

Safeguarding Strategy 2017-2020



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1. Introduction

United Lincolnshire Hospitals NHS Trust (ULHT) is committed to safeguarding all patients who access services across the Trust. The term safeguarding covers everything that assists a child, young person or adult at risk to live a life that is free from abuse and neglect and which enables them to retain independence, well-being, dignity and choice. It is about preventing abuse and neglect, as well as promoting good practice for responding to concerns on a multi -agency basis.

ULHT is committed to ensuring that safeguarding is firmly embedded within the wider duties of the Trust; acknowledging the findings of large scale inquiries such as Francis and Lampard, and also recent legislation, such as the Care Act, 2014.

As such, this is the Trust's first strategy for safeguarding which outlines the intended improvement journey.

1.1 Legal framework for safeguarding

There are very different legal frameworks that supports the safeguarding of children and adults at risk. Below is a summary of that legislation

Adults legislation	Children legislation
Mental Health Act 1983	Children & Families Act 2014
Mental Capacity Act 2005 & Deprivation of Liberty 2009	The Local Safeguarding Children Boards (Review) Regulations 2013
Safeguarding Vulnerable Groups Act 2006	Children, Schools & Families Act 2010
Mental Health Act 2007	Children & Young Person Act 2008
National Health Service and Community Care Act, 1990	Children Act 1989 and 2004.
Care Act 2014	
Health & Social Care Act 2008, regulations 2014 states: Safeguarding service users from abuse and improper treatment	
Human Rights Act, 1998	
Equality Act, 2010	

1.2 What does safeguarding cover?

As society changes and this is reflected in our community, so does the need to respond to safeguarding concerns. This strategy is a response to the current changes within safeguarding.

Areas for children safeguarding	Areas for adult Safeguarding
Abuse	Abuse
Serious Case Reviews	Safeguarding Adult reviews
Domestic Violence and Abuse	Domestic Violence and Abuse
Neglect	Self-Neglect
Traditional harmful practice e.g. FGM, breast ironing	Traditional harmful practice e.g. FGM, breast ironing
Multi Agency Public Protection Arrangements (MAPPA)	Multi Agency Public Protection Arrangements (MAPPA)
Radicalisation	Radicalisation
Child trafficking	Trafficking
Modern Slavery	Modern Slavery
E safety	E safety
Children with disabilities	Adults with learning disabilities
Children with Mental Health Issues	Adults with mental health issues including deprivation of liberty/ restraint and restrictions issues with capacity and consent
Missing children	Missing adults
Sexual abuse and exploitation	Sexual abuse and exploitation
Children who abuse children	Adult at risk who abuses an adult at risk
Allegations against people who work/volunteer with children	Allegations against carers who are relatives and friends
Child protection	Child protection
Other Areas – Children	Other Areas - Adults
Child Death	Raising an alert or serious incidents
Young Person's substance misuse	Abuse by children to adults
Peri-natal Mental Health	Mental Capacity
Elective Home Education	Advocates
Children living away from home Private Fostering	Community Safety
Historic Abuse Allegations	Historic Abuse Allegations
Looked after Children	
Gang Activity	
Pre-natal Substance Misuse	
Pre-birth Protection Plans	

2 Our duties

2.1 Statutory compliance for safeguarding

From April 2015, Providers had to comply with the following two groups of regulations which replaced in its entirety CQC's Essential Standards of Quality and Safety which included 28 outcomes:

1. Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part 3)
2. Care Quality Commission (Registration) Regulations 2009 (Part 4)

The above regulations introduce the new fundamental standards, which describe requirements that reflect the recommendations made by Sir Robert Francis following his inquiry into care at Mid Staffordshire NHS Foundation Trust. The following regulations relate to Safeguarding and need to be considered in how the Trust's assures itself that there are effective and safe safeguarding processes and practices in place:

- Regulation 9: Person-centred care
- Regulation 10: Dignity and respect
- Regulation 11: Need for consent
- Regulation 12: Safe care and treatment
- Regulation 13: Safeguarding service users from abuse and improper treatment

Additionally for children, the Trust is statutory obliged to comply with section 11 of the Children's Act, 2014, which outlines the requirement for clear lines of accountability for provision of services that safeguard and promote the well-being of children. For adults, Part 1 of the Care Act 2014 came into force on the 1st April 2015 and Working Together to Safeguard Children 2015, established a clear legal framework for statutory agencies to maintain rights of those with care and support needs who are at risk of abuse or neglect.

