

Safeguarding Strategy 2019-2022

If you see something, say something

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Consultation Groups	Trust Directorate Leads
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Services	Applicable
Trustwide	x
Mental Health and LD	
Community Health Services	

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1.0	27.11.2019	Agnes Adentan Janette Clark	Associate Director for Safeguarding Children Associate Director for Safeguarding Children	

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1. Introduction

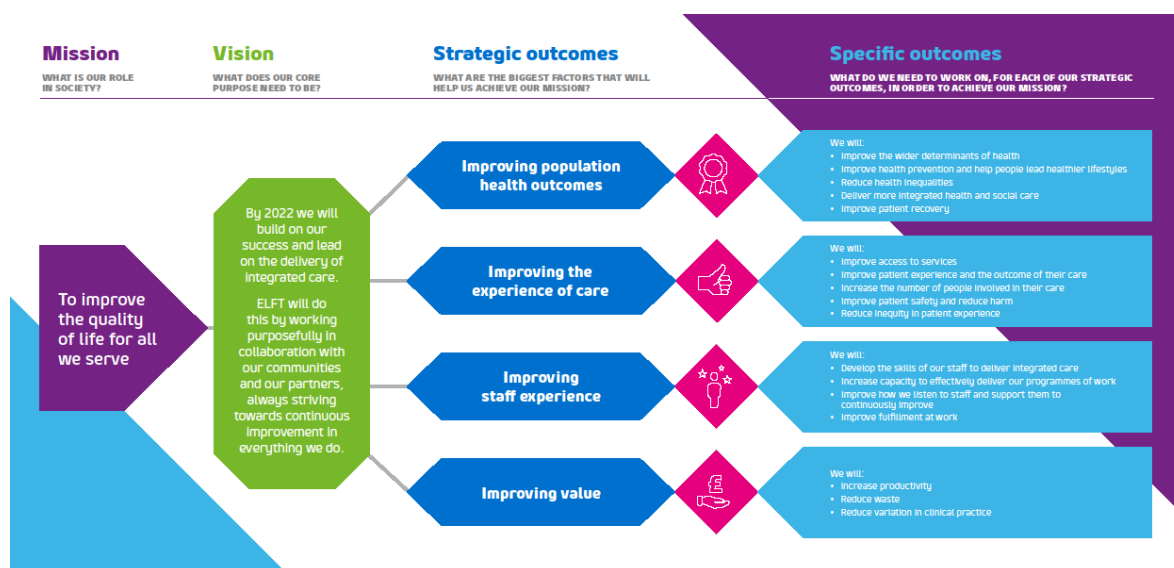
East London Foundation Trust (ELFT) serves a wide geographical area which includes seven Local Authorities. Being aware of the demography of our service users ensures future planning for our staff to deliver excellent care in the community and on our wards, care that is safe and effective which meets the needs of the patients.

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

This document sets out the strategic approach to strengthen our arrangements for safeguarding across the Trust over the next 3 years and in the future. It makes clear the roles and responsibilities of all staff to safeguard. This plan is contributing to and is aligned with the Trust’s Five-Year Strategy Mission to improve quality of care for all we serve. Safe care is the bedrock of the National Health Service.

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

As such, this is the Trust’s first strategy for safeguarding which outlines the intended improvement journey linked to the four Trust Strategy Outcomes i.e. improving population health outcomes, improving the experience of care, improving staff experience and improving value.



2. What is Safeguarding?

Everybody has the right to be safe no matter who they are or what their circumstances. Safeguarding is about the protection of harm by abuse and/or neglect. Safety from harm and exploitation is a basic need, being and feeling unsafe undermines our relationships and self-belief. Safeguarding is a range of activities aimed at upholding a child and adults right to be safe. This is important as some children, young people and adults because of their age, environment, situation or circumstances are unable to protect themselves.

This strategy considers all the steps taken by the Trust to prevent safeguarding issues escalating and how the Trust endeavours to protect children, young people and adults. The Trust, as part of the NHS has a duty of care.

3. Legal framework for safeguarding

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

Adults legislation	Children legislation
Mental Health Act 1983	Children Act 1989 and 2004.
Mental Capacity Act 2005	Children and Social Work Act 2017
Care Act 2014	Protection of Freedoms Act 2012
	Children & Families Act 2014
	Female Genital Mutilation Act 2003
	Children and Adoption Act 2006
	Education Act 2011
	The Local Safeguarding Children Boards (Review) Regulations 2013

Both children and Adults' legislation

Domestic Violence Act 2018

Human Rights Act, 1998

Equality Act, 2010

Modern Slavery Act 2015

4. What does safeguarding cover?

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

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

5. Our duties

5.1 Statutory compliance for safeguarding

The Care Act 2014 gave safeguarding adults a legal framework for the first time. The overarching objective is for adults to live a life free from abuse or neglect. This cannot be achieved by any single agency.

