

Document name
Safeguarding Adults Policy and Procedure

This document is relevant to:	Tick to show who it is relevant to:
Central support services	✓
Education	✓
Therapy and wellbeing	✓
Residential	✓

Senior manager responsible	Ellie Crosthwaite
Author	Ellie Crosthwaite
Superseded documents	Safeguarding Policy January 2017, Sep 2018, Sept 2019, Sept 2020 Sept 2021
Date of latest review	New policy due to split of Children's and Adults
Date of next review	Sept 2023
Changes in this revision	New policy
Associated documents	Recruitment and Selection Policy Disciplinary Policy Whistleblowing policy Anti-Bullying & Harassment Policy Complaints Policy Health & Safety Policy E safety Policy Prevent Policy Positive Behaviour Policy Personal Care Policy Risk assessment Policy Visitors Procedure Working Alone Policy Data Protection Policy Leaving Premises Without Permission Policy Personal Relationships and Sexuality Policy Mental Capacity Policy Deprivation of Liberties Policy Supervision Policy Infection Prevention & Control Policy Equality & Diversity Drugs Policy Duty of Candour Policy

SLT approval	Approval date
	September 2022
Senior manager approval	Approval date

Adopted by governing body	Adoption date
	September 2022

Equality Impact Assessment

St. John's takes its duties under the Equality Act 2010 seriously. We have assessed the equality implications of this policy during the writing and subsequent reviews of the policy and, where necessary, during SLT and Governor discussions of the policy.

Contents of document

1. Introduction
2. Policy Statement
3. St. John's Safeguarding Team
4. Purpose
5. Scope
6. Roles and Responsibilities
7. Support, Information and Advice
8. Review
9. Procedures and Guidelines

1. Introduction

This policy supersedes the Safeguarding Policy (September 2020) In this policy 'Learner' and 'Adults at risk' are used interchangeably.

2. Policy Statement

St. John's College regards the Safeguarding of Adults at Risk as a priority and is committed to **safeguarding all Learners at all times**:

- Safeguarding is everyone's responsibility.
- We will follow statutory specialist guidelines in working with our Learners.
- We will seek to support all those affected by abuse.
- We will review our policy annually.
- We will complete a self-assessment audit annually.
- We have a safeguarding lead that is a member of the Senior Leadership Team.

- We have a team of trained Safeguarding delegates who will meet regularly to discuss safeguarding issues.

All allegations of abuse will be discussed within the team and reported when required to the relevant Local Safeguarding Board. We will work in partnership with the Local Safeguarding Board to determine the next steps.

We will exercise care and vigilance in the appointment of all staff, including Volunteers. (See Recruitment & Selection Policy).

All staff, as part of their induction training will be familiarised with this policy and procedures, this induction will also include understanding of professional boundaries and St. John's code of conduct.

Keeping safe will be promoted through improving the Adult's own knowledge of their safety and what to do or who to talk to if they don't feel protected or safe from harm.

All Learners at St. John's must have these fundamental rights accorded to them whilst they are in our care.

To be treated as an individual

Each Learner at St. John's is taught, cared for and treated as unique. This is reflected in Individual Plans. Our population has a wide ability range and our organisation and structure reflect the aim to offer consistency in approaches to our Adults irrespective of setting. Each Adult is given the time and opportunity to take part in all activities, to do things for themselves, to understand and be understood.

To be treated with dignity and respect

All Learners have the right to the highest standards of Education, Care, therapeutic support and medical intervention and this is delivered in an individual way having regard to the learners' abilities, personal preferences and cultural or religious background. Privacy and confidentiality are key issues.

The Learner Council provides opportunities for Learners to represent their views to the staff and recommendations are made to the Senior Leadership Team. Advocacy can be pursued; external representation is accessed as needed to ensure both quality and fairness.

To be safe

St. John's has a Safeguarding team, representing the residential and educational aspects of the provision. It should be noted however that safeguarding the learner is the responsibility **of all staff** and there is a clear procedure in the event of a disclosure or concern.

Our staff recruitment practices involve rigorous vetting procedures through enhanced DBS disclosures.

In all our dealings with young people St. John's views learners' rights and safety as paramount. Our policies and practices are revised and updated as required to meet the needs of our current population.

Sometimes we may need to share information and work in partnership with other agencies when there are concerns about a learners' welfare. We will ensure that our concerns are discussed with the learners' on a level compatible with their age and understanding, and with parents/carers, unless we have reason to believe that such a move would be contrary to their welfare.

St. John's encourages staff members to raise any matter of practice which they feel needs further explanation. Good working practice dictates that corporately and individually our work with learners' meets the highest standards and any member of staff who is concerned is encouraged to question and raise any matter about which they feel unsure. Staff are encouraged to do so in the knowledge that the vast majority of such questions can be satisfactorily answered quickly and informally. All staff should be aware that the Public Disclosure Act 1998 provides workers who make disclosures as defined under the Act with rights - "*not to be subjected to any detriment by any act, or any deliberate failure to act by his employer done on the ground that the employee has made a "protected" disclosure...*"

Should staff be dissatisfied with the outcome from reporting a concern to the Safeguarding Team at St. John's about a learner, then contact can be made independently by them with Brighton and Hove or East Sussex Safeguarding Teams.

3. St. John's Safeguarding Team

There is a designated member of the Senior Leadership Team who acts as Designated Safeguarding Lead. Staff from differing departments act as on call Safeguarding team members. They take calls and respond to alerts (via My Concern) concerning any of the learners who attend St John's. This ensures that there is a team member available to all staff whether in the college or post 19 residential services. They fulfil this function in addition to their main role.

Information about who can be contacted regarding safeguarding concerns can be found around the college and residential houses.

The role of the Safeguarding Team is to:

- Discuss referrals made to the Safeguarding Team at the weekly Safeguarding Team meetings held in term time.
- Ensure safeguarding procedures are in place and updated as needed.
- Ensure all staff remain aware of the Safeguarding policy & procedures,

- Be available to provide advice/support to staff and for staff to discuss concerns with.
- Be available to provide support to learners as needed.
- Liaise with Social Care Services in accordance with Pan Sussex procedures concerning adults at risk.
- Liaise with OFSTED and CQC with notifiable incidents.
- Attend and/or contribute to Strategy Meetings/Case Conferences.
- Keep records of any concerns/suspected cases of abuse/referrals on My Concern.
- Co-ordinate arrangements for monitoring of specific learners on roll who have been identified as needing protection by developing protection plans or working with the behaviour support team to develop and implement strategies to maintain safety.
- Deliver Induction and refresher training for all staff to ensure that the staff whom work with learners undertake appropriate training to equip them to carry out their Safeguarding responsibilities.
- Help prepare governors reports reviewing arrangements for safeguarding and promoting the welfare of learners, and also support the implementation of any action plan from this review.
- Review relevant policies when required to do so.

4. Purpose

This document sets out St. John's College's policy on responding to concerns regarding the safeguarding and protection of its learners. The policy and associated procedures provide guidance to all staff that may have concerns of this nature within the context of their work for the organisation.

