

## Group Policy Statement

### **Safeguarding Children and Adults in Vulnerable Situations**

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**Issue: 02**

**Responsibility: HR**

#### **Scope**

All Group companies

#### **Purpose**

This policy sets out to explain the Stannah Group's commitment to safeguarding the welfare of vulnerable adults and children whom its employees may come into contact with during business operations. The policy raises awareness and provides an understanding of the issues around safeguarding and provides guidance on how to safeguard against possible abuse of children and adults in vulnerable situations if there is a concern.

#### **Policy**

This policy does not confer contractual rights on individuals. All staff have a duty of care and a responsibility to follow these procedures and training packages.

#### **DEFINITION OF ABUSE**

Abuse is a violation of an individual's human and civil rights by any other person or persons. It may consist of a single act or repeated acts and may be intentional or unintentional. The abuse can be physical, verbal, psychological, financial, or emotional and can be seen as an act of negligence or omission to act and may be the unintended consequences of a person's actions (neglect). Abuse can and may occur when an adult is persuaded to enter into financial or sexual transactions to which they have not consented or cannot consent to.

#### **RECOGNISING TYPES OF ABUSE**

Employees are trained to be aware of the symptoms and indicators when identifying the various forms of abuse.

#### **RISK**

Abuse of children and adults can be caused by anyone who is involved with the individual. It can be deliberate or inadvertent due to lack of training and awareness. Abusers can be friends, relatives, partners, casual acquaintances, care staff, healthcare staff, service providers and other people. Abuse can be by one or more individuals and can happen anywhere and not just in the Individual's home – it can occur in day centres, residential or care homes.

Neglect can be deliberate or due to carelessness or lack of communication.

Adults and children include people with learning disabilities, mental health problems, older people and disabled people, particularly when their situation is complicated by additional factors such as but not limited to:

- physical frailty; chronic illness; sensory impairment; challenging behaviour; social problems; emotional problems; poverty; homelessness; substance abuse.

## RECRUITMENT

Stannah safeguards against possible abuse of children and adults in vulnerable situations, through a rigorous selection process, suitable training and the provision of a safe environment for children and adults by means of the following:

- Through the Disclosure and Barring Service (DBS).
- Employees may only start work in unsupervised activity where they may come into contact with children or vulnerable adults once a satisfactory criminal record check is received and checked by the HR department.
- Prospective employees are required to declare all unspent convictions, cautions, warnings during the recruitment process. Any declarations will be verified by the HR department and a Senior Manager to assess whether the applicant is eligible for employment.
- It is made clear to all successful applicants that if any unspent convictions, cautions or warnings are not previously declared and which subsequently appear on a criminal record check, their application or offer for employment may be refused or their employment may be terminated with immediate effect.
- Employees are required to notify their manager and the HR department in the event that they receive a conviction, caution or warning during the course of their employment.
- Employees are required to undergo safeguarding training as part of the induction training programme and refresher training is provided as appropriate.

## THE ROLE OF THE DESIGNATED SAFEGUARDING OFFICER (DSO) STANNAH

The Designated Safeguarding Officer (DSO) will be responsible for dealing with all allegations and suspicions of abuse. The designated DSO for the Stannah Group is the Head of HR.

The DSO will:

- i. Receive and record information from staff members, the persons themselves, any carers or other agencies that have person protection concerns.
- ii. Assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate.
- iii. Consult where appropriate with Social Services to test out any uncertainties.
- iv. Make a formal referral to a statutory agency without delay, if necessary.
- v. Be responsible for dealing with any enquiries from the media if an incident or allegation of abuse arises.

The DSO will not decide if a person has been abused, as this is the task of Social Services.

