



Policy Number: A7
Revision Date: January 22nd 2021 Section: Safeguarding

My Life Advocacy Safeguarding Policy

RECOGNISE RESPOND RECORD REFER

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1. Introduction

My Life Advocacy is committed to safeguarding and promoting the welfare of all our members and service users, both children and adults. Our members have the right to be safe from harm and should be able to live free from fear of abuse, neglect and exploitation.

Safeguarding and promoting the welfare of children (any person who has not reached their 18th birthday) is defined for the purposes of this policy as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable all children to have the best outcomes.

Working Together to Safeguard Children (2018) page 6

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard_Children.pdf

The legal definition of an 'adult at risk' is anyone aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing, or is 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, or the experience of abuse or neglect.

Care Act 2014 Section 42 (1)

<http://www.legislation.gov.uk/ukpga/2014/23/part/1/crossheading/safeguarding-adults-at-risk-of-abuse-or-neglect/enacted>



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2. Purpose and Legal Context

My Life Advocacy fully recognises the contribution it can make to protect its members and service users from harm.

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The purpose of this policy is to outline the duties and responsibilities of Advocacy staff, volunteers and trustees working on behalf of My Life Advocacy and My Life Advocacy in relation to;

- the protection of children within the context of *Keeping Children Safe in Education 2016*,
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf,
- *Working Together to Safeguard Children 2018* (see link on page 1) and
- *What to do if you are worried a child is being abused – Advice for practitioners 2015*.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- the protection of adults at risk of harm within the context of the *Care Act 2014* (see link on page 1) and
- The *Making Safeguarding Personal Toolkit 2020*. <https://www.local.gov.uk/msp-toolkit>
- The Human Rights Act 1998 <https://www.equalityhumanrights.com/en/human-rights/human-rights-act>
- The Data protection Act 2018 (GDPR)
<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- The Equality Act 2010 <http://www.gov.uk/equality-act-2010-guidance>

It is important to remember that adults at risk can also abuse and that any such incidents also fall into the remit of this policy.



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3. Aims and Objectives

My Life Advocacy is committed to the development of good practice, sound internal procedures and establishing a culture of vigilance;

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The aim of this policy is to safeguard and promote members' welfare, safety, health and guidance by fostering an honest, open, caring and supportive climate. This ensures that child and adult protection concerns and referrals may be handled sensitively, professionally and in ways which place the best interests of the member at the centre of all we do.

Our policy for adults at risk of harm is designed to promote practice which:

1. a) achieves or exceeds the Care Quality Commission (CQC) fundamental standards below which care should never fall; Regulation 13: Safeguarding service users from abuse and improper treatment. <https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-13-safeguarding-serviceusers-abuse-improper>
2. b) Upholds the six key principles which inform the way in which all staff should work with adults, <https://www.highspeedtraining.co.uk/hub/principles-of-the-care-act-2014/> and,
3. c) provides clear procedures to be followed should adult protection issues arise.

Our objectives are to:

- Always act in the interests of the member and respect confidentiality in all cases
- Contribute to inter-agency working in line with statutory guidance, ensuring our safeguarding arrangements align with local Safeguarding Board procedures
- Ensure the safe recruitment of all staff working with members across the organisation
- Provide Safeguarding training ensuring all staff are aware of their duties and responsibilities
- Ensure our advocates work to the Care Act and Advocacy Charter when advocating for individuals as they go through a safeguarding process
- Ensure that the Advocacy DSL and Deputies complete updated Safeguarding training in line with local Safeguarding Board guidance
- Teach our members about safeguarding and promote ways they can access help and support
- Ensure that there is a transparent system to manage allegations against staff members involving LADO/PIPOT/DBS



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- Ensure that the CEO / Safeguarding Lead Trustee liaise with the local authority and/or partner agencies on Safeguarding matters and if any allegations are made against the Advocacy DSL

4. Roles and Responsibilities

My Life Advocacy Chief Executive Officer

The Chief Executive Officer (CEO) will take the lead responsibility for safeguarding if any concerns are raised in respect of the Advocacy Designated Safeguarding Lead.