This policy fulfils the requirements of:

- The Sexual Offences Act 2017
- CQC Fundamental Standards
- Care Standards Act 2000
- Safeguarding Vulnerable Groups Act (2006)
- The Human Rights Act 1998
- Education Act 2002
- Education Act 2011
- Disability Discrimination Act
- The Equality Act 2010
- The Care Act 2014
- Health & Social Care Act 2008 (Regulated activities) Regulations 2014
- Mental Capacity Act 2005
- Protection of Freedoms Act 2012
- Pan Sussex Adult Safeguarding Procedures
- Guidance issued under section 175/157 of the Education Act
- Keeping Children Safe in Education September 2022
- Prevent Duty 2015

- Deprivation of Liberty safeguards 2009

5. Scope

This policy applies to all staff (including bank & agency staff), learners & service users of St. John's. Staff from other organisations, volunteers & visitors will also be expected to follow this policy.

6. Roles & responsibilities

All safeguarding procedures will be implemented by all staff & volunteers within the organisation.

The safeguarding team will regularly review cases & safeguarding practice.

The safeguarding team will be responsible for investigating any reported safeguarding concerns.

All staff, no matter what their role within St. John's are required to have read and understood this policy and section 1 of the Keeping Children Safe in Education 2020. You can view this on My Concern under the resources tab.

7. Support, information and advice

Information and advice can be sought from members of the Safeguarding Team & the Safeguarding Procedures and Guidelines.

Staff requiring support due to a disclosure or investigation will receive support from the safeguarding team, their line manager or the HR department.

8. Review

This policy will be reviewed annually by the safeguarding team to respond to changes in legislation, current practice and the annual safeguarding self-assessment audit

9. Procedures and guidelines (see following pages):

SAFEGUARDING OF ADULTS AT RISK PROCEDURES AND GUIDELINES

Contents

	Pages
CHAPTER 1 The team, what you should do and the process	9-17
CHAPTER 2 Allegations concerning staff	18-20
CHAPTER 3 Safeguarding Adults at Risk, including Mental Capacity & Consent	21-33
CHAPTER 5 Safeguarding adults with learning disabilities and autism	46-48
CHAPTER 6 Additional categories and areas for consideration - Prevent, Restrictive Practice, Safe Holding and other forms of harm.	49-59
APPENDICIES 1. Protection Plan 2. Further reading 3. Specific circumstances relating to Adults at Risk	60-66

CHAPTER 1

WHAT TO DO	Page Number
The team	10
What you should do	11
What the team will do	13
Safeguarding process – Flow chart	15
Radicalisation flow chart	16

THE SAFEGUARDING TEAM

St. John's provides Senior Staff who act as Safeguarding Co-ordinators to help manage the organisation's protection of Children, Young People & Adult at Risk. At least one will be available at all times to provide advice and guidance in respect of safeguarding and if necessary, an extraordinary meeting of the Safeguarding Coordinators will be held.

A learner may disclose information to you, or you may be concerned regarding the learner's behaviour, or you may observe something which leads you to believe that the learner may be at risk of abuse.

We must be aware that some learners may not have a full understanding that what they are experiencing constitutes abuse or could be abusive, education around safeguarding should be part of the PSHE taught, what is safeguarding, what does this mean, what is ok/not ok, private/not private as examples of this practice. Staff will be aware of the need to make a distinction between behaviour of consenting adults with capacity and understanding, and more serious assaults which require advice and support from external protection agencies.

St. John's organise safeguarding training for staff, it is up to the individual staff member to make sure they attend regular updates.

Staff should also be aware of all the Policies & Procedures listed on page 1 with regard to:

- Positive Behaviour Policy (including the use of Physical Interventions)
- Bullying
- Confidentiality
- E-safety

- Prevent duty

THE TEAM

The team is comprised of the people in the roles listed below:

COLLEGE & POST 19 RESIDENTIAL
SAFEGUARDING MANAGER - SLT Designated Safeguarding Lead HEAD OF LEARNERS SERVICES – SLT Deputy Designated Safeguarding Lead
PRINCIPAL
LEAD NURSE
REGISTERED CARE MANAGERS
EDUCATION LEADERS
AUTISM LEAD

Posters with photographs and names of team members are available in all areas of the college and residential houses.

Telephone numbers for the safeguarding team members can be gained from reception on either site, if this is closed then the care houses all have contact numbers for a member of the team.

This team are responsible for managing safeguarding matters across the organisation. They will meet on a weekly basis to discuss cases and concerns.

It is important to remember that safeguarding is not only about abuse. It is also about enabling all staff and learners to work in an environment that is safe and that the practice of staff ensures the safety and wellbeing of learners at all times.

JARGON BUSTER:

SLT – Senior Leadership Team
DSL – Designated Safeguarding Lead
DDSL – Deputy Designated Safeguarding Lead
TED – Tell, Explain, Describe
LADO – Local Authority Designated Officer
LSB – Local Safeguarding Board
SPOA – Single point of advice
FGM – Female Genital Mutilation
CCE – Child Criminal Exploitation
CSE – Child Sexual Exploitation
HBV – Honour Based Violence
SVSH – Sexual Violence and Sexual Harassment

WHAT SHOULD YOU DO?

If you are concerned that abuse or neglect may be taking place, take immediate action. Share your concerns or seek advice from the safeguarding team via My Concern. **If you feel that there is immediate risk of harm or danger, speak directly to a member of the Safeguarding Team**

Remember!

- You may not be the only person who has noticed or experienced the abuse or neglect.
- There could be lots of people who have 'low level' concerns about the same thing but if you don't pass the information on it can't be addressed.
- Abuse and neglect does not just appear from nowhere. Sharing information before something becomes abuse or neglect is really important – don't think you are making a fuss about nothing!

Record Keeping

Good record keeping is a vital component of professional practice, and should be factual and objective.

Whenever a complaint or allegation of abuse is made, St. John's will maintain clear and accurate records through the use of the My Concern electronic incident logging system.

Confidentiality

All matters to do with our learners and their families are subject to clear standards of respect and confidentiality.

Guidance in relation to confidentiality at St. John's College can be found in the St. John's Confidentiality Policy. This forms part of the Induction Pack.

However we must understand that to keep Adults at Risk safe from abuse we must share information with the appropriate agencies and professionals. Research has shown that the failure to share information has put & Adults at risk of further or continued harm and abuse.

WHAT SHOULD YOU DO IF A LEARNER DISCLOSES?

- Stop & listen.
- Reassure that their feelings are important.
- Write notes/observations immediately after.
- Keep originals.

- Never promise to keep secrets.
- Do not ask leading questions – Use the T.E.D model (**T**ell Me What Happened, **E**xplain What Happened, **D**escribe What Happened)
- Never attempt to carry out a formal interview.
- Inform St. John's Safeguarding Team as soon as possible.
- The safeguarding team will work with you to:
 1. Consider the need to make the LEARNER safe from further harm, or from harming others.
 2. Consider the need for hospital or medical attention. Also consider the need to retain evidence of harm or assault.

