

## Standard Operating Procedures to support the delivery of Imperial College Health Partners (ICHP) Adults at Risk Safeguarding Policy

### Responsibilities of ICHP staff in supporting safeguarding

#### On a day-to-day basis:

- Ensure safeguarding training (available on the ChelWest's a-learning portal) is part of your and your team's induction
- Familiarise yourself with the [Adults at Risk Safeguarding Policy](#) and procedures set out in this document

#### On establishing projects that will involve adults at risk:

- Complete a Risk Assessment (Safeguarding Standard Operating Procedures: Appendix C) to ensure you have minimised the risk of harm and/or abuse to those you are working with
- Provide the Safeguarding Policy and contact information of ICHP Safeguarding Officers to anyone involved who is not ICHP staff, in case they'd like to raise any concerns. If there is sustained engagement planned (e.g. patient partner involvement over time), ensure the person understands the policy and procedures from the outset of activities, and clarifying how ICHP will share information with other safeguarding organisations if needed.
- If working in partnership with another organisation, clarify what safeguarding processes they have in place.

#### On recognising a safeguarding concern:

- Follow the appropriate reporting mechanism outlined in this document, ensuring the alert is raised on the same day as the incident occurs
- Fill in the ICHP Safeguarding Reporting Form here and notify the Safeguarding Officer/Lead of the submission.

### Responsibilities of ICHP Safeguarding Officer and Safeguarding Lead in supporting safeguarding

- If needed, seek further support and help from the [ChelWest adult safeguarding team](#)

If appropriate, the Safeguarding Officer may report a safeguarding concern to the Local Authority. **On having a safeguarding concern reported to the Local Authority, they should:**

- Ensure to get confirmation that the Local Authority Safeguarding team has received the report and any associated documentation.
- Complete and return the forms provided by the Local Authority Safeguarding teams as soon as they are received
- Raise any concerns about the Local Authority response or the practice of the Local Authority Safeguarding Team to the Safeguarding Team Manager in the first instance. If it feels that concerns about Local Authority performance are being ignored or are not being resolved satisfactorily, they can be escalated by making an organisational complaint.

- If it feels that processes are not being followed correctly by the Local Authority, concerns can be raised with the NHS North West London Safeguarding Team (Designated Safeguarding Doctors and Nurses).

## ICHP safeguarding contacts:

If you have any questions relating to safeguarding and this policy, please contact the Safeguarding contacts below. This team can also help you in deciding if actions should be taken and support you through the reporting process.

Name	Email address
Erika Aquino, Sadie Myhill (Safeguarding Officer)	safeguarding@imperialcollegehealthpartners.com
Amy Darlington (Safeguarding Lead)	safeguarding@imperialcollegehealthpartners.com

## Procedure for ICHP staff reporting a concern

**ICHP staff are not responsible for investigating any harm, abuse or neglect. It is our responsibility to gather information about the situation accurately and share this information with the appropriate authorities on the same day that the concern is observed.**

There are five principles that underpin the process of appropriately safeguarding individuals:

- 1) **RECOGNISE** concerns that an adult at risk is being harmed, or might be at risk of harm
- 2) **RESPOND** appropriately to the situation. **If an individual is disclosing information to you:**
  - a. Do not promise to keep information secret, private, or confidential (*see below for further notes on confidentiality*)
  - b. Listen actively without any judgement
  - c. Make brief notes during the disclosure: who is making the disclosure and their contact information, what is being said (including slang and swearing), any observations you have about physical signs that could indicate harm/abuse, how the individual is behaving, and any information disclosed about the perpetrator. There is a copy of the ICHP Safeguarding Reporting form in the Safeguarding Standard Operating Procedures: Appendix B which may help support you in notetaking.
  - d. Do not ask individuals leading questions when trying to gather information for the report; instead use open questions
  - e. Reiterate questions if you are unclear as to the circumstances
  - f. Seek consent from the individual to report this concern if required (*see below for further notes on consent*)
  - g. Explain what happens next about the legal obligation to report to the ICHP Safeguarding Officer and if appropriate, a report will be made to Local Authority for investigation. You may wish to reassure the individual that only nominated Safeguarding Officer/Lead have access to these reports once they are made but if necessary, information will be shared with the Local Authority.
- 3) **REPORT** the concerns as soon as possible (within 24 hours).

