



Safeguarding Policy		Policy Reference: CS2	
Lead Department:	Operations – Care and Quality	Approval Date: June 2024	
Approved by:	Board	Review Date: June 2025	
This document applies to the following areas of New Outlooks Business			
Group Policy – Covering all areas of the Group.			
Appendices/forms:	Safeguarding Procedure Safeguarding - Easy Read		

### SCOPE

This is a group policy and applies across all areas of New Outlook and Vision Homes.

Safeguarding is the responsibility of everyone, and this policy applies to:

- All employees, including agency staff and volunteers;
- Our Boards;
- The people we support; residents; tenants; and their families;
- Any contractor; agency; or third party working at one of our sites or having contact with the people we support;

The policy relates to all sites and offices operated by New Outlook and Vision Homes and includes communities and people's homes visited by any of our employees, Board members or contractors.

This policy has been developed in accordance with the statutory guidance and legal and regulatory frameworks as outlined under section 8.

# **POLICY STATEMENT**

New Outlook and Vision Homes take our responsibilities in relation to safeguarding extremely seriously. We promote the fundamental right of every person to live free from harm, abuse and neglect.

We have a zero-tolerance approach to abuse and every concern in investigated and followed up with appropriate action.

We recognise that safeguarding is about people and organisations working together to prevent abuse or neglect, and reducing the risk of harm occurring to the people we support. Safeguarding is working with adult with care and support needs to keep themselves safe from abuse and neglect.

Safeguarding balances the rights of people to have choice, control, and independence with promoting the safety and well-being of the people we support.

The policy sets out the roles and responsibilities to ensure all reasonable and proportionate controls and interventions are in place to safeguard any person identified as at risk of harm or abuse. In doing so, New Outlook and Vision Homes will have due regard to our statutory responsibilities set out by the Care

Act 2014 and the relevant regulatory framework, specifically the Health and Social Care Act (Regulated Activities) 2008.

The policy refers to the use of the Mental Capacity Act 2005 and Deprivation of Liberty Safeguards as the relevant frameworks to safeguard and protect individuals identified as lacking capacity to make decisions about protection.

The policy is informed by recognised best practice in relation to safeguarding, including the NICE guidance Safeguarding Adults in Care Homes 2021.

The policy is intended to achieve the following outcomes:

- Safeguarding concerns are dealt with responsively and appropriately, actions are taken in a timely way to prevent and reduce risk.
- Staff understand their responsibilities for safeguarding and feel skilled, knowledgeable, confident and supported to report concerns about abuse and neglect.
- The people we support are involved as practically possible in the safeguarding process and in decisions about their safety and well-being. They are supported to keep themselves safe; and are provided with meaningful information to recognise abuse and report concerns.
- The organisation promotes best practice in relation to safeguarding and takes learning from internal and external experience.

### **TERMS AND DEFINITIONS**

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION	
Adult at risk	This is the term used to describe the person whom the safeguarding concern is related to. The concern may be that they are at risk of abuse or neglect or may have already experienced abuse or neglect. Terminology such as person we support or vulnerable adult is also used.	
Vulnerability	The policy recognises that there is increased risk of vulnerability for people using care and support services but does not assume that vulnerability is a characteristic or identity of a person or group of people. Instead, it is used to describe a set of circumstances, experiences and factors that result in a person feeling at risk.	
Risk factors	Risk factors to consider in the context of safeguarding are complex and multiple. Factors include: age, disability, health, mental health, capacity and decision making, domestic abuse, poverty and care experienced. These factors are not exhaustive or weighted and it is frequently the interaction of multiple factors that influence risk and vulnerability. People do not necessarily view themselves as at risk or vulnerable.	
NICE	National Institute for Clinical Excellence	
CQC	Care Quality Commission – the regulator for adult social care settings.	
MCA	Mental Capacity Act 2015	
DoLS	Deprivation of Liberty Safeguards	
GDPR	General Data Protection Regulations	

### **POLICY SECTIONS**

# 1. Policy Introduction

The safeguarding policy sets out the principles, role and responsibilities for everyone at New Outlook and Vision Homes to ensure that the people we support are safeguarded from abuse or neglect. It outlines the standards we will work to and the process we will follow to ensure that our employees, Board members and contractors are clear in how to respond to concerns about safety, abuse and neglect; how to report those concerns; and the action required to keep people safe, reduce risk and prevent harm.

The policy uses a broad definition of safeguarding and applies to any person and all areas of New Outlook and Vision Homes, without exception.

