

Please Note:-This document contains a copy of:

- Lynher Training Limited's Safeguarding Adults Policy
- Lynher Training Limited's Safeguarding Children Policy
- Log of Employee Evidence of agreement to Safeguarding Adults & Children's Policies.



Safeguarding Adults Policy

Introduction

Lynher Training Ltd believes that everyone has the right to live their life in safety free from harm, abuse, neglect and exploitation.

The purpose of this document is to explain the basic principles of safeguarding to all Lynher Training Ltd staff. It is intended to cover those issues, which are likely to be the most relevant and assist them in their recognition and handling of safeguarding concerns about adults at risk who are involved with our services, including learners, (including Apprentices), Employers and their representatives, delivery staff, office workers and visitors

This policy and procedure are consistent with the Care Act 2014 and developed in conjunction with the Zebra Collective, Plymouth, following delivery by Zebra, of a Safeguarding training event for all Lynher training staff in January 2019.

All staff and sub-contractors must make themselves aware of the organisation's policy and procedures as laid down in this document. This is an issue of importance both for adults at risk who come in to contact with Lynher Training Ltd and for the reputation of the organisation and its workers.

In the course of all our training delivery for learners, and for delivery and admin staff and visitors, we are committed to safeguarding adults at risk by:

- protecting them from the risks and experience of abuse or neglect
- making sure their safety and wellbeing is promoted and their views, wishes, feelings and beliefs are respected (see the 6 key safeguarding principles below)
- responding promptly to any allegations of misconduct or abuse
- working in partnership with other people and organisations as appropriate to prevent and stop the risks and experience of abuse or neglect
- sharing information appropriately
- providing effective management for workers and volunteers through supervision, support and training
- requiring all workers to abide by this safeguarding adults' policy and procedures
- adhering to HSE guidelines with regards to lone working (<http://www.hse.gov.uk/pubns/indg73.pdf>).
- ensuring there is a designated person to promote safeguarding awareness and practice within Lynher training Limited

Definitions:

2.1 Adult at risk as specified in the Care Act 2014 is:

An adult who:

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

“Adult at Risk” has replaced the term “vulnerable adult” as it has the advantage of focusing on the risk to the person and of the situation.

2.2 Main Categories of Abuse:

There are many forms of abuse and neglect, and instances can be one-off or multiple and affect one person or more. The list below is not exhaustive, but seeks to illustrate the sort of behaviour that could give rise to a safeguarding concern:

<p>Physical Abuse including:</p> <ul style="list-style-type: none">• assault• hitting• slapping• pushing• misuse of medication• restraint• inappropriate physical sanctions	<p>Self-neglect covers:</p> <p>This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding</p>
<p>Sexual Abuse including:</p> <ul style="list-style-type: none">• rape• indecent exposure• sexual harassment• inappropriate looking or touching• sexual teasing or innuendo• sexual photography• subjection to pornography or witnessing sexual acts• indecent exposure• sexual assault• sexual acts to which the adult has not consented or was pressured into consenting <p>Sexual exploitation involves exploitative situations from the seemingly 'consensual' relationship where sexual activity is exchanged for attention, affection, or gifts, to serious organised crime and human trafficking.</p>	<p>Psychological Abuse including:</p> <ul style="list-style-type: none">• emotional abuse• threats of harm or abandonment• deprivation of contact• humiliation• blaming• controlling• intimidation• coercion• harassment• verbal abuse• cyber bullying• isolation• unreasonable and unjustified withdrawal of services or supportive networks <p>It also includes risks posed by the misuse of mobile and interactive online services such as social networking e.g. stalking, exposure to violent or hateful content or images.</p>

<p>Finance or Material Abuse including:</p> <ul style="list-style-type: none"> • theft • fraud • internet scamming and bogus callers • coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions • the misuse or misappropriation of property, possessions or benefits <p>It can also include aspects of "mate crime", where people pretend to befriend an adult at risk, while secretly stealing from or abusing them.</p>	<p>Domestic Abuse is:</p> <p>Any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to:</p> <ul style="list-style-type: none"> • Psychological; • Physical; • Sexual; • Financial; • Emotional • So-called 'honour' based violence • Female Genital Mutilation • Forced marriage
<p>Neglect and Acts of Omission including:</p> <ul style="list-style-type: none"> • ignoring medical • emotional or physical care needs • failure to provide access to appropriate health, care and support or educational services • the withholding of the necessities of life, such as medication, adequate nutrition and heating 	<p>Organisational Abuse including: neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.</p>
<p>Discriminatory Abuse including forms of:</p> <ul style="list-style-type: none"> • harassment • slurs or similar treatment: <ul style="list-style-type: none"> ○ because of race ○ gender and gender identity ○ age ○ disability ○ sexual orientation ○ religion 	<p>Modern Slavery encompasses:</p> <ul style="list-style-type: none"> • slavery • human trafficking • forced labour and domestic servitude. • traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
<p>Radicalisation: - a process by which people are drawn towards and groomed to support violent extremism and in some cases join terrorist groups. There is no 'typical' profile of what kind of person is at risk of radicalization, and contact with radicalisers can take a direct form, i.e. face to face, or indirectly through <i>the internet, social networking or other media</i>.</p> <p>Please also see Prevent information below, and Online safety for learners' information Appendix 3</p>	