WHAT SHOULD YOU DO IF YOU HAVE CONCERNS ABOUT A LEARNER?

- Write notes/observations
- Keep original notes
- Don't ask questions about your concerns
- Never attempt to carry out a formal interview.
- Inform St. John's Safeguarding Team as soon as possible to report your concerns ensuring all written documentation is handed over.

Accumulative concerns

It may be that the incident that you are dealing with does not in itself appear significant or of a serious nature, however it may be one of a series of incidents over time and it is important that senior members of staff are made aware of such incidents so that necessary information can be collated.

WHAT THE TEAM WILL DO

The safeguarding team will ensure that all incident reports are read daily to ensure that any actual or potential safeguarding issues arising from LEARNERS's behaviour are acted upon.

When a safeguarding concern is raised with a member of the safeguarding team, they will ask you for your written notes/concerns (please ensure that notes are available when the concern is raised). They will then liaise with other team members to decide upon the necessary action to be taken. They will also guide other staff in what they need to do; this could be to collate incident reports etc.

If required a referral may be made to the appropriate external local safeguarding team, this task will be completed by a member of the St. John's safeguarding team, they will then be responsible to maintain contact with and complete any further tasks requested by the external team

For adults:

Brighton & Hove Specialist Community Disability Service Intake Team

Email address: SCDSintake@brighton-hove.gov.uk

Phone: 01273 295550

Local Authority Designated Officer

The Local Authority Designated Officer (LADO) deals with the management of allegations against staff who work or volunteer with Adults at Risk

- The LADO role includes liaison with Adults Services, who now have a Designated Adult Safeguarding Officer (DASM) in relation to adults who work in adult settings,
- The LADO also attends meetings with groups, including independent schools/colleges, disability services, and supports agencies with updates to safeguarding policies.
- The LADO has close links with the Standards and Learning Effectiveness Service (SLES) regarding OFSTED complaints from parents about Early Years and Education provisions and assists with School Safeguarding Reviews.
- The LADO is part of a small team who provide training for Designated Safeguarding Leads (DSLs) in Schools, as well as for School Governors.
- The LADO also delivers separate Managing Allegations Training to DSLs.

Contact:

Brighton & Hove Phone: 01273 295643

CQC

Any concerns relating to Adult Residential Homes can also be reported to the CQC

Phone: 03000 616161

Address: CQC National Customer Service Centre, Citygate, Gallowgate, Newcastle upon Tyne, NE1 4PA

Online contact form - <https://webdataforms.cqc.org.uk/Checkbox/contactus.aspx>

DFE

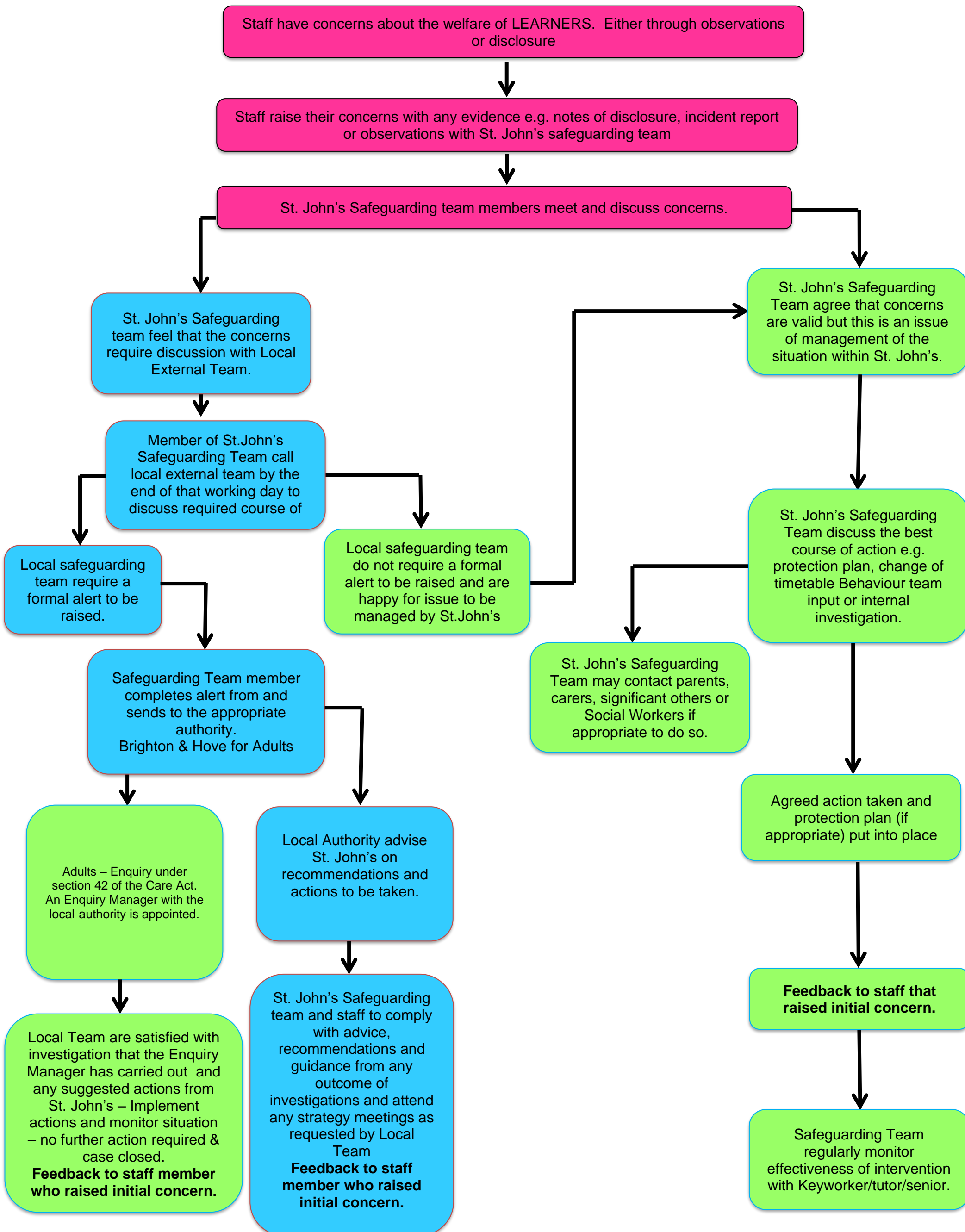
Any concerns relating to the College education provision can also be reported to the DFE:

Ministerial and Public Communications Division
Department for Education
Piccadilly Gate
Store Street
Manchester
M1 2WD

Tel: 0370 000 2288

Website: www.gov.uk/contact-dfe

Safeguarding Process Flow Chart



MODEL FLOW CHART FOR REFERRAL FOR CONCERNS OF RADICALISATION

Identifying concerns

Cause for concern identified

Initial response

Concern reported to St. John's safeguarding team and recorded

St. John's safeguarding team gathers more information and identifies whether further action is required

Is there any immediate risk/emergency?

