White Lodge

Safeguarding Policy

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1. Safeguarding statement

All White Lodge staff, volunteers, students on placement and trustees recognise our moral and statutory duty to safeguard and promote the welfare of children, young people and adults with care and support needs.

Employees, trustees and volunteers must all follow the White Lodge Safeguarding Policy and should be made aware of how this policy can be accessed. Failure to comply with the policy and related procedures may ultimately result in dismissal or exclusion from White Lodge.

The purpose of this policy is to:

- Safeguard and provide protection for the children and adults who receive services from White Lodge
- Provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or adult may be experiencing, or be at risk of harm
- Provide sources for further information and advice relating to all areas of Safeguarding for children and adults

1.1. Scope

This policy covers Child and Adult Safeguarding and has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults with care and support needs. This includes reference to Surrey Safeguarding Children Partnership and Surrey Safeguarding Adults Board along with the following legislation and guidance documents:

- Children Act 1989

- Children Act 2004

- Children and Social Work Act 2017

- Working Together to Safeguard Children 2023

  https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

- Ofsted

- Children's Home (England) Regulations 2015

- Sexual Offences Act 2003

- Care Act 2014

- Safeguarding Vulnerable Groups Act 2006

- Mental Capacity Act 2005

- Health and Social Care Act 2008

- Deprivation of Liberty Safeguards

- CQC

- Sexual Offences Act 2013

1.2   Responsibilities
1.2.1   Trustee with overall safeguarding responsibility

Will ensure there is appropriate scrutiny of White Lodge's safeguarding performance and provide assurance to the Board of Trustees. The Trustee responsible for the Quality and Safety Committee will ensure there is appropriate scrutiny of safeguarding performance across the Charity.

1.2.2   The Quality and Safety Committee

Is responsible for ensuring there is appropriate scrutiny of safeguarding performance in all areas of White Lodge and to provide assurance to the Board of Trustees.

1.2.3 Chief Executive Officer (CEO)

Will provide strategic leadership, promote a culture of supporting good practice regarding child protection and safeguarding of children and vulnerable adults within White Lodge and promote collaborative working with other agencies.

1.2.4 Operational lead for SMT

Will, in conjunction with the CEO, ensure safeguarding incidents are reported and monitored by the Board of Trustees via the Quality and Safety Committee; take responsibility for child protection and safeguarding issues, reporting to the Board of Trustees via the Senior Management Team and will provide leadership in the long-term strategic planning for safeguarding and child protection services for children and adults at risk across the organisation. They will also ensure there is a culture of collaboration and willingness to learn in order to safeguard the welfare of children and adults at risk.

1.2.5 HR Manager

Is responsible for: ensuring safer recruitment standards are maintained; ensuring Disclosure and Barring Scheme (DBS) checks are carried out in line with national and statutory guidelines; ensuring allegations against staff working with children at work or in private life are addressed in accordance with the Disciplinary Policy and national/statutory guidelines and working with the CEO to ensure that job descriptions include a statement regarding safeguarding children and adults.

1.2.6 Designated Safeguarding Lead (DSL)

Is responsible for ensuring that White Lodge has systems in place to safeguard children and adults at risk (including safeguarding supervision, education and training, risk and assurance frameworks); promoting a coordinated approach to the development, implementation, management; and monitoring of relevant national guidance and standards in relation to safeguarding children. The Designated Safeguarding Lead also has responsibility for ensuring that safeguarding incidents are investigated with appropriate liaison with relevant agencies including the Local Authority Designated Officer. It is important to note that there is only one organisational DSL even though other managers may have completed the training.

1.2.7   Staff and Volunteers

Irrespective of discipline or role, all staff and volunteers have a responsibility to safeguard the welfare and best interests of children, and adults. All staff and volunteers working at White Lodge should know the potential indicators of maltreatment (see Appendix 4 – Safeguarding Indicators) of children and adults and how to report their concerns. Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions. Staff should adopt high standards of personal conduct to maintain the confidence and respect of their peers, children and families and the public. An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting.

2   Safeguarding and Disability

While we are conscious that anybody can be abused, harmed or maltreated, research shows that disabled children and adults are significantly more at risk of harm or abuse.

2.2 Why Are Disabled Children and Adults at Greater Risk?

A number of factors contribute to this including possible:

- Social isolation and fewer trusted contacts
- Dependency on parents and/or multiple carers including for intimate personal care
- Reduced capacity to understand, resist or avoid abuse
- Communication barriers making it difficult to tell others what is happening increasing the importance and knowledge of non-verbal communication
- Vulnerability to bullying and intimidation
- Need for moving and handling (eg using hoists)

2.3 Additional Risk Factors

Other factors which can make disabled children and adults more vulnerable include their care needs, challenging behaviours and the vulnerability of carers/parents given the demand and challenges of caring for a those with complex needs:

- Lack of support/training for parents and carers in dealing with difficult behaviour

- The child/adult being perceived as being of less importance

- Parents/carers may accept lesser standards of substitute care because of their need for support/respite

- Some children and adults may behave in ways that are self-harming, this can lead to an abusive injury being missed

- An assumption that behaviour is an integral part of a condition, rather than a response to abusive treatment or a negative reaction to medication

2.4 Additional Vulnerabilities

Because of the needs of disabled children and adults, they may also be at risk of being abused in other ways including:

- Force feeding or inappropriate feeding

- Their personal care needs may not be met adequately

- Practices such as physical restraint carried out unnecessarily or not in accordance with available guidelines

