



Safeguarding Adults Policy & Procedure

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Why the policy is important

Safeguarding is the responsibility that organisations have to ensure their staff, volunteers and activities do no harm to children and adults at risk, and that they do not expose them to harm or abuse.

This policy and procedures set out how we promote and manage safeguarding with a consistent approach.

Milewood is committed to empowering and protecting adults who are at risk of abuse and neglect, as defined in legislation and statutory guidance.

As well as safeguarding people we support, we recognise the importance of safeguarding all staff from harm when at work or in providing a service. The safeguarding policy and procedures and are meant to work in conjunction with both Health and Safety and People policies.

This policy includes statements reflecting current best-practice requirements on:

- what is abuse
- the different types of abuse
- how to prevent abuse
- overview of the safeguarding procedures, with reference to current legislation
- how staff and people we support should raise concerns
- description of the role and responsibilities of the designated safeguarding lead
- how Milewood enquires into and follows up allegations of abuse /harm
- how Milewood works in partnership with the local authority safeguarding team

We make our policy available and provide information to everyone in forms that they can understand so that they know how to raise any safeguarding concern to us, to the local authority safeguarding team or to the Care Quality Commission (CQC).

All staff receive training in the policy, and its implementation in relation to their role. We keep our staff well informed about our [Freedom To Speak Up/ Whistleblowing policy](#) and their rights and responsibilities to voice their concerns about people's safety and wellbeing to our leadership team, or failing that, to escalate them directly to the local authority safeguarding team or to the CQC.

Our policy covers all the sections recommended by the Local Authority Adults Safeguarding Board guidance.

The term abuse will be used to cover all types of abuse, whether an allegation, suspicion or actual abuse. For any child protection related issues please use the [Child Protection Policy](#).

The impact of not implementing this policy

If staff do not follow this policy

- People we support may suffer a breach of their human rights
- People we support may be abused or harmed
- People we support or their representatives may lose trust in us and not want us to support them anymore
- Staff may be at risk of allegations of abuse or poor safeguarding practice
- Milewood's reputation may be affected
- We may have action against us from our regulators or local authorities who commission our services.

Contacts to call if you suspect an adult at risk is being abused or neglected

- Milewood Designated Safeguarding Lead/ Deputy/ Officers
- **If immediate risk of harm – contact emergency services**



- 999 (hearing)
- 18000 (text relay for deaf)
- 18001 (Relay UK app)
- TapSOS (TapSOS is completely non-verbal app)
- 999BSL (app for deaf BSL users)
- Care Quality Commission (CQC) - 03000 616161
- Local Authority Safeguarding Board – see local authority website for reporting details

Who is the policy for?

This policy is a Milewood Group policy, meaning it applies to all subsidiaries. The policy applies to Milewood staff, volunteers and anyone working on behalf of Milewood.

Definitions

Person subject of the concern: this is the person who is at risk of or has experienced harm or abuse. The old term would be ‘victim’. We no longer use this language as it helps people see that they can move on from the harm or abuse without the label.

Person of concern: this is the person who is the alleged perpetrator or cause of the harm or abuse.

Survivor: A person who has been abused or exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive.

Adult at risk: In England an adult at risk is defined as a person over the age of 18 who

- ‘Has needs for care and support (whether or not the local authority is meeting any of those needs)
- Is experiencing, or at risk of, abuse or neglect
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect’. (Care Act 2004, section 42)

Safeguarding Adults: ‘Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. 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 adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances’. (Care and Support Statutory Guidance 2018 s.14.7, England).

Abuse: is ‘a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual or violates their human or civil rights’.

What forms can abuse take?

The Care and support statutory guidance identifies ten types of abuse, these are:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

Physical abuse or harm: including assault, hitting, slapping, pushing, misuse of medication, inappropriate or excessive restraint or inappropriate physical sanctions.

Domestic violence: (including psychological, physical, sexual, financial, emotional abuse; ‘honour’ based violence.) 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

Sexual abuse or harm: refers to - 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 or does not have the mental capacity to consent.

Psychological or emotional abuse: including 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.

Financial or material abuse: including 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.

Modern Slavery: Modern Slavery includes human trafficking, forced labour and debt bondage, sexual exploitation, criminal exploitation, domestic servitude, descent-based slavery, child labour, slavery in supply chains, and forced and early marriage.

Discriminatory abuse: including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational abuse or harm: 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 a person's own home. This may be a one-off incident or on-going ill-treatment. It can refer to neglect or poor professional practice because of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission: include ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, equipment, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect, self-harm and hoarding: This includes a broad spectrum of behaviour. The Statutory Guidance defines self-neglect as: "a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding". Self-neglect is recognised as the failure or unwillingness by an individual to meet their own basic care needs required to maintain health. It should be noted that self-neglect or hoarding may well prompt a Section 42 Enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on an adult's ability to protect themselves by controlling their own behaviour. Chronic self-neglect and/or hoarding is likely to have developed over many years, and it may be considered a safeguarding concern at the point:

- where the person with care and support needs can no longer control their behaviour, so they cannot protect themselves
- where there is a defined high risk of harm to the individual
- where the physical / environmental risk to others is significant.

For more information and guidance about supporting a person who is self-neglecting or hoarding contact the Designated Safeguarding Lead for advice. The local authority the person is resident in may have Self-Neglect and Hoarding Guidance and suggested templates for screening and assessment.

Where the hoarding does not meet the criteria for a safeguarding intervention under the Care Act, the principles of safeguarding can still be applied, where people work together with the adult, forming a 'team around the person', to prevent harm and support well-being.

There are additional types of abuse listed below:

Controlling Behaviour: Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive Behaviour: Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their person subject of the concern.

Forced Marriage: A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party in identifying a spouse. Forced marriage can be a particular risk for people with learning difficulties and people lacking capacity

Exploitation by radicalisation: The Home Office leads on the anti-terrorism PREVENT strategy, of which CHANNEL is part of (refer to www.gov.uk for information). This aims to stop people becoming terrorists or supporting extremism. CHANNEL particularly looks at stopping people who are identified at risk from being drawn in. All local organisations have a role to play in safeguarding people who meet the criteria. Contact should be made with Police regarding any individuals identified who present concern regarding violent extremism.

Sexual exploitation: The term "sexual exploitation" means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. It may be very important in specific cases to be clear about the context in which concerns about sexual exploitation arise. Some individuals may have been groomed as children or young people, whilst others may be engaged as sex workers so are at risk because they are threatened or coerced, have drug dependencies and/or mental health needs. People with learning disabilities may be led into harm because of perceptions they are being offered friendships.

