



Safeguarding Vulnerable Adults and Child Protection Policy 2021

1. Aim

The purpose of this policy is to outline the duty and responsibility of staff working on behalf of the organisation in relation to Safeguarding children, young people and vulnerable adults. Everyone has the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation.

The safeguarding of learners and staff at GLP is deemed to be the responsibility of all members of staff. Safeguarding, along with the associated elements of Child Protection and the Prevent agenda, is integral to all activities associated with the GLP Training whether on site or off.

The Policy takes account of all relevant legislation including the latest statutory guidance, Keeping Children Safe in Education 2021. Safeguarding is the umbrella term now used and covers many more aspects than Child Protection. It also covers protecting children, young people and vulnerable adults. GLP embraces the six adult safeguarding principles, empowerment, protection, prevention, proportionality, partnership, accountability, which all underpin the safeguarding practices including information-sharing.

GLP Training has a responsibility and moral duty to ensure that safeguarding and promoting the welfare of children, young people and vulnerable adults receiving educational provision. Throughout this policy and procedure, reference is made to “children and young people”. This term is used to mean “those under the age of 18”. GLP does recognise that some adults are also vulnerable to abuse, accordingly, the procedures may be applied to allegations of abuse and the protection of vulnerable adults.

In developing the policy and procedure, GLP will take account of, guidance issued by the Department for Education and Skills and other relevant bodies and groups.

GLP will refer concerns that a learner might be at risk of significant harm to social services/the appropriate agencies. The GLP SMT will review safeguarding reporting and case progress at all SMT meetings (individual identifiers redacted) and the Safeguarding Lead will present a full report to the SMT on a quarterly basis.

All staff working within the apprentice recruitment and enrolment and qualification delivery functions must have been DBS checked, all staff will also receive training adequate to familiarise them with child protection issues and responsibilities and will have a copy of GLP procedures and policies available within their Breathe HR account, with refresher training at least every 2 years dependant on job role.



2. The purpose of the policy

- To explain the responsibilities the organisation and its staff have in respect of vulnerable adult protection and children and young people
- To provide staff with an overview of vulnerable adult protection and child/young person
- To provide a clear procedure that will be implemented where vulnerable adult/child protection issues arise.
- To uphold and promote the core “BRITISH VALUES” of democracy, the rule of law, individual liberty, mutual respect and the tolerance of those with different faiths and beliefs
- For this policy ‘adult’ means a person aged 18 years or over.

3. Types of abuse

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent. Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it.

GLP recognises the following as definitions of abuse:

a. Physical Abuse

Physical abuse causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.

b. Neglect

Neglect is the persistent or severe failure to meet a child, young person and vulnerable adult's basic physical and/or psychological need. It will result in serious impairment of the child, young people and vulnerable adult's health or development.

c. Sexual Abuse

Sexual abuse including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, involves a person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the apparent consent of the child is irrelevant.

d. Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the person's behaviour and emotional development, resulting in low self-worth. Some level of emotional



abuse is present in all forms of abuse.

e. Forced Marriage and Female Genital Mutilation

There is a distinction between forced marriage and arranged marriage. An arranged marriage is one where the two individuals consent to marry each other and the decision as to whether they accept the arrangement remains with the prospective spouses, even though the marriage is likely to have been arranged by other family members. A forced marriage is one where either one or both individuals who are expected to marry do not consent to the marriage. Duress is likely to be involved and may be in the form of physical, psychological, financial, sexual or emotional abuse. The duress may include one or all the forms mentioned here. Female Genital Mutilation includes all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

f. Bullying and Harassment (including cyber bullying)

GLP has an Anti-Bullying and Harassment policy in place and has a zero-tolerance attitude towards bullying in all forms. The process followed thereafter is GLP's disciplinary procedure, if necessary.

g. Modern Slavery & Trafficking

GLP is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. Guidance on actions to be taken when employees have suspicions of such behaviour are contained within the Code of Conduct and the Whistleblowing Policy.

h. Child Sexual Exploitation

This is a form of sexual abuse that involves the manipulation and/or coercion of children and young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. Staff are made aware of this issue and advised to contact a Designated Person who will make the appropriate referrals.