The policy also covers the governance of our safeguarding arrangements and how we will learn from concerns that arise and improve the way we work as a result.

The policy is set in a multi-agency context and we operate our process in parallel to the statutory responsibilities for local authorities and local safeguarding adult boards as established by the Care Act 2014. This includes our responsibilities to report concerns about the safety and well-being of a person with care and support needs, and the statutory duty to carry out enquiries and investigate concerns. The police will also be notified, based on the nature of the concerns identified and reported. For regulated services, we will also notify the Care Quality Commission.

Our approach to safeguarding is informed by the organisational values and should be reflected in everything we do. For New Outlook, our values are:

- Approachable
- Supportive
- Professional
- Innovative
- Respectful
- Empowering

For Vision Homes, the values are:

- Caring
- Empowering
- Bold
- Integrity
- Inspirational

### 2. What is Safeguarding?

Safeguarding is the means of protecting a person's safety, ensuring the people we support are free from harm, abuse and neglect. It means people and organisations working together to prevent and stop such abuse and neglect, whilst making sure that the adult's wellbeing is promoted and gives due regard to their views, wishes, feelings and beliefs in deciding on any action.

At New Outlook and Vision Homes, we take our responsibilities for safeguarding very seriously. Our responsibilities are to:

- Stop abuse or neglect from happening as soon as it is identified. We will agree an immediate plan to stop abuse and reduce the risk of further harm or abuse.
- Implement plans to help people to keep themselves safe and to be able to identify and report
  any concerns about abuse and neglect. This includes providing meaningful information to people
  about abuse, neglect and safeguarding.
- Safeguard people in ways that supports them to have choice and control over how they want to
  live their lives and promote an approach that enables them to achieve their outcomes, goals and
  aspirations.
- Provide training and awareness for our staff and teams to understand their roles and responsibilities
  for safeguarding, including identifying concerns about abuse and neglect and how to report
  those concerns. Training will be based on the specific roles of our teams, including for managers
  to understand their roles and responsibilities. Training will be completed at induction and refreshed
  on a regular basis.
- Raise awareness, through internal communications and campaigns, on the importance of safeguarding and the need to protect people who may be at risk.
- Appoint a designated safeguarding lead to oversee the implementation of the safeguarding policy and procedure. The safeguarding lead is required to champion a person centred approach to safeguarding to ensure an open culture of listening and learning. It is also their role to advise, support and report to the Executive and Board on all matters relating to safeguarding.
- Recognise, risk assess, respond and record all safeguarding concerns and incidents. All concerns
  or allegations of abuse or neglect will be reported to the lead agencies responsible for carrying
  out safeguarding enquiries and investigations. This includes the local authority safeguarding team
  and police as necessary. We will fully co-operate with all enquiries and will comply with the
  statutory duty to provide information as required.
- Notify our regulator, the CQC of all concerns and incidents relating to safeguarding and abuse involving our services and the people we support. We will operate within the duty of candour and ensure that all notifiable incidents are reported.
- Maintain a safe and secure system for recording safeguarding incidents and to keep appropriate records relating to allegations of abuse or neglect.
- Promote a zero-tolerance approach to safeguarding and abuse where all concerns are investigated appropriately to ensure that there is a clear outcome or conclusion.
- Ensure that our processes for recruitment of staff working with the people we support are safe and
  robust. We will recruit in accordance with the Disclosure and Barring Service (DBS) regulations and
  will also ensure that contractors also comply with this requirement as necessary. We will also ensure
  that our processes for the supervision of staff promote a safeguarding culture and that all staff are
  clear about their roles and responsibilities.
- Promote a culture of safe-challenge where members of staff are confident and able to question approaches, practice, policy and procedure without fear or come back.

This policy is underpinned by the six principles of safeguarding and is based on the outcomes of Making Safeguarding Personal, as set out by the Care Act (2014)

**Empowerment –** people are supported and encouraged to make their own decision and give informed consent.

'I get help to understand what keeping safe means'

'I am asked what I want from the safeguarding process and my opinion directly informs what happens'

**Prevention** – It is better to take action before harm occurs.

'I am given the information I need, in the way that I need it'

**Proportionality** – The least intrusive response appropriate to the risk presented.

'I know that people will work in my interests, as I see them, they will only get involved as much as needed'

'I know that decisions are made in my best interest when I lack capacity to make them, and that this is explained to me'

**Protection –** Support and representation for those in greatest need.

'I get help and support to report abuse and neglect. I feel listened to and what I say is taken seriously. I am kept informed about what is happening'

**Partnership** – Local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse.

'I know that staff treat any personal or sensitive information in confidence, only sharing what is helpful and necessary. I am confident that people will work together and work with me to get the best result for me'

**Accountability -** Accountability and transparency in safeguarding practice.

'I understand the role of everyone involved in my life and so do they'

# 3. Types of Abuse and Neglect

The following is a guide to the types of abuse in the context of this policy. This is not an exhaustive list and there are likely to be other factors that will constitute abuse. If you are unsure, please speak to your manager.

