

17/01/2019: Policy review will take place following the publication of the revised pan-London procedures. Expected publication of those procedures will be published around July 2019. In the interim, please continue to refer to this policy.

Adults at Risk Policy

1	SUMMARY	This policy describes the process for the coordination of Adult Safeguarding arrangements within NHS Islington Clinical Commissioning Group (CCG). It should be read in conjunction with the London Multi Agency Safeguarding Adults policy and procedure.
2	RESPONSIBLE PERSON:	Jen Yousuf, Designated Professional Safeguarding Adults
3	ACCOUNTABLE DIRECTOR:	Melanie Rogers, Director of Quality & Integrated Governance
4	APPLIES TO:	All Islington Clinical Commissioning Group/Joint Commissioning staff.
5	GROUPS/ INDIVIDUALS WHO HAVE OVERSEEN THE DEVELOPMENT OF THIS POLICY:	Islington CCG Safeguarding Committee
6	GROUPS WHICH WERE CONSULTED AND HAVE GIVEN APPROVAL:	Islington CCG Safeguarding Committee

7	EQUALITY IMPACT ANALYSIS COMPLETED:	Policy Screened		Template completed	
---	--	------------------------	--	---------------------------	--

8	RATIFYING COMMITTEE(S) & DATE OF FINAL APPROVAL:	Quality and Performance Committee September 2016			
9	VERSION:	3.0			
10	AVAILABLE ON:	Intranet		Website	

11	RELATED DOCUMENTS:	<p>Protecting adults at risk: London multi-agency policy and procedures to safeguard adults from abuse 2016</p> <p>Safeguarding adults: the role of NHS commissioners (DH 2011)</p> <p>The Care Act 2014 / Care Act Guidance 2014</p> <p>http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted https://www.gov.uk/government/publications/care-act2014-statutory-guidance-for-implementation</p> <p>Adult Safeguarding and domestic abuse- a guide to support practitioners and managers.</p> <p>Mental Capacity Act 2005- A guide for CCGs and other commissioners on Commissioning for compliance NHS England 2014</p> <p>Making effective use of data and information to improve safety and quality in adult safeguarding. Local Government Association 2013</p> <p>Deprivation of liberty safeguards-: putting them into practice.</p>
		<p>SCIE 2013</p> <p>Making Safeguarding Personal 2014</p> <p>Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework 2015</p> <p>Counter-Terrorism and Security Act 2015</p>
12	DISSEMINATED TO:	All Staff on Islington CCG intranet
13	DATE OF IMPLEMENTATION:	September 2016

14	DATE OF NEXT FORMAL REVIEW:	September 2017
-----------	------------------------------------	-----------------------

BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE VERSION

DOCUMENT CONTROL

Date	Version	Action	Amendments
June 2016	3	Updated	To incorporate requirements of the Care Act 2014 & other new guidance released in 2014

Section	Page
List of acronyms & definitions	8
1 Introduction	10
2 & 3 Policy aims and scope	11 4
terms 12 5 CCG roles and responsibilities	15
6 Safeguarding concerns: how to raise an alert	20
7 Dealing with emergencies	21
8 Record keeping	22
9 Training requirements for CCG staff	22 10
Allegations of abuse against staff members	23
11 Safeguarding adult reviews	25
12 Legal advice	25
13 CCG governing body assurance	26
14 Islington Safeguarding Adult Partnership Board (SAPB)	26
15 Dissemination and implementation	27
16 Monitoring	27 17
Review	27
18 Sources of support	28
19 Safeguarding adult leads	29
Appendices	
Appendix A CCG Structure Chart (adult safeguarding)	32
Appendix B CCG governance structure (adult safeguarding)	33

Appendix C	CCG safeguarding adults reporting flowchart	34
Appendix D	Safeguarding adults serious concerns flowchart	35
Appendix E	PREVENT Assurance flowchart	36
Appendix F	Local Contact Details	38

List of acronyms & definitions

CCG	NHS Islington Clinical Commissioning Group
CHANNEL terrorism	A process for safeguarding individuals by assessing their vulnerability to be drawn into terrorism
CONTEST	UK's counter-terrorism strategy
CQC	Care Quality Commission
CQRM	Clinical Quality Review Meeting
DASM	Designated Adult Safeguarding Manager
DBS	Disclosure and Barring Service (previously Criminal Records Bureau)
DH	Department of Health
DoLS	Deprivation of Liberty Safeguards
GB	Islington Clinical Commissioning Group Governing Body
HRA	Human Rights Act
MCA	Mental Capacity Act
NCOP	National College of Policing NHS National Health Service
NHSE	NHS England
PREVENT	One of the four areas of work under CONTEST
SAAF	Pan-London Safeguarding Adults Self-Assessment Assurance Framework
SAPB	Islington Safeguarding Adult Partnership Board
SARs	Safeguarding Adults Reviews
STEIS	Strategic Executive Information System – where providers log Serious Incidents

1. Introduction

- The Clinical Commissioning Group (CCG) is responsible for commissioning high quality, safe and effective health services for patients living in Islington. The CCG is also responsible for promoting wellbeing, preventing harm and responding effectively if adult safeguarding concerns are raised in any of their provider commissioned services working in partnership with Islington Local Authority Adult Social Care.
- Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.
- Whilst the main responsibility for coordinating adult at risk arrangements lies with local authorities under the Care Act 2014, effective safeguarding is based on a multi-agency approach and in Islington this is managed through the Joint Commissioning arrangements in place between the CCG and Islington Local Authority. Islington CCG is a statutory partner on the Islington Safeguarding Adult Partnership Board (SAPB) under the auspices of the Care Act 2014.
- The CCG is accountable for ensuring that its own adult at risk structures and processes, meet the required statutory requirements in the Care Act 2014 and other statutory and National guidance.
- The CCG is committed to the principles and definitions set out in the London Multi Agency protecting adults at risk policy and procedures revised 2015.
- The CCG is statutorily responsible for ensuring that the organisations from which it commissions services provide a safe system which safeguards adults at risk of abuse. This includes adults who lack capacity and the CCG will therefore ensure it commissions Mental Capacity Act (MCA) 2005 and Deprivation of Liberty Safeguards (DOLS) compliant care
- This policy should be read in conjunction with the Care Act 2014 and the London multi-agency policy and procedures, along with other national guidance outlined on the front page of this document under related documents.

