

Safeguarding Policy

1. Policy Statement

The Sheppard Trust is wholly committed to protecting its residents, and anyone involved with the Trust in any way, from all forms of abuse or neglect. We believe everyone has the right to live a life that is free from harm and abuse. We aim to promote and support the welfare of all our residents, particularly those who are adults at risk, and will be pro-active in responding to any allegation or suspicion of abuse.

Safeguarding is everyone's responsibility. Everyone has a responsibility to keep adults at risk safe and to report any concerns that they have.

Ignoring abuse or neglect is not an option.

The objectives of this policy are:

To prevent harm and reduce the risk of abuse or neglect to all those associated with the Sheppard Trust, especially adults who are vulnerable due to care and support needs.

To safeguard residents at risk in a way that supports them in making choices and having control in how they want to live their lives.

To provide staff and volunteers with the principles that guide our approach to safeguarding.

The Care Act 2014 put safeguarding adults on a legal footing for the first time and explicitly acknowledges the role of housing providers in helping to keep people safe. The statutory guidance sets out responsibilities of housing providers in playing their part effectively. This policy reflects the guidance.

2 Definition

An "adult at risk" is an adult who has care or support needs who is experiencing or is at risk of abuse or neglect and who is unable to protect themselves because of their support needs.

Older people and people with care and support needs are not inherently vulnerable but may come to be at risk of abuse or neglect at any point, examples of this are:

- Financial abuse
- Physical abuse
- Sexual abuse
- Psychological abuse
- Discrimination
- Neglect and acts of omission
- Self-neglect

- Organisational abuse

Perpetrators of abuse and neglect with regards to older people are often people they trust, family members or care staff, and they also are at risk of exposure to scams.

The Sheppard Trust houses older women who are disproportionately affected by some types of abuse, particularly domestic violence. In implementing this policy the Trust has regard to the fact that its residents are women. We also recognise that perpetrators may be of any gender.

Poor practice and poor quality services are not the same as abuse and neglect but they can in the worst cases lead to abuse and neglect. Complaints about the quality of service will be dealt with under the complaints procedure but if the impact of the poor service results in a concern about the safety of an adult at risk action may also be considered under this procedure.

This policy applies to residents and also to all adults associated in any way with the Sheppard Trust, including our employees, Trustees, volunteers and any agency workers, freelancers or contractors we may engage.

3. Principles

Our policy and procedures are underpinned by the six principles of safeguarding set out in statutory guidance:

Empowerment – People being supported and encouraged to make their own decisions and informed consent. *"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."*

Prevention – It is better to take action before harm occurs. *"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*

Proportionality – The least intrusive response appropriate to the risk presented. *"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."*

Protection – Support and representation for those in greatest need. *"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*

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 and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."*

Accountability – Accountability and transparency in delivering safeguarding. *"I understand the role of everyone involved in my life and so do they."*

Our safeguarding arrangements should make safeguarding personal, that is, they should keep the resident at the heart of the process, rather than a tick box, process-led approach. Making it personal means that we focus on involving the resident from the very beginning, asking them what they want to happen, helping them make informed choices to achieve the outcomes they want, and ensuring their voice is heard.

Capacity

In accordance with the Mental Capacity Act 2005, we work from a presumption of mental capacity unless a person's apparent comprehension of a situation gives rise to doubt.

It is the right of adults who have capacity to take risks and to make their own choices, irrespective of how unwise we consider their decisions to be. Our approach takes into account a person's preferences, circumstances and tolerance of risks. *"What good is it making a person safer if it merely makes them miserable?" (Sir James Munby)*

However, there are situations, for example where:

- a serious crime is suspected or
- allegations involve a member of staff, paid carer or volunteer, or
- there is a risk of serious harm to that person or anyone else,

when we will override a person's wishes in certain circumstances.

4. How we will put this policy into effect

4.1 We will make sure roles and responsibilities are clear.

The Chief Executive is the nominated safeguarding lead with overall responsibility for oversight of the safeguarding arrangements at the Sheppard Trust.

All trustees carry responsibility for safeguarding. One trustee will be nominated as a safeguarding lead trustee and also as the deputy safeguarding lead in the case of absence or involvement of the Chief Executive. In the absence of a nominated trustee the Chair will take on this role. An annual report will be made to all trustees along with other reports as required.

All staff are responsible for safeguarding adults at risk and reporting any concerns to the Chief Executive, or if the Chief Executive is absent or involved, to the Chair or safeguarding trustee.

4.2 When recruiting staff, we will ensure that safe recruitment procedures are followed, including ensuring that Disclosure and Barring Service checks are undertaken.