Prevent is the Government counter-terrorism initiative and is a multi-agency approach to safeguard people at risk of radicalisation. Lynher Training Limited has a legal obligation to fulfil the Prevent duty statement by protecting learners and staff from radicalising influences. Our staff are trained to educate apprentices and other learners to understand the nature of extremism and how they may be affected. Learners are taught to be resourceful and resilient, and training programs are designed to boost learner's self-esteem and sense of responsibility, enabling them to make safer choices. Small class sizes enable tutors to better identify changes in behaviour of learners, with 1:1 review held at every session with every learner. If staff believe someone is at risk of radicalisation they can help them obtain support and prevent them becoming involved in terrorism by raising their concerns via the confidential Anti-Terrorist Hotline on 0800 789 321 or emailing prevent@devonandcornwall.pnn.police.uk. See also Lynher Training's Prevent Policy, and Prevent Risk Register www.lynher.com policies

*Please also see Appendix 3) **Online safety for learners**.*

For full definitions of the above and signs/indicators refer to Plymouth Safeguarding Adults Board Procedures Manual:

http://plysab.proceduresonline.com/chapters/p_cat_abuse.html

Concerns about abuse may arise in a number of ways:

- the adult at risk may tell you
- via another person
- through the person's behaviour
- through visual signs e.g. bruises
- the behaviour or attitude of a person towards the adult at risk worries you or makes you feel uncomfortable in some way

3. Six Key Principles of Safeguarding Adults

Lynher Training Ltd subscribes to the six key principles (which underpin all adult safeguarding work and apply to all sectors and settings), as set out in the Care Act 2014 Care and Support Guidance: <https://www.gov.uk/guidance/care-and-support-statutory-guidance/safeguarding>

These principles should inform the ways in which we respond to and support adults at risk:

- **Empowerment**
People being supported and encouraged to make their own decisions and have informed consent
- **Prevention**
It is better to take action before harm occurs
- **Proportionality**
The least intrusive response appropriate to the risk presented
- **Protection**
Support and representation for those in greatest need
- **Partnership**
Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability**
Accountability and transparency in delivering safeguarding

4. Guidance for workers - if you suspect abuse or neglect has occurred:

4.1 All workers have a responsibility to share their concerns with the Designated Safeguarding Person (DSP) as soon as possible depending on the urgency/ seriousness of the concerns

4.2 The DSP will then consider how to take the matter forward e.g., a referral to the Local Safeguarding Adults Team (see Appendix 1) and keep you informed of their decision

4.3 It is important that all workers communicate concerns accurately. To this end, workers will follow the procedures below:

- Upon the receipt of any information about an adult at risk, including from the person themselves, you must record accurately what you have seen, heard or know, at the time the event occurs or as soon as possible afterwards
- You must share your concerns with the DSP at the earliest possible opportunity, provide any information that you have, and agree actions to be taken which should be recorded clearly and SMART.
- Always REFER never INVESTIGATE any suspicions or allegations about abuse.
- Do not assume that someone else will help the adult at risk

4.4 If your information has come from the adult at risk themselves then you must do the following:

1. Listen carefully to what they are telling you, stay calm. Keep questions to a minimum and ensure that you only ask OPEN questions.
2. Assure them they have done the right thing by telling you and that you are taking the concerns seriously
3. Do not start to investigate or ask detailed or probing questions
4. Explain that you can't keep secrets but the information will be treated confidentially i.e. need to know basis only. This means you will inform the Designated Safeguarding Person who may refer the concerns to Adult Social Care. DO NOT GOSSIP
5. Wherever possible, consider what the adult at risk wants to happen next. On some occasions, it may be necessary for the designated person to raise a safeguarding concern even if this is contrary to the wishes of the adult at risk. Reassure the person that they will be involved in decisions about them.
6. Make a formal written record of everything that has happened/been discussed as soon as possible. All recording should be factual - use the exact words/terminology that the adult at risk has used. Do not include your opinion(s).
7. In the report you must include: the date and time of disclosure, suspicion or allegation and the exact time and date when you wrote the report. Sign your report and print your name and position.