Chief Executive Officer Caroline Tomlinson

Designated/Deputy Designated Advocacy Safeguarding Lead.

The Designated Safeguarding Lead (DSL) and the Deputy DASL are most likely to have the complete picture and be the most appropriate person to advise on responses to safeguarding concerns. The DASL should take lead responsibility for safeguarding and ensure that My Life Advocacy's Safeguarding policy is fully implemented. Together with the DSL The Designated Advocacy Safeguarding Lead has responsibility for the day-to-day operational implementation of safeguarding practice across My Life Advocacy. This includes:

- Ensuring all My Life Advocacy staff receive safeguarding training upon commencement of post and annually thereafter.
- Receiving information from any of the staff, members and associates who have a safeguarding concern and ensuring this is recorded accurately for My Life Legacy on CPOMS or for Advocacy in an Advocacy case notes, where appropriate.
- Providing advice on action to be taken or consulting statutory safeguarding agency (e.g., relevant Council Safeguarding Team, individual social worker) to test any doubts.
- Managing the proactive Safeguarding discussions for the most complex cases
- Co-ordinating referrals to the Safeguarding Team and any other bodies as appropriate e.g. Ofsted, CQC.
- Collating Board reports for My Life Board of Trustees detailing safeguarding activity, interventions and outcomes.

Designated Safeguarding Lead:

Advocacy Designated Safeguarding Leads:

Safeguarding Lead Trustee

Gareth Hughes – My Life Legacy



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Nigel Lyons – My Life Advocacy

The Board of Trustees has a duty to ensure that My Life Advocacy meets its statutory safeguarding responsibilities and that all the members supported by My Life are safe. The DSL provides quarterly reports to the Board which advocacy will contribute with, to support their execution of this function. In addition to this there is a designated Lead Trustee for safeguarding who carries out regular safeguarding review with the DSL.

Lead Trustee for Safeguarding: Amanda McDonough

Staff

“What if I’m right?”

All staff, volunteers and trustees working on behalf of My Life Advocacy have a duty to promote the welfare and safety of all our child, adult members and service users. Staff may receive disclosures of abuse, observe or have suspicions of abuse. Any such concerns (whether or witnessed or otherwise) should be reported immediately to the DSL or the most senior member of staff on duty in their absence.

“Safeguarding and promoting the welfare of children is everyone’s responsibility, everyone who comes into contact with children and their families has a role to play”

Keeping Children Safe in Education (2018) P.5

“If someone knows that abuse or neglect is happening, they must act upon that knowledge, not wait to be asked for information.”

Care & Support Statutory Guidance DOH (2014) para. 14.185

<https://www.gov.uk/government/publications/care-actstatutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

Staff working with our members or service users are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a member, staff should always act in the interests of that individual. Staff should always share their concerns with a colleague, not thinking “What if I’m wrong?” but thinking *“What if I’m right?”*

Staff should not assume a colleague or other professional will act and share information that might be critical in keeping a person safe. Early information sharing is vital for effective identification, assessment and identifying the best response (see Procedures on page 9).



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“Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children”

Keeping Children Safe in Education DfE (2018) P.12

If a child is at immediate risk of harm, a referral should be made to children’s social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in My Life’s Safeguarding practice. They should feel able to raise concerns with the Senior Leadership Team. Staff can also utilise the Whistleblowing policy where appropriate.

5. Policy

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Abuse is a form of maltreatment - somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Children and adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting put children and adults at risk of danger. Safeguarding issues can also manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), physical abuse, sexual violence/sexual harassment and sexting (also known as youth produced sexual imagery) and initiation/hazing type violence and rituals. Such incidents should not be passed off as ‘banter’ and will be treated as a safeguarding concern in the same way as any other issue through My Life Advocacy’s Safeguarding procedures.