**Physical abuse:** Includes assault, hitting, slapping, pushing, kicking, misuse of medication or inappropriate sanctions.

**Domestic abuse:** Includes psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence. This can impact on adults through witnessing or experiencing the effects of domestic abuse and/or experiencing it through their own personal relationships.

**Sexual abuse:** Includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, exposure to pornography or witnessing sexual acts, indecent exposure and sexual assault or acts which the adult has not consented to or was pressured into consenting.

**Sexual exploitation:** Used to refer to any actual or attempted abuse of a position of power or trust, for sexual purposes, including but not limited to, profiting financial, socially or politically from the sexual exploitation of a vulnerable person.

**Coercive controlling behaviour:** Used to refer to a range of acts designed to make a person subordinate or dependent by isolating them from sources of support and resources, depriving them of the means needed for independence, choice and resistance regulating their everyday behaviour and opportunities.

**Psychological abuse:** Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation harassment, verbal abuse or unreasonable and unjustified withdrawal of support networks. Also, acts deemed to be punitive or withholding access to equipment or limiting independence.

**Financial abuse:** Includes theft, fraud, internet scamming, coercion in relation to a person's financial affairs or arrangements, pressure in relation to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. This can also include identity theft.

**Modern slavery:** Includes slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters will use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. People will generally be isolated from support networks and communities.

**Discriminatory abuse:** Includes forms of harassment, unfair treatment and slurs or similar treatment, based on protected characteristics, such as race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational abuse: (also known as institutional abuse) is considered distinct from other forms of abuse or neglect because it is not directly caused by individual action or inaction. Instead, it is a consequence of how services are managed, led and governed. This includes charities, care settings and hospitals. Organisational abuse may be one-off incidents or ongoing ill-treatment. It can affect one person or groups of people. It can result in neglect, poor practice or closed cultures through structure, policies, processes and practices within an organisation.

**Neglect and acts of omission:** Includes ignoring medical advice, emotional or physical care needs and failure to provide access to appropriate health, social care support or education. The withholding of the necessities of life, such a medication, nutrition and heating or withholding aids and equipment, food, shelter clothing and emotional connection. It also includes not following agreed procedures or support plans for providing appropriate care and support. Neglect includes both action and inaction of the person providing care and support.

**Self-neglect:** Covers a wide range of behaviours in neglecting to care for one's own welfare, including hygiene, health or living environment, and includes behaviour such as hoarding.

There are additional factors now recognised as types of abuse. These include:

**Human trafficking:** The illegal movement of people through force, fraud or deception in order to exploit them, typically for forced labour or sexual exploitation. Human trafficking can include both adults and children being forced into a situation through the use (or threat) of violence, deception or coercion. People may enter the UK legally, on forged documentation or covertly under forced hiding. They may also be a UK citizen living in the UK who is then trafficked within the country. People who are considered as vulnerable, isolated or excluded are at increased risk of human trafficking.

**Exploitation by radicalisation:** PREVENT is a key part of the government's counter-terrorism strategy. Its aim is to strop people from engaging in terrorist activity or supporting terrorism. This includes preventing the exploitation of 'vulnerable' people who are risk of being drawn into radicalised extremism. All local organisations have a role in safeguarding people who meet the criteria of being at risk. Contact should be made with the police regarding any individuals identified who present concerns regarding extremism.

**Cuckooing:** This involves individuals or groups taking over a person's home in order to use it as a base for criminal activity. Organised criminal groups will target people with care and support needs in this way. The level of coercion and control involved with cuckooing often leaves the person with little choice but to co-operate with their activities.

**Forced Marriage:** Forced marriage is a marriage without the full consent of both parties and where pressure, threat and intimidation are a factor. This is a form of coercive control and severely restricts any self determination, choice or freedom for the person. This is very different to an arranged marriage.