- a. If the individual is in immediate danger of abuse/harm: call the police via 999
  - b. If you think abuse/harm is taking place: report the incident to the ICHP Safeguarding Officer immediately
  - c. If you are unsure as to whether it is abuse/harm but just have a feeling: report the incident to the ICHP Safeguarding Officer immediately.
- 4) **RECORD** the concerns appropriately. You should fill out the ICHP Safeguarding Reporting Form and notify the Safeguarding Officer of the submission.
  - 5) **RESOLUTION and escalation**: if you have made a report you should follow up with the Safeguarding Officer and/or police to confirm they received it. You can take further action/escalation if you are dissatisfied with the response of those investigating the incident.

Once the concern has been raised with the ICHP Safeguarding Officer and Lead, it is their responsibility to take appropriate action. Safeguarding concerns are reported to the Local Authority for investigation and resolution. Incidents should be reported to the Local Authority where the incident occurs. It is most likely that you will not be informed about the results of your safeguarding concern for the sake of privacy.

**If an individual does not turn up to an agreed activity:**

1. Follow up with the person to check why they missed the activity and offer an alternative arrangement
2. If they don't turn up to two sessions without explanation, follow up with the organisation they came through (e.g. voluntary sector) if there are available contact details
3. If you don't hear back within a reasonable timeframe, reach out to ChelWest safeguarding team to check if the person is known to them. If so, discuss if a report to Local Authority is necessary

**Notes on Confidentiality:**

Confidentiality is an important principle that enables people to feel safe in sharing their experiences, reflections and concerns. However, the right to confidentiality is not absolute and sharing relevant information with the right authorities at the right time is fundamental to good safeguarding practice.

You should not promise complete confidentiality. Instead, you should make it clear that confidentiality may be broken if:

- There is immediate danger to themselves or another person
- A safeguarding concern is raised about an adult at risk, and this adult gives consent for reporting to a Local Authority
- A safeguarding concern is raised about an adult at risk and consent is unable to be given due to capacity

**Confidentiality is not broken by talking to people within your organisation. If you are a ICHP member of staff and have concerns that you want to discuss with the ICHP Safeguarding Officer/Lead, you would be able to do so without breaking confidentiality.**

**Notes on Consent:**

To report a safeguarding concern about an adult at risk, you need to have their consent to do so (unless you believe the person lacks the capacity to consent). This is because where adults have competency, we have no legal authority to make decisions on their behalf.

**During the process of responding to disclosures from adults at risk, you should gain their verbal consent to make a report.** Explain the importance of consent and be clear about who information will be shared with (the Local Authority). To encourage consent you can explain what support may be available for them and reassure them that as far as possible they will remain in control of the decision-making in investigations.

You may overrule the lack of consent in the following circumstances:

- If there is immediate risk to themselves or others
- If you think the individual lacks the mental capacity to decide (as outlined in the Mental Health Capacity Act 2014).
  - If you are unsure of how to make this judgement or would like support in the decision-making process, contact the Safeguarding Officer to discuss
- If a serious crime has been, or is going to be, committed
- If there is a legal requirement to do so
- If the safeguarding concern has a public interest that outweighs the individual's interest (i.e. a disclosure is made about abuse by staff within an NHS Trust)
- If you suspect the individual is being coerced or under duress
- If the individual gives information which indicates a possible terrorist threat

**You do not need to get consent from children and young people (under 18) to report a safeguarding concern.**

If you do overrule an individual's lack of consent, you should explain to the individual that the information will be shared without consent and why. You should then also record the rationale, and note that this discussion has been had, in any reports you make.

## Managing allegations against ICHP staff

A report of a safeguarding concern may relate to ICHP staff who has:

- Behaved in a way that has or may have harmed an adult at risk
- Possibly committed a criminal offence against or related to an adult at risk
- Behaved towards an adult at risk in a way that indicates that they are unsuitable to work with adults with care and support needs

These procedures apply regardless of whether the allegation is made in regards to a member of staff's professional or personal life.