Contextual safeguarding: safeguarding incidents and/or behaviours can be associated with factors outside My Life. All staff should be considering the context within which such incidents and /or behaviour occur. Assessments of members should consider whether wider environmental factors are present in their lives that are a threat to their safety and/or welfare. Special Educational Needs (SEN) and disability should be considered as part of the contextual safeguarding agenda; therefore, the members of My Life are particularly vulnerable.

Being alert to abuse means:



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- Thinking about what we see and asking if it is acceptable behaviour.
- Taking a member-centred approach and being mindful of discriminatory behaviour.
- Always taking seriously what we are told.
- Being mindful of any signs/signals/non-verbal communication that could suggest abuse or neglect.
- Being mindful that adults may be targeted by organisations or persons associated with terrorism, trafficking, slavery and forced marriage.

The following are categories of child abuse but the core element that ties them together is **the emotional effect on the child:**

- Physical abuse including Female Genital Mutilation (FGM) https://greatermanchesterscb.proceduresonline.com/chapters/p_fgm.html
- Emotional abuse <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/emotional-abuse/>
- Sexual abuse including child sexual exploitation and child on child sexual violence and sexual harassment <http://www.wiganlscb.com/Professionals/Keeping-children-safe/Child-sexual-exploitation.aspx>
- Neglect <https://www.gov.uk/government/publications/indicators-of-neglect-missed-opportunities>
- Criminal Exploitation <https://www.stopthetraffik.org/criminal-exploitation/>

These categories are considered for abuse of 'adults at risk'; the Care and Support Statutory Guidance (issued under the Care Act 2014; link on page 5) outlines how abuse takes many forms and how individual circumstances should be considered.

Exploitation is a theme in these categories:

- Physical
- Psychological
- Sexual
- Financial or material
- Neglect and acts of omission
- Domestic abuse (including 'honour' based violence)
- Modern slavery
- Self-Neglect
- Organisational
- Discriminatory / Hate Crime

Further detail can be accessed via this link;
<http://wigansafeguardingadults.org/Public/What-isabuse/Types-of-abuse.aspx>

Finally, these categories cover both children and adults at risk;



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- Prevent – Radicalisation for the purposes of terrorism activity
<https://www.wigan.gov.uk/Docs/PDF/WSCB/PVE-Policy.pdf>
- Forced Marriage - <https://www.gov.uk/stop-forced-marriage>

6. Procedures

The four Rs RECOGNISE RESPOND RECORD REFER

To begin the process of following the four Rs, we must first be able **Recognise** the signs of abuse. This maybe any of the categories as listed on page 7 and detailed within the respective links.

If we recognise it, we need to **Respond** to it. Remember, as identified in Staff Responsibilities on page 5, any such concerns (whether or witnessed or otherwise) should be reported immediately to the DSL or the most senior member of staff on duty in their absence.

Recording - this is the crucial part. Ask yourself “Why did it happen? When did it happen? What happened? Who said it? What was going on? What was happening at the time? Who was around? Why that time?” Submit an ‘incident’ to CPOMS (see further detail on pages 12 and 13) or include detailed notes within an individual’s advocacy case file (where relevant).

Refer - is there an immediate risk of harm to this child or adult? If so, we must ring the Police on 999, and ring the relevant Local Authority Safeguarding Team, and not delay.