**County Lines:** This is a term used for groups that are supplying drugs to suburban areas and rural towns, using children, young people and adults with care and support needs. Criminal groups establish a base

in the location and will use coercion, force and intimidation to require the person to be involved in their activities.

**Hate Crime:** Involves any criminal offence which is perceived to be motivated by hostility or prejudice based on a personal characteristic. Hate crime can be motivated by disability, gender identity, ethnicity, religion or faith, or sexual orientation. It should be noted that this definition is based on the perception of the victim or a witness and is not reliant on evidence.

Mate Crime: This is the exploitation, abuse or theft from any person at risk from those they consider to be their friends. People with care and support needs are targeted and the perpetrators will seek out their contact and 'friendship'. Mate crime can take the form of theft or financial abuse; cuckooing; physical assault; harassment or emotional abuse; or sexual assault or abuse. In some cases, people experiencing mate crime can be seriously harmed or even killed as a result.

**Scams:** Internet scams, postal scams and doorstep crime are frequently targeted at adults with care and support needs. They are all forms of financial abuse and the person can be coerced into parting with large sums of money or valuable items. These incidents should always be reported to the police and the local authority trading standards department for investigation. Scams are becoming ever more sophisticated and elaborate. These scams can seriously affect the health and well-being of the person.

It should be noted that these different types of abuse do not happen in isolation and the person may experience multiple forms of abuse, over a specific period. Incidents of abuse may be one-off and opportunistic or multiple and affect more than one person. We will look beyond single incidents or individuals to identify patters of concern. Repeated instances of poor practice, medication errors and notifications of improvement for staff members may be an indication of more serious concerns and a reflection of a wider issue around quality, compliance and culture within the service. To identify these patterns, we will ensure that we record and report on safeguarding issues and will routinely analyse the information we keep.

# 4. Safeguarding Children in an Adult Social Care Setting

New Outlook and Vision Homes has specific responsibilities to protect and safeguard children who, whilst not being people we directly support, will accompany the people we support, their representatives and families, and will be present in our environments, during the delivery of the service. In order to ensure we are safeguarding these children and young people, we apply the Think Family principles and promote the whole family approach.

Refer to our Safeguarding Children in Adult Settings Policy. This policy sets out the responsibilities of staff regarding any allegation of abuse involving children that may be witnessed by staff whilst working for New Outlook and Vision Homes. We are committed to working in partnership with other agencies so that the protection of children and young people is paramount.

### 5. Mental Capacity and Deprivation of Liberty Safeguards

New Outlook and Vision Homes recognise that issues relating to assessing capacity, consent and decision making all have implications for our safeguarding policy and practice. This policy has been written in accordance with the Mental Capacity Act (2005) so that we promote people's rights to self-determination, choice, control and independence whilst ensuring adequate safeguards are in place for people that are deemed to not be able to make specific decisions for themselves.

The MCA created the criminal offences of 'ill-treatment' and 'wilful neglect' in respect of harm caused to people who lack capacity to make decisions. The offences can be committed by anyone responsible for that person's care and support, either paid staff or family and informal carers.

New Outlook and Vision Homes recognise that there are occasions where we are required to restrict a person's choices, control and freedom in order to keep them safe. We have clear policies and procedures for applying restrictive interventions based on the principles of the MCA and DoLS guidance. All restrictive interventions will be based on a multi-disciplinary approach, in consultation with the person and their representatives, and will be reviewed at regular intervals.

Refer to our policies for Mental Capacity and Deprivation of Liberty Safeguards for detailed guidance and procedure.

# 6. Reporting and Responding to Abuse and Neglect

New Outlook and Vision Homes recognise that good record keeping is a vital component of safeguarding practice. We will keep full, clear, up to date and accurate records of all concerns, complaints or allegations of abuse. Recording information about an allegation of abuse should be completed as soon as possible, on the same day, that the concern is identified or disclosed.

We will maintain a chronological written record to include:

- The date and time of the disclosure, or when you were told about or witnessed the incident
- Who was involved, any other witnesses, including the people we support and other staff.
- Exactly what happened or what was told, in the person's own words, to keep in factual and to avoid interpretation of what was seen or told.
- The views, wishes and account of the person concerned.
- The appearance and behaviour of the person and/or the person making the disclosure.
- Any actions or decisions taken at each point.
- What the initial protection plan is to minimise risk and to ensure the safety and well-being of the person.
- Any other relevant information.