i. Child Criminal Exploitation

This is a form of abuse where drugs networks or gangs groom and exploit children, young people and vulnerable adults to carry drugs and money from urban areas to suburban and rural areas and market towns

j. Psychological abuse

Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.



k. Financial or material abuse

Theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

l. Neglect and acts of omission

Ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

m. Discriminatory abuse

Race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.

n. Radicalisation

In respect of safeguarding individuals from radicalisation, GLP Training works to the Prevent element of the Government's Counter Terrorism Strategy, and where, deemed appropriate seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

o. Institutional abuse

Institutional abuse although not a separate category of abuse, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level as detailed in the contract specification.

p. Multiple forms of abuse

Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

q. Domestic abuse

Home Office Definition 2004 - 'Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults



who are, or have been intimate partners or family members, regardless of gender or sexuality.'

Women's Aid Definition - Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behaviour. This can also include forced marriage and so- called "honour crimes". Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently "violent".

Most research suggests that domestic violence occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class or educational level.

Both definitions would therefore include incidents where extended family members may condone or share in the pattern of abuse e.g. forced marriage, female genital mutilation and crimes rationalized as punishing women for bringing 'dishonour' to the family. It is important to recognise that children, young people and vulnerable adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing. Where children, young people and vulnerable adults are victims of Domestic Abuse, they may need extra support to plan their future.

The violence or threat of violence may continue after a victim has separated from the abuser. It is important to ensure that all the vulnerable people in this situation have appropriate support to enable them to maintain their personal safety. A separate Domestic Abuse Protocol is in place between Police, Social Services and Health. Incidents reported by the police through the domestic abuse protocols will be addressed under the adult protection processes if it is considered that a vulnerable adult may be at risk of abuse. (See Joint Police, Social Services and Health protocol for dealing with cases of domestic abuse where vulnerable adults are involved)

4. Mental Capacity Act 2005 (MCA)

The MCA provides a statutory framework to empower and protect people aged 16 and over who lack, or may lack, medical capacity to make certain decisions themselves because of illness, a learning disability or mental problems. GLP Training has a Mental Health First Aider on site.

5. PREVENT (Terrorism and Extremism)

This is the Government initiative being promoted in GLP Training to help prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The strategy provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate



advice and support. GLP Training will contact Special Branch and West Midlands Police Counter Terrorism as well as local organisations should a case occur.

6. Designated Staff with Responsibility for Safeguarding

GLP Training has nominated the Human Resources Manager with special responsibility for safeguarding issues and who has undertaken appropriate training. The role of the designated officer is to deal with all instances involving adult protection that arise within the organisation. They will respond to all vulnerable adult protection concerns and enquiries which may involve Overseeing the referral of cases of suspected abuse/ radicalisation or allegations to the City/County Council's Department of Children and Young People's Services, or other agencies (such as the police, Channel) as appropriate. The key duty is to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and vulnerable adults.

The designated member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with the appropriate agencies
- Ensuring that staff receive basic training in safeguarding issues and are aware of the procedures.
- Ensuring all staff whom may come into contact with learners have had the appropriate DBS checks performed before contact with learners is initiated, to include apprentice recruitment, enrolment and support services.

All staff working on behalf of the organisation have a duty to promote the welfare and safety of children, young people and vulnerable adults. Staff may receive disclosures of abuse and observe children, young people and vulnerable adults who are at risk. This policy will enable staff to make informed and confident responses to specific adult protection issues.

7. Role of Line Manager

The role of the line manager is to support the member of staff involved with the incident and to ensure the correct procedures are followed.

The line manager could, if agreed with the staff member dealing with the incident, contact the designated Adult Protection Lead in the first instance.

The line manager must ensure that all staff within their team are familiar with the organisation's vulnerable adult protection procedures and ensure that all staff undertakes training, where appropriate.



Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

In all cases the (SRF) Safeguarding Report Form GLP-DOC-0010 must be completed as far as possible with the information available at the time of reporting an incident.