The strategy is aligned to the above regulatory requirements and takes into consideration the revised government published guidance to all NHS organisations on their responsibilities to safeguard children and adults at risk "Accountability and Assurance Framework for Safeguarding Vulnerable People in the Reformed NHS".

3 Our safeguarding vision

ULHT firmly believes that a whole organisational approach is required to safeguard and promote the welfare of children, young people and adults at risk using Trust services.

ULHT very much emphasises that safeguarding is everyone's business; whether they provide direct patient care or not and irrespective of seniority. This will require safeguarding governance and practices to be embedded across all divisions and services provided by the Trust, and in every aspect of the Trust's work.

There will be robust governance arrangements around the safeguarding agenda and all staff working within United Lincolnshire Hospitals Trust will be able to discharge their statutory responsibilities within their professional boundaries through developing a workforce who are competent, confident and empowered to speak up and take action when they see or suspect safeguarding issues.

Shared learning will enhance and shape service provision.

ULHT fully supports the Making safeguarding personal agenda within safeguarding and hopes to do this through building supportive internal processes and pathways that enable the needs of patients to be met in a dignified manner which also includes responses to incidents and concerns.

The patient and carer's experience will also be enhanced by the provision of effective partnership working with other agencies, which will aid seamless service provision.

ULHT is committed to maintaining patients right to be safe and is aware that professional interagency working is critical to ensure that patients receive seamless care.

4 Our aims

1. To ensure that safeguarding is everyday business across the organisation, evidenced in all areas of the Trust's activities and business.
2. To ensure that staff are empowered to speak up and act when they see or suspect safeguarding issues by ensuring that they receive appropriate level training based on national and local standards
3. To ensure that patients are protected by ensuring that Organisational Policies and Processes are streamlined to facilitate staff to do the "right thing"
4. To develop a dataset of information to monitor not only safeguarding activity, to ensure that the organisation has sufficient capacity, but also quality metrics to ensure that the organisation is meeting their statutory requirements by monitoring themes patterns and trends across the organisation and external areas.
5. To make safeguarding personal through learning from children, families and adults at risk who have used the service to ensure that the response to safeguarding incidents/concerns is proportionate and least intrusive, thus appropriate to the risk presented and ensuring the person remains at the centre of any processes
6. To work in partnership with other Health colleagues to facilitate co-operation in a transparent and productive way to progress safeguarding

7. To ensure that there is clear accountability and transparency in delivering safeguarding, by building an effective governance assurance framework which includes measuring the quality of work and compliance against the regulatory standards

ULHT will use this strategy over the next 3 years to drive forward and embed the Safeguarding agenda across the organisation. The Trust's promises and standards will underpin the strategy in the way we conduct our daily business to improve services, enhance quality and positively impact on the patients'; service user's and staff experience.

5 Safeguarding standards for children and young people

The child is at the centre of everything we do

Ensure we meet the organisational, legal, and strategic responsibility under the Children Act and CQC fundamental Standards	To support all our team members recognising the emotional impact of our work	Provide evidence based training in the prevention of child maltreatment to Trust Staff	Provide guidelines and policies for staff to fulfill their safeguarding children responsibilities	Providing an evidence based expert service in all functions of safeguarding children to keep children safe	Commitment to multi-agency working, liaising where appropriate and offering professional challenge in order to keep children safe	Commitment to multi-agency working, liaising where appropriate and offering professional challenge in order to keep children safe
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6 Safeguarding standards for adults

Keep adults safe from harm through a culture of prevention

<p>Acknowledge that neglect and abuse of an adult can happen and that it is every person's right to live free from abuse and neglect</p>	<p>Ensure that staff are aware of their responsibilities and know who they can access for support, guidance and advice and use reflective practice in supervision.</p>	<p>Have good systems in place for effective identification of neglect and abuse of an adult, taking prompt action</p>	<p>Have supportive policies and procedures in place to assist staff through safeguarding processes</p>	<p>Provide a training programme that equips staff with the knowledge and skills to safeguard adults</p>	<p>Develop and strengthen relationships with partner organisations to enhance service provision, working together to keep adults safe from harm</p>	<p>Sharing and learning from incidents and developing change to improve future outcomes</p>
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7 Governance assurance framework for safeguarding

ULHT has a governance structure in place to ensure policies, procedures, information and concerns are recorded, discussed and assessed as risks.