Records should be kept in such way that the information can easily be collated to share with the safeguarding team.

If any employee of New Outlook and Vision Homes has concerns about abuse or neglect or knows that it is happening, they must act on that knowledge and not wait to be asked for information.

Registered managers, service managers and team leaders should ensure that:

- All actions taken to safeguard people are recorded and shared with the safeguarding team as necessary.
- The Group Director of Quality and Care/Nominated Individual/Designated Safeguarding Lead is informed of all concerns and incidents without delay.
- The appropriate agencies are notified about all concerns and incidents, without delay. This includes the local authority safeguarding team, CQC and the police, as required.
- Safeguarding records are focused on the safety and well-being of the individual.
- All records are full, clear and easily accessible for the purpose of investigation, quality and compliance audits, inspection and court proceedings.
- Safeguarding records are audited on a regular basis to include a review of accuracy, quality, appropriateness and to identify development needs for staff.

#### Confidentiality

This policy has been developed in accordance with our responsibilities set out by the General Data Protection Regulations (2016). We will work within local protocols and agreements to share information set out by the relevant safeguarding board. As such, we will ensure that:

- Staff handle other people's information in a way that is fair and lawful.
- Information will only be shared on a 'need to know' basis when it is in the interests of the person.
- Confidentiality must not be confused with secrecy.
- Informed consent should be obtained from the person but, if this is not possible and other people are at risk of abuse or neglect, it may be necessary to override the requirement.
- It is inappropriate for agencies to give assurances of confidentiality in cases where there are concerns about abuse or harm.

When a person has refused to consent to information being disclosed for these purposes, we will review the decision based on the overriding public interest that would justify information sharing. This will be done in consultation with the Group Director of Quality and Care.

The effective and timely sharing of information between agencies is essential to deliver high quality safeguarding practice.

## 7. Investigations

New Outlook and Vision Homes will investigate all allegations of abuse and neglect unless there is a compelling reason why it would be unsafe or inappropriate for us to do so, such as if there is a criminal investigation or where the Local Authority Safeguarding Adults Board has identified that they will lead the investigation.

Safeguarding investigations will take precedence over other processes or un-resolved issues raised by the alleged perpetrator, such as complaints or grievances.

Where a criminal investigation is taking place, the disciplinary procedure is likely to be suspended until the Police investigation has been concluded.

The Group Directors of Quality and Care and People and Culture will decide who conducts the investigation and will also agree who and how the person involved and their representatives will be kept up to date and informed. This will be done through a named contact. We may not be able to share all specific details relating to the investigation but they should be kept up to date and informed of progress and assured that appropriate action has been taken.

The objectives of the investigation will be:

- Establish the facts based on the presenting evidence
- Assess the needs of the person, in terms of protection, support and redress
- Listen to the individual and take into account the outcomes they wish to happen
- Make decisions in regard to the follow up action required and establish the urgency of the situation and whether immediate action needs to be taken in order to keep the person, and others, safe

Employees of New Outlook and Vision Homes will make themselves available to attend any investigation interviews.

We will not accept a staff member's resignation or retirement to avoid a disciplinary hearing in the event that they have been accused of abuse. We will take all reasonable steps to ensure that the process is concluded in a timely way.

## 8. Other legislation and guidance

Adult Safeguarding Multi-Agency Guidelines and Protocols (West Midlands, Shropshire, Bradford) Care Act 2014

Mental Capacity Act 2005 and Deprivation of Liberty Safeguards guidance

Making Safeguarding Personal (ADASS/LGA)

Working Together to Safeguarding Children 2015

Children Act 1989 and 2004

General Data Protection Regulations 2016

Sexual Offenses Act 2003

Equality Act 2010

Human Rights Act 1998

Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

Modern Slavery Act 2015

# 9. Links to the regulatory quality statements

This policy has been developed in accordance with the requirements of our regulators and its implementation demonstrates the quality statements for care and support in the following ways:

#### We Statements:

We have a proactive and positive culture of safety based on openness and honesty, in which concerns about safety are listened to, safety events are investigated and reported thoroughly, and lessons are learned to continually identify and embed good practices.

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.

We work with people to understand and manage risks by thinking holistically so that care meets their needs in a way that is safe and supportive and enables them to do the things that matter to them.

We detect and control potential risks in the care environment.

We make sure there are enough qualified, skilled and experienced people who receive effective support, supervision and development. They work together effectively to provide safe care that meets people's individual needs.