Human Trafficking: The definition of human trafficking is the illegal movement of people through force, fraud or deception with the intention of exploiting them, typically for the purposes of forced labour or sexual exploitation. Men, women and children are forced into a situation through the use (or threat) of violence, deception or coercion. People at risk may enter the UK legally, on forged documentation or secretly under forced hiding, or they may even be a UK citizen living in the UK who is then trafficked within the country, although this should not be confused with people smuggling. People smuggling is where the person has the freedom of movement upon arrival in the UK. There is no 'typical' person subject of the concern of human trafficking and modern slavery. People at risk can be men, women and children of all ages, ethnicities, nationalities and backgrounds. It can however be more prevalent amongst the most at risk members of society, and within minority or socially excluded groups.

Internet/ technology safeguarding/ cyberbullying: can be defined as the use of technology, and particularly mobile phones and the internet, to deliberately hurt, upset, harass or embarrass someone else. It can be an extension of face-to-face bullying, with the technology offering the bully another route for harassing the person subject of the concern or can be simply without motive. Cyberbullying can occur using practically any form of connected media, from nasty text and image messages using mobile phones, to unkind blog and social networking posts, or emails and instant messages, to malicious websites created solely for the purpose of intimidating an individual or virtual abuse during an online multiplayer game.

Mate Crime: Mate Crime and grooming: Mate Crime occurs when someone 'makes friends' with a person and goes on to abuse or exploit that relationship. This may be for financial or sexual gain. The relationship is likely to be of some duration and, if unchecked, may lead to a repeat and worsening abuse. The person may not be aware that this is happening to them. Mate crime can happen to anyone but adults with learning disabilities are especially vulnerable. A 'mate' may be a 'friend', family member, supporter, paid staff or another person with a disability.

Hate Crime: Hate crimes and incidents can be against the person or property. Hate Crime can be motivated by the offender's hatred of people who are seen as being different. An adult or child may be a victim because of race, religion, disability, age, sexuality or gender.

Cuckooing: Is a practise where people take over another person's home, usually to sell or store drugs, use the home for sex work or to live in the property themselves. Sometime move into the home to financially abuse the person.

Antisocial behaviour: There are also various forms of antisocial behaviour that intentionally or unintentionally can result in being abused or harmed. These include general rowdiness, creating lots

of noise, keeping people awake, interfering and invasions of people’s privacy. Milewood might need to act in response to antisocial behaviour with the responsible authorities.

Responsibilities

Every member of staff has a responsibility for safeguarding.

Anyone who has or wishes to raise a safeguarding concern can go to one of the Designated Safeguarding Lead/ Deputy/ Officers in the first instance. They can advise on the procedures to be followed and act directly if the situation requires it.

Any staff member can go directly to the local authority safeguarding team or CQC if they feel their concern isn’t being acted on or if the allegation involves senior managers.

<p>Head of Quality, Governance & Safeguarding/ Designated Safeguarding Lead</p>	<p>Responsibilities include</p> <ul style="list-style-type: none"> • To ensure governance and oversight of safeguarding at Milewood • To ensure safeguarding is resourced and is high-profile across the organisation • To develop systems and structures within which it is possible to deliver the best possible care and support • To encourage a culture and ethos that is hostile to any sort of abuse/ harm • To produce and regularly review the policies and procedures to prevent and manage abuse/ harm • To ensure training for staff in all aspects of safeguarding, abuse/ harm and protection • To advise and guide in safeguarding referrals and investigations • To ensure any evidence of abuse/ harm is investigated speedily and sympathetically • To implement improvements to company policy and systems if an investigation into abuse/ harm reveals deficiencies in the way in which Milewood operates <p>Jill Roberts Head of Quality, Governance & safeguarding jill.roberts@milewood.co.uk Mobile/ text: 07510 574411</p>
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<p>Deputy Designated safeguarding Lead</p>	<ul style="list-style-type: none"> To be appropriately trained and support the Designated Safeguarding Lead & deputise in their absence for safeguarding matters <p>Keeley Cremona Chief Operating Officer keeley.cremona@milewood.co.uk Mobile/ text: 07596 954500</p>
<p>Regional Operations Managers/ Designated Safeguarding Officers</p>	<ul style="list-style-type: none"> To be appropriately trained and be the first point of contact for safeguarding concerns/ allegations in their area To support the DSL to manage and report safeguarding incidents in their area To will make sure that all staff are aware of this policy and operate within it To promote the discussion of safeguarding at team meetings and as part of supervision or one-to-one meetings. To monitor, advise and guide service managers' compliance with the policy To ensure service quality and safety in the application of the policy To make sure that risk assessments are carried out to identify and evaluate risks to/ from people we support and staff To ensure that learning is shared To ensure any evidence of abuse/ harm is investigated speedily and sympathetically as directed by the DSL To implement improvements to service procedures if an investigation into abuse/ harm reveals deficiencies in the way in which Milewood operates To collaborate with all other relevant agencies in combating abuse/ harm and improving the safeguarding and protection of the people we support To liaise with the relevant safeguarding adult's authority teams and following their guidance and instructions where applicable, including the issues arising from multi-agency involvement To ensure the CQC and Local Authority are notified of all instances of abuse, alleged or suspected abuse, using its inline reporting procedures. <p>Rebecca Vickers Regional Operations Manager rebecca.vickers@milewood.co.uk Mobile/ text: 07542321436</p>



	<p>Kieran Mann Regional Operations Manager Kieran.mann@milewood.co.uk Mobile/ text: 07561805383</p> <p>Samantha Hunt Regional Operations Manager Samantha.hunt@milewood.co.uk Mobile/ text: 07542 321435</p> <p>Kelly Rose Regional Operations Manager Kelly.rose@milewood.co.uk Mobile/ text: 07394873349</p> <p>Farah Hutchinson – On maternity leave currently Regional Operations Manager Farah.hutchinson@milewood.co.uk Mobile/ text: 07712 306968</p>
<p>Service Managers</p>	<ul style="list-style-type: none"> • To support the Designated Safeguarding Lead to manage and report safeguarding incidents in their respective areas • To ensure that action is taken to address safeguarding issues as agreed with the Designated Safeguarding Lead Understand and follow this policy and the safeguarding principles • Promote personalisation in safeguarding • Attend and arrange safeguarding training for the staff members and embed the learning • Work in partnership to respond and report concerns • Have a copy, understand and follow their local authority safeguarding policies and procedures • Have knowledge of and know where to find the relevant nations safeguarding legislation/policy (see reference section) • Ensure any actions required by the Safeguarding Adults Teams are carried out • Log any actual or suspicions of abuse • Report appropriately to the Designated Safeguarding Lead, Local Authority and regulatory body as required • Ensure safeguarding adults training is embedded learning through team meetings and supervision



<p>All Staff</p>	<ul style="list-style-type: none"> • Be vigilant about any safeguarding concerns • Balance choice and control with safety • Understand who might be at risk of abuse • Attend training and understand what the signs and symptoms of abuse are and how to report it • Provide an open and supportive environment where people we support are able to recognise abuse and feel empowered to report it provide people with the best possible support • Never engage in any abusive/ harmful action in relation to the people we support • Report anything they witness which is or might be abusive/ harmful to their line manager or on-call manager • Co-operate in every possible way in any investigation into alleged abuse
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Policy

We believe everyone has the right to live free from abuse or neglect regardless of any protected characteristic and have a zero-tolerance approach to any mistreatment or abuse.