As The Sheppard Trust is small and recruits only very occasionally, we will always refresh our knowledge and practice prior to each recruitment, taking account of up to date local and national guidance and training recruiting managers as necessary.

4.3 We will use the expertise of other agencies and local safeguarding arrangements to guide our procedures.

The Bi-borough Safeguarding Adults Executive Board has published a guide for staff "*Safeguarding Adults from Neglect or Abuse: Handbook for Frontline Staff*" (April 2019). It contains information for staff about safeguarding and types of abuse, and procedures to follow when safeguarding concerns come to our attention. It supplements the London Multi-Agency Safeguarding Adults Policy and Procedures.

This booklet will act as our Safeguarding Adults Procedure, and we will ensure it is available to all staff. When concerns arise, the Chief Executive will use the procedures in the guide and the flowchart attached to this policy to make decisions about onward reporting and information sharing with other agencies.

As at January 2025 we are no longer working in RBKC. However the principles and procedures set out in this guidance apply to all London boroughs as they are based on London-wide procedures. We will therefore continue to use this guidance whilst the Sheppard Trust is working at temporary sites in Barnet and in Ealing, but we will also use local policies and procedures to guide particular cases.

4.4 We will provide training and support for staff.

This includes support and supervision as well as appropriate training on safeguarding issues and related issues. We will aim to provide formal training or refresher training at least every three years (or two years for online training) to staff working directly with residents at risk.

The Sheppard Trust will respect and support staff who speak out in good faith about suspicions of abuse or inappropriate behaviour, even if it transpires that they are unfounded.

4.5 We will try and create safe and secure environments and equip residents with the skills to keep themselves safe.

Part of our support to residents includes supporting people to take actions in order to live their lives as they choose and reduce the risk of abuse. We aim to develop safe relationships with our residents so that they feel confident to disclose abuse.

4.6 We will ask those working with us to share responsibility for safeguarding.

If contractors employed by us need to enter a resident's flat and that resident is an adult at risk, we will ask the contractor to adopt this policy or check that they have an equivalent policy that incorporates a commitment to keeping people safe and appropriate procedures including relevant background checks on staff. If this is not practicable, we will supervise work undertaken by a contractor in the flat of an adult at risk.

5. Review

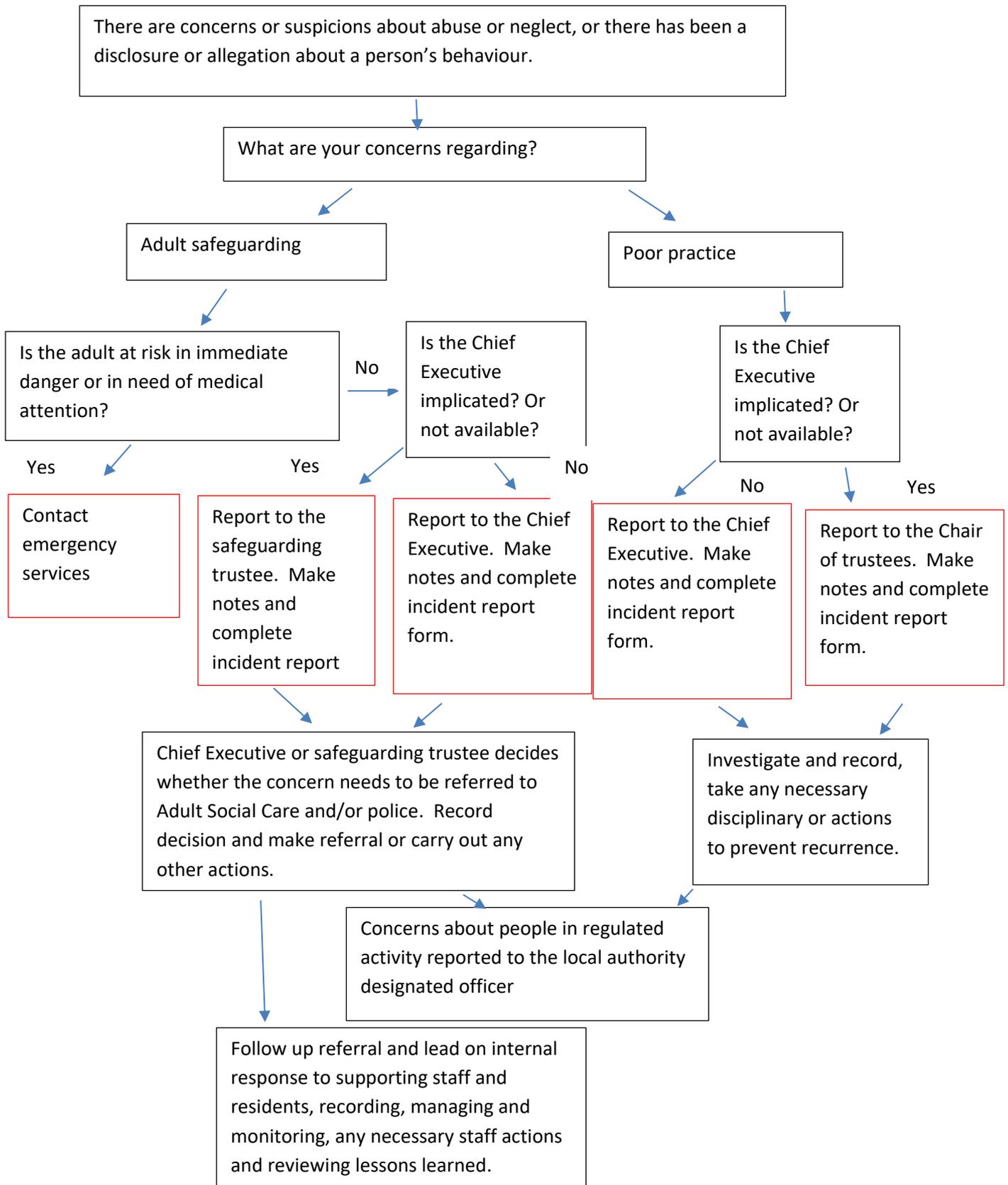
This policy and the associated procedures will be reviewed every year, and checked as and when there are changes in legislation, to keep up to date with best practice standards.

