisation.

There is no single profile of a terrorist and it is not about race, religion or ethnicity. The many contacts staff have with people through their work in the NHS mean that they may well come across someone who is being exploited for terrorism. There are factors which can make individuals susceptible to the terrorist message, including factors personal to the individual, such as low self-esteem and rejection, and external factors such as foreign policy and group identity.

Radicalisation is a process and not an event and at points through the process it is possible to intervene. Frontline staff in the NHS can potentially make a difference to supporting and redirecting individuals who are being exploited in this way.

The Prevent strategy aims to stop people becoming terrorists or supporting terrorism. The health sector is involved in two key objectives:

To prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.

- To work with sectors and institutions where there are risks of radicalisation that we need to address.

Prevent is part of existing safeguarding responsibilities for the health sector, not an additional responsibility. Healthcare workers have the opportunity to refer vulnerable individuals for support in a pre-criminal space by:

- Recognising adults at risk, children and young people who may be at risk of radicalisation;
- Working in partnership to reduce risk and protect the individual and
- Providing adequate and necessary support as part of a proportionate multi-agency response to any concerns.

Appendix 9 – Procedural Document Checklist for Approval

Title of document being reviewed:		Yes/No/Unsure	Comments/ Details
A	Is there a sponsoring director?	Yes	
1.	Title		
	Is the title clear and unambiguous?	Yes	
	Is it clear whether the document is a guideline, policy, protocol or standard?	Yes	
2.	Rationale		
	Are reasons for development of the document stated?	Yes	
3.	Development Process		
	Do you feel a reasonable attempt has been made to ensure relevant expertise has been used?	Yes	
	Is there evidence of consultation with stakeholders and users?	Yes	
4.	Content		
	Is the objective of the document clear?	Yes	
	Is the target group clear and unambiguous?	Yes	
	Are the intended outcomes described?	Yes	
5.	Evidence Base		
	Is the type of evidence to support the document identified explicitly?	Yes	
	Are key references cited?	Yes	
6.	Approval		
	Does the document identify which committee/group will approve it?	Yes	
7.	Dissemination and Implementation		
	Is there an outline/plan to identify how the document will be disseminated and implemented amongst the target group? Please provide details.	Yes	To be cascaded via CCG Communications Team and displayed on public facing website
8.	Process for Monitoring Compliance		
	Have specific, measurable, achievable, realistic and time-specific standards been detailed to <u>monitor compliance</u> with the document? Complete Compliance & Audit Table.	Yes	Managers are to ensure their staff they are aware of, and adhere to, the Policy.
9.	Review Date		
	Is the review date identified?	Yes	
10.	Overall Responsibility for the Document		
	Is it clear who will be responsible for implementing and reviewing the documentation i.e. who is the document owner?	Yes	

Title of document being reviewed:		Yes/No/ Unsure	Comments/ Details
Director Approval			
On approval, please sign and date it and forward to the chair of the committee/group where it will receive final approval.			
Name		Date	
Signature			
Committee Approval			
On approval, Chair to sign and date.			
Name		Date	
Signature			

Appendix 10 – Compliance and Audit Table

Criteria	Measurable	Frequency	Reporting to	Action Plan/ Monitoring
All managers are responsible for ensuring that staff are aware of, and adhere to, the Policy and for ensuring that all staff are updated with regards to any changes or amendments to the Policy	100%	Annually	Quality Committees	Directorate Team Meetings
Monitoring of adherence with this policy: Reports Bi-annually via annual report and 6 month update.	100%	Bi-annually	Quality Committees	Directorate Team Meetings