

Management of Allegations against Staff Policy

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1.0 Introduction

Despite all efforts to introduce safety mechanisms there will be occasions when allegations are made. All staff have a responsibility for safeguarding and promoting the welfare of adults and children and a duty to report any concerns they may have about service users, members of staff (including bank, agency and honorary, unpaid, volunteers, contractors and those seconded from other services) and visitors. For the purpose of this policy the term child refers to any person who has not yet reached their 18th birthday.

Working Together to Safeguard Children (2018) sets out the expectations that all statutory organisations will have clear policies for dealing with allegations against people who work with children, and the Children Act (2004) sets out the duty placed on the NHS to safeguard children and work cooperatively with other agencies in doing so.

This duty also applies to adults at risk of harm or abuse in accordance with the Care Act 2014. The Care Act 2014 (part 1 care and support statutory guidance) outlines the requirements for safeguarding Adults Boards to have clear policies and procedures in place to deal with the management of people in a position of trust who may pose a risk to adults with care and support needs.

This policy should be read in conjunction with:

- Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children (HM Government, 2018)
- Professional Boundaries and Relationship Policy and Code of Conduct for All Staff
- ELFT Safeguarding Children Policy
- ELFT Domestic Abuse and Harmful Practices Policy
- ELFT Network, E-Mail and Internet Acceptable Use
- ELFT Disciplinary Policy and Procedure
- ELFT Freedom To Speak Up: Raising Concerns (Whistleblowing) Policy
- ELFT Disclosure and Barring Service Policy
- Statutory guidance for the Care Act 2014
- The London Multi-Agency Safeguarding Adult Policy & Procedures December 2015
- ELFT Safeguarding Adults Policy
- For any allegations within London, please refer to The London Child Protection Procedures. 6th Edition. (London Safeguarding Children Partnership, 2020) for full procedural requirements of action to take following an allegation. These can be accessed online at https://www.londoncp.co.uk/alleg_staff.html
- For any allegations within Bedfordshire, please refer to The Bedfordshire and Luton Child Protection Procedures (Bedford Borough, Central Bedfordshire and Luton Safeguarding Children Boards, 2021) for full procedural requirements of action to take following an allegation. These can be accessed online at https://bedfordscb.proceduresonline.com/p_alleg_staff_wk_ch_yp.html

The Trust is required to collate data on allegations and submit monitoring data to Health Commissioners and the Local Safeguarding Children Partnerships and Safeguarding Adult Boards of which the Trust is a member.

The initial response to allegation is the responsibility of the senior management team within the area the allegation was made, with support from the Human Resources Department.

2.0 Scope

This policy applies to all employees working for the Trust, and any other worker (including bank, agency, students, volunteers, contractors, and staff on honorary contracts) providing services for or on behalf of East London NHS Foundation Trust (ELFT).

This policy covers:

- Conduct in the workplace and any work-related setting outside the workplace e.g. business trips, work related social events
- Conduct connected with employment when it makes the employee unsuitable for his/her work, and /or unacceptable to colleagues and /or patients/general public

This policy should be applied when there is an allegation that any person who works with children or adults has:

- Behaved in a way which has harmed, poses a risk of harm, or may have harmed a child or adult at risk of harm;
- Possibly committed a criminal offence against or related to a child or adult at risk of harm;
- Behaved in a way that indicates that he/she is unsuitable to work with children or adult at risk of harm;
- A sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see ss16-19 Sexual Offences Act 2003);
- Involved in 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text / e-mail messages or images, gifts, socialising etc;
- Possession of indecent photographs / pseudo-photographs of children;
- Has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include arrest for possession of a weapon, or a perpetrator of domestic abuse;
- As a parent or carer, has become subject to child protection procedures;
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering.

