

Safeguarding Adults at Risk Policy and Procedures

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Version	Date	Author	Status	Comments
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V7	February 2022	Michelle Dougan		Reviewed to ensure policy is reflective of all four nations Barnardos University replaces BORIS

				Safecall Whistleblowing platform added.
V8	February 2023	Michelle Dougan	Approved	<p>Reviewed to ensure policy is reflective of all four nations. Regional guidance/reporting channels and links updated/ added as new legislation enacted</p> <p>Policy reviewed to reflect equality and recognition of how people identify their gender rather than referring to him/her.</p> <p>Scotland the Code of Practice 2022 Adult Support and Protection Learning Review definition added.</p>

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Definitions of Safeguarding and 'Adult at Risk'

In England, an **"Adult at Risk"** is defined as any person aged 18 years and over who is, or may be, in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

In Scotland, an adult at risk is defined as a person over the age of 16 years who cannot safeguard his or her own well-being or property and is affected by disability, mental disorder, illness or infirmity and is more at risk of being harmed than other adults who are not so affected.

In Wales the Social Services and Wellbeing Act (2014) places adult safeguarding on an equal status as child protection. An "adult at risk", is an adult who is experiencing or is at risk of abuse or neglect, has needs for care and support (whether or not the authority is meeting any of those needs), and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

In Northern Ireland, an adult at risk of harm is defined as a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their Personal and life Circumstances. The NI Prevention and Protection in Partnership Policy 2015 can be found [here](#).

The range of people considered to be vulnerable may include (but not a definitive list) people encountering domestic violence, misusing substances and asylum seekers. Adults may not necessarily be service-users they may also be significant adults in the lives of children and adults with whom we work.

In Barnardo's, we understand our safeguarding responsibilities towards adults at risk as:

- Protecting their rights to live in safety, free from abuse and neglect.
- People and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening.
- Making sure their wellbeing is promoted, taking their views, wishes, feelings and beliefs into account.

Purpose

The purpose of this policy is to ensure the safety, needs and interests of adults at risk are always respected and upheld. This includes upholding human rights, ensuring a proportionate, timely, professional and ethical response is made to any adult at risk who may be experiencing abuse.

It provides clear procedures on what to do if you have a concern about an adult at risk; how to manage, respond and refer those concerns and where to go for help and support.

The Procedures also aim to make sure that each adult at risk maintains:

- choice and control
- safety
- health
- quality of life
- dignity and respect.

Scope

This Policy applies across all of Barnardo's Corporate Departments to ensure that all staff, volunteers, Barnardo's Corporate Departments, the Board of Trustees and also adults at risk who work for us as volunteers are clear about their role, responsibility and expectations in responding to any safeguarding concerns regarding adults at risk.

Barnardo's Safeguarding and Protecting Adults at Risk Policy and Procedures must be followed alongside the local adult safeguarding board arrangements and protocols.

All staff, volunteers, trustees and other workers must be made aware of the policies and procedures and have access to them in order to comply with their responsibilities. They will undertake an induction process and appropriate training i.e. Safeguarding Adults at Risk, Safeguarding Children and Young People. Supervision will take place on a regular basis in accordance with Barnardo's supervision policy.

Our Basis and Values

At Barnardo's we believe in children – no matter who they are, what they have done or what they have been through. Our purpose is to transform the lives of the UK's most vulnerable children. Our vision is to realise Thomas Barnardo's dream of a world where no child is turned away.

We also aim to ensure the safety, needs and interests of adults are respected and upheld. This includes upholding human rights and ensuring a proportionate, timely, professional and ethical response is made to all adults but especially adults who are vulnerable and at risk of abuse by others.

Our Safeguarding and Protecting Adults at Risk policy and associated procedures reinforce our values, corporate responsibility and uphold our statutory duties. They demonstrate our compliance with UK legislation and other four nations government legislation, policy guidance, research and good practice.

Our approach to safeguarding, as with all of what we do, is under-pinned by our four key values:

- Respecting the unique worth of every person
- Encouraging people to fulfil their potential
- Working with hope
- Exercising responsible stewardship

Our Approach to Safeguarding Adults at Risk

Our policies and procedures are based on six principles of safeguarding that underpin all adult safeguarding work.

Empowerment	Adults are encouraged to make their own decisions and are provided with support and information.
Prevention	Strategies are developed to prevent abuse and neglect that promotes resilience and self-determination.
Proportionate	A proportionate and least intrusive response is made balanced with the level of risk.
Protection	Adults are offered ways to protect themselves, and there is a co-ordinated response to adult safeguarding and well-being.
Partnerships	Local solutions are sought through services working together within their communities.
Accountable	Accountability and transparency in delivering a safeguarding response.

Senior Management Responsibilities

There is a lead Corporate Director for Safeguarding across the organisation, responsible to the CEO who is the designated safeguarding lead for the organisation and will work in line with national legislation and guidance. The Corporate Director is supported by the organisation's Head of Corporate Safeguarding and Quality who along with the Safeguarding Unit promotes safer working practices and has oversight of allegations, serious incidents, case reviews and appropriate training.

Audit and Assurance Unit and includes Risk and Data Protection

Barnardo's has in place a programme of internal audit and review that enables continuous improvement and learning, across all corporate and directorate levels. This unit makes recommendations on key policies and procedures and safeguarding issues.

Procedures and Practice

The organisation has clearly defined procedures for identifying and taking action where there are safeguarding concerns about actual or suspected incidents or abuse.

Safeguarding Leads

Each region/nation and department in the organisation ensures there are designated individuals who are competent to advise staff and volunteers and can respond to safeguarding concerns, ensuring that actions are always respectful, professional and based on what we know to be good practice.

Safe Recruitment and Safe Practice Procedures

Recruitment is undertaken in line with Barnardo's robust safeguarding principles, including references spanning a minimum of 5 years' for regulated posts and a minimum of two years for non-regulated posts.

Enhanced Disclosure checks are obtained including checks against the adult and/or children's Barred list where the activity that meets the eligibility criteria.

In retail, Basic Disclosure checks are carried out in line with our Licence to Practice.

Repeat disclosure checks for existing staff and volunteers are undertaken re-checked periodically and/or at every three years. Barnardo's uses an online DBS employment check system that enables faster, easier and more secure turnaround on Disclosure checks. For regulated work in Family Placement – references are required to cover an applicant's full employment/work history (including volunteering), where they have worked with children and/or adults at risk

Barnardo's has developed criminal record disclosure policies for each nation to ensure that it abides by the obligations of the Disclosure and Barring Service, Disclosure Scotland, and Access NI, as appropriate, and to ensure that it complies with the spirit and requirements of the Rehabilitation of Offenders legislation.

All those who work for or on behalf of Barnardo's, including paid and unpaid staff, volunteers, and chaperones are required to sign and abide by the organisation's Safeguarding Code of Conduct.

Learning Development & Training

Staff, volunteers and managers are required to attend bespoke safeguarding training courses in line with their specific responsibilities and are expected to attend updated programmes every three years. Barnardo's learning and development provides evidence-based briefings, information and tools to support safeguarding practice development.

Supervision and One-to-one Meetings

There is an expectation that all Supervision, one-to-one and team meetings will have Safeguarding as a standing item in order for Safeguarding as it relates to each role to be discussed and embedded in all the work we do.

Managing Risk

Barnardo's has an effective procedure for assessing and managing risks with regard to safeguarding Adults at risk including a robust whistleblowing policy. The organisation has procedures in place for reporting, recording and reviewing allegations and significant incidents. These reports and the learning informs both practice and the risk assessment. Revisions to management procedures are discussed using this learning.