We are committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

We acknowledge that safeguarding is everybody’s responsibility and are committed to prevent abuse and neglect through safeguarding the welfare of all adults involved.

We will safely recruit and support all people within Milewood by

- Preventing harm and abuse with a rigorous recruitment and selection process, in accordance with legislation and government guidance. This will be followed for all relevant staff appointments.
- Making sure all staff have the appropriate level of criminal records/ barring list check and that these are renewed at the intervals suggested by the DBS.
- Including safeguarding in all adverts and job descriptions
- Asking interview questions to allow applicants to demonstrate their understanding of safeguarding as it applies to their role
- Provide effective training to all staff working within Milewood relevant to their role
- Making sure staff receive ongoing support and supervision
- Making sure safeguarding is a regular agenda item in supervision and team meetings
- Responding to poor practice promptly

We will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

A person's right and capacity to make decisions about issues that affect them will always be assumed. Where the capacity of a person to make a specific decision is brought into question, we will follow the Mental Capacity Act 2005.

We will do all we can to help staff promote the human rights of people we support and stop them being harmed, abused, neglected, and coerced. This means providing training and information to understand human rights and to identify abuse and respond to it when they suspect it's happening.

We will deal with all allegations and concerns appropriately. This means we will:

- report allegations and concerns to the right people and agencies
- investigate them when we need to
- learn from them and share what we learn with the wider organisation and external staff where appropriate

When a colleague harms a person we support, we will take disciplinary action as appropriate.

We will support anyone we are concerned about as well as we can. This includes involving them as fully as possible in all safeguarding procedures. We will also involve their family or other representatives as appropriate.

We will work together with the people we support and other organisations to keep the people we support safe, and free from abuse and neglect

We will make sure that the adult's well-being is promoted, including, where appropriate, have due regard to their views, wishes, feelings and beliefs in deciding on any action. This will recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

We will always promote the adult's well-being in their safeguarding arrangements.

We recognise that people have complex lives and being safe is only one of the things they want for themselves.

Staff teams will work with the person supported to establish what being safe means to them and how that can best be achieved.

Procedure

Preventing abuse and early intervention

Support planning and reviews will include a discussion about risks of abuse with the aim to empower people to recognise any areas or individuals within their life that are abusive or could lead to abuse.

Risk assessments are created and shared to minimise risk of harm. Wherever possible, risk assessments should be created in an accessible format using the person's preferred method of receiving information, involving the person and their circle of support including other agencies.

Staff will adopt a positive approach to risk which does not limit people's choice and control – including making unwise decisions. This must be balanced with our duty of care to safeguard people. Any concerns about assessing risk should be discussed with the line manager.

Where people lack capacity to make decisions which keep them safe, staff must hold best interest meetings in line with the Mental Capacity Act and involve a person's circle of support in managing their safety and well-being in the least restrictive way.

Safeguarding Framework

Milewood shares and is committed to the vision of the local authority safeguarding arrangements, which is to empower and protect adults who are at risk of abuse and neglect, as defined in legislation and statutory guidance.

Milewood understands that local safeguarding arrangements and developments follow a government strategy based on:

- **empowerment** - supporting people to make decisions and have a say in their care
- **protection** - support and representation for those in greatest need
- **prevention** - it is better to take action before harm occurs
- **proportionality** - safeguarding must be built on proportionality and a consideration of people's human rights
- **partnership** - local solutions through services working with their communities
- **accountability** - safeguarding practice and arrangements should be accountable and transparent.

Approach to Safeguarding

Milewood works on the principle that it is the right of people receiving care and support to be kept safe from all forms of abuse/ harm. Being and feeling safe will contribute a great deal to peoples well-being and quality of life. We therefore recognise that we must always protect the people we support and identify and deal with specific instances of abuse/ harm if they occur, following the required procedures and best practice guidance.

Milewood is always aiming for the best quality of care and will not be satisfied with anything that falls short of this. We take every possible action to prevent abuse/ harm and associated risks and to deal with the issues as promptly and effectively as possible when they arise.

Milewood seeks to work in line with local authority safeguarding adults teams policies and procedures and guidance from the Care Quality Commission (CQC). We recognise the importance of government and national guidance and seek to comply in all respects with current safeguarding legislation and regulations.

Milewood has systems in place to track and monitor incidents, accidents, disciplinary action, complaints and safeguarding concerns, and to identify patterns of potential abuse/ harm to people we support.

People Who Might Lack Mental Capacity

We recognise that the people we support who lack mental capacity are particularly at risk of abuse/ harm and exploitation.

We will follow the principles and practice guidance that has accompanied the Mental Capacity Act 2005. These apply particularly to investigations of possible abuse/ harm in which it is important to seek means of understanding the experiences and views of any person at risk or indeed alleged perpetrator who might lack capacity, e.g. through the services of independent advocates.

We recognise that anyone who might need the help of an independent advocate when engaged in safeguarding enquiries and plans is entitled to one (as legislated for by the Care Act 2014). We will always support a person to have advocacy help where required in line with our [Advocacy Policy](#).

See the [MCA and DoLS policy](#) for further information.

Making Safeguarding Personal

All our safeguarding policies are in line with the Making Safeguarding Personal (MSP) agenda, which has been developed by the Local Government Association (LGA) with the Association of Directors of Adult Social Services (ADASS), and other national partners. The MSP aims for:

- a person-centred approach so that safeguarding is done with, not to, people
- practice that achieves meaningful improvement to people's circumstances rather than just on "investigation" and "conclusion"
- an approach that makes use of social work skills rather than just "putting people through a process"
- an approach that enables practitioners, families, teams and the safeguarding adults boards (SAB) to know what difference has been made.