Every organisation and person who comes into contact with a child or an adult has a responsibility and a role to play to help keep adults safe.

From April 2015, Providers had to comply with the following groups of regulations:

- i. Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part 3)
- ii. Care Quality Commission (CQC) (Registration) Regulations 2009 (Part 4)
- iii. Safeguarding Vulnerable People in the NHS –Accountability and Assurance Framework 2013 updated 2015

The above regulations introduce the fundamental standards, which describe requirements that reflect the recommendations made by Sir Robert Francis following his inquiry into care at Mid Staffordshire NHS Foundation Trust.

The Trust has statutory obligation to comply with section 11 of the Children’s Act, 2014, which outlines the requirement for clear lines of accountability for provision of services that safeguard and promote the well-being of children. For adults, Part 1 of the Care Act 2014 came into force on the 1st April 2015 and Working Together to Safeguard Children 2018, established a clear legal framework for statutory agencies to maintain rights of those with care and support needs who are at risk of abuse or neglect.

The strategy is aligned to the government published guidance to all NHS organisations on their responsibilities to safeguard children and adults at risk “Accountability and Assurance Framework for Safeguarding Vulnerable People in the Reformed NHS” (2015).

6. Our safeguarding vision

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

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

There will be robust governance arrangements around the safeguarding agenda. All

staff working within ELFT will be able to discharge their statutory responsibilities within their professional boundaries through developing a workforce who are competent, confident and empowered to speak up and take action when they see or suspect safeguarding issues.

Shared learning will enhance and shape service provision.

ELFT supports the Think Family approach within safeguarding and hopes to do this through building supportive internal processes and pathways that enable the needs of service users to be met in a dignified manner which also includes responses to incidents and concerns.

The service users and carers experience will also be enhanced by the provision of effective partnership working with other agencies, which will aid seamless service provision.

7. Our aims

- To ensure that safeguarding is everyday business across the organisation, evidenced in all areas of the Trust's activities and business.
- To ensure that staff are empowered to speak up and act when they see or suspect safeguarding issues by ensuring that they receive appropriate level training based on national and local standards
- To ensure that organisational Policies and Processes are streamlined to facilitate staff to do the "right thing" to promote the welfare of patients and service users.
- To develop a dataset of information to monitor not only safeguarding activity, to ensure that the organisation has sufficient capacity, but also quality metrics to ensure that the organisation is meeting their statutory requirements by monitoring themes patterns and trends across the organisation and external areas.
- To make safeguarding personal through learning from children, families and adults at risk who have used the service to ensure that the response to safeguarding incidents/concerns is proportionate and least intrusive, thus appropriate to the risk presented and ensuring the person remains at the center of any processes
- To work in partnership with other Health colleagues to facilitate co-operation in a transparent and productive way to progress safeguarding.
- To ensure that there is clear accountability and transparency in delivering safeguarding, by building an effective governance assurance framework which includes measuring the quality of work and compliance against the regulatory standards

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

8. Safeguarding standards for children and young people

The child is at the centre of everything we do

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

Keep adults safe from harm through a culture of prevention

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

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

The ultimate responsibility is to the Trust Board through the Quality Assurance sub-board Committee.



Table One: Organisational Meeting Structure

11. Lead responsibilities

The Chief Nurse has the Strategic responsibility for the Trust with regard to Safeguarding Children and Adults at risk. All staff are accountable for their actions and to their professional bodies (as appropriate) for their actions. The Trust works in partnership with the 6 Local Authorities and 9 Local Safeguarding Children's Board (LSCB) and Safeguarding Adults Boards (SAB), who have statutory responsibility to safeguard children and adults in their areas.

The Trust has Named Doctors for Adult Safeguarding and Named Doctors for Safeguarding Children.

12. Policies and procedures

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

All staff should also refer to the London and Pan- Bedfordshire Safeguarding Inter-Agency Procedures for the Safeguarding Adults Board and Safeguarding Children Board.

13. Safer recruitment

The Trust has several policies in place relating to safe recruitment, including the Disclosure and Barring Policy and the Allegations Policy.