3.0 Aim of policy

The aim of this policy is to safeguard adults at risk and children when concerns/allegations are raised concerning staff by:

- Carrying out an investigation
- Completing a risk assessment (as necessary)
- Reporting the matter to the appropriate authority (as required)
- Taking action in accordance with the Disciplinary Procedure (where appropriate)

4.0 Definitions and abbreviations

Abuse – Abuse has many different forms including neglect, self-neglect, physical abuse, emotional/Psychological abuse, discriminatory abuse, financial abuse, modern slavery, domestic abuse, exploitation, sexual abuse and organisational abuse

Adult - An adult at risk of harm is defined as a person who is 18 or over and:

- Has care and support needs (whether or not these needs are being met) and;
- Is experiencing, or 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 of, or the experience of abuse or neglect.

Allegation - An allegation may relate to a person who works with children or adults who has:

- behaved in a way that has harmed a child, or may have harmed a child or adult
- possibly committed a criminal offence against or related to a child or adult
- behaved towards a children or adults in a way that indicates they may pose a risk of harm to them
- behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults

Child - A child is defined as a person from birth to their 18th birthday.

Employer - An 'employer' is defined as an organisation that has a working relationship with the individual against whom the allegation is made.

LADO – Local Authority Designated Officer. The specific role of the designated officer employed by the local authority to manage and have oversight of allegations across the children's workforce

Local Authority Lead Officer – The specific role of the designated officer employed by the local authority to manage and have oversight of allegations across the adult's workforce

Member of staff – includes all staff whether paid, unpaid, including bank, agency, students, volunteers, contractors, and staff on honorary contracts and those seconded from other services

5.0. Roles and Responsibilities

The trust has a duty to ensure that they have systems, processes and properly trained and informed employees to safeguard adults and children.

Trust Chief Executive - is the Trust's accountable officer.

Chief Nurse – The Chief Nurse as Lead Executive Director for Safeguarding fulfils the role of Allegations Manager, Designated Safeguarding Lead and Named Senior Manager, with support from the Director of Human Resources.

Chief Medical Officer – Fulfils the role of Named Senior Manager if the allegations or concerns relate to a doctor.

Director of Nursing – Fulfils the role of Director of Safeguarding and chairs the Safeguarding Committee, which monitors allegations against staff and referrals to the LADO.

Director of People and Culture - The People and Culture Lead for allegations against staff.

Associate Directors for Safeguarding – Responsible for ensuring the Trust deals with allegations in line with local and national guidance and procedures. Collates data and feeds back to Health Commissioners and the Safeguarding Partnerships with regards to allegations made.

Borough / Service Directors - As an employer, the Trust has designated the Borough / Service Directors as named Senior Managers for allegations against staff to whom allegations or concerns should be reported in each Borough / Directorate. In their absence they will assign a delegated deputy. If that person is the subject of the allegation or concern, the Chief Nurse will be informed.

Service Managers / Ward Managers / Department Leads - Responsible for ensuring that this policy is fairly and consistently applied within their team, department or service and for ensuring that this document is adhered to by staff members. They may also become responsible for any actions that result from an investigation into any allegations against Trust staff.

SOVA – Safeguarding of Vulnerable Adults

Trust staff – All staff, including bank, agency, students volunteers, contractors and staff on honorary contracts have a responsibility for raising any concerns they may have about the conduct of a Trust employee or the safety of patients and visitors. They are responsible for adhering to this policy in order to provide professional and safe care to patients and visitors. Staff are also responsible for ensuring they are aware of this guidance and the impact of not meeting the standards detailed within their code of conduct, their job description, contract of employment or other Trust policy or procedure

6.0. Responding to a complaint or allegation

There are a number of sources from which a complaint or allegation might arise including:

- a service user (child/adult) themselves or their relatives/carers
- member of the public
- a disciplinary investigation
- a safeguarding enquiry
- an employee

6.1 This section provides guidance on how concerns should be reported and the process to be used to respond to these. If a 'person in a position of trust' is alleged to have abused or harmed a child or adult at risk, or who may pose a risk of abuse to a child or adult with care and support needs, it is essential that the concerns are appropriately reported and responded to. The possible risk of harm to vulnerable groups posed by an accused person needs to be effectively evaluated and managed in respect of those involved in the allegations, and any other vulnerable people in the individual's home, work or community life.

6.2 Consequently, where an allegation involves a staff member, managers should seek advice from their People Business Partner in considering the need for removing someone from the workplace. Suspension from duty should be considered in any case where there is cause to suspect a child or adult is at risk of significant harm, or the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal.