Records

Well-kept records are essential in situations where it is suspected or believed that a child or adult may be at risk of harm. The organisation has a clear policy on the management of records, confidentiality, and sharing of information. Trustees, staff

and volunteers are clear about what information can be shared with relevant people within and outside of the organisation and have access to specialist advice if they are unsure.

Links with other Policies

This safeguarding policy and procedure is supported by other organisational policies and procedures aimed at promoting safe and healthy working practices.

Roles and Responsibilities

The Trustees have a duty of care, which includes taking necessary steps to safeguard and protect children, young people and vulnerable adults. They will act in their best interests and ensure that they take all reasonable steps to prevent any harm to them. Trustees also have duties to manage risk and to protect Barnardo's assets and reputation¹.

Barnardo's Trustees are responsible for ensuring that those benefitting from, or working with, the organisation are not harmed in any way through contact with it.

The Trustees must ensure that there are appropriate Safeguarding Policies and that they are implemented effectively. They also have a personal duty of care in relation to Safeguarding.

The Chief Executive and the Corporate Leadership Team are the accountable senior managers responsible for the management of serious safeguarding incidents. The Corporate Director of Children's Services (England) is the designated safeguarding lead for the organisation.

Children's Services Region/Nation and Commercial Directors and Corporate Department Heads/Managers hold responsibility for the implementation of the Safeguarding and Protecting Adults at Risk Policy and Procedures and effective management of safeguarding concerns in their department/division or region/nation. Locality Assistant Directors and Heads/Assistant Heads of Business hold delegated operational accountability for services.

Line managers and staff, all safeguarding and adult protection concerns should be addressed through respective line management structures in accordance with this Policy and Procedures.

The **Head of Corporate Safeguarding** and Quality is responsible for providing advice and support to Directors and other senior managers on best practice in adhering to this Policy and Procedures, safer working practices and oversight of allegations, serious incidents and significant case reviews. Locality Assistant Directors are also available to offer support and advice alongside Safeguarding Leads.

Safeguarding Leads provide additional Safeguarding advice and support in their Region, Nation, Business Line or Department in ensuring that Policy and Procedures are adhered to and in ensuring that there is oversight of all Serious Safeguarding Incidents, Allegations and Serious Case Review/Practice Reviews/Significant Case Reviews activity in their area of responsibility.

The People Team is responsible for consultation and advice in relation to the implication of safeguarding in Human Resources and Learning and Development issues.

Definitions

The scope of adult safeguarding is where there is reasonable cause to suspect that an adult:

- a) has needs for social care and support
- b) is experiencing or is at risk of abuse or neglect and,
- c) as a result of those needs the adult is unable to protect themselves against the abuse or neglect or the risk of it.

In relation to the nature of abuse or neglect referred to at (b) above, Barnardo's recognises different categories of abuse which includes:

- Discriminatory
- Domestic Violence
- Financial and Material
- Institutional
- Modern Slavery
- Neglect/Acts of omission
- Physical
- Psychological/Emotional
- Self- Harm
- Self-neglect
- Sexual
- Radicalisation
- On line abuse

In Scotland The new code of practice highlights an adult at risk - In terms of Section 53 of the Act, 'adult' means a person aged 16 years or over.

[Section 3\(1\)](#) defines an 'adult at risk' as someone who meets all of the following three-point criteria:

they are unable to safeguard their own well-being, property, rights or other interests;

they are at risk of harm; and

because they are affected by disability, mental disorder, illness or physical or mental infirmity they are more vulnerable to being harmed than adults who are not so affected.

[Adult Support and Protection \(Scotland\) Act 2007](#)

[Adult Support and Protection revised Code of Practice](#)

In Wales the Social Services and Well Being Act (2014) has introduced adult protection and support orders. An authorised officer may apply to a justice of the peace for an order ("an adult protection and support order") in relation to a person living in any premises within a local authority's area. The purposes of an adult protection and

support order are to enable the authorised officer and any other person accompanying the officer to speak in private with a person suspected of being an adult at risk.

In Northern Ireland, an adult at risk of harm is defined as a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their Personal and life Circumstances. The NI Prevention and Protection in Partnership Policy 2015 can be found [here](#).

Procedures

1. Communicating Safeguarding Responsibilities

Action: Line Managers:

1. Ensure that all staff/volunteers are aware of this Policy & Procedure and any relevant codes and practices.
2. Ensure local contact numbers are displayed in an accessible place for staff and volunteers to refer to, these include, Local Authority/Trust referral teams (children and adults) and the Local Area Designated Officer (LADO) or equivalent and Gateway Services in Northern Ireland.

2. Code of Conduct and Professional Boundaries

The Safeguarding Code of Conduct supports staff and volunteers by making clear what is expected of them in terms of their conduct and behaviour; it assists them to raise concerns without fear of recrimination and reduces the risk of misplaced or malicious allegations being made against them.

2.1 Induction

Action: Staff/Volunteers

1. Ensure that you have read, fully understand, agreed and signed the [Safeguarding Code of Conduct](#). By signing the document you are agreeing to the content. It is your responsibility to speak to your line manager if you are not clear or require further clarification.

Action: Line Managers

2. Ensure all staff and volunteers have fully understood, accepted and signed the terms of the safeguarding code of conduct.

2.2 Gifts and Hospitality

Action: All Staff/Volunteers

You must not use a relationship with a service user or their family for personal gain. Gift-giving and accepting presents should only take place in line with [Barnardo's Policy on Gifts and Hospitality](#) and should be agreed with your line manager.

2.3 Concern about a breach/potential breach of your own or a member of staff/volunteer/external colleague's professional boundaries

Action: Staff/Volunteers

1. Concerns about a breach or potential breach of professional boundaries by you or a colleague or external agency must be shared with your line manager. This should happen regardless of whether the breach of professional boundaries was due to initial intentions being well meant. A breach to the Professional Boundaries may place an Adult at Risk at even further risk of harm and you have a duty to act upon your concerns to safeguard children, Adults at Risk and families.
2. Where you feel unable to report the concern(s) to your line manager, you should refer them to your manager's manager.
3. If you cannot raise issues through your line management or consider the breach of Professional Boundaries not to have been dealt with appropriately, is continuing or your line manager is complicit on the breach you should report via the [Whistleblowing Procedure](#). The hotline is accessible via Safecall on **0800 915 1571** or online through the '[Report a Whistleblowing Concern](#)'
4. The organisation recognises that there is a possibility that the friends and family of staff members or volunteers may become Service Users and that staff members themselves may in some circumstances become Service Users. It is incumbent on staff members to speak to their Line Manager about such situations to avoid any conflicts of interest, breaches of confidentiality or professional boundary issues.

Action: Line Manager

1. All potential breaches of professional boundaries must be taken seriously. The breach may not be a single event but a series of events and interactions, which together cause the individual, a colleague or external agency to cross the boundary between what would be considered a professional relationship to a non-professional relationship.
2. Staff and volunteers must be supported to address any concern about their own breach of professional boundaries without the automatic risk of disciplinary proceedings. However, staff should be made aware of all possible consequences depending on the severity and nature of the breach including disciplinary action; up to and including; dismissal; referral to the Regulatory bodies, relevant local Authorities, Disclosure and Barring Service, Disclosure Scotland and/ or police.
3. Conduct an investigation to establish the facts and decide whether there is a disciplinary case to answer – refer to [Disciplinary Policy and Procedure](#).
4. All breaches of professional boundaries are to be recorded on individual staff and volunteer files including any action taken. In cases where no case to answer is found the outcome should be recorded.
5. Work through the implications and issues with staff members and volunteers sensitively, but honestly, where they or a member of their family is or becomes a Service User.
6. If concerns arise regarding a colleague from another organisation, consult with your line manager to consider how these matters are appropriately raised in a timely manner.