8. Reporting a Concern - see Appendices D for Process Charts

a) If a learner raises a concern/allegation with you: If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will only be recorded on the SRF if learner agrees, and, raised with the manager if learner agrees. If the learner gives consent you must report the issue to a designated officer. If you feel the learners' safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should escalate only when you believe the matter would deteriorate if additional support was not sourced. You should always consider the wishes of the individual, even those aged Under 18 Guidance should be sourced with a safeguarding officer if you are unsure. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate. (D1)

b) If a GLP Trainer has concerns over a learner: This might be through observation, alleged by others or discussion. To follow procedure set out as point (a) If a learner raises an issue/allegation with the RT. (D1)

c) If a learner/ parent has a concern/ allegation about a GLP Training staff member: All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their trainer about, they are to contact one of the detailed GLP Training safeguarding officers. Contact details for the designated persons are available in this policy, GLP Training website, GLP Training Learning Hub and GLP learner website section. The GLP Training Safeguarding Lead contact details are also available at the bottom of all the learner's e-portfolio page's. (D2)

d) If a parent contacts you to report a concern about their child. Ensure you listen, and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent. You must report the issue to the designated officer. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are deemed to be adults, and therefore no information should be passed to parents or carers without prior consent to do so from the learner. (D2)

e) If you observe a safeguarding issue taking place within the working practices of an employer's setting - example would be a practitioner hitting a child, or, observing inappropriate restraint techniques. Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager.



Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform your designated safeguarding officer. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately. (D3)

f) If a learner reports unsafe practices or safeguarding issues to you within their working environment - Advise the learner to follow in house reporting or whistle blowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to your designated safeguarding officer who will offer additional guidance and signposting for the learner. (D3)

It is important you do not pass any information to other parties, or to try to investigate the concern yourself. All concerns should be reported to safeguarding@glptraining.co.uk in the first instance.

- If you require an immediate response call your sector designated safeguarding officer immediately, it is noted that the designated officer may not be available out of normal working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999.
- The designated officer will endeavour to make initial contact with regards the concerns within 72 hours.
- The designated officer will assess if the individual is at risk of significant harm and decide upon the next course of action, this can range from offering signposting to support agencies to referral to the police and local safeguarding authorities. This may also involve passing information to the DBS.

The procedure will consider an introduction that addresses the following issues: If a learner tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Do not interview the learner, but question normally and without pressure, to be sure that you understand what the learner is telling you.
- Do not put words into the learner's mouth.
- Reassure the learner that by telling you, they have done the right thing.
- Inform the learner that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the learner said, did and your questions etc.

Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Person. You should also determine whether and when a member of staff, other than a designated member of staff, should make a referral.



Important Information

If you feel the safeguarding concern you have reported is not being dealt with effectively by the safeguarding team, please refer to the Designated safeguarding Lead or follow the whistleblowing policy.

If you disagree with the outcome of a safeguarding referral outcome, please refer to the Safeguarding lead for guidance or you may also follow the local safeguarding board escalation procedure – found on their local authority website.

Key points a member of staff should remember in the event of an incident or disclosure:

DO	DO NOT
<ol style="list-style-type: none">1. Make sure the individual is safe2. Assess whether emergency services are required and if needed call them3. Listen4. Offer support and reassurance Ascertain and establish the basic facts5. Make careful notes and obtain agreement on them6. Ensure notation of dates, time and persons present are correct and agreed7. Take all necessary precautions to preserve forensic evidence8. Follow correct procedure9. Explain areas of confidentiality; immediately speak to your manager for support and guidance10. Explain the procedure to the individual making the allegation11. Remember the need for ongoing support.	<ol style="list-style-type: none">1. Confront the alleged abuser2. Be judgmental or voice your own opinion3. Be dismissive of the concern4. Investigate or interview beyond that which is necessary to establish the basic facts5. Disturb or destroy possible forensic evidence6. Consult with persons not directly involved with the situation7. Ask leading questions8. Assume Information9. Make promises10. Ignore the allegation11. Elaborate in your notes12. Panic

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the designated Children, Young people and Vulnerable Adult Protection Officer.