6.3 The Trust must consider carefully whether the circumstances of a case warrant a staff member being suspended from contact with vulnerable groups whilst investigations continue. This decision should be informed by a risk assessment which leads to a conclusion as to whether the staff member is considered safe to continue working in their present capacity, a different capacity or whether they should temporarily refrain from working with children and/or vulnerable adults. The power to suspend is vested in the employer alone; neither the Local Authority nor the police can require an employer to suspend a member of staff or a volunteer. However, any such decision by the employer will take into account the following: whether a strategy or initial evaluation discussion concludes that there should be enquiries by Social Care and/or an investigation by the Police; the views of the Police/Social Care on the need to suspend the individual.

6.4 Where suspension is instigated, the provisions of the relevant suspension policy must be adhered to; this will include what arrangements the line manager will adopt in order to stay in regular contact with the suspended individual. At this stage, it remains an allegation only and the facts are yet to be established. In view of the fact that an investigation will follow, a broad rationale for suspension from duty will be given. Ultimately, it should be borne in mind that suspension is intended to be a neutral act to facilitate the investigation.

6.5 Cross-boundary issues. Where a child from one local authority area, makes an allegation in a setting or placement which is in another local authority area, the lead responsibility for action lies with the local authority for the area where the alleged abuse occurred where there is most organisational risk. ELFT will work with LADOs across local authority boundaries in such cases.

7.0 Types of Investigation

When there is concern that a member of staff has harmed a child or vulnerable adult, either within the course of their work, or within their personal life, there are various potential strands of investigation which need to be co-ordinated, as follows:

Inter-Agency Enquiries led by Social Care

Decisions will be made on the action necessary to ensure the continuing protection of the child or adult at risk. Social Care has a statutory duty to make enquiries or to ask others to make enquiries on their behalf.

The **Local Authority Designated Officer (LADO)** will lead the allegations management process in cases involving children and will be able to give advice, seeking views of other agencies, monitoring progress, and receiving information about outcomes.

Do's	Don't
<p>The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should:</p> <p>Make a written record of the information (where possible in the child / adult's own words), including the time, date and place of incident/s, persons present and what was said;</p> <p>Sign and date the written record;</p> <p>Report to the police if required and record CAD number</p> <p>Immediately report the matter to the Service</p>	<p>Investigate or ask leading questions; Make assumptions or offer alternative explanations; Promise confidentiality.</p> <p>Do not record on Datix if allegation is made about staff in relation to their private life</p>

Manager and Borough Director Notify the safeguarding team Report on Datix	
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<p>Report to Borough Director/Deputy Director/Service Manager or On Call Manager if Out of Hours</p> <p>Borough Director to: Ensure immediate safety and support of child / adult and staff member. Consider removal of staff member from the workplace;</p> <p>Obtain written details of the concern / allegation, signed and dated by the person receiving it (not the child / adult making the allegation);</p> <p>Approve and date the written details;</p> <p>Record any information about times, dates and location of incident/s and names of any potential witnesses;</p> <p>Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions;</p> <p>Contact the LADO of the Local Authority where the staff works / SOVA to discuss case. If threshold is met a written referral is to take place within 1 working day. If out of hours referral to be made to Social Care duty team;</p> <p>Update allocated social worker. If not already open to social care then referral to be made;</p> <p>People and Culture Business Partner and Associate Director for Safeguarding Children / Adults to be notified of allegation and action taken;</p> <p>Inform parents / carers of allegation and next steps.</p>

For any allegations within London, please refer to The London Child Protection Procedures. 6th Edition. for full procedural requirements of action to take following an allegation. These can be accessed online at https://www.londoncp.co.uk/alleg_staff.html. For Bedfordshire the Bedfordshire and Luton Child Protection Procedures should be accessed online at https://bedfordscb.proceduresonline.com/p_alleg_staff_wk_ch_yp.html

In the case that an allegation is made against a member of staff who has since moved to another NHS Trust (or any job with exposure to children or adults at risk, The LADO / SOVA would coordinate the response in notifying the current employer.