Key Legislation

We recognise the safeguarding duties of the local authority under the Care Act 2014, which apply to an adult who:

- a) has needs for care and support (whether or not the authority is meeting any of those needs)
- b) is experiencing, or is at risk of, abuse or neglect
- c) as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

Milewood's policy shows how we protect people receiving our care and support from abuse or harm in line with these local authority responsibilities by complying with all legal requirements and best practice safeguarding guidance, including the National Institute for Clinical and Health Excellence: N189, *Safeguarding Adults in Care Services* (NICE, 2021).

It reflects in particular:

- Regulation 13: Safeguarding Service Users from Abuse and Improper Treatment of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- the CQC's benchmark quality statement on safeguarding, which it refers to in its assessment of service provision, i.e.:
 - *"We work with people to understand what being safe means to them as well as with our partners on the best way to achieve this. We concentrate on improving people's lives while protecting their right to live in safety, free from bullying, harassment, abuse, discrimination, avoidable harm and neglect. We make sure we share concerns quickly and appropriately"*
- the statutory guidance for the Care Act 2014 (Chapter 14: Safeguarding), which details the duties and responsibilities of local authorities and its partner organisations to protect adults with care and support needs from abuse, neglect and other sources of harm, and to make enquiries if they suspect or have evidence of people being abused
- the relevant sections of the Mental Capacity Act 2005 as set out in its Code of Practice, which provides the basis for a care service's responsibilities to safeguard anyone receiving its service, who currently might be subject to Court of Protection judgment that could restrict or deprive them of their liberty
- the Equality Act 2010, which legally protects people by way of age, disability, gender, assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation from discrimination in the workplace and in wider society. Working to the Equality Act will help to enable an adult at risk to understand and take part in the safeguarding process.

We believe that our safeguarding practice should be in line with the Human Rights Act 1998, which means protecting an adult's right to live in safety, free from abuse and neglect, while at the same time

making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Milewood will also remind its staff of their duties to protect vulnerable people, which are included in their job descriptions and the Code of Conduct for Healthcare Support Workers and Adult Social Care Workers in England.

Milewood follows Local Authority Adults Safeguarding Board guidance and recommendations.

Local Authority Safeguarding

We develop our policies, procedures and colleague competences in line with the Local Authority Safeguarding Adults Boards (SABs) recommendations and guidance, as found on each locality authorities' respective website together with relevant documentation, e.g. raising alerts and staff training.

Referrals

In the event of having to make a referral we can use the online referral form or a manual form that can be downloaded from the local authority website and sent to their email address.

We make available to the people we support and their relatives the local safeguarding board's information leaflets and means by which they can obtain full information from their website and raise any concern directly with the local safeguarding team.

For advice, or to raise a concern directly, we will contact the local authority safeguarding team via email or telephone and ensure all staff have access to this information.

In an emergency we should dial 999 and ask for the appropriate emergency service.

Identifying persons of concern

Abuse/ harm can be committed by a range of people. We therefore accept our responsibility to protect the people we support from possible abuse from all sources. Potential people of concern include:

- the staff and management of Milewood
- volunteers working in Milewood
- contractors working in Milewood homes
- visiting health and social care practitioners and other official visitors to the person's home
- relatives and friends of people we support
- individuals who have contact with the people we support while out in the community
- neighbours, people on their social network or living in their local community

- total strangers, including those who engage in random attacks on other people
- people who set out to exploit and abuse a vulnerable person

Safe Recruitment Practices

Milewood takes great care in the recruitment of staff, carries out all possible checks on recruits to ensure that they are of a high standard, and co-operates in all initiatives regarding the sharing of information on support staff who are found to be unsuitable to work with people at risk.

Milewood ensures that new staff employed in regulated activity have been checked against the Disclosure and Barring Service (DBS) criminal records and barred lists in line with the current requirements. (Please refer to the [Recruitment Policy](#)).

Preventing Abuse/ Harm from Occurring

Milewood is committed to taking all possible steps to prevent abuse or harm of the people we support from occurring, including:

- 1) setting out and making widely known the procedures for responding to suspicions or evidence of abuse/harm
- 2) operating HR policies which ensure that all potential staff in regulated activity are rigorously checked, by the taking up of references and clearance through DBS criminal records and barred list checks, with equivalent checks for staff employed from overseas
- 3) incorporating material relevant to abuse/ harm into staff training at all levels
- 4) maintaining vigilance concerning the possibility of abuse/ harm of the people we support from whatever source
- 5) encouraging among staff, people we support and all other stakeholders a culture of openness and awareness that makes it possible to pass on concerns about behaviour that might be abusive or that might lead to abuse/ harm
- 6) devising systems that minimise the risk of abuse to the people we support by other people, by understanding and dealing appropriately with any form of aggression
- 7) maintaining robust and effective procedures for regulating any contact staff have with the property, money or financial affairs of people we support.
- 8) communicating concerns to the local Adults' Safeguarding Board, the Care Quality Commission in line with its Outcome 20 notification procedures

- 9) helping people we support as far as possible to avoid or control situations or relationships that would make them at risk to abuse/ harm
- 10) having a clear [Freedom to speak up/ whistleblowing policy](#) that informs staff of their rights and responsibilities when reporting concerns to management or an appropriate outside agency.

Identifying Actual or Possible Abuse

Milewood will identify any instances of actual or possible abuse/ harm of people we support by all possible means including:

- 1) fostering an open and trusting communication structure so that staff, people we support, and others feel able to discuss their concerns with someone authorised to act
- 2) ensuring that all staff and the people we support know whom they may turn to for advice and action if they become aware or suspect that abuse/ harm is occurring
- 3) encouraging staff to recognise that a commitment to the highest possible standards of care must, when necessary, overrule loyalty to staff individually or corporately
- 4) making it clear to staff that failing to report incidents or suspicions of abuse is itself abusive and may lead to disciplinary or criminal proceedings
- 5) operating systems of management, supervision, internal inspection and quality control that have the potential to reveal abuse/harm where it exists.

Procedures for When Abuse has Occurred or is Alleged to Have Occurred

Initial procedures

If abuse/ harm is clearly occurring or is alleged to have occurred, Milewood takes swift action to limit the damage to the people we support and to deal with the abuse, as follows.

- 1) A colleague who witnesses a situation in which a person we support is in actual or imminent danger must use their judgment as to the best way to stop what is happening without further damage to anyone involved including themselves.
- 2) It is not possible to be prescriptive about this because the circumstances might be different in each case. The colleague could act by immediately intervening personally or by summoning help from the nearest source, which could be from spectator or colleague, phoning a line manager, phoning on call or the police.