Yes
Contact emergency services

Discussion with nominated local police officer

Further information gathering. Consider convening an initial meeting of all those involved

Yes

Are there grounds for not informing parents/carers?

Involve parents/carers

Multi agency assessment

Organise multiagency Assessment meeting, involving relevant police officers and other key people

Low risk – further action within normal support process with further monitoring

Is there a significant risk of harm?

Yes

No

Is there sufficient need and parental support for the common assessment of need?

Yes

No

Delivery of support

Refer to Social Care

Initiate common assessment of need and produce support plan.

Establish multi agency support plan and lead professional

Implement plan

Review

Regularly review progress

CHAPTER 2

ALLEGATIONS CONCERNING STAFF	Page Number
Allegations concerning staff	18
Allegations against staff and volunteers – Internal disciplinary process flow chart	21

Allegations concerning staff

Creating a culture in which all concerns about learners (including those that do not meet the threshold of an allegation) are shared responsibly and with the right person, and recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage a more open and transparent culture; enable organisations to identify concerning behaviour early; minimise the risk of abuse; and ensure that adults working in the organisation are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the organisation.

Allegations against colleagues are extremely challenging to other members of staff and to the organisation. However to be able to protect the learners we have to *allow ourselves to think the unthinkable* and keep an open mind to the possibility that a staff member may be implicated.

Never think that abuse is impossible at St. John's or that an allegation against someone you know well is bound to be wrong.

In such incidents, the St. John's disciplinary procedures will run alongside the adults at risk investigation and possible police investigation. However, if a member of staff is implicated they can be told that an allegation has been made against them and why, but must not be given details of the allegation. Any further action taken by St. John's will be guided by the Local safeguarding team and the LADO (local authority designated officer)

Allegations against senior members of staff

In some residential College settings it has been known for Senior Staff to be involved in the abuse of Adults at Risk. In such situations it is difficult for other staff members to know how best to raise their concerns.

If this should be the case, referral should be made to the St. John's Whistle-blower Policy. St. John's accepts responsibility for establishing the above procedures, for responding to allegations of abuse and for providing guidelines for good practice.

St. John's will ensure that all staff who are employed, those who volunteer and others who have regular access to the learners, are checked through the Disclosure and Barring Service and other appropriate sources. See also St. John's Safer Recruitment Procedures.

What should you do if you have concerns about a staff member:

Managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with adults at risk in, college or residential. This includes any staff member working for or at St John's:

- **Behaved in a way that has harmed a learners.**
- **Possibly committed a criminal offence against or related to a learners and/or;**
- **Behaved towards an adult at risk in a way that indicates they may pose a risk of harm to learners and/or**
- **Behaved or may have behaved in a way that indicates they may not be suitable to work with adults at risk.**

Report any of the above immediately to the principal at the college or to the care manager of the residential house. They will then contact the DSL and HR along with the LADO to ensure that we are following guidance in all cases.

If the concern does not meet the threshold of reporting to the LADO – Low Level Concerns. They should still be reported to those above, records will be kept secure and within the guidance under data protection.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school, college or residential may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- **Being over friendly with learners.**
- **Having favourites.**
- **Taking photographs of learners on their personal mobile phone or device**
- **engaging with a learner on a one-to-one basis in a secluded area or behind a closed door or,**
- **Using inappropriate sexualised, intimidating, or offensive language.**

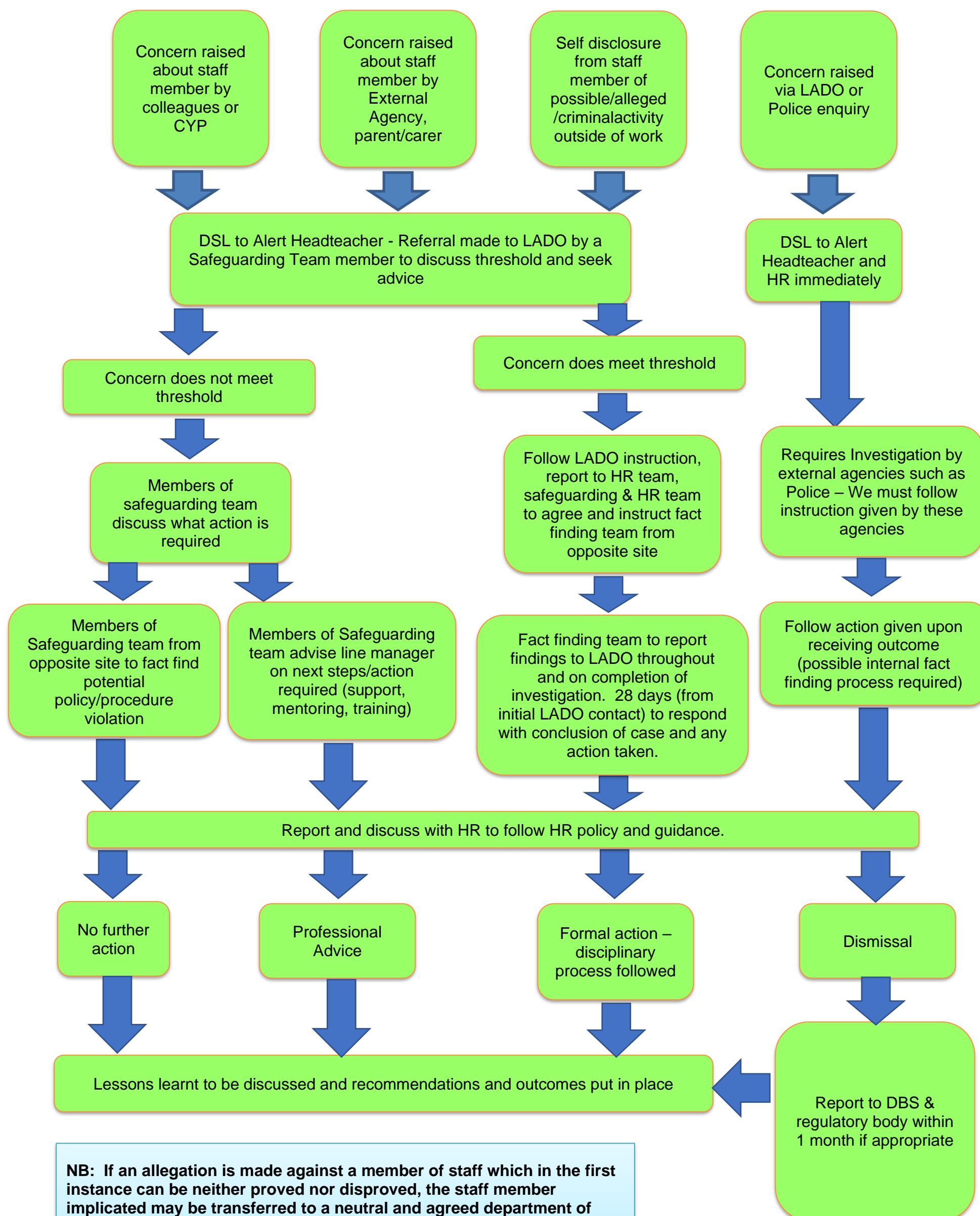
Not following St John's policies and guidance, as an example, a staff member may smoke outside of allocated areas, thus not following St John's policy, to test the boundaries of others, if not addressed by other staff who saw this, what further boundaries could be tested and what levels of abuse could begin

to happen? This creates an un-safe culture. Therefore lower-level concerns should be reported and addressed as a matter of urgency and with consistently by the staff present and/or managing teams, creating a safe culture and the likelihood of abuse is decreased.