9. Reporting and Dealing with Allegations of Abuse Against Members of Staff

This procedure represents a starting point only. The procedures apply to all staff, whether teaching, administrative, management or support staff. The word “staff” is used for ease of description.

In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, vulnerable adults may have allegations of child abuse made against them. GLP recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

GLP Training recognises that the children act 1989 states that the welfare of the children, young people and vulnerable adults is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within GLP will do so with sensitivity and will act in a careful, measured way.

a. Other potential outcomes are:

The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the learner. The matter should be addressed in accordance with GLP disciplinary procedures. The allegation can be shown to be false because the facts alleged could not possibly be true.

b. Enquiries and Investigations

Safeguarding enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by GLP. GLP may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct GLP to act in a way, however, GLP should assist the agencies with their enquiries.

GLP shall hold in abeyance its internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures. If there is an investigation by an external agency, for example the police, the CEO (or designated person) should normally be involved in, and contribute to, the inter-agency strategy discussions.

The CEO (or designated person) is responsible for ensuring that GLP gives every assistance with the agency’s enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The CEO (or designated person) shall advise the member of staff that they should consult



with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the CEO (or designated person) shall:

- inform the learners or parent/carer alleging that the investigation is taking place and what the likely process will involve.
- ensure that the parents/carers of the learner making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.

The CEO (or designated person) shall keep a written record of the action taken in connection with the allegation.

c. Suspension of Staff

Suspension should not be automatic. Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay.

Consideration should be given to alternatives: eg paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- where a learner is at risk
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct. where necessary for the good and efficient conduct of the investigation.
 - If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.
 - Prior to making the decision to suspend, the CEO should interview the member of staff. This should occur with the approval of the appropriate agency
 - If the police are engaged in an investigation the officer in charge of the case should be consulted
 - The member of staff should be advised to seek the advice and/or assistance of them and should be informed that they have the right to be accompanied by a work colleague
 - The member of staff should be informed that an allegation has been



made and that consideration is being given to suspension.

It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be given as much information as possible, the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt but given the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to them at the meeting and prepare a response, although that adjournment may be brief.

If the CEO considers that suspension is necessary, the member of staff shall be informed that they are suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible, and ideally within one working day.

Where a member of staff is suspended, the CEO should address the following issues:

- the parents/carers of the learner making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the learner making the allegation of the suspension
- senior staff who need to know of the reason for the suspension should be informed depending on the nature of the allegation, the CEO whether a statement to the learners of the GLP and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity
- the CEO shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The external investigating authorities should be consulted.
- the suspended member of staff should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.
- the suspension should remain under review in accordance with GLP Training's disciplinary procedures.



10. The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

- the disciplinary charge against them
- their entitlement to be accompanied or represented by a trade union representative or work colleague

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The learner making the allegation, and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to work of the member of staff (if suspended).

The CEO (or designated person) should consider what information should be made available to the general population of the company

11. Allegations without foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept, and consideration given to a referral to other agencies may act upon the information. In consultation with the designated senior member of staff and/or the designated CEO shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support
- inform the parents/carers of the alleged victim that the allegation has been made and of the outcome
- where the allegation was made by a learner other than the alleged victim, consideration to be to give to informing the parents/carers of that learner
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

12. Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the GLP's statutory duty to inform the Secretary of State for Education under the "List 99" procedures.



13. Monitoring Effectiveness

Where an allegation has been made against a member of staff, the nominated CEO, together with the senior staff member with lead responsibility should, at the end of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of GLP's procedures and/or policies and/or which should be drawn to the attention of the agency. Consideration should also be given to the training needs of staff.

14. Recruitment and Selection Procedures

GLP Training has implemented policy and procedures to ensure that recruitment and selection of staff is fair, diverse and rigorous, taking into consideration DBS checks, the Rehabilitation of Offenders Act 1974 and the Safer Recruitment Guidelines.