Vulnerable People and Fundraising

We recognise that some of the people we engage with through our fundraising activities will not always have the capacity to fully understand the nature of the donation they are being asked to make to Barnardo's, or the consequences of making that donation.

An individual who finds it difficult to immediately make an informed decision about the choices offered to them is called a 'vulnerable person'.

A vulnerable person may experience:

- a diagnosed condition such as dementia
- a recent bereavement
- an undiagnosed or temporary mental health condition such as severe anxiety
- learning difficulties
- difficulty understanding the language

The following principles underpin our approach to fundraising:

- We must never make a fundraising ask where we know or suspect an individual to be experiencing vulnerable circumstances or lacks capacity to manage their own finances
- Regardless of whether a declaration has been made or not, Barnardo's does not accept donations where it has reason to believe that a supporter may be experiencing vulnerable circumstances and that accepting the donation would be ethically wrong and/or harmful to the donor.
- There may be circumstances where somebody experiencing vulnerable circumstances is able to make a donation with support, and in a way that is not harmful to them, and each case should be looked at individually.
- Should a situation arise where Barnardo's becomes aware that it has unknowingly accepted donations from an individual during a time that he or she was experiencing vulnerable circumstances and that accepting donations was ethically wrong and/or harmful to the donor, it will endeavour to return all donations accepted during this period.

Action: Staff/Volunteers undertaking fundraising activity

Any staff undertaking fundraising activity of any kind should familiarise themselves with the [vulnerable person policy](#).

If a member of staff suspects that someone we engage through fundraising with is lacking capacity or is in vulnerable circumstances they must take steps to terminate the contact in a way which seeks to:

- protect that person
- protect their dignity
- note any desire they have expressed to support Barnardo's

If after a donation is received, we become aware that the individual may have been in a vulnerable circumstance at the time the donation is made, then the Safeguarding lead for Fundraising must be made aware. A decision will then be taken as to whether the donation will be returned.

Where a vulnerable person may be at risk of abuse, then the relevant sections of this policy should be followed.

3. Responding to an Adult at Risk Concern

If an adult discloses information to you verbally, in person, or by phone regarding abuse or harm that they are experiencing or at risk of experiencing, or if you witness or are informed about an incident that raises an adult at risk concern, the following procedure should be followed. Be mindful that an adult may also reveal abuse which happened to them when younger, such as female genital mutilation or sexual exploitation and the same procedures below should be followed.

Action: Person receiving the information

1. Always offer reassurance, listen to what is being said and take seriously. Never promise to keep secrets or be persuaded by the individual or the family not to take action if you are worried that the individual is being harmed or is at risk of harm.
2. Ask for contact information and some brief details of the incident. Ask if there are children or other adults at risk present and whether they are known to Barnardo's services.
3. It is **not** your job to investigate, verify what is being said or examine the individual. Doing so may compromise any future investigation. This is the statutory responsibility of the local authority/Trust/adult care services and/or the Police. However, it is important to tease out relevant information and it may be necessary to undertake some very basic enquiries before making a referral. If there is a high level of risk and/or actual harm to anyone refer immediately to the Police on 999
4. Where a disclosure is made, explain to the adult concerned: that you will need to pass this information on to your manager, the reasons why and possible actions. If children are involved, explain that you have a statutory duty to pass on these concerns and take action in accordance with the [Barnardo's Corporate Safeguarding & Protecting Children Policy & Procedure](#).
5. In Wales the Social Services and Well Being Act (2014) introduces a new duty to report adults at risk as a statutory requirement. The inclusion of 'at risk' enables early intervention to protect an adult at risk. The decision to act does not require actual abuse or neglect to have taken place. The aim is to protect people who need it and to help them to prevent abuse or neglect. In Wales there are national safeguarding procedures that detail the essential roles and responsibilities for practitioners to ensure they are safeguarding children and adults who are at risk of abuse and neglect.
6. If a partner agency has reasonable cause to suspect that a person is an adult at risk it must inform the local authority of that fact. There is a duty for a local authority to make enquiries if it has reasonable cause to suspect that a person is an adult at risk. Authorities must decide whether any action should be taken and, if so, what and by whom. The timescale is usually 7 days to make the enquiry.
7. Through your line management chain, consult with your line manager or an appropriate senior manager to agree a course of action, but do not delay if this would place the service user concerned at increased risk.

8. If the adult making the disclosure is in receipt of a Barnardo's Service and is not in immediate danger, inform them that you will ask one of their Service staff to call them back and refer the matter immediately to the Service. You must speak to a member of staff in the Service; if no one is available pursue the matter through your line management structure to ensure that action is taken within 24 hours.
9. If the adult is thought to be in immediate danger, take steps to keep the adult and anyone in the vicinity, including yourself, to a safe place and call 999 to request Police assistance.
10. If the adult concerned is not in receipt of a Service, not in immediate danger and does not have children, refer them to their local Adult Services which can be accessed through their local authority/local Trust.
11. You must record what your concerns are and identify what action has been taken and pass this record to the relevant Service. For Children's Services staff, records must be completed and stored in accordance with the [Barnardo's Children's Services Recording Policy and Procedure](#).
12. If for any reason you do not feel able to alert a line manager then the [whistleblowing procedure](#) must be followed. The hotline is accessible via Safecall on **0800 915 1571** or online through the '**Report a Whistleblowing Concern**'

Action: The Line Manager

1. The line manager must make a clear assessment of whether the information received from the member of staff or volunteer is deemed to be an adult protection referral and/or a situation in which further action must be taken as outlined above. If they are unsure, they must seek advice via their line management chain and act in accordance with local protocols. They may also contact the Head of Corporate Safeguarding and Quality for further information and advice.
2. Line Managers must endorse any decision *not* to refer to adult protection services and the reasons that led to the decision to not make a referral should be recorded
3. If there is a disagreement between the Barnardo's manager and a member of staff or volunteer about the need to report concerns to adult protection services, the matter must be referred to the Assistant Director, Children's Services, relevant Safeguarding Lead or Head of Corporate Safeguarding and Quality for further information and advice.
4. You must disclose to adult protection services any other relevant information or known risks about the adult and family within the context of their wider family and environment. This action is expected and in accordance with GDPR and our internal information sharing protocol.
5. If an adult at risk has a care plan managed by a local authority/Trust, the line manager must ensure that they are alerted to the concerns.

6. Referrals of suspected adult abuse must always be confirmed by encrypted email using local referral protocols, if they exist, to the local adult safeguarding service within 24 hours or sooner of staff becoming aware of the concern.
7. The report must contain details of the information that has been shared together with appropriate dates, times, action taken and the names and roles of people contacted, together with any outcome known at that stage. Reports should be copied to the Senior Manager and departmental/regional safeguarding lead manager and Head of Corporate Safeguarding and Quality.
8. It is imperative that the staff member record events at the earliest opportunity in accordance with the [Barnardo's Recording Policy & Procedure](#). Failure to do so may jeopardise any ensuing criminal or civil proceedings.
9. If at any point, the situation escalates and it seems that the adult is at increased risk you must immediately contact the police and local adult safeguarding services to seek guidance on what action must be taken.
10. You must establish the outcome of the referral. The Local Authority Social Work manager will decide if Adult Protection Procedures are appropriate.
11. If adult protection services do not make further contact with Barnardo's within three working days (five working days in Scotland), you must contact them for an update.
12. If you are not satisfied that the adult protection service's response adequately safeguards the adult at risk then you must inform the Assistant Director Children's Services, relevant Safeguarding Lead or Head of Corporate Safeguarding and Quality who can make representations on Barnardo's behalf to escalate the concerns accordingly.