2 Policy aims

- To demonstrate how the CCG meets its statutory duties for safeguarding adults at risk under the Care Act 2014 and the Safeguarding Vulnerable People in the NHS – Accountability and Assurance Framework 2015.
- To provide guidance to CCG employees to enable them to fulfil their adults at risk responsibilities under the Care Act 2014 and other relevant statutory and national guidance.
- To ensure that where safeguarding concerns have been raised about an adult at risk that the CCG ensures those concerns are acted upon appropriately by the CCG and our providers in line with the London multi-agency safeguarding adults Policy and procedures 2015.
- For CCG staff to be aware of and follow where appropriate the stages of the Safeguarding Adults procedures.

3 Scope of this policy

3.1 This Policy applies to CCG staff, including interim staff and joint Commissioners.

3.2 The Policy outlines the roles and responsibilities of Islington CCG and its staff in Safeguarding Adults at risk as outlined in statutory legislation and national guidance. The Policy also gives staff information on how to access support and advice at all times, whether in normal working hours or outside them. The Policy also lists sources of expert advice and a description of channels of inter-agency communication and procedures for information sharing and for decision making and lists services which might offer access to support for adults at risk.

3.3 Related CCG Policies

- Complaints Policy
- Incidents Policy
- Child Safeguarding Policy
- Whistleblowing Policy
- Disciplinary policy

4 Definitions and key terms

4.1 Adult at risk

The Care Act 2014 identifies an Adult at risk as someone who has needs for care and support (whether or not the local authority is meeting any of those needs) 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.

4.2 Abuse

The following table considers the different types and patterns of abuse and neglect and the circumstances in which they may take place. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

Abuse is recognised in the following categories:

Physical	Deliberately inflicting pain, physical harm or injury including, hitting, punching, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
Domestic violence	Includes psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.
Sexual abuse	Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
Psychological abuse	Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Financial or material abuse	Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Modern slavery	Encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
Discriminatory abuse	Including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion

Organisational abuse	Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, 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
Neglect and acts of omission	Including 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.
Self-neglect	This covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

4.3 **Mental Capacity Act (MCA) 2005**

The Mental Capacity Act (2005) consolidates human rights law for people who might lack capacity to make their own decisions. Commissioners of health and social care need to have a good understanding of the MCA (2005) to ensure that providers from whom they commission services carry out appropriate assessments of capacity including all possible attempts to empower people to make relevant decisions themselves. Commissioners also need to ensure that providers from whom they commission services who make decisions for those lacking capacity, do so in their best interests.

Islington CCG is responsible for ensuring that provider services are delivered in accordance with the provisions of the Mental Capacity Act (2005) and that the rights of those who use services are promoted and protected.

4.4 **Deprivation of Liberty Safeguards (DoLS)**

The Deprivation of Liberty Safeguards (DoLS) were introduced in April 2009 to provide a legal framework around deprivation of liberty in a care and treatment setting and to prevent breaches of Article 5 of the European Convention of Human Rights. The MCA 2005 was amended to provide safeguards for people who lack capacity to consent to treatment or care in either a hospital or a care/nursing home that, in their own best interests, can only be provided in circumstances that amount to a deprivation of liberty.

As part of their authorisation process the CCG is required to have a Mental Capacity Act and DoLS Lead. Islington CCG discharges this statutory duty through the Local Authority Head of Safeguarding. Please refer to **Appendix A** Safeguarding Adults structure chart.

4.5 PREVENT

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “*due regard to the need to prevent people from being drawn into terrorism*”. This guidance is issued under s24 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.

The *Prevent* strategy, published by the government in 2011, is part of the governments overall counter-terrorism strategy, CONTEST. The aim of the *Prevent* strategy https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf is to reduce the threat to the UK from terrorism by stopping people *becoming* terrorists or *supporting* terrorism. In the Act this has simply been expressed as “*prevent people from being drawn into terrorism*”. The *Prevent* strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The key challenge for the healthcare sector is to ensure that, where there are signs that someone has been or is being drawn into terrorism, the healthcare worker is trained to recognise those signs correctly and is aware of and can locate available support, including the CHANNEL (**See acronyms and list of definitions on page 8**) programme where necessary. Preventing someone from being drawn into terrorism is substantially comparable to safeguarding in other areas, including child abuse or domestic violence.

Amongst the key findings from the 2013 Channel Implementation Review was to take steps to increase knowledge of radicalisation, awareness of the Channel process and confidence to make a referral and also to provide additional training products to support this.

NHS England (NHSE) have developed a Channel General Awareness e-learning module for multi-agencies partners in collaboration with colleagues from the National College of Policing (NCoP). This is designed to raise awareness of Channel across a wide range of practitioners and partner agencies.

Appropriate CCG staff will receive PREVENT (see acronyms and definitions page 7) training as outlined in the CCG Statutory and mandatory training programme.

5 CCG Roles and Responsibilities

The CCG is responsible for

- Commissioning safe services that safeguard adults at risk (statutory responsibility).
- Having an effective system for responding to suspected abuse and neglect, including:
- Identifying safeguarding incidents through recognising the signs of abuse, through review of relevant serious incident and complaints
- Alerting the relevant local authority adult social care department of suspected abuse.

- Contributing to safeguarding adult strategy meetings and case conferences relating to alleged abuse and neglect of vulnerable adults.
- Overseeing and monitoring Implementation of protection plans related to providers.
- Being a statutory partner on the local Islington SAPB.
- Working effectively with multi-agency partners to prevent abuse and respond effectively to abuse allegations.

- Preventing and minimising the risk of abuse and neglect occurring, including through commissioning arrangements and robust contract management.

The CCG Chief Officer is responsible for:

- Ensuring the contribution by health services to safeguarding and promoting the welfare of adults is discharged effectively across the whole local health economy through the commissioning arrangements for the Borough.
- Ensuring that the CCG meets its responsibilities as a statutory partner on the local Safeguarding Adults Partnership Board.
- This accountability is discharged to the Executive Lead with responsibility for Safeguarding.

The Director of Quality & Integrated Governance is responsible for:

- Ensuring that the monitoring of safeguarding adults at risk across the Borough takes place through the CCG Quality and Performance Committee and Islington Safeguarding Adults Partnership Board (SAPB)
- Reporting any appropriate safeguarding/deprivation of liberty risks and achievements to the Chief Officer
- Drafting corporate media responses when required.

Elected Nurse Lead for Clinical Quality & Integrated Governance is responsible for:

- Vice- Chair of the SAPB
- Ensuring the CCG Governing body has oversight of adult safeguarding concerns or issues.