GLP Training's recruitment and selection procedures. Will be reviewed to ensure that they take account of the following:

- They should apply to staff who may work with learners.
- The post or role should be clearly defined.
- The key selection criteria for the post or role should be identified.
- Vacancies should be advertised widely to ensure a diversity of applicants.
- Require documentary evidence of academic/vocational qualifications.
- Obtain professional and character references.
- Verify previous employment history.

Criminal Records disclosure/List 99 checks (maintain sensitive and confidential use of the applicant's disclosure).

Use a variety of selection techniques (eg qualifications, previous experience, interview, reference checks).

15. Confidentiality

Children, young people and vulnerable adult protection raises issues of confidentiality, which must be clearly understood by all. Staff have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and any relevant social services departments.

Clear boundaries of confidentiality will be communicated to all. All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.

If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies. Within



that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.

Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.

Where a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result. Staff must assure the adult that they will keep them informed of any action to be taken and why. The adults' involvement in the process of sharing information must be fully considered and their wishes and feelings considered.

This policy needs to be read in conjunction with other GLP Training policies, including:

- Disciplinary and Grievance Policy
- Privacy Policy
- Whistleblowing Policy
- Internet Usage Policy
- Social Media Policy
- Data Protection Policy
- Recruitment Policy
- Equality and Diversity Policy
- Prevent Duty Policy

16. Legal Framework

Human Rights Act 1998, the Mental Capacity Act 2005 and Public Interest Disclosure Act 1998, Equality Act 2010, Data Protection Act 2018, Freedom of Information Act 2000, Safeguarding Vulnerable Groups Act 2006, Deprivation of Liberty Safeguards, Code of Practice 2008, Care Act 2014 and the Prevent Strategy 2011.

The Mental Capacity Act 2005, covering England and Wales, provides a statutory framework for people who lack capacity to make decisions for themselves, or who have capacity and want to prepare for a time when they may lack capacity in the future. It sets out who can take decisions, in which situations, and how they must go about this.

The Human Rights Act 1998 gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR).

The Public Interest Disclosure Act 1998 (PIDA) created a framework for whistle blowing across the private, public and voluntary sectors. The Act provides almost every individual in the workplace with protection from victimisation where they raise genuine concerns about malpractice in accordance with the Act's provisions.



a. The role of key individual agencies Adult Social Services

The Department of Health's recent 'No secrets' guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of children, young people and vulnerable adults at risk of abuse. All local authorities have a Safeguarding Adults Board, which oversees multi-agency work aimed at protecting and safeguarding vulnerable adults. It is normal practice for the board to comprise of people from partner organisations who can influence decision making and resource allocation within their organisation.

b. The Police

The Police play a vital role in Safeguarding children, young people and vulnerable adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

c. Training

Training will be provided, as appropriate, to ensure that staff are aware of these procedures. All staff are required to undertake essential Safeguarding Training during their probation period and thereafter attend refresher training as deemed appropriate by GLP Training in order to ensure staff are updated with legislation changes and to refresh their knowledge and understanding of Safeguarding requirements. All training is recorded within the Breathe HR system. Staff are also regularly updated on any emerging issues through the Breathe HR system, website staff corner, standardisation meetings, SMT meetings, team meetings, one to ones and company coffee calls where appropriate.

d. Complaints procedure

To ensure that the service users, (or their representatives, parents/carers) are aware of GLP Training's Safeguarding commitment this policy is published on the GLP website and signpost on the apprenticeship agreement. Should the service users have any concerns about possible abuse or neglect by a member of GLP Training staff, they may contact the designated Safeguarding Officer.

e. No Secrets' report

The first national policy developed for the protection of children, young people and vulnerable adults, for use by all health and social care organisations and the police. It introduced guidance around local multi-agency arrangements and was issued under Section 7 of the Local Authority Social Services Act 1970. Its implementation is led by local authorities with social services responsibilities.



Action on Elder Abuse (AEA) is a charity working to protect, and prevent the abuse of, vulnerable older adults. <http://www.elderabuse.org.uk>

The Centre for Policy on Ageing was established in 1947 by the Nuffield Foundation with a remit to focus on the wide-ranging needs of older people
<http://www.cpa.org.uk/index.html>

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy which came into force in September 2015. It aims to stop people becoming terrorists or supporting terrorism. Details and information on the policy can be found by following the link highlighted above and below.