- Rough handling

- Extreme behaviour modification including the deprivation of clothing, medication, or food, limiting movement, restricting freedoms, locking doors etc

- Misuse of medication, sedation, heavy tranquillisation

- Invasive procedures which are unnecessary or are carried out against the child/adults will

- Being denied access to required medical treatment

- Misapplication of programmes or regimes

- Ill-fitting equipment e.g. mobility aids, sleep boards which may cause injury or pain

- Incorrect, improper or inadequate splinting

- They may be more vulnerable to online abuse

2.5 Contextual Safeguarding

Threats to the welfare of children and adults with care and support needs may come from their families. In addition, they may be vulnerable to abuse or exploitation from outside of their families (extra-familial harm). This may arise in schools, other educational or care establishments, from within peer groups, carers or from online and wider communities. These threats can take a variety of different forms such as those described in paragraphs 2.3 and 2.4 above, including exploitation by criminal gangs, county lines, trafficking, online abuse, sexual exploitation, financial exploitation, trafficking, and influences of extremism leading to radicalisation.

Children and adults with care and support needs can have a heightened vulnerability on the nature of their needs. They may present with hidden difficulties that place them at higher risk of exploitation. They may experience difficulties with communication, disinhibition, decision making and evaluating risk. These factors could inadvertently place themselves or others at risk.

3 Sexual Offences and Consent
3.2 The Sexual Offences Act 2003

The Sexual Offences Act 2003 defines 'consent' as "if he agrees by choice and has the capacity to make that choice" (legislation.gov.uk, 2023).

3.3 Consent

The Act, removes the element of consent for many sexual offences for:

- Children/young people under 16 (including under 13).
- Children/ young people under 18 having sexual relations with a person of trust (for example: teachers, youth workers, foster carers, police officers).
- Children / young people under 18 involved with family members over 18.
- Persons with a mental disorder impeding choice or who are induced, threatened or deceived.
- Persons with a mental disorder who have sexual relations with care workers.

In relation to young people under the age of 13, consent is irrelevant. The law says 'a child under the age of 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity'.

The Police must be informed immediately of any sexual activity involving a child under 13 years of age.

4 Safeguarding Children

4.1 Safeguarding Children Definition

Working Together to Safeguard Children (Department for Education, 2023) defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interest of the children and
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

4.2 How White Lodge Will Safeguard Children

We will seek to safeguard children and young people by:

- Valuing, listening to and respecting them

- Adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Sharing information about safeguarding, child protection and good practice with children, parents, staff and volunteers
- Sharing information about concerns promptly with agencies who need to know, and involving parents and children appropriately
- Providing effective management for staff and volunteers through support, supervision and training

4.3 Main categories of Child Abuse and Neglect

Child abuse and neglect is a generic term encompassing all ill treatment of children, including serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

The are four categories of abuse[1] which are used as a basis for determining that a child should be subject to a Child Protection Plan. These are:
- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse

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[1] As defined in "Working Together to Safeguard children" (Department for Education, 2023

4.4 Types of Child Abuse

There are many types of abuse that we need to be aware of and are covered in our mandatory training. These include:

- Bullying and cyberbullying
- Child sexual exploitation
- Child trafficking
- Criminal exploitation and gangs
- Grooming
- Neglect
- Domestic abuse
- Emotional abuse
- Female genital mutilation
- Non-recent abuse
- Online abuse
- Physical abuse
- Sexual abuse
- Radicalisation/exploitation

For more information about the types of abuse and how to spot the signs, please visit

www.nspcc.org.uk/what-is-child-abuse/types-of-abuse (NSPCC, 2023)

Radicalisation: 'Prevent' is a national government programme that aims to stop people from becoming terrorists or supporting terrorism. The journey to becoming radicalised is different for everyone and there are many reasons why someone becomes vulnerable. Radicalisation can take place very quickly, or over a long period of time. More important than any one specific sign is the sense that something is not quite right with the person you're worried about. You could spot one sign or a combination of signs that seem to be increasing in intensity.

There is more information about the signs that someone may be vulnerable to radicalization : Advice For Families | Counter Terrorism Policing

4.5 Safer Caring Practices

- Remember not to be a young people's friend, always maintain a professional manner when working with them.

- Do not accept a young person as a friend on any social networking site that you use.

- Always keep a record of any text or email exchanges with a young person (staff will use work telephones where available).

- Always be aware that your comments or actions may be perceived differently than intended, so be sensitive to the situation.

- Do not meet a young person alone, this is for the safety and well-being of the young person but also yourself. Where this is necessary, try to use public spaces for one-to-one meetings if you are not meeting at White Lodge

- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex.

- Never speak to the press about a child or young person without permission from White Lodge

4.6 What To Do If You Are Concerned About a Child

Any member of staff who is concerned that there is a possibility that a child is being harmed or is at any risk, has a duty of care to bring their concern to their senior/supervisor, line manager, Operational lead for SMT White Lodge's DSL as soon as possible, however unsure they are or however small it may seem. In all cases it is vital to take every action which is needed to safeguard the child.

If a child is in immediate danger or risk of harm contact the Police by dialling 999.

4.6.1   Identifying Abuse

There are many potential sources of information that could raise concerns that a child is being harmed or at risk of harm and could include:

- The child communicating directly by telling you or showing you or indirectly through their behaviour

- Another child passing on information

- Other members of staff sharing information

- Family or carers displaying behaviour that they may consider to be 'normal' but is concerning to staff

- Members of the public

- Another professional

For reference there is additional information about common signs of abuse in Appendix 4 – Safeguarding Indicators.