The ultimate responsibility is to the Trust Board through the Quality Governance sub-board Committee. ULHT plan to further strengthen that process with the introduction of separate children/young people and adult operational meetings that report to an overarching integrated safeguarding strategic meeting.

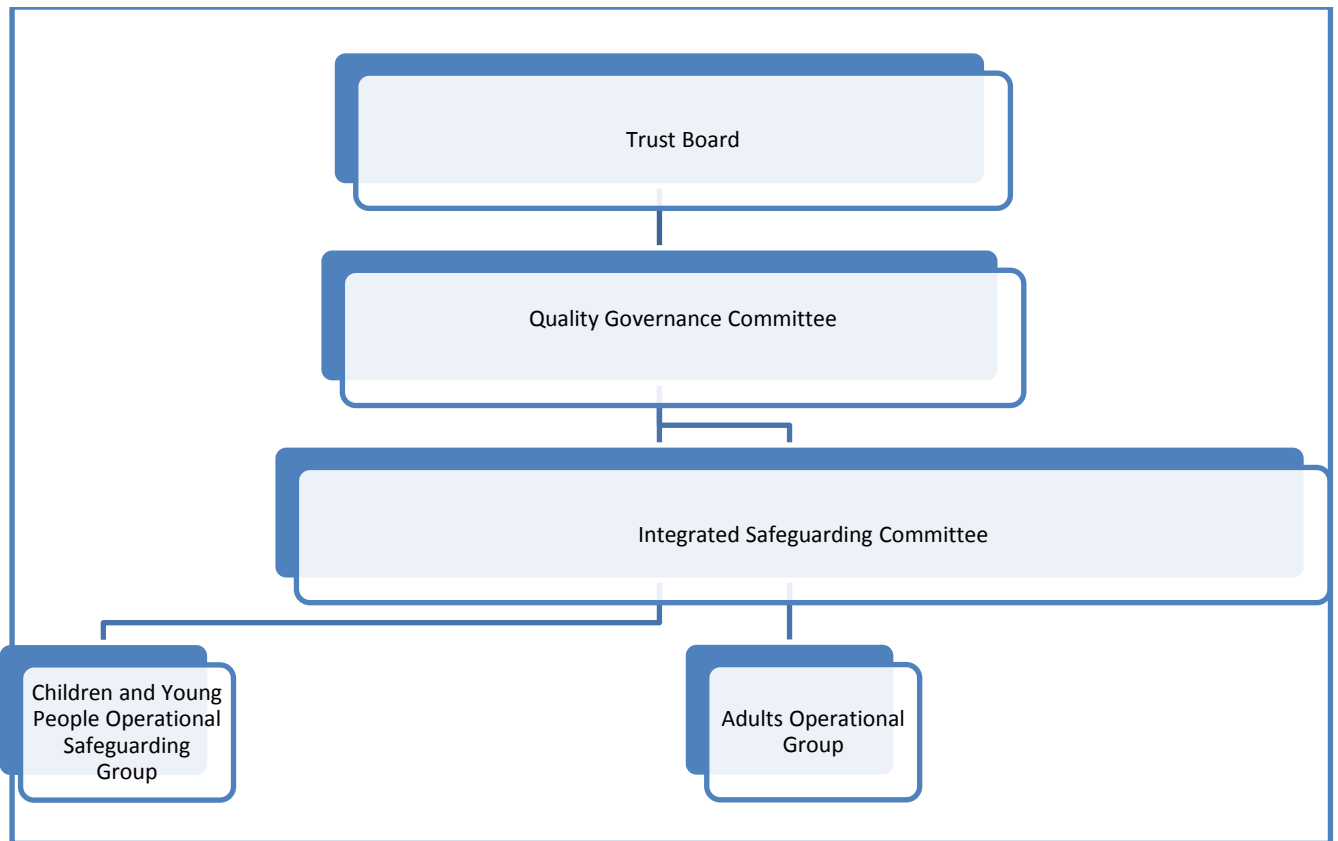


Table One: Organisational Meeting Structure

8 Lead responsibilities

The Director of Nursing has the NHS Board responsibility for the Trust with regard to Safeguarding Children and Adults at risk. All staff are accountable for their actions and to their professional bodies (if appropriate) for their actions. The Trust works in partnership with the Local Authority, who has a statutory responsibility to safeguard children and adults.