4. Responding to Safeguarding Allegations Against Adults who work for or on behalf of Barnardo's

1. A safeguarding allegation is one where information comes to light from any source, which suggests that an adult working or volunteering for, or on behalf of, Barnardo's has or may have:
 - Caused significant harm to a child or adult at risk
 - Committed a criminal offence against a child or adult or
 - Behaved in such a way that indicates they may pose a risk of harm to children.This includes historical information about abuse an adult may have experienced as a child whilst in receipt of services from Barnardo's.
2. The management of an allegation of abuse may involve one or all of:
 - a police investigation of a possible criminal offence
 - enquiries and assessment by the local authority about whether the adult child is in need of protection or in need of services
 - consideration by Barnardo's of disciplinary action in respect of the individual.
 - Consideration around informing the regulator i.e SSSC or Care Inspectorate in Scotland

Action from member of staff or volunteer who has a concern about an adult working for or on behalf of Barnardo's who works with or is in contact with a child or adult at risk.

1. Inform your line manager or other responsible manager, relevant Safeguarding Lead and the relevant senior manager at Assistant Director or Director level immediately. Action must have been taken and recorded within 24 hours (including weekends and bank holidays).
2. If the allegation involves a staff member or volunteer in Retail or Fundraising and Media then immediately alert the Area Business Manager (Retail) or Assistant Director/Deputy Director (Fundraising/Media).
3. It is not your job to investigate the allegation. Your job is to listen, ensure you have the basic details so you can record what was said, and respond appropriately. For further information see [Guidelines for responding to Allegations against Adults](#).
4. If for any reason you do not feel able to alert a line manager then the [Whistleblowing Policy and Procedure](#) must be followed.

Action: Responsible Senior Manager

(See additional [investigation guidance for managers: responding to external investigations into safeguarding/gross misconduct allegations](#))

1. Upon receiving information, ensure the safety of the adult or child. If a crime has clearly been committed or you suspect that it has, contact the police and the local authority child protection services/Trusts/Local Authority Designated Officer (LADO) as a matter of urgency and within 24 hours. If there are other children or adults who could be at risk the details of these people must also be shared. Advice should be sought from the Head of Corporate Safeguarding and Quality or Safeguarding Lead where the allegation is serious or unclear. The Local People should also be advised of the allegation.
2. Do not inform the member of staff/volunteer against whom the allegation been made the nature of the allegation until consultation has been undertaken with the relevant Local Authority, Adult Protection Services and where necessary the Police. The responsible Director must ratify any decision.
3. In consultation with the LADO/local Child Protection Services/Trusts and Barnardo's People Team, conduct a risk assessment within 24hrs or more urgently, to decide whether the person concerned can continue in their role or whether a period of suspension is required or a temporary redeployment is appropriate.
4. If the allegation concerns a volunteer then a decision must be made as to whether to suspend their volunteering activities. This must be confirmed in writing by the relevant line manager.

5. If the allegation involves harm or risk of harm to a Barnardo's service user then you must consider whether the Content Server Service User Record or Service level recording system record should be sealed and the relevant IS Account Manager, or in their absence the IS Helpdesk, requested to arrange this. Advice must be sought from the Head of Corporate Safeguarding and Quality
6. Consult with People Team to agree next steps regarding the member of staff/volunteer. Any officer, tasked with undertaking further enquiries or conducting an investigation under disciplinary procedures must be competent in child protection matters and be of sufficient seniority to enter into discussion with external agencies. Including consideration of reporting under the Duty of Candour policy /legislation. Any action must be agreed with the Head of Corporate Safeguarding and Quality, the Local Authority Designated Officer (LADO) or Social/Health Care Trust. These procedures must be followed in conjunction with [Barnardo's Disciplinary Procedures](#).
7. Consideration must be given as to whether the allegations represent a possible crime that needs to be reported to the Police; discussions will need to take place regarding the primacy of the Police investigation and the impact on internal timescales for subsequent investigation, etc.
8. As soon as possible, agree with the Health/Social Care Trust/Child Protection Agency who will ensure that the adult's family/parents/significant others are kept informed about the allegation and how they will be kept updated on any progress of the case and its outcome.
9. Any other local authority with responsibility for the adult and any relevant partner agencies must also be notified of the allegation and/or investigation within 24hrs. In some circumstances, the Local Authority or Health and Social Care Trust in the locality where the Barnardo's staff, volunteer or carer resides, may become involved if the allegations have implications for other family members.
10. Ensure the [Allegations Against Adults Reporting Form](#) has been completed and signed off by the Senior Manager (Assistant Director or above), as soon as possible (always within 24 hours) and sent to those named in the circulation list.
11. The reporting form must be monitored and regularly updated by the responsible Assistant Director/Regional Business Manager when there is significant new information, and/or reviewed quarterly and when the outcome of the investigation is known.
12. Ensure that staff involved with an investigation are aware of the support options available. Refer to [Inside Barnardos](#) for information on 'Sources of Support' which includes the Employee Assistance Programme

13. Senior managers are responsible for ensuring that any support offered is kept separate from the managers involved in the investigation (Children's Services Volunteering Advisors must be contacted to signpost appropriate support).
14. Notify the Local Authority Designated Officer (LADO) in English authorities or senior managers in the relevant Local Authority or Health and Social Care Trusts in Wales, Scotland, and Northern Ireland of the conclusion of any internal investigation. Care Inspectorate and Scottish Social Services Council should be notified before the conclusion of the case.
15. At the conclusion of a case all required regulatory referrals or notifications (including Ofsted, Care Inspectorate Wales, CQC and the Charity Commission) must be made and a decision made and recorded by Children's Services and the People Team as to whether the person will be referred to the Disclosure and Barring Service (England, Wales and Northern Ireland) or Disclosure Scotland that is under the Protection of Vulnerable Groups Scheme (Scotland).

5. Reporting of Serious Safeguarding Incidents

1. A serious safeguarding incident is defined as:
 - Unexpected or avoidable death of child/young person/adult at risk in receipt of services from Barnardo's
 - Serious harm to child/young person/adult where a life-threatening outcome required intervention by Barnardo's staff
 - Actions of a service- user which caused death or serious injury to another child or adult
 - Incident that meets the criteria for reporting under the Duty of Candour legislation
 - A 'Near Miss' where an unplanned event or incident did not result in serious injury, harm or illness, – but had the potential to do so and only a fortunate/timely break in the chain of events prevented a serious outcome for the child/vulnerable adult
 - An incident that is serious enough that it may lead to a Child Safeguarding Practice Review (England)/Case Management Review (Northern Ireland)/Learning Review (Scotland)/Child Practice Review (Wales)
 - A situation that indicates organised crime or large scale abuse
 - An incident likely to raise concern about Barnardo's policies or procedures
 - An incident which raises concern about possible radicalisation of any member of staff/volunteer/adult/child/vulnerable adult
 - Where a registered provider (residential or early years) is required to close by an external body following safeguarding concerns
 - Full criteria for thresholds of reporting an SSI are detailed within the SSI Threshold Guidance - December 2019

Action: Line Manager

1. If a member of your team is involved in a serious safeguarding incident and/or any of the above situations apply, you must complete a [Serious Safeguarding Incident](#)

[Form](#) within 24 hours and send it to your region/nation or departmental director and to all those on the circulation list detailed on the form.