The Designated Professional for Safeguarding Adults has been delegated strategic responsibility for adults at risk for the CCG and lead for PREVENT, MCA and DOLS (oversight).

They are specifically responsible for:

- The management and oversight of individual complex cases.
- Promoting partnership working and keeping in regular contact with their counterparts in partner organisations.
- Assessing and highlighting the extent to which their own organisation prevents abuse and neglect taking place.
- Overseeing and signing off Internal Management Reviews (IMRs)/Health Overview Reports for SAR's written for the CCG.
- Ensuring that appropriate recording systems are in place that provide clear audit trails about decision-making and recommendations in all processes relating to the management of adult

BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE safeguarding allegations against the person alleged to have caused the harm or risk of harm and ensure the control of information in respect of individual cases is in accordance with accepted Data Protection and Confidentiality requirements.

- Representing the CCG on the NHS England Safeguarding Adults forum.
- Acting as the Prevent Lead for the CCG and representing the CCG on the NHSE Prevent Forum.
- Assisting the Local Authority with Safeguarding Adults reviews as requested.
- Training relevant CCG staff in WRAP 3 prevent training.
- Reviewing and implementing national guidance as requested by NHSE
- Completing the annual Safeguarding Adult Assurance Framework (SAAF) on behalf of the CCG and sending the returns to NHSE.
- Representing the CCG on the CHANNEL panel.
- Working across the North Central London (NCL) Region with CCG Adult Safeguarding leads.
- Attending regular NCL Adult Safeguarding forum meetings to share intelligence and to undertake joint working as appropriate.
- Collating quality assurance information on adult safeguarding from providers reports, local authority and soft intelligence.
- Supporting the Head of Quality with gathering of information from providers as required.
- Overseeing CCG CHC funded nursing homes compliance with the Care Act 2014 adult safeguarding requirements through joint partnership working with local authority quality assurance lead.
- Managing the Safeguarding Adults responsibilities of the CCG.
- Supporting the review of National Guidance as requested by NHSE.
- Supporting strategic Safeguarding Adult Partnership aims, specifically identification, reporting and management of pressure ulcers and links to appropriate safeguarding adult referrals.
- Working across the North Central London (NCL) Region with CCG Adult Safeguarding leads.
- Attending regular NCL Adult Safeguarding forum meetings to share intelligence and to undertake joint working as appropriate.
- Chairing Islington SAPB Quality and Assurance sub-group.

CCG /LA Joint Commissioning staff have responsibility for:

- Taking action to safeguard vulnerable adults in CHC funded healthcare and advising the CCG of actions taken for assurance.
- Managing the reviews of people with Learning disabilities and challenging behaviour and reporting monthly Winterbourne View returns to NHSE and the CCG.
- Work in partnership with the CCG Quality and Safeguarding Adults leads.

CCG Staff

CCG staff have responsibility for:

BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE

- Reporting any concerns relating to adult safeguarding to Designated Professional Safeguarding Adults and Islington Local Authority (see contact details below)
- Completing mandatory adult safeguarding training as part of their induction and ongoing as required by the CCG according to the requirements of their post and set out in the CCG's mandatory training requirements.
- Completing any training as set out by NHSE (e.g. PREVENT)

Islington Local Authority Safeguarding

Through the Care Act 2014 the Department of Health placed the responsibility for and development of local procedures for Safeguarding Adults at risk with Local Authorities who are responsible for:

- Co-operating with each of their relevant partners including CCGs who are statutory partners in order to protect adults with care and support needs experiencing or at risk of abuse or neglect.
- Carrying out enquiries or ensuring that relevant partners do so.
- Setting up a Safeguarding Adults Board (SAPB) which will publish a strategic plan and an annual report.
- Ensuring the SAPB conducts any Safeguarding Adults reviews when an adult in the Islington area dies as a result of abuse or neglect, whether known or suspected, and there is a concern that partner agencies could have worked more effectively to protect the adult.
- Co-ordination where allegations are made, or concerns raised, about a person, whether an employee, volunteer or student, paid or unpaid of the CCG.

Governance of Adult Safeguarding in the CCG

A structure chart is provided at **Appendix A** and a governance chart at **Appendix B**.

Adult Safeguarding reports to the CCG Quality and Safety Committee and Governing Body.

The Quality and Safety Committee also receives a quarterly adult safeguarding performance report from Islington Local Authority and an Annual Adult Safeguarding report from the CCG.

6 Safeguarding Concerns: How to raise a concern or an issue under PREVENT

A concern may be:

- A direct disclosure by the adult at risk (they tell you about it).
- A concern raised by others, e.g.: staff, volunteers, others using the service, a carer or member of the public.
- An observation of the behaviour of the adult at risk or the behaviour of another.

Where an adult experiencing abuse or at risk of harm makes a disclosure the member of staff needs to:

- Listen carefully to what is being said, assure the person that you are taking them seriously, and get a clear and factual picture of the concern.
- Be honest and avoid making assurances that you may not be able to keep, for example: complete confidentiality.
- Take any immediate action required to protect the adult at risk: deal with any immediate needs.
- Ensure the person is, as far as possible, central to the decision making process
- Be clear and say that you need to report the abuse. Do not be judgmental and try to keep an open mind.
- Make a clear record of the events you have been told – see record keeping below.
- All staff (professionals and volunteers) of any service involved with adults at risk should inform the relevant manager if they are concerned that an adult has been abused or may be at risk of harm.
- Seek advice from the Designated Professional Safeguarding Adults as to the way forward in relation to referral to adult social care and the police where a crime may have been committed, as well as complying with statutory health reporting mechanisms.
- When a member of staff hears about an incident of abuse from a third party (this is when someone else tells you about what they have heard or seen happen to a vulnerable adult at risk), encourage them to report it themselves or help them to report the facts of what they know. However if the third party refuses to report the abuse then CCG/Joint Commissioning staff must report it to a relevant manager, making a clear record of the events, timed, dated and signed.

- Follow the London multi-agency policy and procedures
- The CCG PREVENT Assurance flowchart is outlined in **Appendix E**

7 Dealing with emergencies

If the abuse you suspect is putting your own or someone's immediate safety at risk, please call 999 straight away.

- Stage one: raising a concern with the London Borough of Islington access and Advice team:

Email: access.service@islington.gov.uk | Fax: 020 7527 5114

- o Ensure your line manager is aware of the concern

Islington Council will then coordinate the remaining six stages and invite the

CCG/ alerter to contribute at appropriate points: An alerting flowchart is included

at **Appendix C**.