The Trust also has in place the relevant statutory roles and plans to expand this with best practice such as a Lead Doctor for Adult Safeguarding

9 Policies and procedures

Policies, procedures, protocols and frameworks relating to safeguarding are in place to support staff in their decision making and require regular review either at a determined time interval or in response to national guidance, legislative changes or findings from Serious Case Reviews, Adult reviews or internal reviews. The policies are endorsed by the Integrated Safeguarding Committee and ratified by the Clinical Effectiveness Committee.

10 Safe recruitment

The Organisation has several policies in place relating to safe recruitment, including the Disclosure and Barring Policy. In light of the Bradbury and Saville Reports, further amendments are required and are captured in associated action plans.

The Trust reports to a Local Authority Designated Officer (LADO) to respond to allegations made by and about staff involving children and has a nominated Designated Adult Safeguarding Manager (DASM) who is notified regarding staffing allegations involving adults. Currently both roles/links are situated within the Trust's safeguarding team but recognition that the LADO and some aspects of the DASM role should sit within Human Resources, which would assist in building stronger links with the Doctors in Distress and Nurses in Distress Meetings

11 Training

All staff members have mandatory and statutory training on safeguarding children and adults at risk. Depending on the job responsibilities, there are different levels and frequency of training. In children this is benchmarked against the Intercollegiate Document (2014) which outlines the appropriate level and content of training.

In adults this is currently benchmarked against the Bournemouth framework; however The Safeguarding Adults: Roles and competences for health care staff – Intercollegiate document is currently being reviewed and approved by NHS England.

Both children and adults training include *Prevent*, as DH response to make staff aware of radicalisation as a safeguarding concern.

12 Regulation and inspection

The last CQC inspection in, February 2015, highlighted concerns regarding mental capacity/ best interests assessment in terms of end of life and DNACPR. Following this inspection, training compliance figures for Mental Capacity Act and Deprivation of Liberty have improved, though further work is required. The Trust is due to be re-assessed in October 2016, by the CQC, and any recommendations regarding safeguarding will be included in the annual workplan.

The Trust is also expecting a joint OFSTED/CQC inspection of Safeguarding practices, as per the new model of inspection across the agencies involved in safeguarding. The likely area of focus for this inspection is Domestic Abuse for which Lincolnshire have recently reported a slightly higher rate of Domestic Homicide Review.

Due to recent Trust changes in strategic leadership of the organisation's safeguarding services, an external peer review was commissioned by the executive lead, Director of Nursing and those recommendations will form the basis of the annual work plan

13 References

ULHT procedures for safeguarding children

ULHT procedures for safeguarding adults at risk

Lincolnshire LSCB multi-agency procedures

<http://lincolnshirescb.proceduresonline.com/index.htm>

Lincolnshire LSAB multi-agency procedures

<https://www.lincolnshire.gov.uk/lsab/multi-agency-policy-and-procedures/120504.article>

Statutory, non-statutory, best practice guidance

Statutory Guidance:

Department for Constitutional Affairs (2007) *Mental Capacity Act 2005: Code of Practice*. London: TSO

HM Government (2007) *Statutory guidance on making arrangements to safeguard and promote the welfare of children under Section 11 of the Children Act 2004*. DCSF Publications

HM Government (2008) *Safeguarding children in whom illness is fabricated or induced*. DCSF Publications

HM Government (2009) *The Right to Choose: multi-agency statutory guidance for dealing with forced marriage*. Forced Marriage Unit: London

HM Government (2013) *Working Together to Safeguard Children 2013. Department for Education and 2015 updated*
<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

Ministry of Justice (2008) *Deprivation of Liberty Safeguards Code of Practice to supplement Mental Capacity Act 2005*. London: TSO

Safeguarding Vulnerable People in the Reformed NHS Accountability and Assurance Framework March 2013, © Crown copyright Year 2013 . Published to www.commissioningboard.nhs.uk in electronic format only.