2. If the incident also relates to Health and Safety, a Barnardo's Incident Reporting Form (BIRF) should be completed (see guidelines on reporting Serious Incidents).
3. Follow [this link](#) for the range and process of internal reporting mechanisms
4. Many of these processes have in-built reviews and senior management oversight that must be completed

6. Prevent

1. Radicalisation is comparable to other forms of exploitation and is therefore considered a safeguarding issue that all staff must be aware of. The process for escalating concerns and procedures regarding how to make a referral to the relevant authorities on this specific matter follow below.
2. The emphasis is upon supporting vulnerable children, young people and adults. There is no expectation that Barnardo's will take on a surveillance or enforcement role as a result of fulfilling our Prevent duty. The **Prevent Concern** promotes a multi-agency approach, and Barnardo's will continue to work alongside Local Safeguard Children Boards.
3. A **Prevent Concern** does not have to be proven beyond reasonable doubt; it should be based on something that raises concerns, which is assessed by using professional judgement.
4. **Extremism** is defined in the Prevent Strategy 2011 as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
5. **The Terrorism and Security Act 2015 defines terrorism** as an act that endangers or causes serious violence to a person/people and/or damage to property; or seriously interferes with or disrupts an electronic system.
6. **Radicalisation** is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. Radicalisation should be considered as an 'additional vulnerability'. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.
7. **Indicators for vulnerability** to radicalisation can be similar to those for other forms of abuse and may particularly include:
 - Distance from cultural heritage
 - Experience of migration
 - Experience of racism and discrimination

- Family members or friends associated with extremist groups
- Family tensions
- Sense of isolation and feelings of failure

It is important to note that not all individuals at risk of radicalisation and acts of terrorism are susceptible or vulnerable and they may be acting out of choice.

8. **Risk Assessments:** The level of risk will vary across different parts of the UK. Local Safeguarding Partnerships, Children's Services, Early Years Centres and Employment Training and Skills practitioners should ensure they are informed of the particular risks in their areas and work with other agencies in assessing risks where appropriate.

6.1 Making a Report

Action: An employee/volunteer may have concerns as a result of:

- A direct disclosure
- An observation
- An expression of concern or complaint made by another person

1. If you suspect that **a child/adult at risk is at immediate risk or actually engaged in the planning or implementing of an act of terrorism**, take the following course of action immediately:
 - a) Contact your line manager and consider referral to Police on 999 Or Anti-Terrorist Hotline on 0800 789 321.
 - b) Contact the Head of Corporate Safeguarding or if unavailable the Assistant Director for Quality and Effectiveness, informing them of the actions taken.
 - c) All actions must be recorded. For further details contact your region/nation Safeguarding Lead.
2. If you suspect that **a child/adult at risk may be under the influence of radicalisation or extremism but not in immediate danger**, the following actions must be taken:
 - a) Raise your concern directly with your line manager in the first instance; informing them the nature of your concerns.
 - b) Contact the Police on number 101 to discuss the next steps, requesting to speak to officers with the responsibility in relation to Prevent duties.
 - c) Contact the Head of Corporate Safeguarding informing them of the actions taken.
3. Clarify with the Police or Anti-Terrorism hotline the next steps and whether/how feedback will be provided.

[Prevent Duty Guidance for Scotland](#)

Action: Line Manager

Ensure any reported Prevent Concerns are managed in accordance with these procedures and where necessary escalated to the relevant authorities.

7. Female Genital Mutilation (FGM)

1. **Duty to report:** From 31 October 2015, there is a mandatory duty for regulated professionals¹ to report cases of FGM in England and Wales. This applies where the victim is under 18 years old and has disclosed FGM directly or the professional has seen something that possibly indicates the girl has been cut and should be reported to the Police and social care department. While there is no equivalent duty in Scotland and Northern Ireland, cases would be reported as a child protection matter.
2. This is a personal duty, which requires the employee who becomes aware of the case to make a report; the responsibility cannot be transferred to anyone else. The only exception is if you know that another employee has already made a report. Therefore, there is no requirement to make a second referral.
3. **Regulated Professions:** The duty only applies to staff that works in a regulated profession e.g. teachers, healthcare profession and social workers. It therefore covers:
 - General Chiropractic Council
 - General Dental Council
 - General Medical Council
 - General Optic Council
 - General Osteopathic Council
 - General Pharmaceutical Council
 - Health and Care Professions Council (whose role include the regulation of social workers in England)
 - Nursery and Midwifery Council
 - Social care workers in Wales

If your professional role is not designated under the duty, you must still report the incident as a safeguarding issue.

4. **When the duty does not apply:**
Women over the age of 18 years old
5. The duty to report does not apply to cases of disclosure from women over the age of 18. In these instances, you must follow local adult safeguarding procedures or contact your local Safeguarding Lead.

Disclosure is from someone other than the child

¹ In Wales, education practitioners are regulated by the Education Workforce Council.

6. If other people disclose a possible case of FGM e.g. parent of friend, or you suspect that a child/adult at risk may be at risk of FGM, the duty to report will not apply. However, this remains a safeguarding concern and must include a referral to the local Social Care Department and informing a local Safeguarding Lead.

7.1 Receiving a Disclosure or becoming aware of a FGM case

Action: Staff Member

1. An employee and/or volunteer may become aware of a case of FGM if they are informed by a girl under 18 that an act of FGM has been carried out on her.
Or
2. Observe physical signs, which appear to show that an act of FGM has been carried out on a girl under 18.
3. You must always speak to your manager about your concerns at the earliest opportunity and certainly the same day that you become concerned
4. Staff members can also seek advice from the National FGM Centre

7.2 Making a report

1. A report can be made in writing or orally to the Police and Social Care department. If calling the Police, use the non-emergency no. 101. This report must be completed no later than by the close of the following working day. Any reports should be discussed with your line manager in the first instance but should not delay the referral to the Police.

Staff in non-regulated posts but belong to one of the “professions” in accordance with the “2003 Act”, should familiarise themselves with the mandatory duty to report and they should contact their Region/Nation Safeguarding Lead to make a safeguarding referral.

2. You should be prepared to provide the call handler with the following information and explain that you are making a report under the FGM mandatory reporting duty:

Your details: <ul style="list-style-type: none"> • Name • Contact details (work telephone number and e-mail address) • Place of work • Details of your organisation’s designated safeguarding lead 	The girl’s details: <ul style="list-style-type: none"> • Name • Age/date of birth • Address
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3. You should update your Region/Nation Safeguarding Lead of the actions taken and identify whether other safeguarding actions are required, and how these will be taken forward.
4. Any reporting of an FGM concern should be reported internally, as a Serious Safeguarding Incident using the [Serious Safeguarding Incident Form](#). This should be sent to the entire list of named people on the form.

7.3 Consequences of a failure to Report

1. If the employee/volunteer does not carry out their duty to report the case of FGM to the Police, this will be treated as a possible breach of their professional duty and may result in a disciplinary action and, where relevant, referral to the governing body for their profession.
2. **Recording.** Cases involving FGM should be recorded in the relevant case file of the individual concerned in accordance with [Barnardo's Recording Policy](#).

7.4 Advice and Support

Further advice and support can be obtained from Region/Nation Safeguarding Lead, Assistant Director of Children's Services and Head of Corporate Safeguarding and Quality.

7.5 Scotland

The Scottish Government considers FGM to be an unacceptable and illegal practice, a form of child abuse, violence against women and a violation of the human rights of women and girls. FGM has been unlawful in Scotland since 1985; there is no mandatory duty to report but if you are worried that a child or young person is at risk of FGM or has had FGM, you must report your concerns to the relevant statutory authority such as police and/or social work.