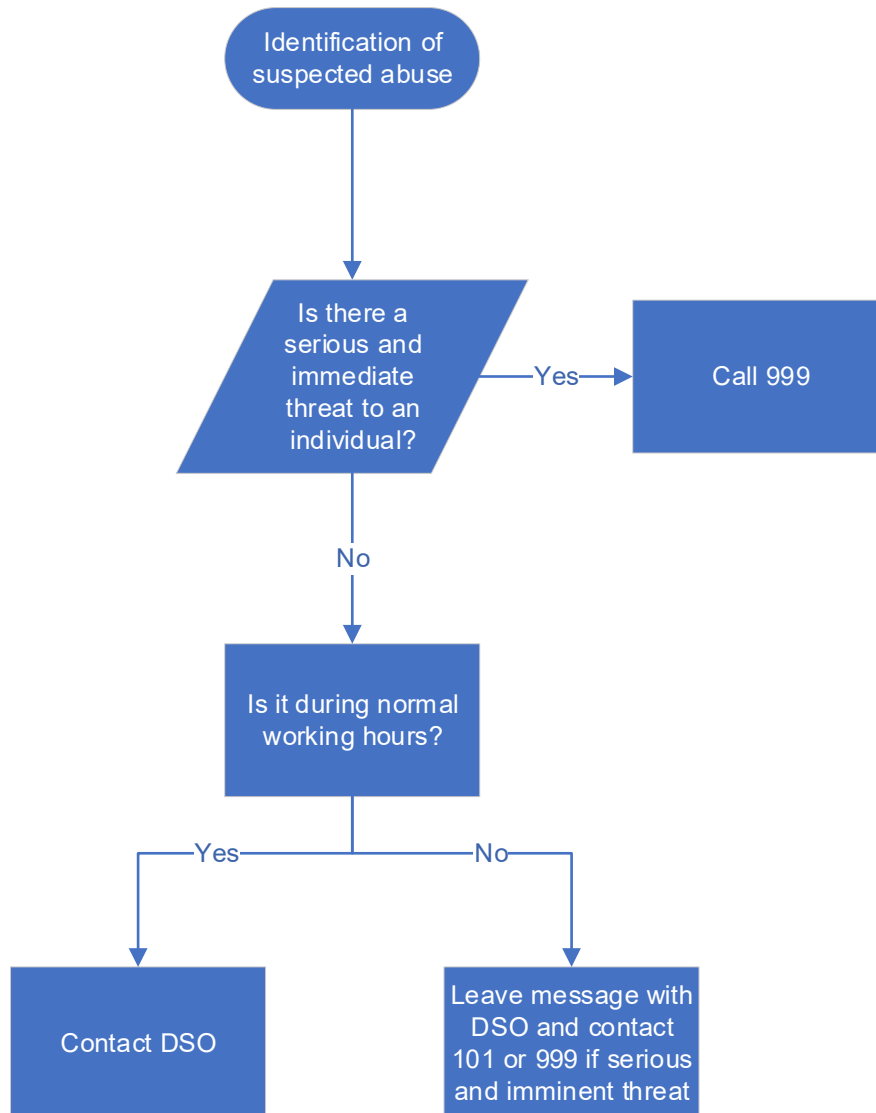
## WHAT STANNAH EMPLOYEES ARE TO DO IF THERE IS AN ALLEGATION OR SUSPICION OF ADULT OR CHILD ABUSE

Stannah does not have the powers to investigate any form of abuse; however, employers do have an obligation and responsibility to report suspicions or disclosures of abuse to the relevant authorities. Although employees are encouraged to know about the signs and signals which make them suspect that someone might be at risk, many incidents will only come to light because the person discloses this themselves. A disclosure may take place many years after a traumatic event, or when someone has just left a place where they were afraid. All disclosures should be taken seriously and reported as appropriate.

The Safeguarding Code of Conduct (available on Pop) outlines what is expected of employees to help safeguard both the vulnerable individual and the employee and/or people who help/care for them.

## Procedure

The below flowchart outlines the reporting procedure following the identification of a safeguarding concern:



The contact details for the DSO are:

<b>Safeguarding Officer</b>
Caroline Johnstone, Recruitment and Talent Acquisition Partner
T: 01264 341326
E: <a href="mailto:caroline.johnstone@stannah.co.uk">caroline.johnstone@stannah.co.uk</a>

If you identify a safeguarding concern outside of standard office hours, you should raise the concern by leaving a message by phone or email with the DSO, who will acknowledge this as soon as possible during standard hours. If there is a serious and imminent threat to a vulnerable person that cannot wait, you should contact either 101 or 999 depending on the circumstances.

## **CRIMINAL OFFENCES**

If you witness abuse which you suspect is a criminal offence, or someone makes a disclosure to you about being a victim of a recent criminal offence, in addition to the above, you **MUST**

- i. Call the emergency services by dialling 999 and follow any advice received.
- ii. Allow the police to conduct all questioning.
- iii. Work with the police at the scene and cooperate with the investigating officer during any investigation.
- iv. Contact the DSO as soon as you can to report on the incident.

Failure to comply with this process might result in any defence asking for evidence to be withdrawn on the grounds that the information has been unfairly obtained 'due to leading the victim or a witness'.