Care Act 2014

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

Planning transition to adulthood for care leavers (2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/397649/CA1989_Transitions_guidance.pdf

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Non-statutory Guidance:

Children's Workforce Development Council (March 2010): *Early identification, assessment of needs and intervention. The Common Assessment Framework for Children and Young People: A practitioner's guide*. CWDC

Department of Health (March 2011) *Adult Safeguarding: The Role of Health Services*

Department of Health (May 2011) *Statement of Government Policy on Adult Safeguarding*

HM Government (2006) *What to do if you're worried a child is being abused*. DCSF Publications

Law Commission (May 2011) *Adult Social Care Report*
www.justice.gov.uk/lawcommission/publications/1460.htm

Royal College of Paediatrics and Child Health et al (2010) *Safeguarding Children and Young People: Roles and Competencies for Health Care Staff. Intercollegiate Document supported by the Department of Health*

Working Together to Safeguard Children and Young People, HM Government, 2015

Best practice guidance:

Department of Health (2004) *National Service Framework for Children, Young People and Maternity Services Standard 5* (including relevant elements that are not contained in Core Standard 5)

Department of Health (2009) *Responding to domestic abuse: a handbook for health professionals*

Department of Health (2010) *Clinical governance and adult safeguarding: an integrated approach*. Department of Health

HM Government (2009) *Multi-agency practice guidelines: Handling cases of Forced Marriage*. Forced Marriage Unit: London

National Institute for Health and Clinical Excellence (2009) *When to suspect child maltreatment*. NICE Clinical Guideline

Department of Health (2006) *Mental Capacity Act Best Practice Tool*. Gateway reference: 6703

Appendix 1: Action to deliver Safeguarding Strategy 2017-2020

This action plan is the combination of:

1. Annual report Safeguarding and Mental Capacity Act 2015-2016
2. Independent review of Safeguarding “Report following the rapid assessment of the form and function of ULHT safeguarding services for both Children and Adults” October 2016
3. 360 Assurance, Internal Audit of Safeguarding – Follow up report, 2016
4. Section 11 Action Plan 2014 – 2017
5. LAF – Lincolnshire assurance framework Bradbury Action Plan, 2016
6. Saville Action Plan, 2016

Annual plan

No	Aim	Action required	Lead	Timescale	Evidence/ progress	Rag rating
1	To ensure that safeguarding children and adults is everyday business across the organisation evidenced in all areas of the Trust's activities and business.	To ensure that there is representation at the safeguarding committee from a range of departments and professions All areas are compliant with safeguarding training	DoN	September 2017		
2	To ensure that staff are empowered to speak up and act when they see or suspect safeguarding issues by ensuring that they receive appropriate level training based on national and local standards	Monitor referrals Undertake audit Monitor training compliance	SG Team	September 2017		
	To ensure that patients are protected by ensuring that Organisational Policies and Processes are streamlined to facilitate staff to the "right thing"	HR policies are up to date regarding safeguarding and voicing concerns Monitor staff surveys Safeguarding policies up to date	DoHR DoN	October 2017		
4	To develop a dataset of information to monitor not only	Quarterly reports to be developed	DoN	June 2017		

	safeguarding activity to ensure that the organisation has sufficient capacity but also quality metrics to ensure that the organisation is meeting their statutory requirements.	Dashboard to be developed				
5	To personalise the safeguarding agenda through learning from children, families and adults at risk who have used to the service to ensure that the response to safeguarding incidents/concerns is proportionate and least intrusive thus appropriate to the risk presented	Surveys with service users Review of incidents Service user involvement and feedback in debriefs	SG Team	July 2017		
6	To work in partnership with other agencies leading on health so that co-operation in a transparent and productive way progresses safeguarding	Attendance at multi-agency meetings Joint working in relation to inspections and the progress of the Woods Review To learn and to evidence learning from SCR and SAR in relation to partnership working	DoN	December 2017		
7	To ensure that there is clear accountability and transparency in delivering safeguarding by building an effective governance assurance framework which	Pro-active well attended safeguarding committees fulfilling terms of reference Monthly upward reports to	DoN	June 2017		

	includes measuring the quality of work and compliance against the regulatory standards	Quality Governance Development of a safeguarding standard for Ward Accreditation				
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