Allegations in relation to ICHP staff should be referred immediately to the Safeguarding Lead. On receipt of the allegation the Safeguarding Lead must report the allegation/concern to the Local Authority Designated Officer (LADO) within one working day of receipt. The LADO will advise ICHP regarding subsequent processes, including notifying the employee of the allegation.

There are up to three strands for consideration of an allegation:

1. A police investigation of a possible criminal offence
2. Enquiries and assessment by Local Authority about whether the adult is in need of protection or services
3. Consideration of disciplinary action by ICHP in respect of the individual

ICHP has a duty of care to staff and will ensure effective support is provided for anyone facing an allegation of safeguarding concern. It is essential that any concern is dealt with quickly and fairly, in a manner that provides effective protection for the person and supports

the person who is subject of the allegation. All options to avoid suspension of staff should be considered first. If ICHP removes an individual because the person poses a risk of harm to others, ICHP must make a referral to the Disclosure and Barring Service

## Storage, Retention and Destruction of Safeguarding Records:

If anyone within ICHP has a safeguarding concern about an adult at risk, it is vital all relevant details are recorded. This is done regardless of whether the concerns are shared with other organisations such as the Local Authority or the police. We keep these records to help us:

- Identify concerns at an early stage
- Identify patterns of concern and build a more complete picture of what a person may be experiencing
- Monitor and manage the safeguarding practices in our organisation to ensure we are always protecting the safety and wellbeing of those we are working with

### Storage of Records:

ICHP staff are required to fill out and submit an internal Safeguarding Reporting Form after every disclosure or incident. Forms are completed and submitted to the Safeguarding Officer via MS Forms (the content of the form can be seen in Appendix B). Access to the MS Forms data is restricted to only the Safeguarding Officer/Lead. Staff must notify the Safeguarding Officer of the successful submission immediately.

The Safeguarding Officer reviews submitted forms and supporting files to ensure all appropriate actions have been taken and the reporting form is complete. If complete, the information gets moved to an individual's Safeguarding Case File for our retention period. Safeguarding Case Files are stored on Sharepoint and are permissions protected with only Safeguarding Officers and Leads authorised to access them.

### Retention of Records:

An individual's Safeguarding Case File will be retained for a period of 6 years from the last contact with ICHP. During this retention period, they will remain within Sharepoint in a permissions protected folder with only Safeguarding Officer and Leads authorised to access them.

### Destruction of Records:

Once it has been confirmed by the Safeguarding Officer that a Safeguarding Reporting Form is complete and has been transitioned into a Safeguarding Case File, staff who have submitted reports will destroy their original copies of the information. Any physical information will be shredded and disposed of in the confidential waste within the ICHP office; whilst all files should be deleted and purged from the system.

After the retention period of 6 years has elapsed, the Safeguarding Officer or Lead will be required to delete and purge the Safeguarding Case File from the system. If deleted/purged by the Safeguarding Lead, an Officer should check and confirm removal of the files; and vice versa.

**If an individual would like to make a request to access a copy of the information in their Safeguarding Case File, please make a request directly to the ICHP Safeguarding Team: [safeguarding@imperialcollegehealthpartners.com](mailto:safeguarding@imperialcollegehealthpartners.com)**

## Safeguarding concern is recognised

If the person is in immediate danger/harm

1: Call 999 and inform emergency services before you risk assess and intervene

2: Complete the ICHP Safeguarding concern report and contact the ICHP Safeguarding Officer

If you think abuse/harm is taking place

1: Gain verbal consent from the individual to share and report your concern

2: Complete the ICHP Safeguarding concern report form and contact the ICHP Safeguarding Officer

If you are unsure if it is abuse/harm but have a feeling

1: Contact the ICHP Safeguarding Officer to review concerns

2: If concerns are not taken seriously or you remain unsure, contact the ICHP Safeguarding Lead