Links to relevant legislation and the Scotland National Action Plan to prevent and eradicate FGM are given below

- [FGM Scotland's National Action Plan to Prevent and Eradicate Female Genital Mutilation \(FGM\) 2016-2020](#)
- Female Genital Mutilation (Protection and Guidance) (Scotland) Act 2020
- [Adult Support Protection Scotland Act 2007](#)

7.6 Northern Ireland

There is currently no provision for mandatory reporting of FGM, it is viewed as a form of child abuse and violence against women and girls and should, therefore, be dealt with as part of existing child and adult safeguarding structures, policies and procedure in Northern Ireland as governed by Cooperating to Safeguard Children (2003). Cooperating to Safeguard Children and Adult Safeguarding Operational Procedures 2016 found here: [NI Adult Safeguarding Operational Procedures 2016](#)

8. Safeguarding and Social Media

Social Media Guidance for staff working with children and young people

What do we mean by Social Media?

'Social media' in this document means any electronic communication that enables people to stay in touch online. This includes apps in which you and others contribute to both shared and private conversations with organisations, communities and individuals.

Background

Social media has become an important part of everyday life. It is an exciting and engaging way of keeping in touch with friends and family, as well as people, groups and brands beyond daily life. Social media at Barnardo's covers both private conversations (e.g. WhatsApp) and public conversations (e.g. Facebook). Although these are obviously very different types of communications, our safeguarding responsibilities apply to both cases.

Many of the children and young people in our care expect to use social media as a default method of communication – even more than talking face to face or on the phone. As we have started using social media more regularly, the number of stories about inappropriate use of technology, grooming behaviour and an inability to challenge colleagues has grown, which means that Barnardo's needs clear practice guidance for workers and organisations around safer working practice in this area.

Individuals who work with children and young people, or adults who are their parents and carers, whether in a voluntary or paid capacity, must always keep their professional role in mind regardless of the method of communication with the service user

All communications with Service Users, regardless of how they take place, should be considered to carry the same weight. As a professional supporting a child or young person, or vulnerable adult you should ensure you document online conversations, chats or interventions as well as you would through any other channel, for instance face-to-face or phone conversations. **All communications with a child or young person, or vulnerable adult regardless of channel, must be recorded in their care record. This includes retail managers communicating with volunteers on social media.**

What happens if a Barnardo's person abuses their access to social media?

This guidance refers to best, safe and poor practice regarding the use Social Media. Barnardo's Safeguarding Code of Conduct outlines the behaviour expected of all staff, workers and volunteers, and treats any breach the same whether it is online or offline.

Inappropriate use of social media may breach Barnardo's Safeguarding Code of Practice, IT Code of Practice and Data Protection/GDPR Policy and could put the lives or livelihoods of children at risk. Failure to use social media appropriately may result in disciplinary action being taken, up to, and including dismissal, or result in the termination of an individual's working agreement or involvement as a volunteer with Barnardo's, as appropriate. In certain circumstances breaches may also result in reports to Regulatory bodies, relevant Local Authorities and/or the police, as appropriate.

Never feel pressured to communicate with children, service users, families, volunteers or other professionals through any channel that you are not personally comfortable with. Advice on usage of any Social Media platform can be sort from the Head of Corporate Safeguarding and Quality.

9. Multi-Agency Adult Case Reviews

9.1 Notification where Barnardo's has been involved in a case under review

Safeguarding Adult Case Reviews (England), Significant Case Reviews and Adult Protection Committee's for Scotland (Scotland), Case Management Reviews (Ireland) or Adult Practice Reviews (Wales) are commissioned when:

- The Safeguarding Adults Board (SAB) must arrange for there to be a review of a case involving an adult in its area who has a need for care and support if there is reasonable cause for concern about how the SAB, members of it or other persons with relevant functions worked together to safeguard the adult, **and** condition 1 or 2 or is met.
- **Condition 1** is met if the adult has died, and the SAB knows or suspects that the death resulted from abuse or neglect (whether or not it knew about or suspected the abuse or neglect before the adult died).
- **Condition 2** is met if the adult is still alive, and the SAB knows or suspects that the adult has experienced serious abuse or neglect.

Thresholds for Adult Practice Reviews (Wales) are different and included in the [linked guidance](#).

For Scotland the Code of Practice 2022 indicates that an Adult Support and Protection Learning Review is a means for public bodies and office holders with responsibilities relating to the protection of adults at risk of harm to learn lessons from considering the circumstances where an adult at risk has died or been significantly harmed. It is carried out by the Adult Protection Committee under its functions of keeping procedures and practices under review, giving information and advice to public bodies and helping or encouraging the improvement of skills and knowledge of officers or employees of public bodies as set out in Section 42(1) of the Act.

Action: Responsible Manager

1. As soon as a formal notification is received that an adult has died or has been seriously injured (or before if directed by senior management), the file and that of any immediate family with whom the service is, or may have been, working with must be sealed. This is by requesting 'file sealing' for the specific named individuals to the IS Content Server Team as soon as possible by emailing ISContentServerTeam@barnardos.org.uk.
2. Manual/paper files, if held, must also be sealed and locked in a cabinet not accessible to project staff/volunteers.
3. On receiving notification of Safeguarding Adult Case Review or equivalent the responsible manager must notify the Assistant Director, Region/Nation/Business

Line Director, other relevant Director and Head of Corporate Safeguarding within 48 hours.

4. Staff involved with the adult/family must be supported and reminded of the support available from Barnardo's Employee Assistance Programme.

Action: Assistant Director Children's Services

1. Alert the local Media Manager as the case may generate local publicity.
2. Notify Barnardo's Head of Corporate Safeguarding and Quality and ensure that the [Notification of involvement in external safeguarding review processes form](#) is completed and returned to the Head of Corporate Safeguarding and Quality, c/o safeguarding@barnardos.org.uk to ensure that the review log is filled out.

Action: Region/Nation Director or Departmental Director

Notify the Corporate Director of Children's Services (England) and copy in CEO in line with serious incident procedure.

1. Identify an Assistant Director (ideally this should not be the line manager Assistant Director) to undertake a 'rapid review & risk assessment' of all related case files, which must include:
 - a) A chronology of Barnardo's involvement with the adult/family
 - b) Any potential internal disciplinary issues (you must liaise with People Team if this applies)
 - c) Any concerns about internal or multi-agency procedures, which may need immediate consideration.
2. If the notification indicates the likelihood that a case might have generated significant public interest or if there are implications for national policy objectives or corporate risk, consideration will be given as to whether to inform the Company Secretary and by discussion with the Corporate Director of Children's Services (England) and relevant others if the case is potentially high profile.
3. Barnardo's media response **must** be co-ordinated in conjunction with the relevant Local Safeguarding Adult Board media strategy to avoid contradiction and misunderstanding.
4. Via the Company Secretary, Barnardo's Insurers must be notified about cases if there is a risk of a claim against Barnardo's for liability.

9.2 All reviews commissioned by Adult Safeguarding Board or equivalent

Identifying appropriate author/s

Action: Region/Nation Director

1. If there is no indication of major public interest, decide who will author the review in consultation with the Head of Corporate Safeguarding and Quality.
2. Authors for single agency reviews undertaken for an external body should have appropriate seniority, have demonstrated competence in preparing complex reports and making recommendations for internal agency and multi-agency change and undergone relevant training. Notice should be taken of any particular expertise that is needed in order to conduct the review.

3. Where possible, two authors should be identified: one to take the lead role and the other to act as a 'buddy', to assist with interviews and report design, and act as a critical reader.
4. If there is likelihood that there will be major public interest, consult with the Region/Nation Director (who must also liaise with the Corporate Director Children's Services (Operations)) and the Head of Corporate Safeguarding and Quality to decide who should author the report. Ensure the Corporate Director of Children's Services (Operations) signs off such reports.