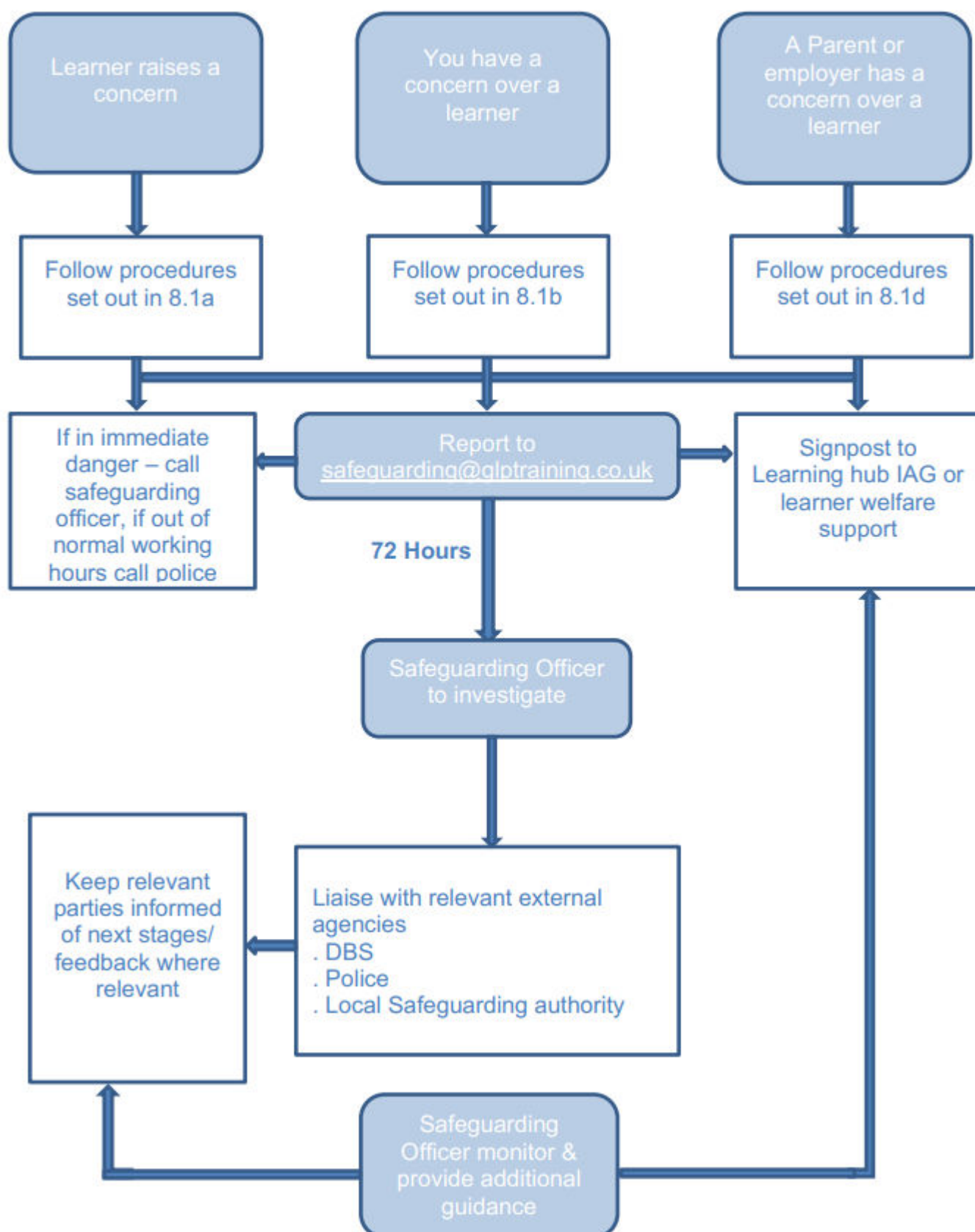
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf



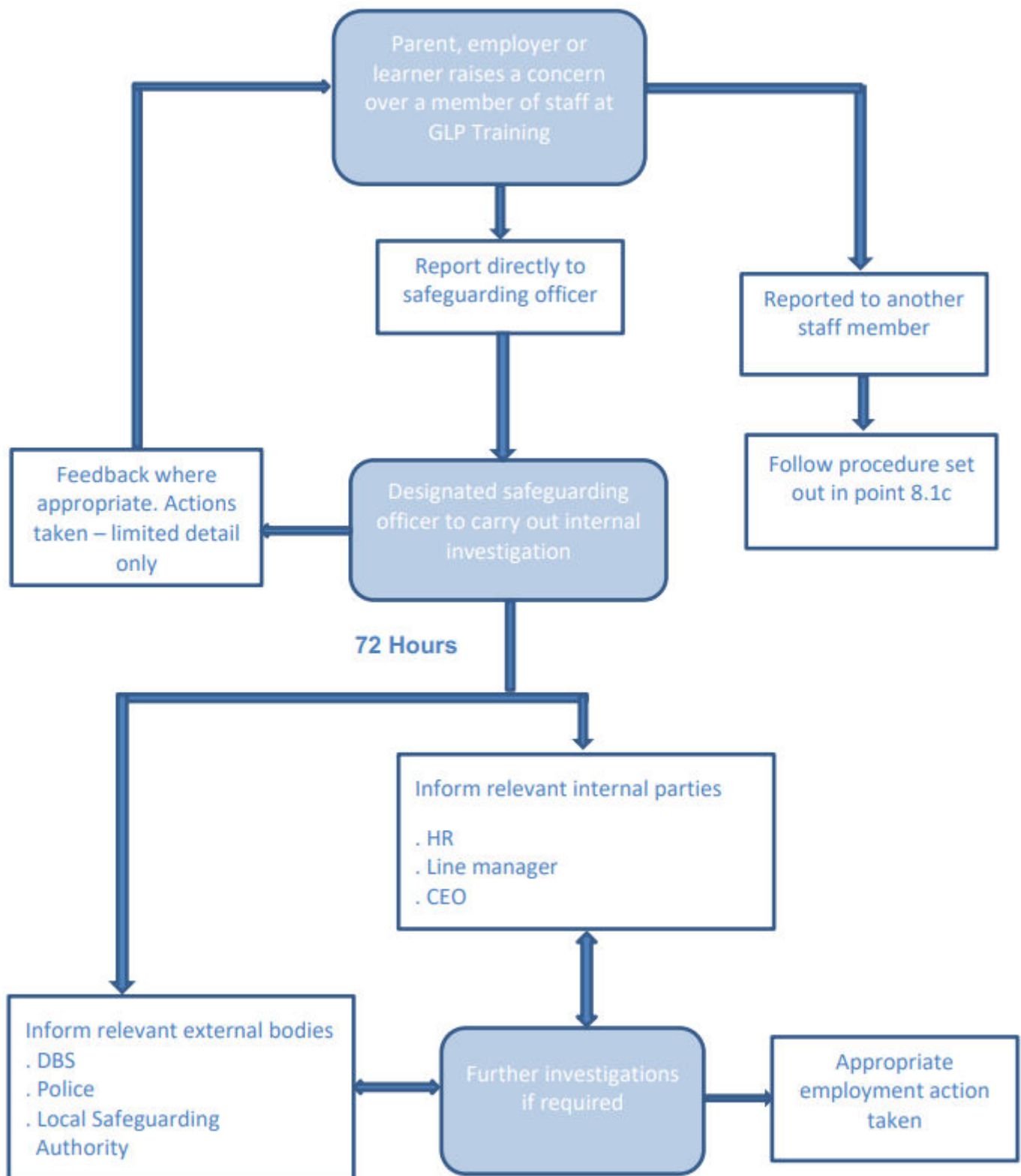
Appendix D1

SG1 – Learner Safeguarding Concerns



Appendix D2

SG2 – Parent, Employer or Learner raises a concern over GLP Training team member





Appendix D3

SG3 – Safeguarding Concern