Wigan Children’s Social Care 01942 828300 or <https://apps.wigan.gov.uk/ChildReferral/>
Wigan Adults Social Care
<https://apps.wigan.gov.uk/adultsafeguardingreferrals/ReferralForm.aspx>

Lancashire Children’s Social Care 0300 123 6720 (or on 0300 123 6722 between 8.00pm - 8.00am)

[Lancashire CSC referral form 2017](#) (Ctrl and double-click) then email to cypreferrals@lancashire.gov.uk. Lancashire Adults Social care https://lancashire-self.achieveservice.com/service/Lancashire_Safeguarding_Adults_Process

St Helens Council Contact Centre 01744 676767 (Children and adults – ask for duty social worker) Bury Multi Agency Safeguarding Hub - Children 0161 253 5678

Bury Multi Agency Safeguarding Hub - Adults 0161 253 5151



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Bolton Safeguarding Children Referral and Assessment Team 01204 331500 or Early Help Form;

<https://www.boltonsafeguardingchildren.org.uk/downloads/file/120/early-help-assessment-and-action-plan>

Bolton Safeguarding Adults 01204 337000

https://selfserve.bolton.gov.uk/CitizenPortal/Form.aspx?form=Adult_Safeguarding_Referral

Dare to Share!

Information sharing is essential for effective safeguarding and promoting the welfare of children and adults at risk. It is a key factor in many serious case reviews (SCRs) where poor information sharing has resulted in missed opportunities to take action that keeps people safe. All staff have a professional responsibility to share relevant information with other professionals, particularly investigative agencies and adult social services.

Any decisions to share information should have due regard to the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (see link on page 2), and the 7 golden rules to sharing information – see page 4 of the following link.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

The GDPR and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. For adults at risk the principles governing the sharing of information are based on the 'best interests' of the adult. The Caldicott Committee Report on the Review of Patient – Identifiable Information (DOH 1997) makes specific reference to 'best interests' in paragraph 4.5 on page 105; <http://static.ukcgc.uk/docs/caldicott1.pdf>.

My Life Advocacy

Within My Life Advocacy, when an advocate has safeguarding concerns regarding an individual, where possible this will be discussed with the person, to include: explaining the options, the need to inform the local authority and find out what they want to happen.

Advocates will discuss confidentiality with all service users and give clear examples of the limitations of this, listed as follows:

- Intention to harm self or others, including immediate dangers to life
- Vulnerable Adult issues (Safeguarding)



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- Vulnerable children issues (Safeguarding)
- Intention to break security rules such as an intention to abscond from an in-patient ward -
Intention to commit a crime, including possession of illegal substances

- Acts of terrorism

When an advocate feels they need to disclose information this will be shared immediately with the Advocacy co-ordinator and/or the Designated Safeguarding Lead (DSL) straight away. If they cannot be contacted then a call should be made to the local authority safeguarding. A record of the disclosure and a detailed account of what was said and done needs to be recorded in the individual's confidential case file.

The DSL will direct the concern to be raised with the local authority for the area in which the service user resides. Contact details for a number of North West Local Authorities are shown on page 9 of this document.

Following a referral, an advocate will make a follow up call to the relevant Local Authority to confirm they have received the referral and if they intend to start a safeguarding enquiry, what protective measures they have put in place and who is overseeing the enquiry. Where possible, the person at risk will be updated on an advocate's actions. Case notes will be kept up to date. An advocate will only close the issue with the permission of their manager.

Advocates receive Safeguarding training from My Life DSL which is updated on an annual basis. We are also able to seek advice from Wigan Authority.

<https://www.wigansafeguardingadults.org/Professionals/Index.aspx>

Advocates also receive regular supervision and it is an advocate's responsibility to ensure supervision sessions are used effectively, and that any matters that they believe may have safeguarding implications are raised. Line managers should also be attentive to any indications that a safeguarding matter may arise.

CPOMS

CPOMS is My Life Legacy chosen software solution for monitoring Safeguarding across the organisation. CPOMS is a secure, web-based solution that allows staff to feel confident in the knowledge that the information they report is shared instantly with the relevant people, immediately and securely. All our staff can log on to CPOMS and create information on any member they have concerns about. They cannot, however, access member information without the required permissions (managed by DSL); Though the use of CPOMS will be limited for My Life Advocacy staff as Safeguarding referrals will be open to the LA already due to the nature of referral. But awareness of how to use the organisational safeguarding web based solution is part of any advocates induction.