8 Record keeping

A record of the incident will be completed on the Datix system at the first opportunity, after attending to the immediate safety and medical needs of the adult at risk.

- Whenever a complaint or allegation of abuse is made, staff will keep clear and accurate records of the allegation/incident/disclosure and at the time it occurs. This will include dates, times, persons present (named), where the incident occurred, any observed bruising/ evidence for suspected abuse, any persons consulted (named) and any action.
- Records should include notes of discussions with managers, referrals and discussions with other professionals and details of why decisions have been made.
- Managers should ensure that appropriate records are kept of decisions and actions taken.
- All records should be dated, timed and signed by the staff member.
- Staff should be aware that written records reports might form the basis for future legal action.

The CCG will keep secure records about any concerns/ referrals on the CCG N Drive in secure folders which are access controlled. These records will only be shared as required under the Islington SAPB data sharing protocol agreement.

9 Training requirements for CCG staff

The key element of safeguarding adults at risk is that all staff receive the appropriate level of training. This is outlined in the CCGs mandatory training programme.

Levels of safeguarding adults training are:

- Corporate induction – basic awareness raising and local procedures / referral routes;
- E-learning – accessed via ‘Skills for health’ <http://www.skillsforhealth.org.uk/> learning and development;
- Specialist training for commissioners and CCG Governing Body (GB) members, including Prevent, <http://www.england.nhs.uk/wp-content/uploads/2015/02/train-competnc-frmwrk.pdf>
- MCA, DOLS which will be delivered by the Local Borough of Islington Safeguarding Team. The CCG’s safeguarding training levels and requirements are in line with the Bournemouth competency framework <http://www.surreycare.org.uk/cms/uploads/downloads/generic/safeguarding/competencies.pdf> and outlined by NHSE <http://www.england.nhs.uk/wpcontent/uploads/2013/03/safeguarding-vulnerable-people.pdf>

Staff in the CCG, Joint Commissioning, and provider agencies are required to complete safeguarding adults training at the level appropriate to their role, and refresh this in line with the CCG Training Policy

The CCG will ensure that all staff receive training at an appropriate level in both adults, MCA and DoLS. Safeguarding adults is part of the mandatory training programme and is included in the staff induction programme.

The CCG will report training compliance to Islington SAPB Learning and Communications group on a quarterly basis.

10 Allegations of abuse against staff members

- Allegations or suspicions of inadequate care or abuse against a member of staff employed by the CCG will be addressed in accordance with the London Multi-agency policy and procedures to safeguard adults from abuse and the CCG HR Policies and procedures. Any incidents will also be reported as per the guidance in the CCG Incident Policy or Complaints Policy.
- If a member of staff is accused of abuse within their personal life outside of work, they should inform their line manager. Consideration will then be given to their suitability to continue with their work role. In the first instance, any allegations of this type must be communicated immediately to the lead director. All allegations must be taken seriously but treated with fairness and openness. If the allegation concerns a Senior Manager it must be reported to a CCG Director or if the allegation concerns a Director to the CCG Chief officer and Designated Professional Safeguarding Adults.

- If the incident is reported when the member of staff is still on duty, consideration must be given to the immediate action to be taken in line with the CCG Incident reporting Policy. With emphasis on protection, action must be taken to separate the member of staff from continuing direct contact with the patient and their relatives.
- The situation must be discussed with senior members of the Human Resources department and HR policies followed with the support and or direction of HR personnel as required.
- If the allegation/witnessed incident is of a criminal nature, then the Police must be contacted. If the Police decide to initiate an investigation into the allegations, the CCG is still obliged to follow its own disciplinary policy and procedure by investigating the allegation/complaint and both investigations may run concurrently. Any actions taken following the allegations/complaints being made must be taken by the relevant associate director
/director.
- The member of staff must be informed immediately about the allegations made against him/her and clearly understand the decisions and actions taken in that initial phase and possible outcomes of investigations i.e. disciplinary hearing. Union representation should be sought for that individual at this stage, wherever possible, and counselling should be offered.
- Confidentiality to protect the case and the individuals must be in place to guard against publicity whether that of an internal or external nature. Support for the adult at risk must be in place to ensure needs are addressed and catered for.
- The CCG is committed to ensuring that appropriate support is offered to staff who work with adults at risk and who may report suspicions of abuse against adults, or who are accused of abuse. Safeguarding adults as a topic will be discussed in individual supervision, and at team meetings as appropriate to ensure all staff are confident in reporting concerns and to encourage reflective practice.
- Where staff are dismissed as a result of concerns that they have harmed or placed at risk a vulnerable adult:
- There must be consideration of what further actions should be taken to protect adults at risk.
- The Safeguarding Vulnerable Groups Act 2006 came into force during 2009/10 and obliges all employers to make referrals to the DBS.
- In addition there should be consideration of referral to the employee's professional register.

- The CCG will ensure that safeguarding and promoting the welfare of adults at risk is integral to the quality and safety of all provider and commissioning services and that there is evidence of robust audit arrangements. This will be reported through the local adult safeguarding partnership boards and the Quality and Performance Committee. The GB receives regular monthly updates from the Quality and Performance Committee and an annual report. Any adult safeguarding issues will be highlighted in these updates and reports.

11 Safeguarding Adult Reviews

- The CCG is responsible for co-ordinating the health component of Safeguarding Adult reviews (SARs) following current national and local guidance via borough based Designated Leads.
- The CCG will ensure that NHS England are notified of all SARs via STEIS.
- Learning from SARs will be disseminated throughout the participating organisations to ensure lessons learnt are applied to practice. The CCG will disseminate learning to primary care where relevant through the weekly GP Bulletin. Regular updating with regards to the progress of SAR recommendations and action plans relating to the CCG will be reported to the CCG's Governing Body and Quality & Performance Committee and to Islington SAPB. Monitoring of provider actions will take place through the Islington SAPB and where appropriate providers Clinical Quality Review meetings.

12 Legal Advice

In complex situations it may be necessary to seek legal advice and guidance on specific adult safeguarding issues. Access to legal advice/solicitors for the CCG is managed by the Head of Corporate Affairs who can access lawyers who are listed on the London Legal Services Framework Agreement.