4.6.2   What if the Abuser is Also a Child

If the concern raised relates to abuse by another child then both children must be considered at risk of harm and have separate concerns raised.

4.6.3   Responding to a Disclosure

- Listen carefully rather than asking leading questions

- Never promise any particular action or NOT to disclose any information shared

- Allow silence and/or allow child, young person to be upset

- Try to relate to the age, understanding or needs of the child or young person

- Write down carefully the information you have been given as soon as possible, preferably within 24 hours and only including what you have been told, heard or seen

- Discuss this as soon as possible with your supervisor or senior as per Figure 1: Concerns About a Child Flowchart

4.6.4   If the Child is Injured

Any child who has sustained an injury or is in any medical danger should be examined by a medical professional.

4.6.5 Informing Parents and Family

The most senior member of staff delivering the service or a manager should keep parent/carers informed of any safeguarding incidents and referrals to outside agencies **unless**:

- Sexual abuse or exploitation is suspected
- Organised or multiple abuse is suspected
- Fabricated or induced illness is suspected
- Female genital mutilation is a concern
- There is a case of forced marriage
- Contacting parents/carers would place a child or others at immediate risk

4.6.6 Where Do We Refer To

Once a safeguarding concern has been raised, the most important thing is to act in a timely way to keep the child safe from harm. We must not wait on the availability of a manager to make a decision. Management advice can always be sought out of normal office hours via the On-Call system: 01932 567131, ext. 333.

- If the child is in immediate danger call 999 to notify the police
- There is a mandatory duty to refer cases of FGM. For advice, contact the NSPCC's FGM helpline: 0800 028 3550 or email: help@NSPCC.org.uk.
- Notify the senior worker on shift who may or may not be the manager
- The senior worker should then make a decision about whether an onward referral is required
- Onward referrals can be made to:
    - The child's social worker if they have one and they can be contacted
    - Children's Single Point of Access (C-SPA) on 0300 470 9100 Monday to Friday 9am to 5pm. For links to forms, see: Concerned about a child - Surrey Safeguarding Children Partnership
    - Emergency Duty Team (EDT) on 01483 517 898 Monday to Friday 5pm to 9am and 24 hours a day at the weekend

- o Radicalisation/Prevent: [Prevent – referral form - Surrey Safeguarding Children Partnership (surreyscp.org.uk).](url) For advice, call the ACT early support line: 0800 011 3764
- o Report instances of FGM by calling 101, or consult the NSPCC FGM helpline, as above

Please note that the C-SPA and EDT numbers should only be used for children living in Surrey. For children living in other counties, please follow the pathways on their safeguarding websites.

4.6.7   Internal Reporting

All safeguarding concerns and incidents should be reported using the '[Safeguarding, Incident and Accident Log](url)' form. This form is an important in terms of recording the concern or the event and the immediate action taken. It must be noted that this is a record and is not a substitute or hindrance to the correct actions being taken in a timely way. The record will be used to identify:

- Any additional steps that need to be taken
- Reflection and learning
- Organisational patterns and trends

4.6.8 Concerns About a Child Flowchart

The flow chart below shows the steps that must be taken if you believe a child has been harmed or is at risk of harm[2]:
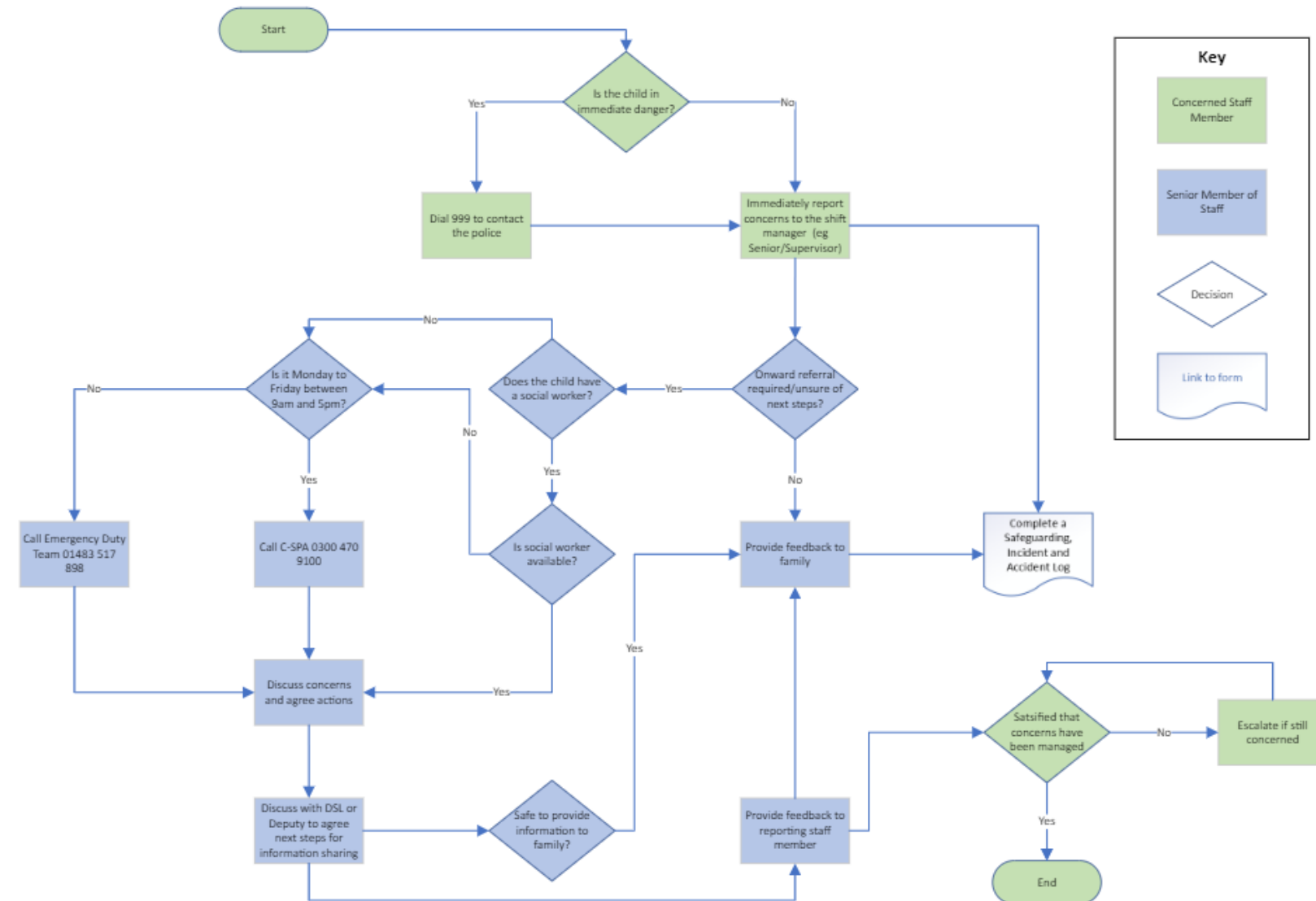
Figure 1: Concerns About a Child Flowchart