Status of this policy:	Approved by the Board January 2025
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Next check and update due:	January 2026
Next full review due:	January 2026

Other documents which may be relevant

Equality and Diversity Policy (which covers harassment and bullying)
Raising Concerns (“Whistleblowing”) policy and procedure
Disciplinary policy

Action flowchart



Appendix 1

Staff Quick Reference Guide:

Your responsibilities for safeguarding – what to do

Safeguarding is everybody’s responsibility. If you have a safeguarding concern you have a duty to report it. A safeguarding concern can be something you have witnessed, a direct disclosure, something somebody else has told you or a suspicion that abuse or neglect has occurred. You don’t need hard evidence to make a report. The two main principles are:

- **In an emergency dial 999** if a person is in immediate danger, medical attention is needed, or a crime has just been committed;
- **Report your concerns to the Chief Executive without delay – never ignore abuse or neglect.** If the Chief Executive is absent or involved, report to the Safeguarding Trustee. If you cannot report to either of these in an appropriate timescale, report to social services.

You should follow the principles and guidance set out in the booklet “Safeguarding adults from abuse or neglect: Handbook for Frontline Staff” (Bi-borough Safeguarding Adults Executive Board, April 2019). There is a summary of your responsibilities from this booklet overleaf.

Contact details for safeguarding:

Chief Executive	Clare Scott Booth	0300 012 0382 clarescottbooth@sheppardtrust.org
Safeguarding Trustee	Chair of trustees	safe@sheppardtrust.org.uk
Social services	London Borough of Barnet	Adult safeguarding referrals: 020 8359 5000 Out of hours: 020 8359 2000 Email: socialcaredirect@barnet.gov.uk Referral forms: Report adult abuse Barnet Council
Social services	London Borough of Ealing	<ul style="list-style-type: none"> • telephone: 0208 825 8000 • email sscallcentre@ealing.gov.uk • report online

What is expected of me?

1 Ignoring abuse is not an option – if at any time you think that an adult with care and support needs is being abused or is at risk of abuse you must report your concerns so that they can be looked into.

2 If you come across a situation where you think or have been told about an adult at risk of abuse you must not ignore the information. Do not assume that others know what you know. You must tell someone so that others can help.

3 Remember that adults have human rights. You have a duty of care to ensure the rights and needs of the adult are your main consideration.

4 If at any time you feel the person needs urgent medical assistance call for an ambulance or arrange for a doctor to see the person at the earliest opportunity.

5 If at the time you have reason to believe the adult is in immediate and serious risk of harm or that a crime has been committed call the police.

6 If an adult tells you something that causes you to be concerned:

- Keep calm; this will help the person.
- Make sure that the person is safe.
- Listen carefully to what is said.
- Do not question except to clarify and ensure that you understand what is being said.
- Clarify what the adult wants to do or what they would like to happen.
- Do not make promises that you cannot keep.
- Do not promise confidentiality, as you cannot keep the information to yourself.
- Reassure and take care of the person.

7 Remember you will need to record everything that you saw, heard and did. Record the facts of what happened.

8 Remember it is expected that you pass on any concerns immediately to your manager and in particular seek support from a manager if you are unsure about the risks observed or disclosed.