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REMM – Risk Evaluation, Management and Monitoring

REMM is the process by which My Life Advocacy can work together across the different business areas on the management of complex risks presented by individual members who access our other services other than Advocacy.

The whole purpose of identifying and managing complex cases aims to allow effective information sharing between the staff who regularly support those members. This allows for greater understanding of individual need and a more consistent response where necessary, leading to a greater organisational ability to recognise when a member is either in or approaching crisis. The process is managed and monitored holistically by My Life Advocacy, rather than responsibility for those tasks remaining within a particular business area where the member is located.

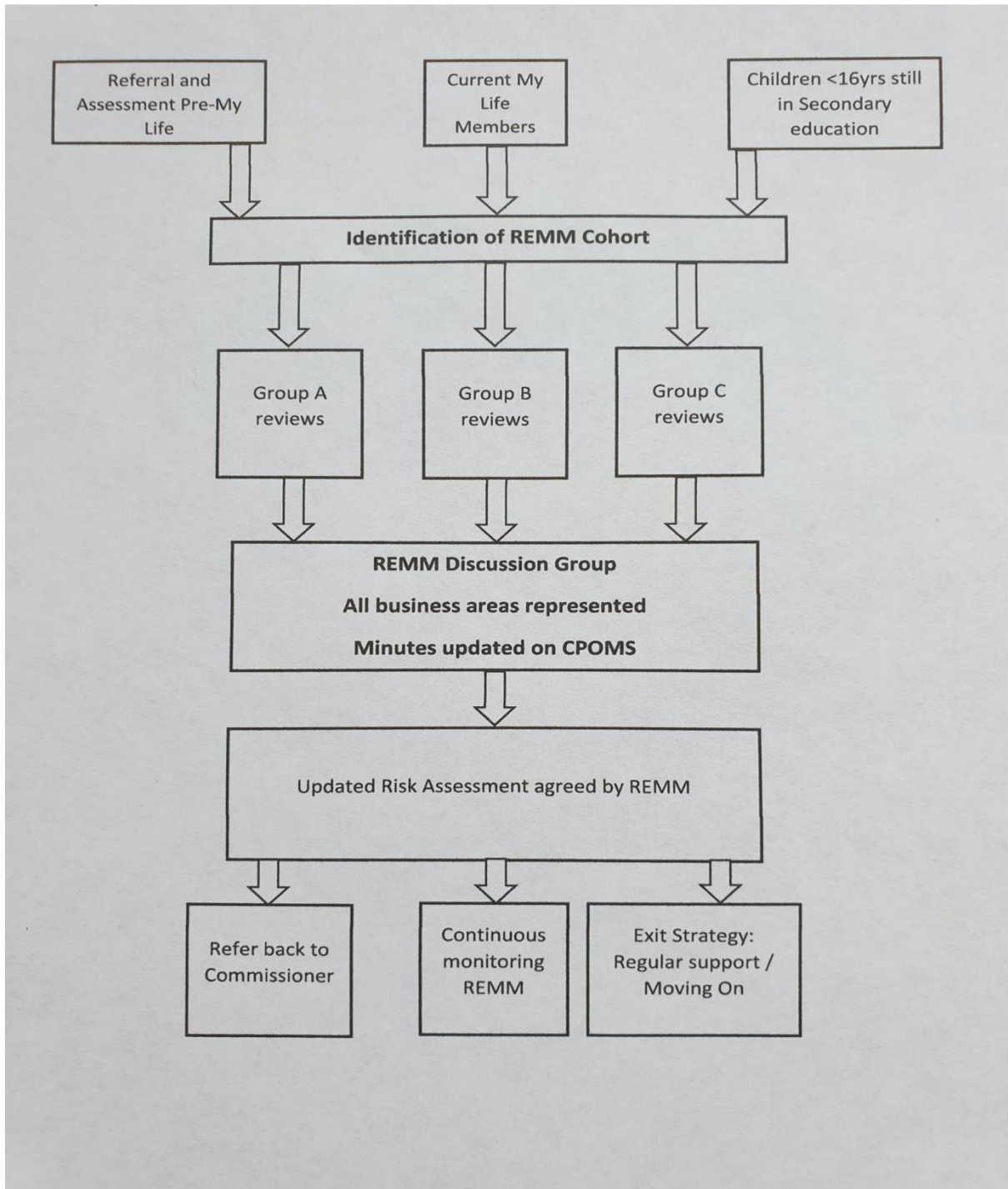
This process ensures that;