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[2] Please note that the C-SPA and EDT numbers should only be used for children living in Surrey. For children living in other counties, we should be notifying their local authority

4.7 Allegations Made Against Staff and Volunteers

When any form of complaint is made against an employee or volunteer regarding poor practice, negligence, or criminal activity, it must be taken seriously. The complaint should initially be dealt with by the most senior staff member on site at the time the complaint is made. If the complaint is against the most senior member of staff on site, then DSL, CEO or Chair of Trustees must be informed.

Allegations about a member of staff working with children must be reported to the Local Authority Designated Officer and may be reportable to the service regulator such as Ofsted.

4.8 Helpful Contacts and Resources

Please note that the C-SPA and EDT numbers should only be used for children living in Surrey. For children living in other counties, please follow the pathways on their safeguarding websites.

4.8.1 Children's Single Point of Access (C-SPA)

This is the front door to Surrey County Council services for children, provides residents and people who work with children in Surrey with direct information, advice and guidance about where and how to find the appropriate support for children and families.

- Available 9am to 5pm, Monday to Friday
- Phone: 0300 470 9100
- Email: cspa@surreycc.gov.uk

4.8.2 Emergency Duty Team (EDT)

Provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

- Available 5pm-9am, Monday – Friday, Weekends 24 hours a day.

- Phone: 01483 517898

- Email: edt.ssd@surreycc.gov.uk

4.8.3   Surrey Safeguarding Children Partnership (SSCP)

The SSCP brings together representatives from different organisations and it is the key statutory mechanism for agreeing how the relevant organisations in Surrey will cooperate to safeguard and promote the welfare of children. They have a range of resources and information for practitioners and families.

- www.surreyscp.org.uk

4.8.4   Local Authority Designated Officer (LADO)

The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children, please contact the LADO:

- Phone: 0300 123 1650
- Email: LADO@surreycc.gov.uk

4.8.5   White Lodge On-Call

White Lodge operates an On-Call system for management support and guidance outside of core working hours, use the On-Call system: 01932 567131, ext. 333.

4.8.6   Support with staying safe online

For support with staying safe online, please see the resources in Appendix 5, call Childline (0800 1111), the NSPCC Helpline (0808 800 5000) or the Internet Watch foundation's 'ReportRemove' tool for assistance with removing personal images from the internet.

5 Safeguarding Adults

5.1 Safeguarding Adults Definition

The Care Act (2014) defines an adult at risk as an individual aged 18 years and over 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

This includes adults with physical, sensory and mental impairments and learning disabilities and people with mental ill health, dementia or other memory impairments.

5.2 Abuse and Neglect

Abuse can take place in any relationship and there are many contexts in which abuse might take place. Often the perpetrator is known to the adult and may be in a position of trust and/or power. Abuse or neglect outside could be carried out by:

- A spouse, partner or family member

- Neighbours or residents

- Friends, acquaintances or strangers

- People who deliberately exploit adults they perceive as vulnerable

- Paid staff, professionals or volunteers providing care and support

5.2.1   Types of Abuse

The Care Act (2014) defines categories of adult abuse and harm as:

- Physical

- Sexual

- Emotional/Psychological/Mental

- Neglect and acts of omission

- Financial or material abuse

- Discriminatory

- Organisational / Institutional

- Self-neglect

- Domestic Abuse (including coercive control)

- Modern slavery

- Online abuse

- Vulnerability to exploitation or radicalisation

For more information about the types of abuse and how to spot the signs, please visit

www.surreysab.org.uk

5.3 Person Centred Safeguarding/Making Safeguarding Personal

Making Safeguarding Personal has been developed to ensure that adults have involvement, choice and control, in improving their quality of life, well-being and safety. The adult's views, wishes, feelings and beliefs must be considered when decisions are made about how to support them to be safe. There may be many ways to prevent harm. Working with the person will mean that actions taken help them to find the solution that is right for them.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate.