Appendix 2

Disclosure and Barring Service checks procedure

- 1 The Trust will carry out checks to the highest level that it is legally entitled to make for each post including volunteers and trustees. This will be assessed by the Chief Executive (or in the case of the Chief Executive, by the Chair).
- 2 The Trust will carry out new checks via UCheck with which it has an arrangement, or another similar body.
- 3 The Trust will bear the cost of subscriptions to the DBS Update Service for all its staff, provided they consent to the information being checked by the Trust at any time. This means that it will be able to easily check that there is no new information on a DBS check. An update check will be made at least once every three years by the Chief Executive and the result will be recorded. If an employee withholds or withdraws consent to checking or membership of the DBS Update Service then a new DBS check will be requested at least every three years.
- 4 Records of DBS checks and Update Service checks made will be kept securely and in accordance with the requirements of the DBS code of practice. Copies of the actual disclosure belong to the individual not the Trust and will not be kept.
- 5 If a DBS check at any time before or during employment reveals any information relevant to the staff member's employment then a risk assessment will be carried out to determine whether their employment can be confirmed or continued and whether any particular procedures need to be put in place to reduce risk.
- 6 It is a contractual obligation upon all staff to inform the Trust if they have or receive any convictions or cautions or changes to their DBS status including any police investigations which might affect their suitability for employment with adults at risk.

Appendix 3

The Sheppard Trust

Role and responsibilities of the lead trustee for safeguarding

All the trustees of the charity carry collective responsibility for safeguarding. It is useful for one trustee to take the lead to support, advise and guide the Board on safeguarding matters but they should not be the only person who understands safeguarding amongst the trustees.

The lead trustee for safeguarding will be a volunteer from within the Board who has skills, experience and confidence in the area of safeguarding or who is willing to undertake the necessary training to develop these.

It is good practice to ensure that the role and responsibilities of the lead trustee are described in writing, agreed by the Board and reviewed regularly.

It is important to distinguish between the strategic, advisory and governance roles of a lead trustee, and the day to day operational designated lead for safeguarding, who in our case is the Chief Executive.

Responsibilities

Strategic

- Consider the organisation's strategic plans and make sure they reflect safeguarding.
- Work with the Chief Executive (designated safeguarding lead) to review whether the things the organisation has put in place are creating a safer culture and keeping people safe.
- Check the organisation's risk register reflects safeguarding risks properly and plan sensible measures to take.
- Make sure there is space on the agenda for safeguarding reports and help trustees understand and challenge those reports.

Creating the right culture

- Champion safeguarding throughout the organisation.
- Attend relevant safeguarding training events.

- Support the trustees in developing their individual and collective understanding of safeguarding.
- Attend meetings, activities, projects to engage with staff, volunteers and beneficiaries to understand safeguarding on the ground.
- Work with the chair and designated safeguarding lead in order to manage all serious safeguarding cases.
- Make sure you have ways of gathering the views of staff and residents in relation to safeguarding and sharing these with the board.

Effective policy and practice

- Make sure there is an annual review of safeguarding policies and procedures and that this is reported to trustees.
- Understand the monitoring your charity does to see whether policies and procedures are effective.
- Learn from case reviews locally and nationally, to improve your organisation's policies, procedures and practices.
- Oversee safeguarding allegations against staff or volunteers, together with the designated safeguarding lead.
- Act as the deputy designated safeguarding lead in the absence of the Chief Executive.
- Be a point of contact for staff or residents if someone wishes to complain about a lack of action in relation to safeguarding concerns.

Appendix 4 Policy on the recruitment of ex-offenders

The Sheppard Trust has adopted the model policy on the recruitment of ex-offenders as follows:

- as an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), The Sheppard Trust complies fully with the DBS code of practice and undertakes to treat all applicants for positions fairly
- The Sheppard Trust undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
- The Sheppard Trust can only ask an individual to provide details of convictions and cautions that The Sheppard Trust are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- The Sheppard Trust can only ask an individual about convictions and cautions that are not protected
- The Sheppard Trust is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background
- The Sheppard Trust has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process
- The Sheppard Trust actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
- The Sheppard Trust select all candidates for interview based on their skills, qualifications and experience
- an application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position
- The Sheppard Trust ensures that all those in The Sheppard Trust who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences
- The Sheppard Trust also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
- at interview, or in a separate discussion, The Sheppard Trust ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment
- The Sheppard Trust makes every subject of a criminal record check submitted to DBS aware of the existence of the DBS code of practice and makes a copy available on request
- The Sheppard Trust undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.