In these cases, the concerns will be regarded alongside any previous concerns, a meeting with that person may be required to address these concerns, supervision may be held with that person, re-training may be required, all of this will be noted and will remain on that staff members file confidentially. The person raising concerns may be kept anonymous but only in so far as practicably possible.

For more information regarding Staff concerns, low level concerns and LADO roles and responsibility please see KCSiE 2022

Allegations against staff and volunteers – process



NB: If an allegation is made against a member of staff which in the first instance can be neither proved nor disproved, the staff member implicated may be transferred to a neutral and agreed department of work, work from home if applicable or in some cases be suspended. This is done a neutral act to safeguard both the learner and the member of staff.

The staff member will be asked not to contact anyone else within the organisation. The HR team will be responsible for updating the member of staff and maintaining contact throughout the process.

CHAPTER 3

	Page Number
SAFEGUARDING ADULTS AT RISK	
Safeguarding Adults at Risk policy statement	22
Key principles in Safeguarding Adults at Risk	24
What is abuse?	26
Why and where does abuse occur?	26
Preventing abuse & neglect	27
Categories of abuse within Safeguarding Adults at Risk	
Where can abuse occur	33
Consent and involvement of the adult in raising a safeguarding concern	33
Mental Capacity	35
Consent	35
Best Interests	35

SAFEGUARDING OF ADULTS (persons aged 18 or over) AT RISK

Protection of Adult at Risk Policy Statement.

The Care Act 2014 was a major step forward in safeguarding adults who are experiencing, or are at risk of, abuse or neglect, and are unable to protect themselves.

Sections 42 to 47 of the Care Act set out the legal duties and responsibilities in relation to adult safeguarding.

The legal framework for the Care Act 2014 is supported by Care and Support Statutory Guidance which provides information and guidance about how the Care Act should operate in practice. The guidance has statutory status which means that there is a legal duty to have regard to it when working with adults with needs for care and support and carers.

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about working together to support people to make decisions about the risks they face in their own lives and protecting those who lack the mental capacity to make those decisions.

The aims of adult safeguarding are to:

- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
- Stop abuse or neglect wherever possible.
- Safeguard adults in a way that supports them in making choices and having control about how they want to live.
- Promote an approach that concentrates on improving life for the adults concerned.
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect.

- Provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult.

Ref Sussex Multi Agency Policy and Procedures for the Protection of Adults at Risk June 2018

It is the belief of St. John's that the safety and wellbeing of all LEARNERS is given paramount consideration. All members of staff share in the responsibility for protecting these adults from abuse while attending St. John's.

St. John's is committed to:

- Continuing to develop and promote a culture that does not tolerate abuse, neglect and exploitation
- Raise awareness about safeguarding adults
- Helping to develop our own young adults' knowledge of safeguarding so that they are well prepared for life beyond St. John's
- Prevent abuse, neglect and exploitation from happening wherever possible.

Making Safeguarding Personal

Making Safeguarding Personal (MSP) is a national approach to promote responses to safeguarding situations in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. It is about seeing people as experts in their own lives and working alongside them to identify the outcomes they want, with the aim of enabling them to resolve their circumstances and support their recovery. Making Safeguarding Personal is also about collecting information about the extent to which this shift has a positive impact on people's lives.

People are individuals with a variety of different preferences, histories, circumstances and life-styles. Safeguarding arrangements must not prescribe a process to be followed whenever a concern is raised, but rather Making Safeguarding Personal emphasises the importance of a person-centred approach, adopting the principle of 'no decision about me without me'. Personalised care and support is for everyone, but some people will need more support than others to make choices and manage risks. A person led approach is supported by personalised information and advice and, where needed, access to advocacy support.

Key Principles of Safeguarding Adults at Risk

The Care Act and the Care Act guidance sets out the statutory requirement for all agencies to both develop and assess the effectiveness of their safeguarding arrangements. This is based on the six key principles below.

- **Empowerment-** People being supported and encouraged to make their own decisions and give informed consent.
- **Prevention-** It is better to take action before harm occurs.
- **Proportionality-** The least intrusive response appropriate to the risk presented.
- **Protection-** Support and representation for those in greatest need.

- **Partnership-** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability-** Accountability and transparency in delivering safeguarding.

These six principles should inform the ways in which we work with the Adult LEARNERS at St John's. They apply to all sectors and settings including care and support services, further education colleges, commissioning, regulation and provision of health and care services, social work, healthcare, welfare benefits, housing, wider local authority functions and the criminal justice system.

These principles are also used by Safeguarding Adults Boards (SABs) and organisations to develop and improve local arrangements.

Ref Sussex Multi Agency Policy and Procedures for the Protection of Adults at Risk June 2018

Preventing Harm & Abuse

The most effective way to safeguard adults from abuse is to enable them to safeguard themselves. For some people this may involve their own support networks, or support or care services, depending on their individual circumstances.

Effective prevention in safeguarding is not about over protective or risk averse practice. The prevention of abuse should occur in the context of person-centred support and personalisation, with individuals empowered to make choices and be supported to manage risks. Prevention of abuse includes multi-agency working (including information sharing), community safety, community participation and public awareness, as well as awareness raising and skills development with adults at risk.

There are many ways in which we can support LEARNERS to reduce the risks they may face, including:

- Recognising potential risks to themselves and considering how they wish to reduce the risks of being harmed or exploited.
- Identifying what strengths, skills, support and networks they could use to avoid potentially abusive situations.
- Being aware of what to do if an abusive situation arises i.e. how to get help, how to report concerns.

St John's will endeavour to reduce the risks that LEARNERS may face as far as practicably possible by ensuring:

- Robust staff recruitment and vetting.
- Producing and implementing policies and procedures staff work to, including confidential reporting (whistleblowing) and complaints procedures.
- Ensuring all new staff undertake a thorough staff induction and training, including the safeguarding adults policy and procedures and awareness of abuse and how to raise safeguarding concerns.
- Ensuring all staff receive supervision and support.

- Adhering to professional codes of conduct or practice and relevant service standards e.g. compliance with standards as detailed by the Care Quality Commission.
- Meet our responsibilities for obtaining Disclosure & Barring Service (DBS) checks and referring to the DBS and relevant professional bodies.
- Meet our professional responsibilities under employment and other legislation.
- Have robust systems in place for training and support.

It is important to remember that although the process above are adhered to, this does not fully protect our LEARNERS. It is essential that staff regularly check and question the practice of their colleagues and raise any concerns with the safeguarding team.