- 3) Milewood will carry out risk assessments so that it has contingency plans for responding to the more likely events or when anyone is most likely to be in danger from acts of harm. Staff will be trained in emergency procedures, for example, in responding to violent behaviour.
- 4) Any staff to whom actual or suspected abuse/ harm is reported — usually the Registered Manager or Regional Operations Manager — must immediately act to protect, support or arrange additional care to a person we support who has been harmed.
- 5) The Registered Manager will discuss with the known or suspected abused/ harmed person what actions they consider to be appropriate and whether they consent to the referral being made to the local authority safeguarding adults team. In some circumstances the person might not wish any action to be taken or agree to a referral being made on their behalf.
- 6) In such cases the Registered Manager will consider whether there are reasons for overriding the person’s wishes, e.g. because it is in the public interest and to prevent further harm or because the harm involves a child. In this instance, seek advice from the DSL.
- 7) Any adult “person subject of the concern” whom it is thought might lack mental capacity to give their consent for the abuse/ harm to be reported, will be assessed for their capacity to decide and a “best interests” decision will be taken in line with Mental Capacity Act procedures.

Responding To a Disclosure of Abuse

Where any case of abuse is disclosed or suspected, staff must:

- Deal with any immediate needs to make sure the person is safe
- Contact emergency services if medical assistance is needed, or a crime has taken place
- Actively preserve any evidence – do not disturb the scene, delete texts or emails or attempt to investigate
- Always listen and take every case seriously
- Always remain calm in all circumstances
- Support the person and their advocate/ representative to remain in control of decision making wherever possible
- Clearly explain your duty to report the allegation of abuse
- Give guidance and reassurance
- Record the allegation in the person’s own voice
- Never appear shocked or press for details
- Never ask leading questions or sweeping reassurance
- Not stop the flow of the conversation and will allow you to speak freely
- Not make comment or judgement
- Tell the person what will happen next and make sure they are involved in decisions
- Not confront the alleged person of concern
- **As soon as possible, and always within 24 hours or before you leave shift - report the abuse to the manager or designated safeguarding lead, deputy or officer.**



- The manager will record on the Safeguarding Reporting Form for you and alert the necessary people
- Record on Nourish as an incident – all safeguarding records should be factual, signed, dated, timed, and use the person’s own words where possible. Any opinions should be clearly identified as such

Within 24 hours the Service Manager should:

- Inform the Regional Operations Manager and Designated Safeguarding Lead.
- Ensure completion of an incident report on Nourish.
- If the incident could potentially attract press interest, the manager will alert the media team and inform staff not to discuss the matter if contacted.
- Once agreed with the Designated safeguarding Lead or Officer, refer the concern or allegation to the Safeguarding Adults Team in the relevant Local Authority. Emergency duty numbers are available on Local Authority websites and should be available within the service.
 - Once a person has consented to further action being taken, or for someone unable to give their consent, it has been decided that it is in their best interests to do so, the manager will alert the Designated Safeguarding Lead or Officer who will then make sure that a referral is made to the local authority safeguarding team and follow its procedures and guidance from that point on. This could involve a strategy meeting and a safeguarding plan to be implemented from the strategy meeting.
 - Where a member of staff is implicated in the abuse, this must be referred to the local authority safeguarding adults team.
 - The specific procedures to be followed and referral forms will usually be available on the local safeguarding adults team website.
 - If a crime has been committed, support the person to report to the police or report on their behalf and take guidance from them on the measures to be taken.
 - Take steps to ensure that there is no further risk of the person subject of the concern being abused/ harmed by the alleged or suspected person of concern.
 - The Registered Manager must address the needs of the alleged person subject of the concern of the abuse/ harm for any special or additional care, support or protection or for checks on health or wellbeing as set out in the person’s safeguarding plan.
 - If the alleged abuser is a colleague the Registered Managers will inform the Designated Safeguarding Lead, Chief Operating Officer and Head of People & Culture for advice on whether to suspend the person from duty pending the outcome of a disciplinary investigation. The manager will receive guidance on the steps to be taken following the local safeguarding adults strategy meeting, which will be held following the reporting of the abuse or suspected abuse/ harm.



- If the evidence is insufficiently strong to warrant suspension, the colleague against whom the allegation has been made will be instructed not to have further unsupervised contact with any of the people we support until the matter is resolved.
- The Registered Manager will notify the CQC of any alert raised with the local safeguarding authority via the statutory notification form and copy in notifications@milewood.co.uk within 24 hours – This is the CQC notification form: [Allegations of abuse \(safeguarding\) – notification form - Care Quality Commission](#)
- Where a referral is made to the police because a criminal offence might have been committed the police investigation will take precedence and no action should be taken that might jeopardise its enquiries, which might contaminate the evidence it is seeking and collecting.
- Where appropriate, inform the nominated family contact or representative of the person supported.

Enquiring into alleged abuse

Enquiries are based on a person-centred approach in which the well-being of the person subject of concern is the central focus of all the activities involved.

In many cases, enquiries will be carried out or led by a Senior Manager or member of an external agency in line with the action plan determined by the initial strategy meeting convened by the local authority safeguarding board (SAB). If a colleague is expected to carry out an enquiry of its own, they will proceed as follows.

- 1) The Designated Safeguarding Lead or a delegated Manager will usually consult the person who may have been abused/ harmed to hear their account of what has occurred and their views about what action should be taken, involving the person's relatives, friends or representatives if that is appropriate and in line with the wishes of the person we support.
- 2) In carrying out these enquiries we recognise that we must consider:
 - a) the fears and sensitivity of the abused/ harmed person
 - b) any risks of intimidation or reprisals
 - c) the need to protect and support witnesses
 - d) any confidentiality or data protection issues
 - e) the possible involvement of other agencies, including the police, local safeguarding team and the CQC
 - f) the obligation to keep the abused/ harmed person and in specific instances the alleged perpetrator informed on the progress of the enquiries.
 - g) The mental capacity of the person and any need or wish for them to have support from an independent advocate.
- 3) The enquirer will assure the person who may have been abused/ harmed that they will be taken seriously, that the comments will as far as possible be treated confidentially within any

information sharing protocol, that they will be protected from reprisals and intimidation, and that they will be kept informed of actions taken and of the outcome.