8. Your report should include the following details:
 - date and time of what has occurred
 - details of the alleged victim such as name, date of birth, address
 - who disclosed the information (if not the alleged victim)
 - any information you may think relevant
 - details of the alleged abuser, such as name, date of birth, address, current whereabouts and his/her relationship to the victim.
 - details of other parties involved
 - the wishes and desired outcomes of the adult at risk
 - details of what action you or anyone else have taken
 - details of reporting including who to, who by and when

9. Give the DSP your report, they have a duty to keep this report in a safe and secure place. They will also keep in contact with you, and support you through this process.

10. Family members of the adult at risk will be informed when/if appropriate by the Investigating Safeguarding Team.

Where required take immediate action to ensure the immediate safety and welfare of the adult at risk (and any other person at risk).
Speak to the DSP where possible for further guidance. Otherwise:

- If urgent medical attention/ambulance/police presence required dial 999
- If a crime needs to be reported dial 101 unless there is an immediate risk, in which case dial 999
- Be aware of the possible need to preserve forensic evidence

5. Additional Guidance for the Designated Safeguarding Person (DSP) when raising a Safeguarding Concern

5.1 When you are informed or become aware of possible abuse or neglect gather information, including what the adult wants to happen now.

The Care Act Guidance emphasises how safeguarding should be person-led and outcome-focused. It should engage the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving their quality of life, wellbeing and safety.

5.2 Decide whether to raise a safeguarding concern, and if so, take action.

- Immediately where the concern is urgent and serious
- Within the same working day for any other concerns
- Document the incident and any actions or decisions taken
- Provide support for the person identifying the safeguarding concern

Appendix 1 contains a list of contact details for the four Local Authorities in whose areas Lynher Training Ltd currently delivers most work.

5.3 On some occasions it may be necessary to raise a safeguarding concern even if this is contrary to the wishes of the adult at risk. Any such decision should be proportional to the risk, for example:

- It is in the public interest e.g. there is also a risk to others
- The person lacks mental capacity to consent and it is in the person's best interests
- The person is subject to coercion or undue influence, to the extent that they are unable to give consent
- It is in the person's vital interests (to prevent serious harm or distress or life-threatening situations)

If you remain unsure whether to raise a safeguarding concern, you can seek advice from local Safeguarding Teams (see Appendix 1)

5.3 Where, after proper consideration, there is a decision not to proceed with raising a safeguarding concern, the reasons for this and any alternative action taken must be fully recorded.

6. Allegations against workers

6.1 Any allegation made against any representative of Lynher training Limited who works with an adult at risk or has contact with them must be taken seriously.

An allegation or suspicion of abuse should be reported immediately to the DSP. It is important that a detailed record is kept, dated and signed.

On receipt of the report the DSP should review the allegation in the light of the three criteria below and take appropriate action.

Where a staff member or subcontractor has:

- Behaved inappropriately in a way that has harmed or may have harmed an adult at risk or
- Possibly committed a criminal offence against or related to an adult at risk or
- Behaved towards an adult at risk in a way that indicates s/he is unsuitable to work with people with care and support needs

The DSP should immediately report the allegation or suspicion of abuse to the local Safeguarding Adults Team (see Appendix 1)

If the DSP is implicated the allegation should be reported to the Local Safeguarding Team for impartial review.

6.2 If an allegation of abuse is made against you, then you must follow the guidelines below and remember:

- The welfare of the adult at risk is paramount
- You must remove yourself from the situation immediately.
- You must refer the matter to the DSP immediately (the earliest possible opportunity), and provide any information that you have, and agree action to take. Provide the DSP with a report immediately (the earliest possible opportunity).
- The DP will decide on the next course of action

6.3 If an allegation of abuse is made against another worker [inside or outside of Lynher Training Ltd] in a session where you are also present then you must follow the guidelines below and remember:

- The welfare of the adult at risk is paramount
- You must ensure that the worker who has been accused of abuse is removed from the situation immediately
- You must ensure that the adult at risk concerned is free from any possible risk of harm
- You must contact the DSP immediately, provide any information that you have and agree action to take.
- Provide the DSP with a report immediately (the earliest possible opportunity).
- You must follow these guidelines if an adult at risk tells you about another worker from any organisation outside of the session.