**NOTE:** In all cases, staff should attempt to obtain the consent of an individual before calling the police. This is not always appropriate and the requirement to obtain consent may be overridden or dispensed with depending on the seriousness of the incident, the risk to other people, and/or the capacity of the individual to make the decision.

The DSO will be designated as the key contact with direct responsibility for ensuring that appropriate action is taken. All safeguarding incidents will be logged and reviewed at management meetings (taking client confidentiality into account).

## **COMPLAINTS AND ALLEGATIONS BY INDIVIDUALS**

If a manager is aware that an individual has accused a member of staff of abusing, or suspected of abusing, an adult or child at risk, they should use both the safeguarding children and adults policy (this document) and our internal company disciplinary procedures to take action to protect adults or children from the risk of abuse.

If the manager believes the seriousness of the allegation warrants that they suspect a crime has been committed, they must inform the police.

Should an incident involving a member of staff be reported, the member of staff will be immediately suspended on full pay during the investigation into any allegations. This is not only to protect Individuals, but also to protect the member of staff whilst the investigation is completed. Suspension does not imply that any decision has already been made about the allegations.

If it appears that an external investigation is necessary, then the police or the responsible adult social care team will coordinate the response with other agencies as required.

Stannah will comply with employment legislation at all times and must await the outcome of any external investigation before taking any disciplinary action. We may, however, carry out our own internal inquiry into the issues raised.

### **Action taken upon outcomes of investigations**

Depending on the outcome of any police, Social Services or other agency's investigation, or in the case of an internal investigation, additional action will be decided based on the Stannah disciplinary procedure and may result in the issuing of sanctions up to and including summary dismissal.

## **MANAGING RISK**

Stannah takes a risk-based approach to the management of operations.

Our robust vetting and recruitment procedure reduces risks and include checks by the Disclosure and Barring Service (formerly the Criminal Records Bureau and the Independent Safeguarding Authority). In order to avoid, control or manage any risk, we will immediately suspend, or find alternative work arrangements pending the outcome of our own or any other investigation, for the individual employee.

A decision not to suspend or arrange alternative work arrangements for an employee and/or not to inform the police will be fully documented and endorsed separately by an independent director or senior manager, in consultation with HR.

## **RAISING CONCERNS (PUBLIC DISCLOSURE OR WHISTLE BLOWING)**

Stannah promotes an open organisational culture in which employees are encouraged to raise genuine concerns of abuse without fear of reprisal. In addition to raising concerns with the DSO, Stannah's Public Disclosure (Whistle Blowing) Policy is available on Pop, the Company Intranet site. This policy should be consulted if an employee suspects a colleague/manager is abusing, colluding with an abuser or not taking an abuse matter seriously.

## **SUPPORT FOR THOSE WHO REPORT ABUSE**

All those making a complaint or allegation, or expressing concern, whether they be staff, Individuals, carers or members of the general public, should be reassured that Stannah will ensure that complaints will be taken seriously and will be investigated. Comments will usually be treated confidentially, but their concerns will be shared if they or others are at significant risk.

## **CONFIDENTIALITY**

Stannah believes that the welfare of the person in the vulnerable situation is paramount, which means that the consideration of confidentiality that might apply to other situations within our Organisation should not be allowed to override the right of the person to be protected from harm. Wherever possible, the consent of the individual concerned should be obtained to the sharing of information for the purpose of protection from abuse.

However, where possible, every effort should be made to ensure that confidentiality is maintained for all, and by all, concerned, when an allegation is made and whilst it is being investigated. We will seek to balance protecting persons from harm whilst protecting our employees from the risk of unfounded allegations.

## **SUBCONTRACTORS**

As well as complying with Stannah's policies and procedures, evidenced through checks and monitoring, all subcontractors must be able to produce criminal record check records for their employees; no more than 3 years old, and evidence that safeguarding training has been undertaken.

## **TRAINING AND AWARENESS**

Safeguarding training is incorporated into the work induction training programme for all new employees involved in the provision of care and support services to at-risk adults and children. Each new employee or an employee who is transferred or promoted to a new job role, will be assessed by their manager and plan any immediate training and development need or requirement. Training is refreshed as appropriate.

## **REVIEWING**

This policy will be monitored and reviewed annually, in line with legislation, by the Stannah HR team in the first instance, having due regard to confidentiality issues.

## **VARIATIONS**

Update to Designated Safeguarding Officer details

## **RETENTION**

The archive period for this document is 5 years.