- 4) The enquirer will consider whether the person we support needs independent help or representation, including services of an independent advocate, in presenting their evidence, which we will help to arrange if possible.
- 5) If the abused/ harmed person expressly states a wish that no further action should be taken, the enquirer will consider if:
 - a) a danger to others exists from not investigating further
 - b) in light of that assessment, it is possible to follow the person's wishes
 - c) in any case precautionary measures should be taken to protect others from the possibility of abuse from the same source
 - d) the person will be informed of what is to happen.
- 6) If it is decided to proceed, the enquirer will, as discreetly and confidentially as possible, investigate all aspects of the situation. This will consider how diversity, beliefs and values of people can influence the identification, prevention and response to safeguarding concerns.
- 7) The enquirer will include interviewing the colleague involved in the incident or circumstances up to that point, hearing and assessing evidence from any others who might be in a position to supply information, exploring every other possible source of evidence, maintaining appropriate contact with any other agencies involved, and if necessary seeking expert advice on any technical aspects of the situation which are outside the knowledge or expertise available within Milewood.
- 8) Any staff from whom evidence is taken will be assured that they will be dealt with in a fair and equitable manner and informed of their employment, legal and procedural rights.
- 9) The alleged person subject of the concern of the abuse/ harm, and where appropriate their relatives, friends or representatives, will always be kept as fully informed as possible of what is happening regarding the suspected abuse/ harm.
- 10) If part of an agreed plan, the enquiries should be carried out as quickly as possible and in an agreed timescale and the findings presented to the local authority safeguarding adults' team, which will then decide what further action to take, e.g. that a Safeguarding Plan should be developed and implemented.

Following the enquiry

For this stage of the safeguarding process Milewood will apply the following principles and procedures.

- 1) If it seems from the enquiries that on the balance of probabilities abuse/ harm did indeed take place, the Managers will, if the person of concern is a member of staff, initiate and carry through

proceedings according to Milewood's disciplinary policy or, if the person of concern is not a member of staff, take action to involve other responsible bodies.

- 2) If abuse/ harm is proved against a colleague, the Managers will initiate appropriate action, which most likely will be dismissal and referral to the Disclosure and Barring Service (DBS) to prevent them from being employed further in regulated activity. This will be carried out by the People Team following the disciplinary outcome.
- 3) Other employment sanctions could apply depending on whether there might have been mitigating or extenuating circumstances. In some cases, retraining could be appropriate.
- 4) The person we support, or their representatives will be informed of the outcome of the investigation and any further action and will be consulted about whether any redress or apology would be appropriate and helpful to them in line with Milewood's duty of candour.
- 5) At all stages of the process, a careful record will be kept of all actions taken, paying particular attention to the sensitivity of the abused/ harmed person.
- 6) Where relevant to the resolution of the situation, a plan will be drawn up to address the issues with the alleged or known person(s) of concern, particularly if they will be continuing to form part of the person subject of the concern's life, directly or indirectly.

Planning further action

At the end of an incident involving possible or actual abuse/ harm, managers should review what has happened with a view to assessing whether the Milewood or its management has been in any way culpable, ineffective or negligent, learning lessons for the way Milewood should operate in the future, and passing on any appropriate information to other agencies.

If necessary Milewood will review and revise policies, procedures and training arrangements in response to any material that has emerged from the incident or the investigation. Milewood might carry this out with advice and guidance from the local authority Safeguarding Adults team.

Milewood will carry out regular audits of its care records to identify hidden or outstanding safeguarding concerns, for which further action is required.

If necessary, Milewood's policies, procedures and training arrangements will be modified in response to any material that has emerged from the incident or the enquiries. might carry this out with advice and guidance from the safeguarding authority.

Milewood will cooperate fully in the event of a Care Act 2014 s.44 review into the circumstances of someone receiving our service who has died because of possible abuse or neglect. We will also cooperate fully with the Coroner's Office if required to contribute evidence to or appear at an Inquest.

Prevent Duty

Milewood recognises its legal responsibilities under the Counter-Terrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent Duty.

Prevent is part of the Government’s counter-terrorism strategy and aims to safeguard people at risk from radicalisation and extremist ideologies that could lead to terrorism. Radicalisation is recognised as a form of abuse and is managed within our safeguarding procedures.

We will:

- Train staff to recognise signs that someone may be vulnerable to radicalisation or extremism, including changes in behaviour, language, or associations
- Create a safe environment where people feel able to raise concerns
- Act promptly on any concerns by following our safeguarding reporting process
- Work in partnership with local Prevent teams, the police, and Local Authority Safeguarding Boards.

Referral Process (Channel)

If we have concerns that an individual is at risk of radicalisation:

- Follow the safeguarding reporting procedure, informing the Designated Safeguarding Lead (DSL) immediately.
- The DSL will assess the concern and, if appropriate, contact the Local Authority Prevent team or the police for advice.
- If the risk meets the threshold, the DSL will make a referral to Channel, a voluntary multi-agency safeguarding programme which supports people at risk of being drawn into terrorism.
- Records of all Prevent-related concerns and actions will be kept securely in line with data protection requirements.

Urgent risk: If someone is in immediate danger or a crime is being committed, call 999.

Referrals to DBS Barred Lists

Milewood will comply with its legal requirement to refer a member of staff, where it has evidence that the person has been guilty of misconduct by harming or putting at risk of harm a person we support or other person at risk, during the course of their work, to the DBS barred lists following the procedures issued by the DBS.

Complaints and Whistleblowing

Complaints

We are committed to reviewing and improving practice. Any person or group of people should be able to easily provide feedback on any service we provide and, where appropriate, make a complaint. We welcome comments and see them as an opportunity to learn, adapt and improve on what we do. Complaints will be managed in line with the [Complaints policy](#).

We publicise information about how to provide feedback in several ways, including information on our website.

Some complaints will give rise to a safeguarding concern. These complaints must be recorded in line with the [Complaints Policy](#) and the Designated Safeguarding Lead notified.

If the complaint consists of safeguarding matters and other matters, there will be a joint decision between the Designated Safeguarding Lead and the Manager to investigate the different parts of the complaint. Any safeguarding issues contained within the complaint will be managed with this procedure.

Responses to the complainant will be jointly agreed between the Designated Safeguarding Lead and person managing the complaint.

Whistleblowing

We are committed to openness and accountability and for staff and volunteers to be able to raise voice concerns or allegations about poor practice, wrongdoing, breaches or failures in a reasonable and effective manner. This can be done through the [Freedom to Speak Up/ Whistleblowing Policy](#). The policy makes it clear how to raise a concern, which can be a safeguarding concern.

Whistle-blowers might be worried about raising issues of poor practice or wrongdoing in the charity. Milewood encourages staff to raise concerns to ensure they are properly investigated.

The law provides protection for workers who raise legitimate concerns ‘in the public interest’ about wrongdoing.

Any instances of poor safeguarding practice must be reported, and this can be done by direct contact with the Designated Safeguarding Lead/ Deputy or via an e mail to speakup@milewood.co.uk

Confidentiality

Everyone has the right to have their information managed sensitively and confidentially. However, confidentiality will never be a barrier to good safeguarding practice.