The 6 principles of the Care Act 2014 are:

1. Empowerment - People being supported and encouraged to make their own decisions and informed consent.
2. Prevention – It is better to take action before harm occurs.

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

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

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

6. Accountability – Accountability and transparency in delivering safeguarding.

For more information about Making Safeguarding Personal please visit www.scie.org.uk/care-act-2014/safeguarding-adults/safeguarding-adults-boards-checklist-and-resources/making-safeguarding-personal.asp

5.4 Safer Caring Practices

- Always maintain a professional manner when working with service users.
- Do not accept a service user as a friend on any social networking site that you use.
- Always keep a record of any text or email exchanges with service users if a work phone has been unavailable
- Always be aware that your comments or actions may be perceived differently than intended, so be sensitive to the situation.
- Do not meet service users alone, this is for the safety and well-being of the young person but also yourself. Where this is necessary, try to use public spaces for one-to-one meetings if you are not meeting at White Lodge
- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex
- Never speak to the press about an adult without permission from White Lodge

5.5 What To Do If You Are Concerned About an Adult

Any member of staff who is concerned that there is a possibility that an adult is being harmed or is at any risk, has a duty of care to bring their concern to their senior/supervisor, line manager, operational lead for SMT or one of White Lodge's DSLs as soon as possible, however unsure they are or however small it may seem. In all cases it is vital to take every action which is needed to safeguard the adult.

If an adult is in immediate danger or risk of harm contact the Police by dialling 999

5.5.1　Identifying Abuse

There are many potential sources of information that could raise concerns that an adult is being harmed or at risk of harm and could include:

- The adult communicating directly by telling you or showing you or indirectly through their behaviour
- Another service user passing on information
- Other members of staff sharing information
- Family or carers displaying behaviour that they may consider to be 'normal' but is concerning to staff
- Members of the public
- Another professional
- Observation, for instance when helping with personal care

For reference there is additional information about common signs of abuse in Appendix 4 – Safeguarding Indicators.

5.5.2　What if the Abuser is Another Service User

If the concern raised relates to abuse by another service user then both adults must be considered at risk of harm and have separate concerns raised.

5.5.3　Responding to a Disclosure

- Listen carefully rather than asking leading questions
- Never promise any particular action or NOT to disclose any information shared
- Allow silence and/or allow adult to be upset
- Try to relate to the age, understanding or needs of the adult

- Write down carefully the information you have been given as soon as possible, preferably within 24 hours and only including what you have been told, heard or seen
- Discuss this as soon as possible with your supervisor or senior

5.5.4   What if the Adult is Injured

If an adult at risk has sustained an injury or is in any medical danger they should be examined by a medical professional.

5.5.5   Informing Family and Carers

Sharing information with the right people is central to good practice in safeguarding adults. However, information sharing must only ever be with those with a 'need to know'. This does **NOT** automatically include the person's spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision **and** family/ friends/ carers need to know in order to help keep the person safe. Information should only be shared by the most senior member of staff on shift or a manager.

5.5.6   Where Do We Refer To

Once a safeguarding concern has been raised, the most important thing is to act in a timely way to keep the adult safe from harm. We must not wait on the availability of a manager to make a decision. Management advice can always be sought out of normal office hours using the On-Call system: 01932 567131, ext. 333.

- If the adult is in immediate danger call 999 to notify the police
- Notify the senior worker on shift who may or may not be the manager
- The senior worker should then make a decision about whether an onward referral is required
- Onward referrals can be made to:
    - The adult's social worker if they have one and they can be contacted
    - Multi Agency Safeguarding Hub (MASH) on 0300 470 9100 Monday to Friday 9am to 5pm

- SCC quality Assurance team for quality issues, as identified in the SCC Safeguarding Adults thresholds, April 2024.
- Emergency Duty Team (EDT) on 01483 517 898 Monday to Friday 5pm to 9am and 24 hours a day at the weekend
- [Prevent – referral form - Surrey Safeguarding Children Partnership (surreyscp.org.uk)](#)
- **Please note that the MASH and EDT numbers should only be used for adults living in Surrey. For adults living in other counties, we should be notifying their local authority**

5.5.7 Reporting

All safeguarding concerns and incidents should be reported using the '[Safeguarding, Incident and Accident Log](#)' form. This form is an important in terms of recording the concern or the event and the immediate action taken. It must be noted that this is a record and is not a substitute or hindrance to the correct actions being taken in a timely way. The record will be used to identify:

- Any additional steps that need to be taken
- Reflection and learning
- Organisational patterns and trends