Promoting wellbeing

St. John's aims to ensure that adult LEARNERS remain safeguarded from harm. This should underpin every activity. We will promote wellbeing when carrying out any of their care and support functions in respect of a LEARNERS.

Wellbeing is a broad concept, and it is described as relating to the following areas:

- Personal dignity (including treatment of the individual with respect).
- Physical and mental health and emotional wellbeing.
- Protection from abuse and neglect.
- Control by the individual over their day-to-day life.
- Participation in work, education, training or recreation.
- Social and economic wellbeing.
- Domestic, family and personal situation.
- Suitability of accommodation.
- The individual's contribution to society.

What is abuse?

Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Abuse may:

- Consist of a single act or repeated acts.
- Be physical, verbal, or psychological.
- Be an act of neglect or an omission to act.
- Occur when an Adult at Risk is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent.

Who may be at risk of abuse or neglect?

Under the Care Act 2014, specific adult safeguarding duties apply to any adult (18 years or over) who:

- Has care and support needs and,
- Experiencing, or is at risk of, abuse or neglect and,

- Is unable to protect themselves because of their care and support needs.

Why and where does abuse occur?

Abuse can occur for a number of reasons that may be inter-related and complex. The following factors could indicate that an adult may be at risk of abuse, due to their situation or circumstances. (these lists are not exhaustive)

The individual

- Poor communication or communication difficulties.
- Physical and / or emotional dependence on others.
- Mental health needs.
- Lacking capacity to make key decisions
- Rejection of help.
- History of making allegations of abuse.
- High level of reliance on others to meet their care needs or manage their financial affairs.
- History of violent relationships within the family or social networks.

The environment

- Overcrowding.
- Poor or insecure living conditions, homelessness.
- Poor management and / or high staff turnover or insufficient staff.
- Other adults with challenging behaviour.

Relationships

- Unequal power relationships (that include controlling, coercive or threatening behaviour)
- Increased reliance on others by the person.
- Multi-generational family structure where conflicts of interest and loyalties may exist
- role reversal or significant change in the relationship between the person and their carer.
- History of abuse within the family, either being abused or responsible for previous abuse.
- Isolation of the carer, due to the demands of caring, leading to a lack of practical and emotional support.
- Lack of understanding about the person's condition, resulting in inappropriate care.
- Reliance on the person by others.
- difficult or challenging behaviour by the person which the carer finds intolerable or stressful, or which puts the carer at risk.
- Financial difficulties.
- Illness or disability of the carer.
- Significant and long-term stress of the carer.
- Inappropriate care responses e.g. poor-quality care, support or treatment.

Abuse can include targeted fraud or scams perpetrated by complete strangers, or the person responsible for abuse can be someone known to the adult who is in a position of trust and power.

The aims of safeguarding adults at St. John's

- Stop abuse or neglect wherever possible.
- Prevent harm and reduce the risk of abuse or neglect to all adult LEARNERS.
- Safeguard LEARNERS in a way that supports them in making choices and having control about how they want to live.
- Promote an approach that concentrates on improving the life for the LEARNERS concerned.
- Educate LEARNERS across all settings to help them understand the different types of abuse, how to stay safe and how to raise a concern about their own or another LEARNERS's safety and wellbeing.
- Support the staff team to understand abuse, how to support the LEARNERS to maintain safety and how to raise a concern.
- Address (if appropriate) what has caused the abuse or neglect and encourage proactive working to implement strategies to prevent abuse re-occurring.

To achieve these aims it is necessary to:

- Ensure that everyone, is clear about their roles and responsibilities.
- Enable LEARNERS to access mainstream community resources such as leisure facilities, safe town centres and community groups that can reduce the social and physical isolation which in itself may increase the risk of abuse or neglect.

Safeguarding is not a substitute for the need to provide safe and high-quality care and support.

Types of Abuse

It is possible and likely that someone can experience more than one type of abuse, for example, Financial Abuse and Physical Abuse or, Psychological Abuse as a result of Physical Abuse.

The impact of abusive behaviour may be greater when there is a disproportionate balance of power involved, for example, when an adult is reliant on another person for providing their care.

Categories of Abuse

This is not intended to be an exhaustive list, but a guide as to the sort of issues or behaviour which could give rise to a safeguarding concern. Abuse can take many forms and we should always consider the circumstances of individual cases.

Abuse type:	Behaviour includes:
--------------------	----------------------------

Physical	being pushed, shaken, pinched, hit, held down, locked in a room, restrained inappropriately, or knowingly giving an adult too much or not enough medication.
Sexual	an adult being made to take part in sexual activity when they do not, or cannot, consent to this. It includes rape, indecent exposure, inappropriate looking or touching, or sexual activity where the other person is in a position of power or authority.
Financial	misusing or stealing an adult's money or belongings, fraud, postal or internet scams tricking adults out of money, or pressuring an adult into making decisions about their financial affairs, including decisions involving wills and property.
Neglect	not meeting an adult's physical, medical or emotional needs, either deliberately, or by failing to understand these. It includes ignoring an adult's needs, or not providing them with essential things to meet their needs, such as medication, food, water, shelter and warmth.
Self-neglect	being unable, or unwilling, to care for their own essential needs, including their health or surroundings (for example, their home may be infested by rats or very unclean, or there may be a fire risk due to their obsessive hoarding).
Psychological or emotional	being shouted at, ridiculed or bullied, threatened, humiliated, blamed for something they haven't done, or controlled by intimidation or fear. It includes harassment, verbal abuse, cyber-bullying (bullying which takes place online or through a mobile phone) and isolation.
Discriminatory	forms of harassment, ill-treatment, threats or insults because of an adult's race, age, culture, gender, gender identity, religion, sexuality, physical or learning disability, or mental-health needs. Discriminatory abuse can also be called 'hate crime'.
Modern slavery	an adult being forced to work for little or no pay (including in the sex trade), being held against their will, tortured, abused or treated badly by others.

Domestic violence	psychological, physical, sexual, financial or emotional abuse by someone who is a family member or is, or has been, in a close relationship with the adult being abused. This may be a one-off incident or a pattern of incidents or threats, violence, controlling or coercive behaviour. It also includes so called 'honour' based violence, being forced to marry or undergo genital mutilation.
Organisational	neglect and providing poor care in a care setting such as a hospital or care home, or in an adult's own home. This may be a one-off incident, repeated incidents or on-going ill-treatment. It could be due to neglect or poor care because of the arrangements, processes and practices in an organisation.

Scenarios in which abuse may take place

Controlling or coercive behaviour is a range of acts designed to make a person subordinate and / or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Section 76 of the Serious Crime Act 2015 has created an offence in relation to coercive control within domestic abuse and sets out the importance of recognising the harm and cumulative impact on the victim caused by these patterns of behaviour.