9.3 Preparation of the Report

Action: Report Author

1. Consult with Head of Corporate Safeguarding and Quality on the process and ensure guidance that local Adult Safeguarding Boards and Adult Protection Committee's for Scotland or other bodies recommend is followed.
2. Ensure draft reports are shared with the Region/Nation Director and/or Head of Corporate Safeguarding and Quality.
3. Ensure all staff referred to in the report have the right to:
 - a. See what is written about them
 - b. Correct any factual errors and comment on the findings.
 - c. And that these processes do not delay completion of the report beyond the agreed timescale.
4. Pass the report to the Region/Nation Director and/or Head of Corporate Safeguarding and Quality for quality assurance.

9.4 External Commissioning

Action: Responsible Senior Manager

1. If reports are externally commissioned through Barnardo's Training and Consultancy or Regions/Nations, authors with relevant expertise should be drawn from the pool, where possible. If Associates are used then they need to have demonstrated competence against the standards and criteria for authors of IMR/CMRs. Individual Management Review/Case Management Reviews
2. All reports must be quality assured by the Head of Corporate Safeguarding and Quality and signed off by the Region/Nation Director or other senior manager responsible for the commission.

9.5 Staff Care

Action: Assistant Director Children's Services

1. The Assistant Director of the service must assess the risk as to whether it is appropriate for the worker to continue their role with children, adults and families in the interim.
2. Staff must be made aware that a Safeguarding Adult Review or equivalent is different to, and separate from, any disciplinary investigation or internal inquiry although information gathered during the review process may be used to inform an investigation or inquiry. Disciplinary action may be taken on a concurrent basis whilst a case review is in progress.

3. Staff must be made aware that they have the right to request to be accompanied, if they are invited to attend a disciplinary hearing. A companion may normally be a UNISON/other trade union representative, or a Barnardo's colleague. Staff should also be made aware of support available through the Employee Assistance programme

9.6 Status of files on conclusion of the review

All records are to be retained in accordance with the Retention of Data Policy

9.7 Implementing Recommendations

Action: Assistant Director/Report Author

1. The Barnardo's IMR Action Plan Template must be used unless local Safeguarding Partnerships/CPCs have an alternative.
2. Copies of Barnardo's Individual Management Reports/Initial Case Reviews including the action plans must be forwarded to the Head of Corporate Safeguarding and Quality. The Head of Corporate Safeguarding and Quality is responsible for ensuring that any organisational learning is appropriately shared and informs policy and training.
3. Copies of executive summaries and of Barnardo's authored overview reports must be forwarded to the Head of Corporate Safeguarding and Quality.

Action: Region/Nation Director

The Region/Nation Director must ensure the implementation of all the actions within the action plan, within agreed timescales and feedback on progress to the Head of Corporate Safeguarding and Quality on a quarterly basis until the actions have been completed.

9.8 Post report

Action: Responsible Senior Manager

1. The Assistant Director and Region/Nation Director or Departmental Director must decide how feedback is given to those staff members/teams implicated in the Safeguarding Adult Case Review.
2. Consideration should be given to the author/s of the report conducting the briefing.
3. The Head of Corporate Safeguarding and Quality will undertake annual analysis and make an annual report to the Audit and Risk Committee outlining key messages and learning.

9.9 Multi Agency Case Reviews or other reviews

Action: Assistant Director/ Director

1. Any requests to undertake a review must be considered by the relevant Director in consultation with the Head of Corporate Safeguarding and Quality, as required.
2. The requests should be logged under safeguarding@barnardos.org.uk.

3. Where Barnardo's has had active involvement with the adult/family subject of the review then a suitably experienced/trained/accredited member of the organisation should be a member of the 'review team' informed by the rapid review and chronology (see above).
4. Ensure that all staff invited to take part are clear about confidentiality, scope of the review and their role in it. Staff and managers directly involved in the case will/ may be required to form part of the 'Case or Review Group'.
5. All staff must be supported to take part in case/review meetings and conversations. Guidance on this anywhere?
6. The final report and any learning or action arising from it must be shared with the Region/Nation or Departmental Director and Head of Corporate Safeguarding and Quality.
7. Suitable experienced/trained/accredited Barnardo's staff may be required to conduct internal systems reviews where Directors consider it appropriate/beneficial to the organisation.
8. In Wales, an Adult Practice Review panel will be established to manage the review process, and an internal reviewer should be part of the panel where a Barnardo's service has supported the adult within the APR timeframe. Where a Barnardo's service is involved, an Assistant Director from another locality would be the most appropriate panel member. Local services may be asked to provide an agency timeline/chronology of significant events. A learning event may be held, which the worker and manager may be required to attend. An APR report will be prepared by the Review Panel and the safeguarding lead should ensure that this is communicated to the safeguarding adviser for internal use.
9. Thresholds for Adult Practice Reviews (Wales) are included in the [linked guidance](#).

9.10 Media strategy

Action: Region/Nation Head Office Media Team

1. Barnardo's media response must be co-ordinated in conjunction with Local Safeguarding Board media strategy to avoid contradiction and misunderstanding. It is usual for the local Board to co-ordinate any media strategy.
2. Barnardo's Region/Nation Media Teams must liaise with the relevant R/N Director and the Barnardo's Head Office (HO) Media Team before releasing any public statements about the review.
Barnardo's Head Office Media Team will liaise with the Corporate Director Children's Services (England), as appropriate.

10. Events and Celebrity Supporters

There are occasions when a VIP might visit a Barnardo's service. Such VIPs might include members of the Royal Family, dignitaries, politicians, and representatives from national bodies, celebrities, sportspeople or others with some degree of fame. Such VIPs often play an important role in supporting the activities of organisations,

or in promoting good health and local services. Many will be accompanied by news or media teams involved in reporting the visit or event.

The organisation will try to accommodate such visits whenever appropriate. Yet, in all such visits it is important that correct procedures are followed which will safeguard the wellbeing of service users and their families, ensure the smooth running of services and minimise disruption. How to manage publicity and ensure security for the VIP, for any associated visitors and for the premises visited should also be considered.

Safeguarding arrangements

The following safeguarding arrangements for sites with children and vulnerable adults **must** be in place in line with recommendations from the Lampard Report (2015).

- a) Visits are to be agreed and arranged in advance, with the purpose for the visit clearly understood by all involved parties
- b) Contact with service users will be agreed with the service users and their representatives in advance
- c) The VIP or celebrity will be accompanied by a suitably senior colleague at all times during their visit
- d) Confidential information will not be disclosed to the VIP or celebrity
- e) Informal follow-up arrangements will not be made with the VIP or celebrity.

Protocol and Checklist

There is a Children's Services protocol and checklist for the attendance of children and young people at Barnardo's events and celebrity VIP visits to services/schools. This process **must** be followed on **every** occasion where children, young people and vulnerable adults attend events and when a Celebrity/VIP visits, even if they have visited before. This is in order to ensure that:

- there is no risk to the safety of children and adults arising from the visit
- staff and visitors are aware of their responsibilities
- systems are in place to effectively manage risks
- the hosting organisation, if not Barnardo's, meets its safeguarding responsibilities
- any issues arising from the event are recorded and learning shared

VIP/Event Lead Roles and Responsibilities

Planning - before the event

- An outline planning document is completed by the VIP team which outlines the purpose, costs and benefits of the event.
- Sign off is obtained at appropriate level (With a service visit this must be the Regional Director).
- An appropriate Lead/Leads for the Visit event is identified – In the case of a service visit this will be a CS Lead and a Media Team Lead (if Media are to be involved).
- A visit to the venue is carried out by the identified lead to plan and discuss the event with the CS Lead. This must include ensuring that the CS Lead gathers signed consent forms for the children and young people involved in the visit/event.
- The VIP/Event lead must have copies of consent forms whether or not a photographer is to be present.