5.5.8 Concerns About an Adult Flowchart

The flow chart below shows the steps that must be taken if you believe an adult has been harmed or is at risk of harm[3]:
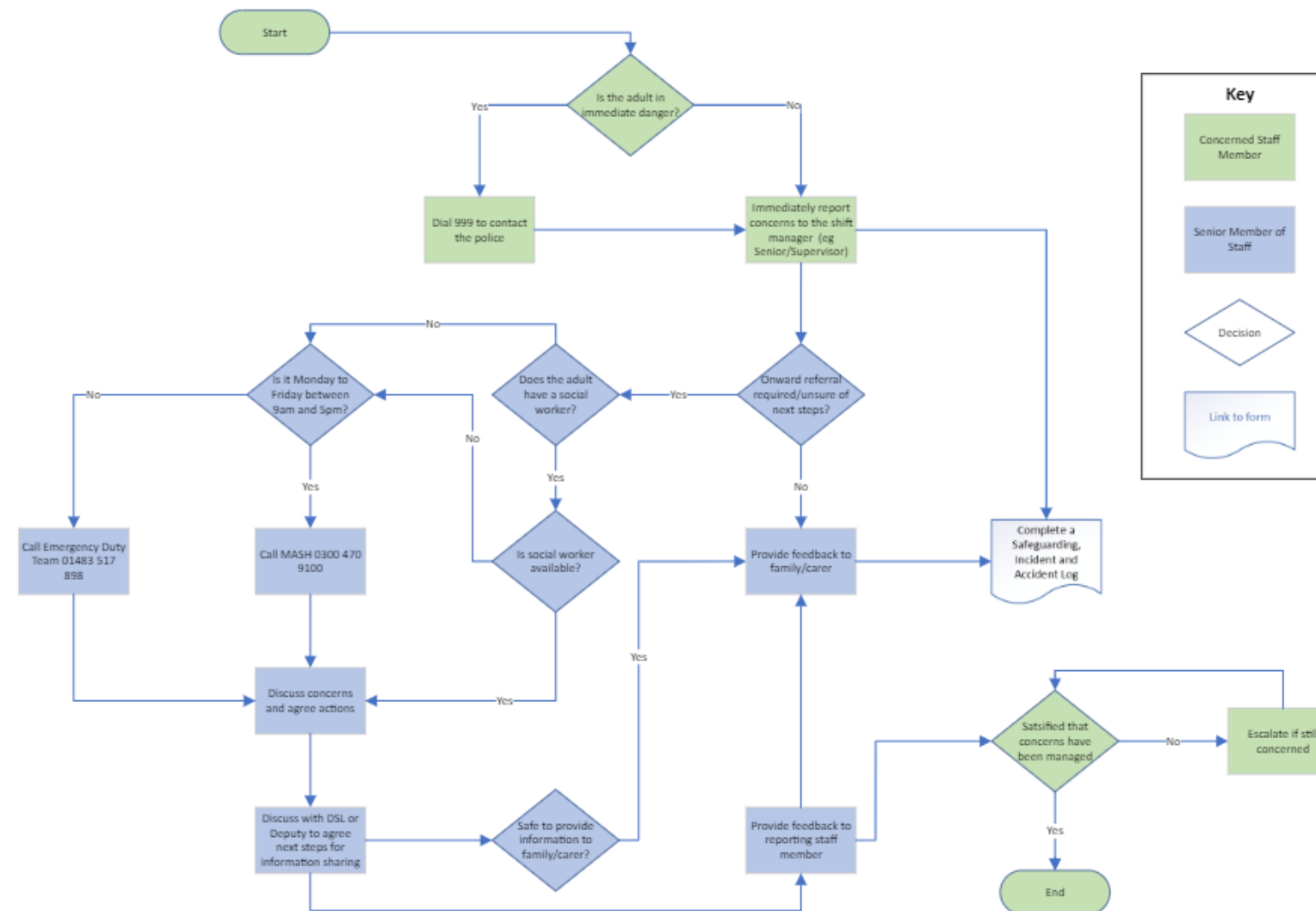

Figure 2: Concerns About an Adult Flowchart

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[3] Please note that the MASH and EDT numbers should only be used for adults living in Surrey. For adults living in other counties, we should be notifying their local authority

5.6 Allegations Made Against Staff and Volunteers

When any form of complaint is made against an employee or volunteer regarding poor practice, negligence, or criminal activity, it must be taken seriously. The complaint should initially be dealt with by the most senior staff member on site at the time the complaint is made. If the complaint is against the most senior member of staff on site, then the Safeguarding Manager, CEO or Chair of Trustees must be informed.

5.7 Helpful Contacts and Resources

Please note that the MASH and EDT numbers should only be used for adults living in Surrey. For adults living in other counties, we should be notifying their local authority

5.7.1   Multi-Agency Safeguarding Hub (MASH)

The Surrey Multi-Agency Safeguarding Hub (MASH) is the initial point of contact that aims to improve the safeguarding response for adults at risk of abuse or neglect through better information sharing and high-quality and timely responses.

- Available 9am to 5pm, Monday to Friday
- Phone: 0300 470 9100

5.7.2   Emergency Duty Team (EDT)

Provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

- Available 5pm-9am, Monday – Friday, Weekends 24 hours a day.
- Phone: 01483 517898
- Email: edt.ssd@surreycc.gov.uk

5.7.3   Surrey Safeguarding Adults Board (SSAB)

The Surrey Safeguarding Adults Board (SAB) works collaboratively across statutory, voluntary and third sector organisations to enable people in Surrey to live a life free from fear, harm and abuse.

- www.surreysab.org.uk

5.7.4   White Lodge On-Call

For management support and guidance outside of core working hours please use the on-call system: 01932 567131, ext. 333.

6   Escalation

It is critical that concerns are addressed. This includes concerns that have already been reported through the correct processes. If a member of staff feels that White Lodge have not managed a concern sufficiently or White Lodge feels that an external partner (eg C-SPA) has not managed a concern sufficiently, it is important that the concern is escalated.

6.1 Internal Escalation

The reporting line for safeguarding concerns within White Lodge is:

- Senior worker on shift
- Service Manager
- Operational lead for SMT
- CEO/Designated Safeguarding Lead
- Trustee with overall responsibility for Safeguarding

Any member of staff or anyone working on behalf of White Lodge is expected to raise concerns that have not been addressed with any person on the reporting line. For concerns that continue to exist

please contact Children's Single Point of Access or the Multi-Agency Safeguarding hub for further advice.