- we have both the capacity and the capability to provide the level of support needed by a member in advance of any agreement to provide services,
- allows us to monitor and respond to variability once services are being provided and,
- if necessary, enables us to refer back, with a detailed evidence base, to the commissioner for a review of support requirements should difficulties be encountered.

It also enables us to develop individual 'exit' strategies from My Life when the member moves on, incorporating an 'after care' / follow up element to aid transition.

Our aim is that this process increases confidence in My Life Legacy and My Life Advocacy and enhances its reputation among members' parents, carers and the wider community.

The REMM process can be presented as follows;



My Life Advocacy will continue effective use of supervision, It is the responsibility of all staff and volunteers to ensure that they use their supervision sessions effectively, and in particular



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to raise any matters that they believe may have safeguarding implications. Line managers should be attentive to any indications that a safeguarding matter may arise. Regular training in Adult Safeguarding for all My Life Advocacy staff and volunteers; are required to attend Safeguarding awareness training at the start of their role, and to refresh this at least once every three years. Managers must also attend the Safeguarding for Managers course, and refresh this at least every three years. Whistleblowing, any My Life Advocacy staff member or volunteer who believes that practice within the organisation is putting vulnerable people at risk is encouraged to raise this at once with their line manager, or with the Chief Executive. However, if they believe this will not lead to resolution, or if they believe there has been a failure to communicate a safeguarding matter to the local authority, they should raise the matter directly with the relevant local authority. They will be protected should they do so by My Life Advocacy Whistleblowing Policy.

7. Further Resources

<http://www.itsnotokay.co.uk/> Child sexual exploitation campaign providing advice, guidance and resources for children, parents and professionals

<https://www.thinkuknow.co.uk/professionals/> Providing support and education to raise awareness of online child exploitation and abuse

<https://learning.nspcc.org.uk/> Tools, training and resources to keep children safe.

<https://www.scie.org.uk/safeguarding/adults> Social Care Institute for Excellence resources for Safeguarding adults

<https://realsafeguardingstories.com/> Real safeguarding Stories is a video resource for safeguarding professionals and the wider community where survivors' stories are central to tackling abuse in society.

8. Associated My Life Legacy Policy links

This policy should be read in conjunction with the following policies:

- Safeguarding Policy Covid 19 appendix
- The Prevent Duty
- Recruitment & Selection of Staff
- Challenging Behaviour Policy
- Anti-Bullying Policy Statement
- Harassment Policy
- Health & Safety
- Lone Workers Policy



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- Sexual Health & Relationships Policy
- Mobile Phones Policy - referred to in Code of Conduct Policy
- My Life Advocacy Confidentiality Policy (2020)
- Discipline policy
- Staff Grievances Policy
- DBS Policy
- Equal Opportunities Statement & Policy
- Equality and Diversity Policy
- Code of Conduct
- Standards of conduct, performance and ethics
- Code of conduct for staff working with vulnerable adults
- Training and competency on Medication
- Complaints and Comments Procedure
- Overarching GDPR Policy
- Data security and data retention Policy

Copies of the above policies can be requested by calling 01257 472 900 or emailing advocacy@my-life.org.uk.