**Procedure for reporting a safeguarding concern about an adult at risk**

## Process for recording and escalating safeguarding concerns

1. Safeguarding Officer receives Safeguarding Reporting Form or is contacted by person with concern
2. If there is immediate danger or harm to the adult – contact 999 and keep person safe
3. Safeguarding Officer checks details are completed on the Reporting Form and creates a Safeguarding Case File
4. Safeguarding Officer escalates to Safeguarding Lead and they may consult informally with Local Authority Designated Officer (LADO) to decide if formal referral should be made to Local Authority/social services
5. If a referral should be made:
  - a. Safeguarding Officer makes formal report to relevant services (LADO)
  - b. Safeguarding Officer and Safeguarding Lead assess ICHP action (disciplinary action for ICHP staff involved if appropriate) and report to appropriate ICHP internal processes
  - c. Safeguarding Officer updates and stores information in Safeguarding Case File and destroys the original report form
6. If a referral should not be made:
  - a. Safeguarding Officer updates and stores information in Safeguarding Case File and destroys the original report form



## Appendix A: Contact information for Local Authorities Adults Safeguarding Teams

Borough	Contact details
London Borough of Brent	020 8937 4098/99  <a href="mailto:safeguardingadults@brent.gov.uk">safeguardingadults@brent.gov.uk</a> 020 8863 5250 (out-of-office-hours)
London Borough of Ealing	020 8825 8000 020 88258000 (out-of-office-hours)
London Borough of Hammersmith & Fulham	020 8753 4198 (choose option 3)  020 8748 8588 (out-of-office-hours)  <a href="mailto:safeguardingadults@lbhf.gov.uk">safeguardingadults@lbhf.gov.uk</a>
London Borough of Harrow	020 8420 9453  020 8420 9453 (out-of-office-hours)  <a href="mailto:safeguardingadults@harrow.gov.uk">safeguardingadults@harrow.gov.uk</a>
London Borough of Hillingdon	01895 556 633  01895 250 111 (out-of-office-hours)  <a href="#">Click here to raise a concern directly with the Safeguarding Adults Team</a>
London Borough of Hounslow	020 8583 3100  020 8583 2222 (out-of-office-hours)  <a href="mailto:safeguardingadults@hounslow.gov.uk">safeguardingadults@hounslow.gov.uk</a>
Royal Borough of Kensington and Chelsea	020 7361 3013  020 7373 2227 (out-of-office-hours)  <a href="mailto:socialservices@rbkc.gov.uk">socialservices@rbkc.gov.uk</a>



Westminster City Council	020 7641 2176/ 020 7641 2500 / 020 7641 1175/020 7641 6000 020 7641 2388 (out of hours 5pm-8am)

## Appendix B: ICHP Safeguarding Reporting Form

This is a copy of the ICHP Safeguarding Reporting Form to help you understand what information you need to record during disclosures. Do not use this form to make a report to the Safeguarding Team at ICHP, all information needs to be submitted via [the MS form](#)

### Your Contact Information

Full name:	
Email address:	
Date of Report	

### Cause for concern

Name of individual concerned:	
Please select whether the individual is a:	<input type="checkbox"/> Child/Young Person (under 18) <input type="checkbox"/> Adult at risk
Please provide details of the incident.  This should include date, time and location; who was present; what was said; observations about behaviour and any observable evidence of harm/abuse.	
Have you gained verbal consent to share/report these concerns beyond ICHP?	Please select
*If you are overruling the lack of consent from the individual to share information beyond ICHP please outline here the grounds for this and any evidence you may have to support your decision:	
Please outline if immediate action has been taken from this incident  You should include information about who has been informed (e.g. police), when reports were made, and provide any case numbers or crime reference numbers you received	
Please add any other relevant details here.	



### Appendix C: Risk Assessment Template

<b>Assessment carried out by:</b>	<b>Date assessment was carried out:</b>	<b>Date of next review:</b>
<b>Summary of activity being undertaken</b>		

<b>What are the hazards?</b>	<b>Who may be harmed and how?</b>	<b>What are you doing to already to control the risks?</b>	<b>What further action do you need to take to control the risks?</b>	<b>Who needs to carry out the action and when is it needed by?</b>	<b>Done</b>