Stalking and Harassment: Stalking refers to unwanted, persistent or obsessive attention by an individual or group towards another person causing fear, anxiety, emotional or psychological distress to the victim. Harassment can include repeated attempts to impose unwanted communications and contact upon a victim in a manner which causes fear or distress to the victim. Stalking and harassment behaviours may include nuisance telephone calls, sending excessive emails, regularly sending gifts, following the person or spying on them and making death threats. The Protection from Harassment Act 1997 makes stalking a specific offence.

Hate Crime is defined as any crime that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. Such incidents may constitute a criminal offence.

Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for criminal activity. Organised criminal groups are increasingly targeting adults with care and support needs in this way, and the level of coercion and control involved with cuckooing often leaves the victims with little choice but to cooperate with the perpetrators.

County Lines is the police term for groups who are supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It can involve child criminal exploitation and using adults who are vulnerable to move drugs and money. Groups establish a base in the market location, typically by taking over the homes of local adults by force or coercion in a practice referred to as 'cuckooing'. The Home Office County Lines guidance describes County Lines as a major, cross-cutting issue involving drugs, violence, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons. The response to tackle this activity involves the police, the National Crime Agency, a wide range of government departments, local government agencies, voluntary and community organisations and groups. County Lines activity and the associated violence, drug dealing and exploitation have a devastating impact on young people, adults at risk of exploitation and local communities.

'Honour'-based violence is a crime or incident which may have been committed to protect or defend the perceived 'honour' of the family and / or community. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and / or the community. Many victims are so isolated and controlled that they are unable to contact the police or other organisations.

Forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party in identifying a spouse. Forced marriage can be a particular risk for people with learning disabilities and people lacking capacity.

Female genital mutilation (FGM) involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is first born, during childhood or adolescence, just before marriage or during the first pregnancy. FGM constitutes a form of abuse and violence against women and girls. In England and Wales, the practice is illegal under the Female Genital Mutilation Act 2003.

Sexual Exploitation involves exploitative situations, contexts and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. It affects men as well as women. People who are sexually exploited do not always perceive that they are being exploited. Those exploiting the adult have power over them such as by virtue of their age, gender, physical strength, and economic or other resources. There is a distinct inequality in the relationship.

Extremism by Radicalisation: Prevent is a key part of the government's counter-terrorism strategy. Its aim is to stop people becoming terrorists, or supporting terrorism, including preventing the exploitation of susceptible people who are at risk of being drawn into violent extremism by radicalisation.

Serious violence

All staff should be aware of the indicators, which may signal learners are at risk from, or are involved with serious violent crime. These may include increased absence from College a change in friendships or relationships with individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or

unexplained injuries. Unexplained gifts or new possessions could also indicate that learners have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and Adults at Risk: county lines guidance.

Sexual violence and sexual harassment is adult sexual abuse is any contact or non-contact sexual activity that happens without consent or understanding, or with forced consent. It includes: Sexual violence, such as rape, date rape, attempted rape, groping or forced kissing.

Where it is clear that the concern is one of safeguarding adults or child protection, St. John's safeguarding team will ensure that there is no delay in the referring to external agencies.

Sexual violence and sexual harassment between adults in colleges

Context Sexual violence and sexual harassment can occur between two learners of any age and sex. It can also occur through a group of learners sexually assaulting or sexually harassing a single individual or group of individuals. Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, people with SEND and LGBT community are at greater risk. Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence It is important that school and college staff are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/105 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Non-consensual sharing of sexual images and videos.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including, on social media.
- Sexual exploitation; coercion and threats.

Upskirting

The Voyeurism (offences) Act, which is commonly known as the Upskirting Act, came in to force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A

victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Where can abuse occur?

Abuse can take place in any context. It may occur when an Adult at Risk lives alone or with a relative, it may also occur within a nursing, residential or day care setting, in hospitals, custodial situations, support services into people's own homes and other places previously assumed safe.

Where the Person Responsible for the Abuse is an Adult with Care and Support needs Themselves

Abuse is unacceptable, regardless of the individual's capacity to understand or be responsible for their actions.

In some situations, the person responsible for abuse may also be an adult with care and support needs. This could leave them at risk e.g. due to retaliation or loss of care or support. It is important to ensure that the needs of both adults involved are addressed. Abuse of this kind may indicate shortcomings or failings in the care or support arrangements in place for both individuals, and possibly for others.

In this situation robust risk assessment and support planning is essential to ensure any future risks are minimised.

Consent and involvement of the adult in raising a safeguarding concern

Adults have a legal right to make decisions about their own lives.

If the adult is not the person raising the safeguarding concern, wherever possible every effort should be made to seek their views and agreement regarding this, unless doing so is likely to increase the risk to them or to put others at risk.

Adults who may be at risk of, or who are, experiencing abuse and neglect, may often feel disempowered by the abuse, and acting without involving them or seeking their consent will often disempower them further.

Empowering adults in this situation involves a proactive approach to seeking consent and maximising the person's involvement in decisions about their care, safety and protection, and this includes decisions regarding whether to raise a safeguarding concern.

When an adult does not want information shared and there is a professional responsibility to do so

Where an adult with capacity to make an informed decision about their own safety does not want any action taken, this does not override a professional's responsibility to raise a safeguarding concern and to share key information with relevant professionals in the circumstances outlined above.

If there appears to be significant risk to the adult, and no one else, consideration would need to be given to whether their wishes should be overridden. The adult's wishes should not stop

professionals from fulfilling their responsibilities in relation to duty of care regarding appropriate sharing of information.

In these situations, the adult must always be:

- Advised about what information will be shared, with whom and the reasons for this.
- Advised that their views and wishes will be respected as far as possible by the local authority or other agencies in relation to any response they may have a duty to make.
- Provided with information regarding what happens when a local authority is advised of a safeguarding concern.
- Assured by the professional passing this information to the local authority, that their lack of consent to the information being shared, and their views and wishes regarding actions they do or do not want taken in relation to the situation as far as it affects them directly will also be explained to the local authority.

Professionals should be alert to the risk of situational incapacity, where a person who would otherwise have capacity no longer has it due to their circumstances.

Where an offence may have been committed

If it is suspected that an offence may have been committed, there should always be a conversation with the adult regarding whether they wish the police to be involved.

If the adult does not want the police to be involved this does not override a professional's responsibility to share information regarding a potential or actual offence with them.

Such situations should always be approached sensitively. The adult should be advised that the police will be contacted and assured that the police will be informed that they do not wish to pursue this matter or speak to the police. It is for the police to determine if they feel it is necessary for them to speak to the adult, or if there is further action they may need to pursue.

Adults who lack capacity to make relevant decisions

If the adult lacks capacity to make informed decisions about the incident and their ability to maintain their safety and they do not want a safeguarding concern to be raised, and/or other action to be taken, professionals have a duty to act in their best interests under the Mental Capacity Act 2005. This requires a Best Interest decision to be made regarding whether a safeguarding concern should be raised.

Adults who lack capacity need to be supported to be able to make informed choices if possible before a decision can be made and a best interest decision made on their behalf. This may be achieved in a variety of ways such as the help of a family member or friend (as long as they are not the person thought to be the cause of risk), an Advocate or Independent Mental Capacity Advocate, a language interpreter or other communication assistance or aid.