13 CCG Governing Body assurance

- The CCG has a system in place for the relevant responsible managers to be notified of adult safeguarding serious incidents. See **Appendix D** Safeguarding Adults Serious Incident flow chart.
- The CCG Governing Body have appointed an executive lead with responsibility for safeguarding adults, who will ensure strategic ownership of safeguarding adults at Governing Body level. They will act as a champion in the organisation's vision and responses, and provide high-level support for staff in leadership positions related to safeguarding adults' issues.¹
- To evidence compliance with safeguarding requirements, the CCG will require an annual safeguarding adults report regarding safeguarding performance across the Borough.
- To provide assurance to the GB, safeguarding adult's reports will be made to the Quality & Performance Committee including a breakdown of where the alerts originate.
- The Designated Professional will attend the Clinical Quality Review Meetings (CQRMs) for each provider Trust when adult safeguarding is on the agenda or when a safeguarding issue arises for providers where we are the lead Commissioner.

14 Islington Safeguarding Adults Partnership Board (SAPB)

SAPBs are established in each borough and provide strategic multi-agency leadership to ensure that adults are appropriately safeguarded by:

- Preventing abuse and neglect from happening.

¹ [Protecting adults at risk: London multi-agency policy and procedures to safeguard adults from abuse](#) (SCIE 2011)

- Promoting well-being and safety.
- Responding effectively to instances of abuse and neglect.

The CCG must co-operate with the Local Authority in the establishment and operation of the SAPB and, as partners, must share responsibility for the effective discharge of its functions in safeguarding and promoting the welfare of adults as outlined in the Care Act 2014.

15 Dissemination and implementation

- The policy will be disseminated throughout CCG and be available on its Internet and intranet websites.
- Document all the issues relating to the implementation of the policy, for example, changes to the existing training materials, the roll out of a specific training programme or the need for revised guidelines.
- Implementation of this policy will be the responsibility of the Designated Professional Safeguarding Adults.

16 Monitoring

- The CCG will review and benchmark its safeguarding adult's arrangements using the Pan-London Safeguarding Adults Self-Assessment Assurance Framework (SAAF). Its primary aim is to support health services to meet safeguarding adults responsibilities and achieve improved outcomes in:
 - Preventing harm occurring
 - Effective, patient centered responses where harm has occurred.

The standards relate to measures that support good safeguarding - strategy, systems, workforce, partnerships and commissioning arrangements.

The CCG has a system in place, administered by the NEL CSU and the Local Authority for Joint Commissioning staff, to ensure it can provide evidence that all staff and contracted staff have the relevant DBS checks for their current role. Human Resources, through an SLA with NEL CSU, are responsible for monitoring this and reporting to Managers should they identify any gaps.

The CCG will also monitor provider safe staffing including DBS checks through the regular Clinical Quality Review meetings.

17 Review

This policy will be reviewed on an annual basis.

18 Sources of support (Appendix F)

Islington CCG Safeguarding

Designated Professional

j.yousuf@nhs.net Tel:

02036882943

Provides support and advice to CCG staff on all aspects of adult safeguarding

Islington Police Community Safety Unit

Tel 0207 421 0174

Investigates crimes relating to race/faith hate, anti-Semitism, homophobia and Safeguarding adults from risk of abuse. Serves the whole of the Borough of Islington. If an incident takes place in another Borough that Borough's Community Safety Unit will deal with it.

Islington Local Authority Access and Advice Team

Tel: 0207 527 7299 Mon – Fri 9 – 5 pm 0207

226 0992 Out of Hours

19 Safeguarding Adults Leads

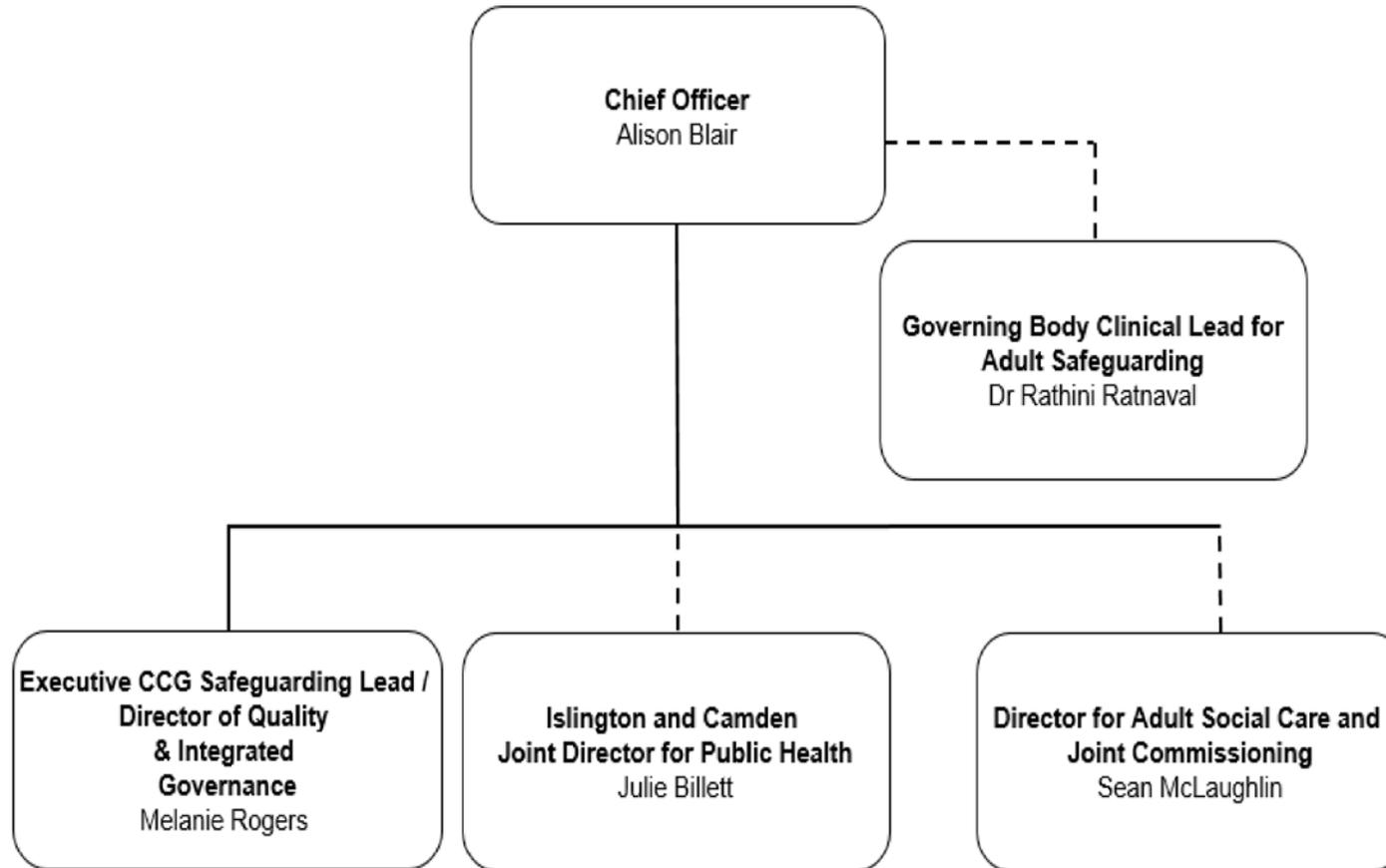
Islington Safeguarding Adults/ MCA and DoLS Leads		
Lead Title	Lead Name	Contact Information