Staff will not promise to keep secrets. They will always make it clear that if they are told something that means someone is at risk of harm or is being harmed, this will have to be passed to the Designated Safeguarding Lead.

Confidential information requested by third parties must be given on a strictly 'need to know' basis, with the consent of the person, their approved advocate or representative and in line with the [Data Protection Policy](#).

The transfer of any personal data must be a secure method and only accessible by the authorised person, e.g., password protected, Egress or shared via secure SharePoint link.

It may be necessary to disclose confidential information without consent if the information suggests that there may be harm to others. Information will be passed to the appropriate statutory agency by the Designated Safeguarding Lead. The Designated Safeguarding Lead will make it clear that consent has not been sought and why, or that consent has been refused. The reasons for the disclosure without consent will be recorded and stored securely by the Designated Safeguarding Lead.

Records

All records must be kept in line with legal requirements, the [Data Protection Policy](#) and the [Confidentiality & Disclosure of Information Policy](#).

Milewood will record all details associated with allegations of abuse/ harm clearly and accurately. The records are kept securely and the Milewood's rules on confidentiality are carefully followed. Reports are made as required to the Care Quality Commission (CQC) and other safeguarding agencies involved.

Records must be retained for a minimum of 5 and then archived for 10 years following the last contact with the person the record is relating to. Records which relate to Section 42 Care Act 2014 enquiries may be kept for longer if there is a risk of ongoing action. Records involving criminal investigations or litigation should be retained until the end of proceedings plus 6 years.

Records kept regarding safeguarding will be confidential but also may need to be disclosed to third parties. Staff must be aware of UK GDPR implications of sharing personal information and ask for advice from the DPO if unsure.

Training

All staff involved in providing services to adults at risk during their initial induction period will complete training in Safeguarding Adults and Children, the Mental Capacity Act and Deprivation of Liberty; and will be introduced to this policy and procedure.

All staff receive training in recognising abuse/ harm and carrying out their responsibilities under this policy as part of their induction program and further training in line with their training needs as identified from their supervision and appraisals and policy developments and changes. All training is updated as needed or through a regular scheduled basis at least annually.

All training, including induction training, is in line with the guidance and standards produced by the relevant social and healthcare workforce development organisations and the local safeguarding authority training policies and guidance.

A copy of the Local Authority Safeguarding Adults Policy and Procedures for the location in which the home/service is operating can be accessed online via Google search or using the link to Safeguarding Adults Boards in the UK. [Safeguarding Adults Boards England](#)

All Managers/ Deputies/ Seniors will be familiar with this and will attend training provided by the Local Authority where available, sharing this as appropriate with the staff team.

Milewood's Safeguarding Training Strategy:

1. Staff new to care must achieve their **Care Certificate** as part of the induction process.

Standard 10 - Adult Safeguarding

Standard 10 of the Care Certificate explores the protection and safeguarding of adults at risk. It looks at the types of abuse and how to respond to suspicions of abuse as well as looking at ways that you and your organisation can reduce the likelihood of abuse occurring. It also details legislation and agencies, both local and national, that help to protect adults at risk. The training will include as a minimum:

- Principles of adult safeguarding
- How to reduce the likelihood of abuse
- Policies and procedures in the work setting
- Your own and others roles and responsibilities
- How to respond
- Restrictive practices

Standard 11 - Safeguarding Children

- Standard 11 of the Care Certificate explores the protection and safeguarding of children at risk. Standard 11 requires all persons working in social care to demonstrate knowledge

of what they must do if they suspect a child, young person (met in any circumstances) is being abused or neglected.

Reference: [Statutory and mandatory training guide March 2025 / CQC / SCIE](#)

2. Other new staff will have a baseline training level that addresses the knowledge as per point 1, to ensure consistency in approach and knowledge base.
3. Milewood will check knowledge and competence requirements to ensure it meets the required standard and provide additional training if needed.
4. All staff receive training to ensure that they are familiar with local Safeguarding Adults' Boards policies and procedures.
5. Managers and staff responsible for safeguarding are required to receive Specialist Safeguarding Training (Level 4) and, where appropriate, to their roles and responsibilities, Level 5. Level 4 manager training is referred to as Safeguarding Advanced. Level 5 leader training is referred to as DSL (Designated Safeguarding Lead)
6. The Registered Managers will include the Safeguarding unit in their Level 5 qualification - Leader in Care

How we will let you know about the policy and put it into practice

The policy will be made available on Redcrier and on SharePoint. It will be made available to all staff at induction and to existing staff via team meetings. Learning and development needs will be assessed via the supervision and appraisal process.

All staff have a responsibility for making sure they read this policy, understand how it applies to their role and where to get further information.

Safeguarding will be a fixed agenda item for team meetings and supervision meetings. The Designated Safeguarding Lead/ Deputy/ Officers details will be displayed clearly in offices.

Equality, diversity and inclusion

All staff are expected to deliver services in a manner which respects the individuality of each person using the service and treat people using services and members of the workforce respectfully, regardless of protected characteristics.

Staff will be mindful of people's preferences in how they provide support during the safeguarding process.

How we will know the policy is working

Service Managers and Regional Operations Manager will monitor the implementation of and compliance with the policy, highlighting trends in practice and areas for improvement.

Internal audit will provide validation about compliance with the policy.

The Designated Safeguarding Lead will monitor compliance and analyse trends.

References and legislation

- Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2015
- The Care Act 2014
- Mental Capacity Act 2005
- Human Rights Act 1998
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018
- General Data Protection Regulations (UK-GDPR)
- The Equality Act 2010

Linked Documents

- Mental Capacity Act & DOL Policy
- Support Planning Policy

Appendix A: Version control

Record of changes

The policy has been transferred to the new template and procedures section added.

Review cycle

This policy will be reviewed every year as part of a planned schedule, or sooner if there are changes to legislation or best practice.