Where a formal Adult section **42 safeguarding enquiry** is being undertaken, under the Care Act 2014, the function can be carried out as part of the enquiry process and this should include:

- An assessment and management of **risk posed** by a 'person in a position of trust' to be considered in the initial safeguarding planning meeting and subsequent meetings.
- Any action taken in respect of a person to be included in the safeguarding enquiry report.
- Supporting documentation should be reviewed as part of the Checking and Review stage of the safeguarding enquiry.

- Further actions to safeguard or management of risk should be included in the safeguarding plan.
- Where a formal safeguarding enquiry is not being undertaken, a 'Managing Concerns Meeting' should be convened to assess and determine the actions required to manage the risk posed by a 'person in a position of trust'.

The refreshed Care Act 2014 statutory guidance removes the requirement for a Designated Adult Safeguarding Manager. Whilst no longer a requirement in the Care Act 2014, some of the LSAB's strongly encourage organisations to establish a nominated lead or **Safeguarding Allegations Management Advisor (SAMA)**, to provide Safeguarding **advice** in complex cases to their organisation. The SAMA should have a significant level of expertise and knowledge in adult safeguarding and they should also have an operational leadership role in respect of their organisation.

- A.** If deemed appropriate, where it is considered that a vulnerable child or an adult is suffering, or is likely to suffer significant harm, Social Care will call a strategy discussion to consider the allegations and a senior manager from this agency will chair the meeting. An appropriate member of staff from the Trust (determined by the individual circumstances of the case), the Associate Director for Safeguarding Children/Adults and a senior HR partner for the service line implicated in allegation will be in attendance.
- B.** The strategy will:
- Determine the composition of the investigating team;
 - Finalise the process of investigation;
 - Agree the process for informing the child's parent/carer or adult at risk who is the subject of the enquiry and/or their carer(s) if not already done and appropriate to do so.
 - Consider any potential risk to any other children or vulnerable adult.
- C. Police Investigation.** This will determine whether a crime has been committed. In order to prosecute there must be sufficient evidence to support a case that an offence has been committed: the burden of proof in such circumstances is 'beyond reasonable doubt'. If there is insufficient evidence, it does not automatically mean that the offence has not been committed, nor does it mean that the member of staff should not face disciplinary proceedings.
- D. Internal Investigation and Disciplinary Procedures.** Internal investigation and disciplinary procedures apply where the conduct or performance of a staff member is suspected to have been unsatisfactory. The procedure aims to deal quickly, fairly, consistently and constructively with any potential breaches. The provisions of these procedures will be strictly followed at all times, including allowing appropriate representation for staff concerned. Any relevant information will be communicated to the appropriate people.

Where the police are conducting an investigation it will be appropriate to maintain on-going contact with them and where appropriate share information and to ensure that information is not passed to the member of staff concerned that would prejudice possible criminal proceedings. However, it is not necessary to await the outcome of any external enquiry before undertaking internal procedures, although it is important to gain consent from the police in order to ensure that evidence for the purposes of any criminal investigation is not contaminated. It is likely that these procedures will run concurrently. Regular contact should be maintained, as appropriate, between the lead managers for the HR investigation and the Associate Directors for Safeguarding Adults/Children and HR Business Partner.

If the outcome of the police investigation is not to prosecute it does not necessarily mean that the internal investigation will not proceed. Each case should be considered individually and a decision made depending on the circumstances. The internal investigation will determine whether a formal disciplinary hearing should be convened, or whether the allegations are unsubstantiated, hence a hearing is inappropriate. However, if the investigation reveals other matters which amount to misconduct in their own right, then the seriousness of these will determine whether the disciplinary process continues or whether it is referred back to line managers for advice and counselling. Normally where the allegation is deemed to be unfounded the staff member would return to their work place. However, each situation should be considered on an individual basis. Members of staff will be given appropriate support to re-establish relationships on their return to work, during what is likely to be a difficult period.