Chief Officer	Alison Blair	NHS Islington Clinical Commissioning Group
Executive Clinical Lead	Melanie Rogers, Director of Quality and Integrated Governance	NHS Islington Clinical Commissioning Group

		Email:
Clinical Governing Body Lead for Safeguarding	Rathini Ratnavel	Islington Clinical Commissioning Group Email: r.ratnavel@doctors.org.uk
Designated Professional Safeguarding Adults	Jen Yousuf	Islington Clinical Commissioning Group Tel: 020 3688 2943 Email: j.yousuf@nhs.net

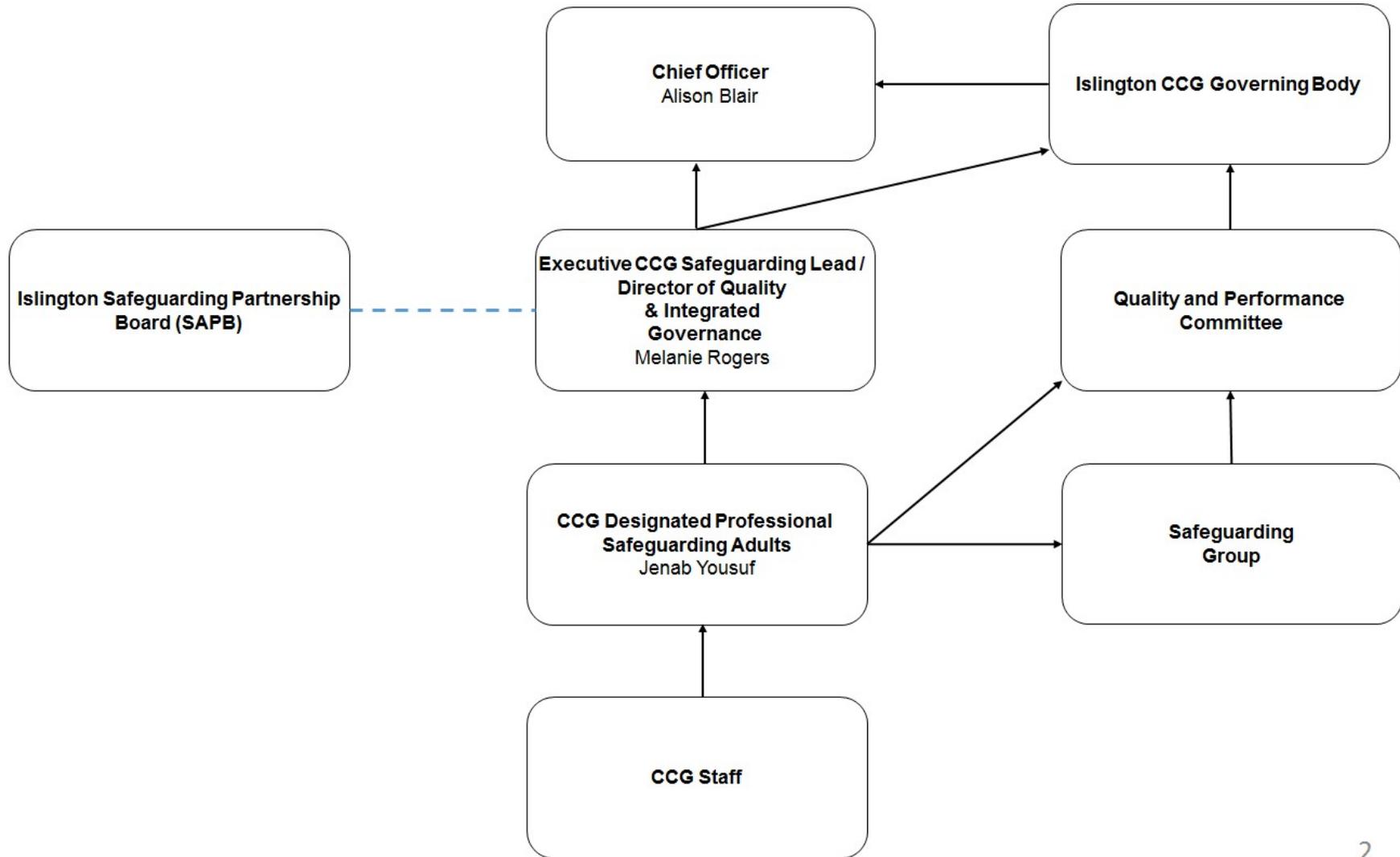
Head of Safeguarding	Elaine Oxley	London Borough of Islington Email: elaine.oxley@islington.gov.uk
MCA Lead	Jo Holloway	London Borough of Islington Email: jo.holloway@islington.gov.uk
Director for Adult Social Care	Sean McLaughlin	London Borough of Islington Email: Sean.Mclaughlin@islington.gov.uk

Appendix A – Islington CCG Structure chart for safeguarding adults: senior and strategic health leads (including partners)