6.2 Inter-Agency Escalation

6.2.1   Finding Solutions Together (FaST) - Children

The Surrey Safeguarding Children Partnership have recognised that the needs of Children and their families can often be complex with no right or wrong solution and quite legitimately practitioners may exercise their professional judgement differently and have differing opinions of what the right approach should be. It is also the case that exceptionally, the needs of some young people and families may not easily fit within conventional application of thresholds.

The Surrey FaST (Finding Solutions Together) resolution process has been agreed, as a mechanism for seeking solutions that places the needs of the child and the family at its centre. For more information about FaST please visit www.surreyscb.procedures.org.uk/pkyqox

6.2.2   SSAB Escalation Policy - Adults

Occasionally situations arise when workers within one agency feel that the actions, inaction or decisions of another agency do not adequately safeguard an adult with care and support needs. Surrey Safeguarding Adults Board has therefore produced an inter-agency safeguarding policy which can be found here: www.surreysab.org.uk/wp-content/uploads/2023/04/SSAB-Inter-Agency-Escalation-Policy-V6-April-2023-FINAL-1.pdf.

7 Information Sharing

White Lodge complies with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR) which allow for the sharing of information without consent for the purpose of safeguarding children and adults. The decision about how much information to share, with whom

and when, can help keep children and adults safe. No practitioner should therefore assume that someone else will pass on information which may be critical to keeping a child or adult safe. When sharing information consider the 7 Golden Rules for information sharing (appendix 4).

8 Safer Recruitment

Staff are recruited in accordance with the Safer Recruitment Policy. Enhanced disclosure and barring checks are carried out on all staff who work with or have access to children/vulnerable adults regularly. This check is repeated every three years and staff contracts outline the requirement to report any new convictions.

9 Referrals to the Disclosure and Barring Service (DBS)

The Care and Support Statutory Guidance states:

"If someone is removed by being either dismissed or redeployed to a non-regulated activity, from their role providing regulated activity following a safeguarding incident, or a person leaves their role (resignation, retirement) to avoid a disciplinary hearing following a safeguarding incident and the employer/volunteer organisation feels they would have dismissed the person based on the information they hold, the regulated activity provider has a legal duty to refer to the Disclosure and Barring Service" (Gov.uk, 2016)

As the DSL, the CEO is responsible for reporting any information to the DBS.

10 Training

All staff receive Safeguarding Training proportionate to their roles and responsibilities which is detailed in 'Appendix 3 - Training'. Staff who have no prior experience of working with children and/or adults at risk or with no experience of UK safeguarding processes should complete each level

of training within the first 6 months of employment, staff who fail to do so will fail their probation review.

11 Whistleblowing

- White Lodge operates a confidentiality policy. However, under no circumstances will information be kept confidential that raises concern about the safety and welfare of a child or adult.

- Any staff or volunteers with concerns about anybody providing services to children and adults should report this to their Line Manager, Safeguarding Lead, CEO or Trustee board member as appropriate. They will be fully supported throughout the process.

- All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and adults in accordance with the Information Sharing Policy published by HM Government. The Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm.

- All staff must be aware that they cannot promise a child or adult that they will keep secrets/ not disclose potentially harmful information.

12 Developing good practice in safeguarding

We have a safeguarding lead on the Board and at Senior Management Team who are responsible for White Lodge's safeguarding arrangements. We are committed to continuous improvement in our practice. When there has been an incident or allegation, the team involved meets to look objectively at what happened and why, so that important lessons can be learnt, and services improved to reduce the risk of future harms and learn lessons.

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Appendix 1 - Key Safeguarding Contacts at White Lodge

Table 1: White Lodge Safeguarding Contacts

Role	Name	Contact number	Email
CEO and Designated Safeguarding Lead (DSL)	Lesleigh Bounds	t: 01932 567131 m: 07593 138499	lbounds@whitelodgecentre.co.uk
Operational lead for SMT	Kathryn Winfield	t: 01932 567131 m: 07938 485704	kwinfield@whitelodgecentre.co.uk
Trustee Whistleblowing & Safeguarding Lead	Juliette Barnes	Contact Pathways reception for information	jbarnes@whitelodgecentre.co.uk

Appendix 2 - 7 Golden Rules to Sharing Information

1. **Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing**, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. **Be open and honest** with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. **Seek advice** from other staff, or your line manager, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. **Where possible, share information with consent**, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. **Consider safety and wellbeing**: base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.

6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure**: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. **Keep a record** of your decision and the reasons for it on the child or adult's file – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 3 - Training

Table 2:White Lodge Safeguarding Training

Staff	Training	Where	When	Repeat/ Refresh
All staff, trustees and volunteers	White Lodge Safeguarding policy	Induction	0-6 months	When revised
	Introduction to safeguarding at White Lodge	Induction	0-6 months	N/A
All staff trustees and volunteers working with children	Working together to safeguard children	SSCP Elearning Or MeLearning	0-1 month	Every 2 years
	Safeguarding children with disabilities	SSCP Elearning Or Me Learning	0-1 year	N/A
	Neglect	SSCP Elearning Or Me Learning	0-1 year	Every 2 years
Seniors and supervisors working with children	Foundation Module 1: Multi agency safeguarding children – Family resilience and family safeguarding	SSCP Classroom/Online	0-6 months	As required