E. Complaints Procedure. A complaint received by the Trust may initially warrant a response in line with the organisation's complaints policy. Where a safeguarding related complaint has been received, the complaints procedure will not be pursued where an inter-agency investigation and/or HR investigation is instigated. In these circumstances it should be explained to the complainant that the matter is being taken seriously and formally investigated. In instances where neither of the procedures: inter-agency or HR investigation applies, then the complaints procedure should be followed.

It might not be clear whether an incident constitutes an 'allegation'. It is important to remember that in order to be an allegation the alleged incident has to be sufficiently serious as to suggest that harm has or may have been caused harm to a child or adult or that the alleged behaviour indicates the individual may pose a risk of harm.

As in all cases, common sense and judgement is required. Some allegations will be so serious as to require immediate referral to the Police and Social Services for investigation. Others may appear at first to be much less serious. It is important though to ensure that even apparently less serious allegations are followed up, and are examined objectively by someone independent. Consequently the LADO should be informed of all allegations that are made directly to the Police or to any area of Children's Social Care.

Any concern that children, young people or adults may be at risk of harm or abuse, must immediately be reported. Reputational issues must be managed appropriately by discussion with the relevant communications team i.e. Trust/Local Authority communications team.

8.0. Confidentiality

All staff members are required to keep confidential any information regarding patients and staff, only informing those that have a need to know. Confidential information must not be disclosed to unauthorised parties without the persons consent and/or prior authorisation by a senior manager. Any breaches of these requirements will potentially be regarded as serious misconduct and as such may result in disciplinary action. All staff have a confidentiality clause in their contract of employment with 3rd party contractors and suppliers who process personal information.

Confidentiality however can be overturned if the public interest in preserving confidences may be outweighed by a greater public interest in the information being disclosed. A professional who reasonably believes that other people will be put at risk of danger if confidential information is not disclosed is entitled to take steps which are reasonable in all circumstances to communicate their concerns to the responsible authorities. These principles should be applied in the context of raising concerns/making allegations of suspected abuse of vulnerable people. In such cases, including disclosure to Police, the Information Governance Team should be consulted, prior to any disclosure of information.

8.1. Strict confidentiality however, should be maintained throughout and particularly to guard against publicity while an allegation is being investigated/considered. In accordance with Association of Chief Police Officers (ACPO) guidance the police will not normally provide any

information to the media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police might depart from that rule, e.g. an appeal to trace a suspect, the reasons should be documented and partner agencies consulted beforehand. The system of self-regulation, overseen by the Press Complaints Commission, also provides safeguards against the publication of inaccurate or misleading information.

8.2 Decisions on sharing information must be justifiable, proportionate and based on the potential or actual harm to adults or children at risk. The rationale for decision-making should always be recorded. When sharing information between agencies about adults, children and young people at risk it should only be shared:

- Where relevant and necessary, not simply sharing all the information held;
- With the relevant people who need all or some of the information; and
- When there is a specific need for the information to be shared at that time.

9.0 Informing the person about whom concerns have been raised:

9.1. Unless it puts the adult at risk or a child at further risk of danger, the person should be informed an allegation against them has been made and that it will be shared with their employer. They should be offered a right to reply.

9.2. If possible, the person's consent should be sought to share information and advised what information will be shared, how and who with. Each case must be assessed on its own individual merits as there may be a case where informing the person about details of the allegation increases the risks to a child or adult at risk.

9.3. If the person has another employer, the person should be given the opportunity to inform that employer themselves – sometimes the immediacy and nature of the risk won't allow for this.

9.4. The Trust should check appropriate information has been shared with the other employer to enable them to assess risk, and review the suitability of the person continuing to work and any other actions required.

10.0. Requirement for a risk assessment

10.1. Should an employee be absent from work and the absence is related to an allegation of adult safeguarding issue, a risk assessment must be completed before the employee returns

10.2. The risk assessment must be carried out by the line manager with support from their HR partner

10.3. Following completion of the risk assessment, a meeting must be held with the employee prior to their return to work to:

- advise the employee of the outcome
- Advise the employee of any restrictions and /or conditions attached to their return to work in order to mitigate any risks
- Seek assurance that they will act in accordance with any restrictions and or conditions
- Agree a return work date
- Advise employee that failure to comply with the risk assessment and return to work arrangements will be viewed seriously and will lead to action taken under the Disciplinary Procedures.