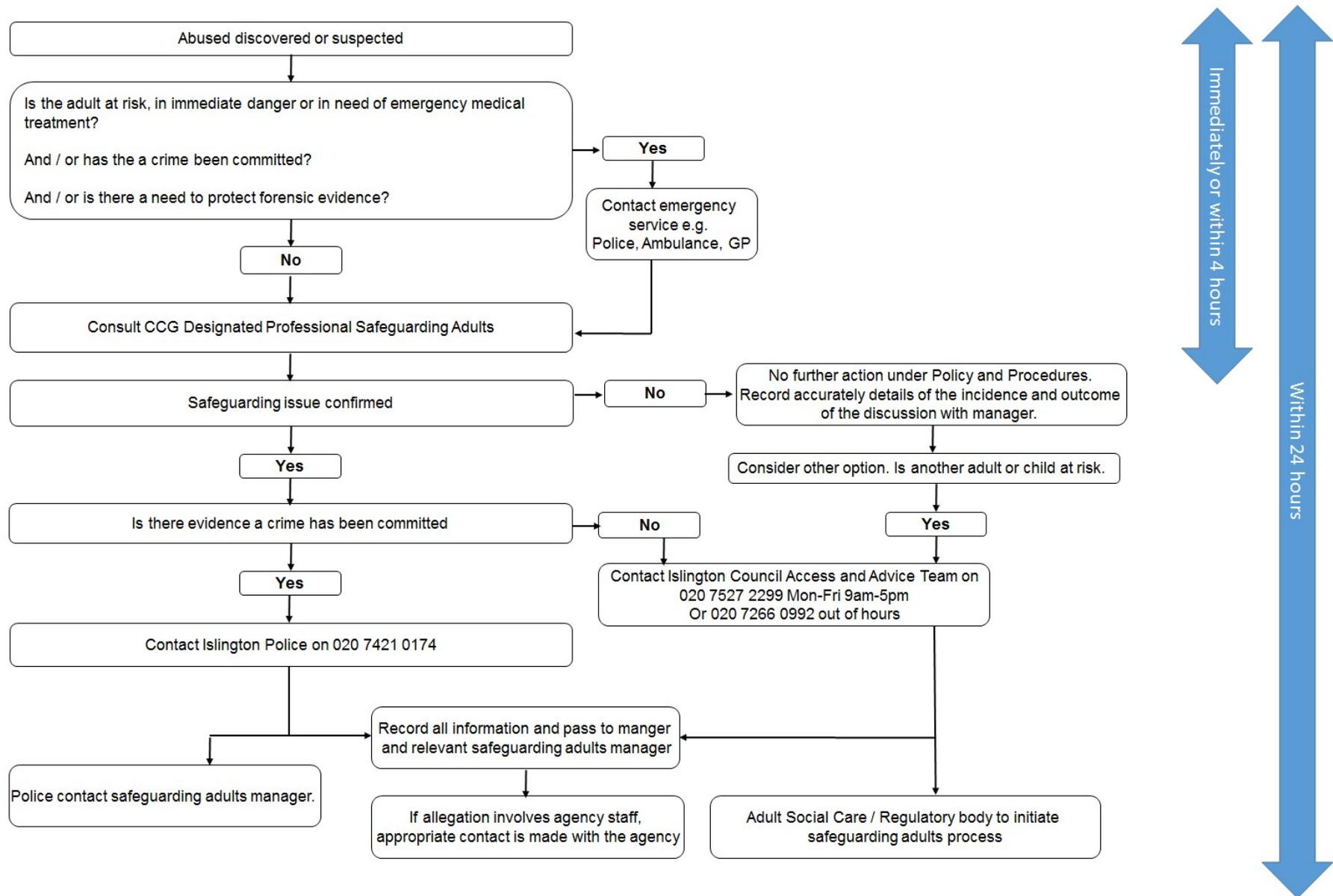
BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE VERSION

Appendix B – Islington CCG Governance structure for adult safeguarding



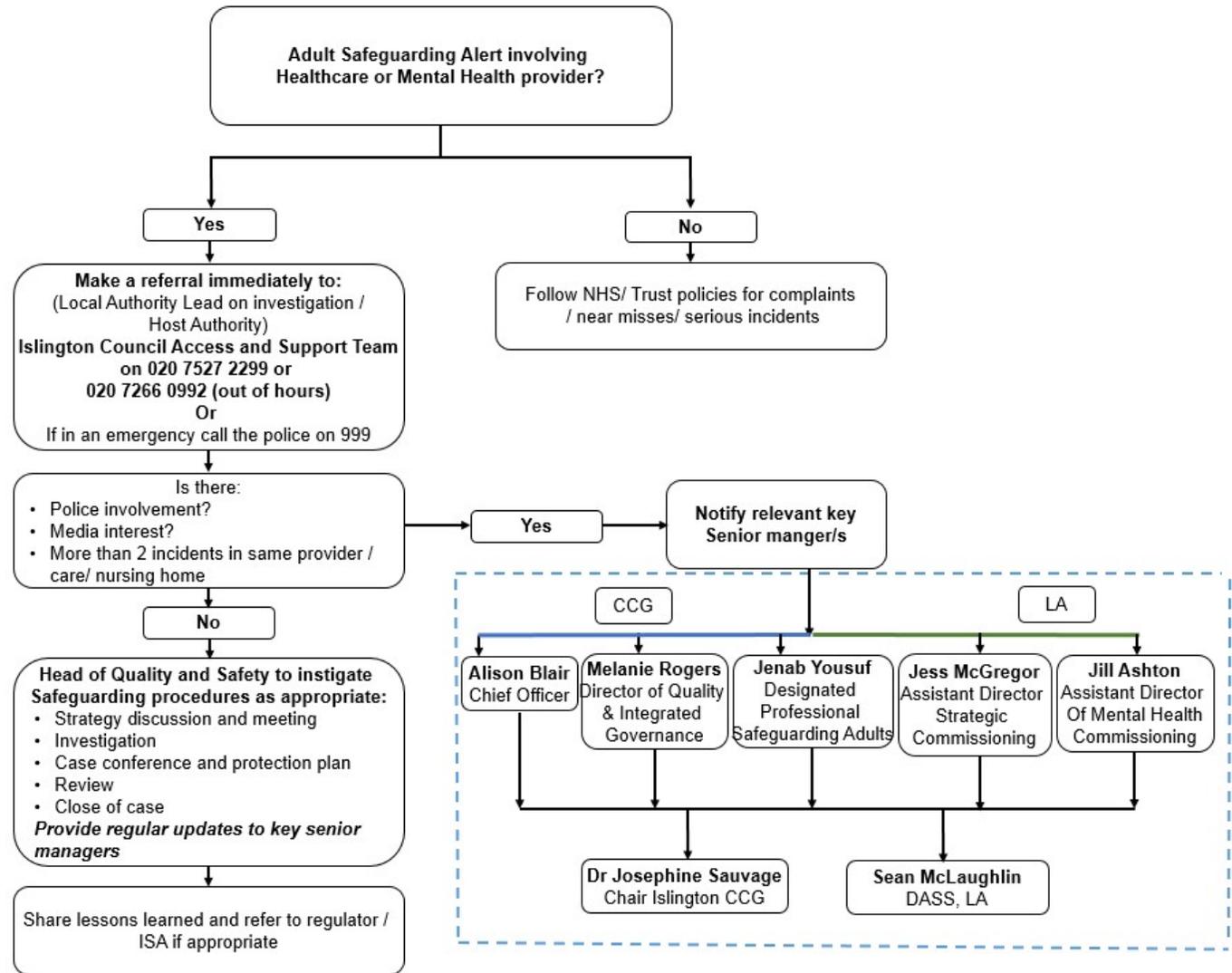
BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE VERSION