MENTAL CAPACITY ACT 2005

The Mental Capacity Act 2005 is underpinned by a set of five key principles.

- A presumption of capacity - every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise.
- The right for individuals to be supported to make their own decisions – people must be given all appropriate help before anyone concludes that they cannot make their own decisions.
- That individuals must retain the right to make what might be seen as eccentric or unwise decisions.
- Best interests - anything done for or on behalf of people without capacity must be in their best interests.
- Least restrictive intervention – anything done for, or on behalf of people without capacity, should be the least restrictive of their basic rights and freedoms.

CONSENT

A key issue in the protection of Adult at Risks is one of consent. Adult at Risks have a fundamental right to decide how they live their life and with whom they live. A person who is able to make decisions for their self is entitled to refuse protection. However, if the person lacks mental capacity to make this decision or there is an overriding public interest, (e.g.: other Adults at Risk are at risk) the need for referral should be considered. Wherever possible, the Adult at Risk should be informed that a referral will be made and the reason for this.

BEST INTEREST

Where there is an issue of whether the LEARNERS is able to give consent, a Best Interest meeting needs to be arranged as soon as possible so that all decisions are made in the best interest of the LEARNERS.

Members of the Best Interest group may include:

- Head of College.
- Care Manager (if LEARNER is resident).
- Key person.
- LEARNER's Social Worker.
- Parents/Carers – If appropriate.
- The LEARNER.
- Medical professionals.

CONSIDERATIONS FOR SAFEGUARDING ADULTS WITH LEARNING DISABILITIES AND AUTISM

RECOGNITION OF ABUSE

Staff at St. John's need to be aware that Adult at Risks may be abused by a variety of people these include:

- A staff member.
- A member of a recognised professional group.

- A volunteer.
- Another CYPA.
- A relative or member of the person's social group.
- A member of the public.
- A person who deliberately targets vulnerable people in order to exploit them.

Recognising abuse is not easy even for experts, but some indication that abuse may be happening, or has happened, are as follows.

- Lack of respect for Learner.
- Repeated exclusions of rights and choices to a Learner, from those that would normally be afforded to others.
- Unexplained injury.
- Injuries inconsistent with learner's lifestyle.
- Bruises or welts on face, lips, mouth, arms, back or buttocks.
- Unexplained burns.
- Fractures.
- Lacerations to mouth, lips, gums, eyes, or external genitalia.
- Finger marks on body.
- Medication misuse.
- Pregnancy in a woman who is unable to consent.
- Withdrawn, depressed, or stressed.
- Bleeding, pain or itching in genital area.
- Sexually transmitted disease.
- Unexplained change in behaviour.
- Poor personal hygiene.
- Inappropriate restraint.
- Denial of visitors or phone calls.
- Failure to ensure appropriate privacy or personal care.
- Lack of flexibility or choice e.g.; choice of food.
- Lack of adequate procedures, e.g. for medication, financial management.
- Controlling relationships between CYPA and members of staff.
- Poor professional practice.

Key considerations

When considering the protection of young people and adults at risk with learning disabilities and Autism, there are some key points to consider:

- Adults at Risk and young people with autism and learning disabilities may find it difficult to communicate that they are being subjected to abuse, especially if they have limited communication skills.
- Some typical indicators of abuse may be a result of the individual's learning disability or autism, such as self-injurious behaviour or withdrawal from social situations. However, it is important to remember that indicators of actual abuse may be falsely explained as a consequence of their autism/learning disability.
- Where an individual is experiencing physical or psychological injury as a result of their behaviours arising from their diagnosis, it may be deemed neglectful not to pursue reasonable interventions to reduce the behaviour.

- Many of the CYPA at St. John's share environments with other CYPA who may display challenging behaviours. It is never acceptable for individuals to be abused by another CYPA.
- There is an increased risk that professionals become overfamiliar with the behaviour of the CYPA within their care. They are then at risk of failing to pick up other concerns or they may see new behaviour as an extension of the behaviour they have already observed. The ability to understand autism and learning disabilities and its impact on individuals is imperative, as is the ability to recognise subtle changes or other indicators. Staff at St. John's need to remain open to the possibility of abuse.

Ref: Safeguarding Children with Autism – Wade Tidbury, National Autistic Society

DRAFT

APPENDICES

APPENDICES	Page Number
Appendix 1 - Protection Plan Template	39
Appendix 2 - Further reading	40

APPENDIX 1

Protection Plan

This plan has been devised by St. John's Safeguarding Team as a response to safeguarding concerns or a safeguarding referral. Please ensure that all staff are aware of this plan and adhere to the advice and recommendations contained in it.
Following any Safeguarding Incident Risk Assessment, Behaviour Support Plans & Care Plans should all be reviewed and updated accordingly.

CYPA (s) name (s):

Recommendations:

Date Risk Assessment Reviewed:

Date Behaviour Support Plan Reviewed: __/__/__

Review date of protection plan by Safeguarding Team:

Effectiveness of recommendations & plan

Outcome of review and any changes to action/recommendations

*NB: The protection Plan is **only** to be produced by the safeguarding team in consultation with Key Staff and when required external agencies.*

APPENDIX 2

Reference list for further information on legislation & policies relating to Safeguarding

Pan Sussex Procedures for Safeguarding Adults
<http://pansussexadultssafeguarding.proceduresonline.com>

Guidance Issued Under Section 175/157 of the Education Act 2002
<http://www.legislation.gov.uk/ukpga/2002/32/section/175>

The Sexual Offences Act 2003
www.legislation.gov.uk/ukpga/2003/42/contents

The Health & Social Care Act 2008 (regulated Activities Regulations 2014
<https://www.legislation.gov.uk/uksi/2014/2936/contents>

Safeguarding Vulnerable Groups Act (2006)
<http://www.legislation.gov.uk/ukpga/2006/47/contents>

The Human Rights Act 1998
<http://www.legislation.gov.uk/ukpga/1998/42/contents>

United Nations Convention on the Rights of the Child 1989
<http://www.unicef.org.uk/UNICEFs-Work/Our-mission/UN-Convention/>

Education Act 2002
<http://www.legislation.gov.uk/ukpga/2002/32/contents>

Education Act 2011

<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>

Disability Discrimination Act

<http://www.legislation.gov.uk/ukpga/1995/50/contents>

Winterbourne View Enquiry

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213215/final-report.pdf

The Care Act 2014

<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted/data.htm>

The Equality Act 2010

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

Health and Social Care Act 2015

http://www.legislation.gov.uk/ukpga/2015/28/pdfs/ukpga_20150028_en.pdf

Mental Capacity Act 2005

<http://www.legislation.gov.uk/ukpga/2005/9/contents>

Protection of Freedoms Act 2012

<http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

Keeping Children Safe in Education 2021

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007260/Keeping_children_safe_in_education_2021.pdf

Further resources can also be found on My Concern under the Resources tab and under National Guidance or Local Policies.