- Visit/Event running order must then be agreed by email with the VIP and CS Lead/event lead as appropriate.
- Risk Assessments must be carried out for every event. CS lead will create these for individual young people.
- CS lead will perform a risk assessment for the group and travel.
- VIP lead will perform a risk assessment for the venue (if not in a service) and the event itself.
- All risk assessments to be shared with the event team prior to the event.
- Briefing documents are prepared. Depending on the scale of the event these could include: VIP Brief, CEO/CLT/CLG Brief, Media Brief, Staff & Volunteers. When an event involves young people they must be included in the briefing process. This briefing must be recorded and shared with the project team.
- Each briefing should be a version of the overarching instruction to ensure consistency, with non-essential or confidential information removed as appropriate
- There must always be a safeguarding element to the brief.
- Where a briefing document is to involve reference to young people, the young people must be consulted on what personal information they are happy to share.
- When involving a photographer, the photographer should also receive a brief, including a Shot List.
- Service users will be provided with a lanyard which identifies their name and role as colleagues. The lanyard will also indicate those who have given consent to photographs being taken.

On the Day

- Project Leads must arrive at least an hour ahead of the event start or arrival of the VIP Guest
- Team verbal briefing to be led by the identified Event Manager.
- The Team will run through the event running order and walk through the route if appropriate.
- VIPs must also receive a verbal brief upon arrival or shortly ahead of arrival to ensure they have read and digested their written briefing and taken note of the safeguarding procedure
- VIP Lead will accompany the VIP at all times – under no circumstances is a VIP guest to be left alone with children, young people or a vulnerable adult. Whilst it is acceptable to step back from a conversation the lead should never leave the room. If the event lead requires a comfort break, they should hand over temporary lead to another member of the team.
- All photography will be taken by the official photographer unless express permission has been given to take mobile phone footage.
- Where photography is not permitted at all – signs should be erected throughout the room instructing guests not to do so.
- Where photography is permitted for social media purposes and young people are involved, the event host will take the images and share with the VIP rather than the other way round.
- The event lead will always have overall control of the event. This is vital to empower the person in this role to make decisions at the event, especially if the plan is altered.

After the visit

- All photographic images must be uploaded to the central database alongside the appropriate consent forms
- Images must be signed off by the VIPs agent ahead of distributing to the media.

- All VIPs must be reminded to report any form of contact from young people or their families to the VIP team. This applies to emails, phone calls, letters and social media
- A review meeting must be scheduled with all key members of the project team to discuss the event and share learning to be applied to opportunity.

Brief and risk assessment

The following brief **must** be used in conjunction with the risk assessment. The brief would normally be conducted by the event team.

Briefing for the VIP/Celebrity - Safeguarding:

As a charity, we work with the most disadvantaged children and young people in the UK; many of whom have experiences of abuse and exploitation. The following guidance is to assist and protect our ambassadors and supporters, in order to maintain our excellent standard of safeguarding for the children, young people and families with whom you will engage during your work with Barnardo's.

Before and during visit/event:

- During your visit you will be accompanied by a member of The VIP Team and we ask all of our Ambassadors and supporters to:
- Recognise that your role as an Ambassador or supporter places you in a position of professional trust. Managing professional boundaries is an important aspect of our work together. We will work hard to support you in your role which is both valued and unique but must remain professional at all times.
- Recognise that their identity as a person of fame or notoriety in the public eye may increase a young person's perception of their power or may influence the familiarity with which they are regarded.
- Conduct themselves as a positive role model.
- Treat all people equally and with respect regardless of their identity or ability, being fair and considerate at all times.
- Not to smoke or drink alcohol prior to or during the visit/event

After the visit/event:

After the visit we ask that all of our Ambassadors and supporters:

- Do not share their personal contact details, or offer to communicate with, any children, young people, vulnerable adults or any service users regardless of age.
- Do not respond to, follow or add as 'friends' any children, young people or families via social media platforms
- Contact the VIP Team if you have been contacted any way to any approaches made by Barnardo's children, young people, vulnerable adults or families.

Should you have any concerns or feel a person is at risk/in a vulnerable situation during your visit please make this known to the VIP Team at the time and as quickly as possible.

11. Information Sharing/Consent

Each individual's right to confidentiality must be respected. All personal data must be treated with care and kept securely; this means not disclosing it to others unless there is a legal reason to do so, and we have informed the subject that we will do this in the privacy notice, or we have the informed consent of the subject, or the person with legal responsibility for them. Disclosing personal data to unauthorised

people could place the subject at risk of harm and may be a breach of GDPR and the Data Protection Act 2018.

There are circumstances when we may share personal data without the consent of the subject. The GDPR (article 6.1.d) permits the sharing of personal data without the consent of the data subject to safeguard the data subject, or others from harm. Safeguarding concerns must always be shared with the local authority and also with the police where this is necessary to protect the data subject or others. The data subject, or their parent, should be informed that the data has been shared unless this would place the individuals concerned at further risk.

Under Schedule 2 of the Data Protection Act 2018, personal data may also be shared with the police without the consent of the subject in order to prevent, detect or prosecute a crime. As a voluntary organisation we are not obliged to share data with the police but may choose to do so. The request must be in writing and specify the data required and why this is needed. The responsible manager must weigh up the impact of not sharing the data against the duty of confidentiality that we owe the subject. If we decide not to share the police must obtain a court order to access the data. All requests to share data must be recorded, including whether or not the data was shared and the reason/s for this.

For further information see the [Information sharing policy](#) or discuss with the Management Information Officer, Data Protection Manager or the Data Protection Officer.

12. References

Please note this list is not exhaustive:

- [Adults with Incapacity \(Scotland\) Act, 2000](#)
- [Prevent Strategy 2015](#)
- [Mental Capacity Act 2005](#)
- [Mental Health \(Care & Treatment\) \(Scotland\) Act 2003](#)
- [Deprivation of Liberty Safeguards 2009](#)
- [Strategy for Dealing with Safeguarding Children and Vulnerable Adults Issues in Charities, Charity Commission \(2012\)](#)
- [Protection of Freedoms Act 2012](#)
- [The Care Act 2014](#)
- [Social Services and Well-being \(Wales\) Act 2014](#)
- [Violence Against Women Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#)
- [The Serious Crimes Act 2015](#)
- [Modern Slavery Act 2015](#)
- [Barnardo's Whistleblowing Policy & Procedure](#)
- [Barnardo's Information Sharing Policy](#)
- [Safeguarding Board for Northern Ireland Procedures Manual](#), November 2017
- [Wales Safeguarding procedures \(application and Web based\)](#)
- [Prevent Duty Guidance for Scotland](#)
- [Adult Support and Protection Act Scotland 2007](#)
- [Scotland Adult Support and Protection Revised Code of Practice](#)
- [Fundraising vulnerable person policy](#).
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13. Compliance

The Corporate Director Children's Services (England) and relevant members of the senior management board will monitor this policy and procedure in line with our Corporate Risk Register and relevant KPIs and performance measures.

General levels of Compliance:

- Induction
 - Supervision
 - Performance and Development Review
 - Learning & Development Plans
 - Case file sampling and file auditing
 - Annual Service Quality Assessment
 - Barnardo's Audit and Assurance Unit
 - External Inspectorates
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