Appendix C – Islington CCG Employee Safeguarding adults reporting flowchart



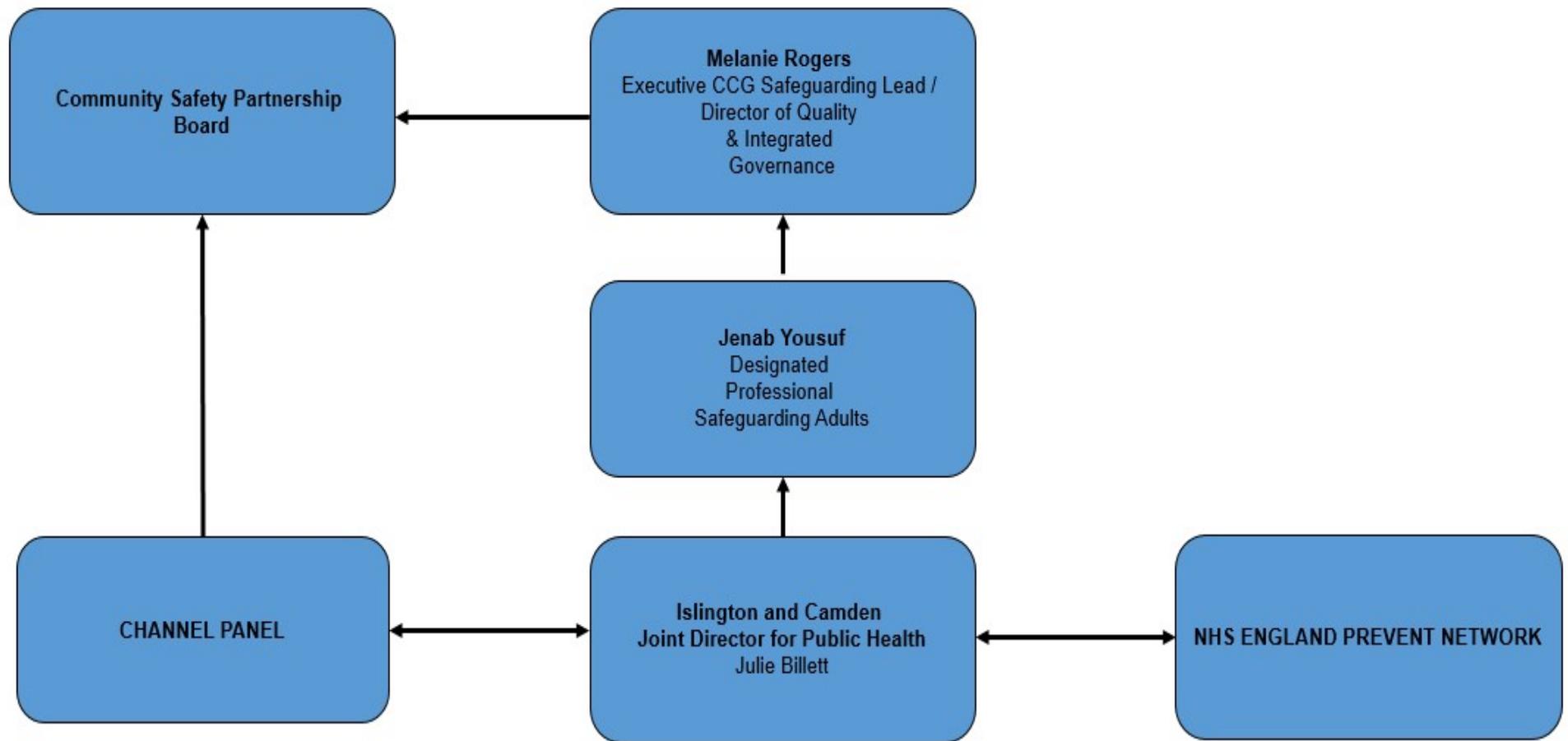
BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE VERSION

Appendix D – Safeguarding adult’s serious concerns flowchart



APPENDIX E - PREVENT ACCOUNTABILITY FLOWCHART

BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE VERSION



Appendix F: Local contact details

This appendix only includes contact numbers relevant to the reporting and investigating of abuse. Many more organisations have a role to play in protecting adults.

SOCIAL SERVICES	
<p>Access and Advice Team: This is the first point of contact. This team takes initial details and refers on to the most appropriate team.</p>	<p>Tel: 0207 527 2299 Fax: 020 7527 5114 Email: access.service@islington.gov.uk accessservicesecure@islington.gcsx.gov.uk</p>
<p>Emergency Duty Team Weekdays- 5pm-9am Weekends and Bank Holidays- 24 hours</p>	<p>Tel: 0207 226 0992</p>
CHILDREN'S SOCIAL SERVICES	
<p>Children's Services Contact Team (Monday to Friday 9am to 5pm)</p>	<p>Tel: 020 7527 7400</p>
<p>Emergency Duty Team (5pm to 9am, Weekends and Bank Holidays)</p>	<p>Tel: 020 7226 0992</p>
POLICE	
<p>Islington Police Station</p>	<p>Address: 2 Tolpuddle Street, N1 0YY Central Switchboard: 0300 123 1212</p>
<p>Community Safety Team/Officer</p>	<p>Tel: 020 7421 0174</p>
<p>Useful links http://cms.met.police.uk/met/boroughs/islington/06advice_and_support/community_safety_unit_csu http://content.met.police.uk/Site/reportingcrime</p>	

INSPECTION	
Care Quality Commission	Address: Finsbury Tower 103 – 105 Bunhill Row London EC1Y 8TG Helpline: 0300 061 6161
Disclosure and Barring Service (replaced the Independent Safeguarding Authority)	
For referrals to the Employment Barring Service	Address: PO Box 110 Liverpool, L69 3JD Tel: 0870 90 90 811 Email: info@vbs-info.org.uk

BEFORE USING THIS POLICY ALWAYS ENSURE YOU ARE USING THE MOST UP TO DATE VERSION