We plan and deliver people's care and treatment with them, including what is important and matters to them. We do this in line with legislation and current evidence based good practice and standards.

We listen to and understand people's needs, views and wishes. We respond to these in that moment and will act to minimise any discomfort, concern or distress.

We provide appropriate, accurate and up to date information in formats that we tailor to individual needs.

We foster a positive culture where people feel that they can speak up and that their voice will be heard.

We have clear responsibilities, roles, systems of accountability and good governance. We use these to manage and deliver good quality, sustainable care, treatment and support. We act on the best

information about risk, performance and outcomes, and we share this securely with others when appropriate.

We focus on continuous learning, innovation and improvement across our organisation and the local system. We encourage creative ways of delivering equality of experience, outcome and quality of life for people. We actively contribute to safe, effective practice and research.

### I Statements:

I feel safe and am supported to understand and manage any risks.

I can get information and advice about my health, care and support and how I can be as well as possible – physically, mentally and emotionally.

I know what to do and who I can contact when I realise that things may be at risk of going wrong or my health condition may be worsening.

I have considerate support delivered by competent people.

I have care and support that is co-ordinated, and everyone works well together and with me.

I have care and support that enables me to live as I want to, seeing me as a unique person with skills, strengths and goals.

I am treated with dignity and respect.

I am in control of planning my care and support. If I need help with this, people who know and care about me are involved.

I am encouraged and enabled to feedback about my care in ways that work for me and I know how it is acted on.

### **RELATED POLICIES AND OTHER REFERENCES**

This policy is to be read in conjunction with the following related policies and procedures:

- Safeguarding Procedure
- Whistleblowing Policy
- Incidents, Accidents and Near Miss Policy and Procedure
- Health and Safety Policy
- Vulnerable Person's Policy
- Complaints Policy and Procedure
- Support Planning, Needs and Risk Assessment
- Recruitment and Selection Policy
- Supervision Policy
- Rehabilitation of Ex-Offenders Policy
- DBS Risk Assessment Guidance
- Disciplinary Policy
- Data Protection Policy
- Safeguarding Children in Adult Settings Policy

# **ROLES AND RESPONSIBILITIES**

ROLE	RESPONSIBILITY
Care and support worker	To implement the policy and provide good safeguarding practice as outlined in the policy. To keep and maintain appropriate records. To complete required training and engage in safeguarding discussions in team meetings and supervision.
Team Leader/Service Manager	To oversee the implementation of the policy and promote good safeguarding practice in service delivery as outlined in the policy. To respond to safeguarding concerns and undertake investigations as required. To ensure teams have completed required training and can demonstrate knowledge, skills and values to respond. To maintain and review safeguarding records.
Registered Manager/Head of Operations	To oversee the implementation of the policy and promote good safeguarding practice across registered services as outlined in the policy. To respond to safeguarding concerns and lead investigations as required. To audit the quality of practice, recording and training compliance across services. To escalate concerns and inform the Group Director of Care and Quality. To ensure appropriate notifications to other agencies and to the regulator. To consider findings from safeguarding concerns, identify trends and patterns and report improvements.
Group Director of Care and Quality	To act as the designated safeguarding lead for the group. To ensure that appropriate systems, policies and procedures are in place and reviewed routinely. To review the response to safeguarding concerns, providing direction and advice as required. To ensure that all concerns are concluded with a clear outcome as set out in the policy. To create an open and learning environment where concerns are raised and acted upon, reporting on trends and patterns to the Executive and Board. To engage with national best practice to ensure policy and practice is current.
Designated safeguarding lead	The Group Director of Care and Quality acts as the designated safeguarding lead for the group. Their responsibilities are set out above.
Group Director of People and Culture	To advise on and direct safeguarding investigations and the implications from a human resources perspective. To ensure that appropriate learning and development is available and current for all staff.
Executive Team	To review findings from safeguarding concerns and consider patterns, trends, best practice and the implications for policy. To review the safeguarding policy on an annual basis.
Operations Committee	To review findings from safeguarding concerns and consider patterns, trends, best practice and the implications for policy. To consider safeguarding practice in the context of wider quality and compliance factors.
Board Safeguarding Lead	To advise on safeguarding policy, procedure and practice. To review safeguarding issues and provide assurance to the board that appropriate action has been taken to conclude safeguarding cases.
Board	To review findings from safeguarding concerns and their wider implications for governance. To review the safeguarding policy on an annual basis.