	Foundation Module 2: Child protection process and children in care	SSCP Classroom/Online	0-6 months	As required
Managers working with children	Safer recruitment	SSCP Classroom/Online Or Me Learning	0-6 months	As required
	Managing allegations against staff and volunteers	SSCP	0-6 months	As required
Designated safeguarding lead and deputies	Designated safeguarding lead	SSCP Classroom/Online	0-6 months	Every 3 years
All staff trustees and volunteers working with adults	Adult safeguarding essentials	SSAB Classroom/online	0-6 months	Every 2 years
Managers working with adults	Level 3 Safeguarding adults: Managing staff and decision making	External provider	0-6 months	As required

Appendix 4 – Safeguarding Indicators

Safeguarding Indicators - Children

Common safeguarding children indicators include but are not limited to:

- Unexplained or unusual injuries
- Unexplained changes in behaviour or personality
- Unusually hungry or poor personal hygiene
- Inappropriate behaviour with peers
- Becoming withdrawn
- Seeming anxious
- Becoming uncharacteristically aggressive
- Lacks social skills and has few friends, if any
- Poor bond or relationship with a parent
- Knowledge of adult issues inappropriate for their age
- Running away or going missing
- Always choosing to wear clothes which cover their body
- Missing appointments
- Use of explicit sexual language, sexualised behaviours
- Fabricated / induced illness

Safeguarding Indicators - Adults

Common safeguarding adults indicators include but are not limited to:

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- A change in a person's behaviour possibly in the presence of a particular person
- Frequent visits to the GP / failure to visit GP

- Signs of malnutrition

- Isolation - not seeing friends or family

- Limited access / restrictions to accessing money

- Verbal abuse and humiliation in front of others

- Low self-worth

- Damage to property or belongings

- Fear of outside help

- Unusual difficulty in walking or sitting

- Foreign bodies in intimate openings

- Infections or sexually transmitted diseases

- Use of explicit sexual language, sexualised behaviours

- Unexplained incontinence

- Fabricated / induced illness

- Unexplained withdrawals of money from accounts

- Spending that cannot be accounted for - no receipts or record of financial transactions / accounts

- Unexplained debts or rent arrears.

Appendix 5 – staying safe online

The following notes are taken from the Surrey Safeguarding Partnership's website -

https://surreyscp.org.uk/children-young-people/staying-safe-online/

Staying Safe Online

It's not always easy to know what's safe online and what's not. There are lots of fun and interesting things you can do on the internet; and it can be a great way to stay in touch with friends and family. But it's important to understand how to stay safe online. Educating yourself, keeping up to date on security and staying away of privacy issues can help you keep clear of abuse or bullying.
Some of the risky things you may come across online are:
- Bullying by people you might consider 'friends'
- Seeing inappropriate or harmful content (e.g posting rude or sexual pictures)
- Posting personal information that can identify and locate you offline
- Being persuaded to do illegal or inappropriate things through contact with strangers
- Seeing information and talking with others line who encourage self-harm
- Seeing racist or hateful material
- Being encouraged to leave or run away from home by someone you met online

Places you can go if you need help:
Childline has lots of great resources on their website to help you stay safe online. Here you can find ways to get support if things go wrong, keeping your information secure and how to spot fake news.
Brook offer advice on cyber bullying, online dating, sexting and selfies. The website also includes stories of real people and their experiences online.
Thinkuknow is from a UK organisation which protects children both online and offline. Explore any of the six Thinkuknow websites for advice about staying sae when you're on a phone, tablet or computer.

The BBC shares that the internet is an amazing place to be creative, chat with friends, and to find interesting fun stuff. It's important to enjoy that time, so the BBC have shared 8 top tips for staying safe online.

Kidscape offer advice targeted at cyber-bullying, including who you can report it to and the steps that you should take to manage the situation.

Online Gaming & Livestreams

Criminals are increasingly targeting children and young people via online gaming sites, pretending to be someone who they are not. Online games like Fortnite and Roblox can let you play with your friends and strangers from around the world. But playing with people online can also be risky.

ThinkUKnow offers tips for online gaming and playing safely online. Livestreaming is a popular way to communicate with your friends or wider community, but livestreams have risks. Remember that they can't be edited, and you can't erase what people have already seen. You can find out more about livestreaming and staying safe here.

Remember: your online friends are not the same as your real ones.

If you are concerned about something that has happened online through a game, or chat, please call childline:

Childline is open 24 hours a day and 7 days a week, so you can speak to them any time.

Childline has counsellors to listen and support you with anything you'd like to talk about. You can call us for free on **0800 1111** or speak online using the 1-2-1 chats. If you're deaf, you can also use BSL via an interpreter.

You can also send us a message after signing up for a private Childline account. We'll answer your message within a day.

Childline has lots of great information on how you can stay safe whilst playing games online, by yourself or on your mobile.

Report and Remove

The ReportRemove tool is to help young people under 18 in the UK to confidentially report sexual images and videos of themselves and remove them from the internet. The details for using it are here: Report Remove | Childline (www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/).

Reviews and Changes

Date last reviewed:	Reviewed by:	Date next review due
03/11/2023	Rob Morello	
30/11/2023	Rob Morello and Lesleigh Bounds	
5/2/2024	Quality and Safety Committee	10/12/24
2/12/24	Kathryn Winfield & Lesleigh Bounds	
10/12/24	Quality and Safety Committee	December 2025
January 2025	Amendments from Q&S	