10.4. A copy of the risk assessment will be provided to the employee.

11.0. Record keeping

11.1. The HR department will retain a copy of the investigated incidents on the employee's personal file.

11.2. The record will contain details of the allegation, how it was followed up, investigated, resolved and what if any action was taken.

11.3. The record will be maintained on the employees personal file for the length of employment and then once a staff member leaves the record will be retained for 6 years.

11.4. The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future **Disclosure and Barring Service (DBS)** disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time.

12.0. Action in respect of false allegations

In all circumstances where an allegation is found to have been vexatious, the Trust will consider whether to take an action against person(s) under the appropriate policy.

13.0. Referral to the Disclosure and Barring Service

13.1. A referral to the DBS will be made by the People and Culture Department where an employee:

- Is dismissed on the grounds of misconduct (whether or not the misconduct took place in the course of employment) which harmed an adult/child or placed an adult/child at risk of harm.
- Resigns or retires in circumstances where the trust would otherwise have dismissed them, or would have considered dismissing them on such grounds if they had not resigned or retired.
- Transfers to a position which is not an adult or child care position, on such grounds
- Is suspended or previously transferred to an alternative position pending a decision to dismiss or to make the transfer permanent (e.g. the trust may have suspended or transferred on a neutral basis pending an investigation)

13.2. A referral is not required when dismissal of an employee was not seriously considered i.e. when dismissal was only a passing consideration within a range of other possible options.

14.0. Referral to professional body

In all cases the People and Culture department will also consider whether the conduct of the employee should be reported to their professional body. In such cases it is their responsibility to inform the professional lead (e.g. Medical Director, Director of Nursing and Director for Social Work) as well as the employee, that this referral will be made.

15.0. Whistleblowing

Staff should be aware of the Trust's Raising Concerns (Whistleblowing) Policy and feel confident to voice concerns about the attitude or actions of colleagues including any concerns relating to child protection and safeguarding adults, including if they feel an allegation has been managed inappropriately. Staff can also contact the Trust Speak up Guardian or the Freedom to speak up Champion in their Directorate. Contact details are available on the Trust intranet page

In 2016 the Home Office commissioned a new Whistleblowing Advice Line regarding child protection concerns.

NSPCC Whistleblowing Advice Line

Tel: 0800 028 0285

Email help@nspcc.org.uk

The NSPCC Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation

16.0. Training

Safeguarding training is mandatory for all staff and Mental Capacity training is mandatory for all clinical staff upon induction and at periodic intervals throughout employment. Line manager will be required to ensure their respective staff are made aware of this policy when this is cascaded through usual dissemination routes.

17.0. Equality and Diversity

The Trust is committed to ensuring that, as far as is reasonably practicable, the way services are provided and the way staff are treated reflects their individual needs and does not unlawfully discriminate against individuals or groups. This policy has been properly assessed.

18.0. Monitoring Compliance with the policy

The success of this policy will be monitored by reference to statistics, which identify awareness on the part of staff members in relation to the measures to be taken in cases of suspected abuse. Its effectiveness will be measured by reference to documentation arising from internal HR cases to the safeguarding team and Safeguarding team to HR, which identify compliance with the requirements of this policy.

19.0. Review

This document may be reviewed at any time at the request of either staff side or management, but will automatically be reviewed 3 years from approval and thereafter on a triennial basis unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

20.0. Reference

- Children Act 1989/2004
- Disclosure and Barring Service
- The Care Act 2014 Including Revised Statutory Guidance to the Care Act 2014
- Working Together to Safeguard Children: A guide to interagency working to safeguard and promote the welfare of children 2018
- <https://londonadass.org.uk/safeguarding/review-of-the-pan-london-policy-and-procedures/>
- <https://bbcdevwebfiles.blob.core.windows.net/webfiles/Social%20Care%20Health%20and%20Community/Bedford%20Borough%20and%20Central%20Bedfordshire%20Multi%20Agency%20Policy>
- ELFT Safeguarding Adults/Children Policy