Appendix B: Safeguarding Reporting Form

Please send this form to your manager or if this is not possible, your manager will complete it for you and cc to the DSL at speakup@milewood.co.uk

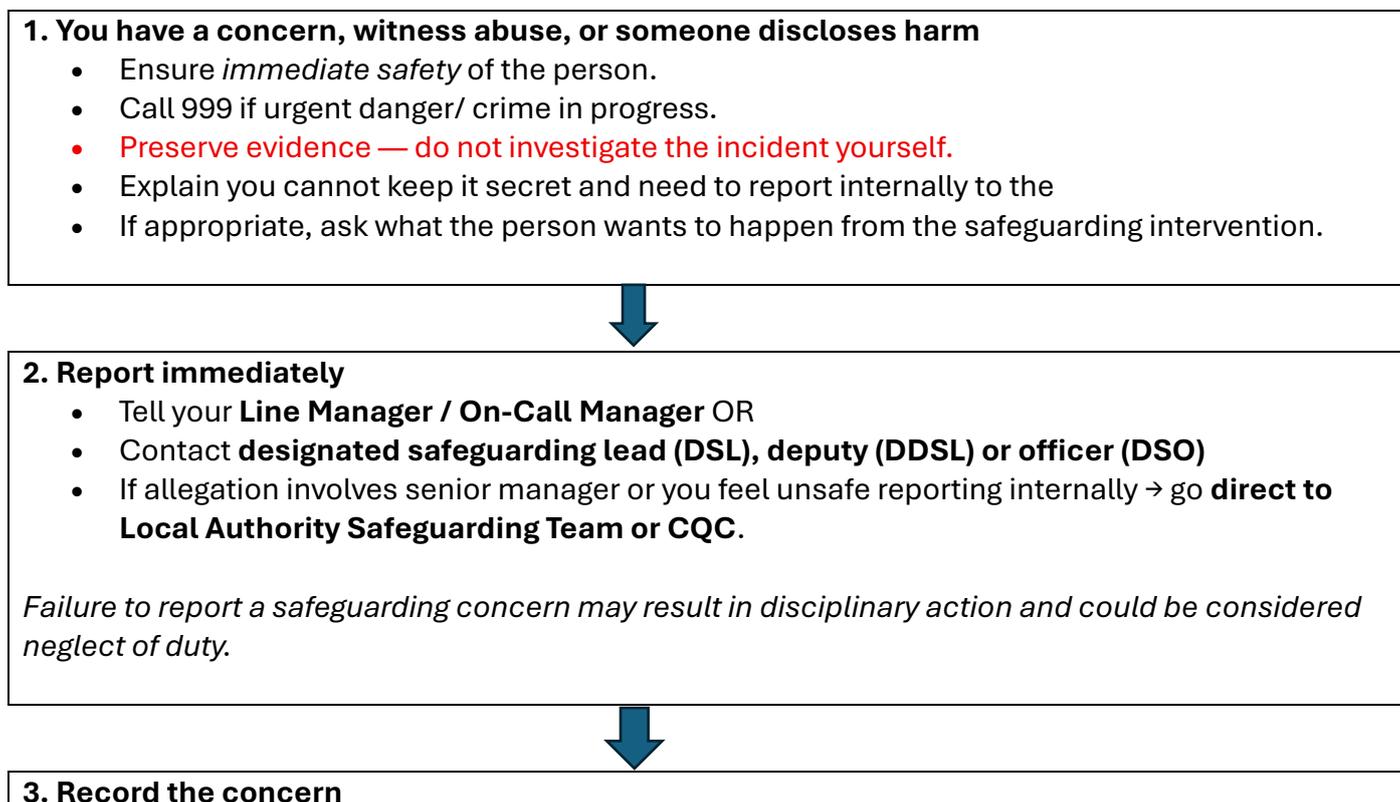
1. Your details	
Full name	
Job role	
Service / location	
Contact details	
Relationship to the person supported	
2. About the person at risk	
Name	
Date of birth or age	
Gender (Male / Female / Other / Prefer not to say)	
Is this concern about:	
<input type="checkbox"/> An adult at risk	
<input type="checkbox"/> A child (under 18)	
Address (if known)	
3. Type of concern (tick all that apply)	
<input type="checkbox"/> Physical abuse	
<input type="checkbox"/> Sexual abuse/ exploitation	
<input type="checkbox"/> Emotional/ psychological abuse	
<input type="checkbox"/> Neglect/ acts of omission	
<input type="checkbox"/> Financial/ material abuse	
<input type="checkbox"/> Domestic abuse	
<input type="checkbox"/> Discriminatory abuse	
<input type="checkbox"/> Organisational abuse	
<input type="checkbox"/> Self-neglect/ hoarding	
<input type="checkbox"/> Radicalisation/extremism	
<input type="checkbox"/> Other (please specify) – e.g., online abuse, county lines, bullying and cyber bullying, trafficking and modern slavery, FGM	
4. What happened?	Brief description of concern (<i>use the person's own words where possible</i>)



5. Immediate actions taken	
Have you made the person safe? (yes/no)	
Did you contact emergency services? (yes/no)	
Details of any immediate action	
6. Consent and capacity	
Have you told the person you are raising this concern? (yes/no)	
<ul style="list-style-type: none">If no, why not? E.g., lack of capacity/ crime has been committed/ telling them may harm the person further.	
<ul style="list-style-type: none">Adults only – Does the person have capacity to agree to the referral? (choice – Has capacity / Lacks capacity / Not assessed)	
<ul style="list-style-type: none">What does the person want to happen as a result?	
7. Who have you reported this to so far?	
<ul style="list-style-type: none">Line Manager / On-call Manager (yes/no)	
<ul style="list-style-type: none">Designated Safeguarding Lead, deputy or officer (yes/no)	
<ul style="list-style-type: none">Other	

<p>Has the Local Authority Safeguarding Team been notified?</p> <p>If yes, date & time of referral:</p> <p>Name of Local Authority contact:</p> <p>Police crime number (if applicable):</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Has CQC been informed?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>8. Date and time of this report</p>	

Appendix C: Flowchart – what to do if you witness abuse or someone discloses harm





- The person you report to will help you to complete the **safeguarding reporting form/** complete it on your behalf – on the same day
- Record on Nourish as an incident
- Include date, time, factual account, person's own words, your actions.

4. Manager / DSL action (within 24 hours or sooner)

- Assess immediate risk & safeguarding needs.
- Inform **Regional Operations Manager** and **DSL**.
- If appropriate, and it meets the safeguarding threshold, refer to Local Authority Safeguarding Adults Team (use emergency number if out-of-hours).
- Notify **CQC** within 24 hours if applicable.
- Consider police referral if crime suspected.
- If the concern is an allegation about a member of staff, inform Head of Quality, COO and Head of People



5. Support the person

- Involve them in decisions.
- Offer advocacy if required.
- Keep them updated.



6. Follow safeguarding plan / investigation process

- Co-operate fully with Local Authority, police, and regulators.
- Follow disciplinary procedures if staff implicated.
- Maintain confidentiality and accurate records.
- Update CQC with outcome of investigations, using the same provider notification reference



7. Review & learn

- After case closure, review incident for lessons learned.
- Update policies, risk assessments, and training as needed.

Email to: speakup@milewood.co.uk