7. Recruitment, Training and Supervision

7.1 As Lynher Training Ltd's delivery involves Regulated Activity, all delivery staff undertake DBS checks. Lynher Training Ltd's Quality Assurance officer ensures that DBS checks are kept up to date and records are stored and maintained with the staff CPD records. Lynher Training Ltd recognises that DBS checks alone do not ensure prospective staff and sub-contractors are safe to work with vulnerable and we operate safer recruitment procedures for any regulated activities. This includes:

- A statement in our recruitment material/pack about our commitment to safeguarding children;
- A role description that clarifies safeguarding responsibilities;
- Completion of an application form;
- Checks on identity and work history;
- Checking of two references;
- An interview;
- An enhanced DBS check (as outlined above)
- No prospective staff member or sub-contractor can be in one-to-one contact with a child / young person or without the presence of another adult who has a current enhanced Disclosure and Barring Service check until identity, references and Enhanced DBS Checks have been completed.

Lynher Training Ltd will operate a rolling programme of re-checking DBS checks for holders of all identified roles and posts. Existing staff (paid or unpaid) who transfer from a role which does not require a DBS check to one which involves contact with children are subject to a DBS check

7.2 Each staff member or sub-contractor will undertake regular Safeguarding Adults training to gain a basic awareness of signs and symptoms of abuse and how to respond to a concern of abuse. The DSP will have access to further safeguarding training as required for their role.

Lynher Training Ltd will emphasise to all workers that they have a duty to report any concerns they have regarding the possible abuse of an adult at risk in touch with our services immediately to the DSP.

7.3 Safeguarding adults will be discussed in supervision as the need arises. Staff and sub-contractors will be supported by the DSP.

7.4 Each staff member and sub-contractor is required to read this policy and to sign to that effect.

NOTE: if you are worried at any time, please discuss your concerns or worries with the DSP.

Designated Safeguarding Person (DSP): Karen Howell

Appendix 1

Contact Details of Local Safeguarding Teams

As Lynher Training Limited works across a number of Local Authorities the Designated Safeguarding Person may need to raise a safeguarding concern with teams in one of the following areas:

Plymouth

Adult Social Care -Tel: 01752 668000

Out of Hours: 01752 346984

Online form:

<http://www.plymouth.gov.uk/homepage/socialcareandhealth/adultsocialcare/adultsafeguardingboard/asbpublic/ascadultabuse.htm>

Cornwall

Multi-Agency Referral Unit (MARU) -Tel: 0300 1234 131

Out of Hours: 0300 1231 116

email: accessteam.referral@cornwall.gov.uk.

Devon

Care Direct -Tel: 0345 1551 007

Out of Hours: 0845 6000 388

email: csc.caredirect@devon.gov.uk.

Torbay

Safeguarding Adults Team -Tel: 01803 219700

email: safeguarding.alertstct@nhs.net

Appendix 2

Covid-19. Latest Information from the Government Guidelines for FE Providers at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1048291/Plan_B_review_FE_operational_guidance_v3.pdf

See also Lynher Training's Covid-19 Information and Measures for Courses. February 2022

Appendix 3)

Online safety for learners/ monitoring IT usage/ Cybercrime:

The Government publication Keeping Children Safe in Education 2021 Statutory guidance for schools and colleges, describes our responsibilities to our learners:

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Cybercrime. *Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;*

- *unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;*
- *denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,*
- *making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.*

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

*If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.*

*Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.*

Lynher Training Limited and employees take responsibility for monitoring learners'/ apprentices' on-line activity whilst on training programmes, in an effort to prevent danger of radicalisation or other forms of on-line abuse/exploitation occurring, including those described

above. Tutors monitor learners' use of devices such as phones and laptops during sessions, and embed training and education to encourage responsible behaviour and better choices. Learners are observed and monitored for behavioural changes as for other safeguarding issues.

All apprentices sign comprehensive statements to agree to a code of conduct for computer/ phone use, including: H&S/ IT checklist agreement, Computer Loan use agreement. Agreement terms are repeated in the Apprentice Handbook.

All Lynher Training employees must be familiar with the dangers as laid out in this policy, and if unsure what to do, they must always speak to the designated safeguarding lead DSP (or deputy).

There are a wide of range resources available for adults, children and their parents and tutors on the [UK Safer Internet Centre](#) website including:

[NSPCC](#) offers parents guidance on live streaming, online games, sexting and sending nude images.

[internetmatters.org](#) provides guidance on setting up parent control on devices as well as age specific advice.

[THINKUKNOW](#) includes a wide range of videos and information to support parents keeping their child safe online.

[ChildnetInternational](#) offers support with having conversations with children about being safe online.

[Council for Internet Safety](#) provides a practical guide for parents whose children are using social media platforms.

[CEOP](#) does not only provide information for parents but also enables users to report any harmful content online.

Additional advice about Cybercrime can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

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Reviewed 7th January 2020

To be reviewed by January 2021

Reviewed and updated March 1st 2021 Covid-19 guidelines -see Appendix 2

To be reviewed by March 2022

Reviewed 18th February 2022

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