14. Training

All staff members have mandatory and statutory training on safeguarding children and adults. The Training needs analysis determines the level of training based on roles and responsibilities. In children this is benchmarked against the Safeguarding Children: Roles and Competences for health care staff Intercollegiate Document (2014) which outlines the appropriate level and content of training.

In adults the training will be benchmarked against Adult Safeguarding: Roles and Competences for Health Care Staff – Intercollegiate Document (2018).

Both children and adults training includes PREVENT training.

15. Regulation and inspection

The Trust was rated as outstanding overall by the Care Quality Commission after an inspection in April 2018.

The trust was rated Outstanding for being caring, responsive and well-led. It was rated Good for being safe and effective. Any recommendations regarding safeguarding in the report will be included in the annual work plan.

As a member of the Local Safeguarding Boards, the Trust has been involved Office for Standards in Education (OfSTED) inspection for the different Boroughs in our service areas.

The Trust uses the CQC five themes (safe, effective, caring, responsive and well – led) in measuring the impact of safeguarding Children, Young People and Adults at risk. (These themes are aligned to the Trust Strategic plan).

16. References

Statutory, non-statutory, best practice guidance

Statutory Guidance:

The Children Act 1989

<https://www.legislation.gov.uk/ukpga/1989/41/contents.htm>

The Children Act 2004

<https://www.legislation.gov.uk/ukpga/2004/31/contents>

The Children and Families Act 2014

<http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

Mental Capacity Act 2005

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

Care Act 2014

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

Children and Social Work Act 2017

<http://www.legislation.gov.uk/ukpga/2017/16/contents/enacted.htm>

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

DCSF Publications

Non-statutory Guidance:

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

NHS England (2015), *Safeguarding Vulnerable People in the Reformed NHS - Accountability and Assurance Framework* (March 2013 updated June 2015).
Crown copyright

NHS England (2015), *Safeguarding Policy*

HM Government (2015), *What to do if you're worried a child is being abused: advice for practitioners*. Crown copyright

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

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

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

National Audit Office (2015), *Care Leavers' transition to adulthood* https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/397649/CA1989_Transitions_guidance.pdf

RCPCH (2019) *Safeguarding children and young people: Roles and Competences for healthcare staff: Intercollegiate Document 4th Edition*

HM Government (2018) *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children*. Crown copyright

RCN (2018) *Adult Safeguarding: Roles and Competences for Health Care Staff: Intercollegiate Document*

Best practice guidance:

Department of Health (2004) *National Service Framework for Children, Young People and Maternity Services Standard 5*

Department of Health and Social Care (2017) *Domestic abuse: a resource for health professionals*. Crown copyright

HM Government Guidance on Forced Marriage 2013 updated 2018

Safeguarding Annual Update NHSE 2018

Glossary and abbreviations

Abbreviation	Meaning
CQC	Care Quality Commission
DOLs	Deprivation of Liberty Safeguards
DON	Director of Nursing
ELFT	East London Foundation Trust
FGM	Female genital mutilation
JTAI	Joint Targeted Area Inspections
LSCB	Local Safeguarding Children's Board
MAPPA	Multi-Agency Public Protection Arrangements
MARAC	Multi-Agency Risk Assessment Conference
MCA	Mental Capacity Act
NHS	National Health Service
OfSTED	Office for Standards in Education
PREVENT	Government Radicalisation Agenda
SAB	Safeguarding Adults Boards
SAR	Safeguarding Adults Review
SCR	Serious Case Review
SG	Safeguarding
SGA	Safeguarding Adults
SGC	Safeguarding Children

Appendix 1: Action to deliver Safeguarding Strategy 2018-2021

This action plan is the combination of:

1. Safeguarding Annual Report 2018
2. Independent review of Safeguarding services for both Children and Adults
September 2017 and Action Plan 2018
3. Saville Action Plan, 2016

Annual Plan based on the Trust Strategy 2018 -2021

No 1	Improved population health outcomes	Action required	Lead	Timescale	Evidence/ progress	Rag rating
1	Implement the Intercollegiate document for Children and Adults and map training as appropriate to ensure that staff across the Trust receive the training and support in line with their roles and responsibilities	<ul style="list-style-type: none"> • Assess training needs against the Intercollegiate document guidelines • Use case studies, SCR and SAR and different interactive methods of learning • Capture accurate training data 	Associate Directors Safeguarding Children and Adults Corporate Safeguarding Team Workforce and Learning Development	Ongoing	Competent staff being aware of the complexities of safeguarding in their day to day work	
No 2	Improved experience of care	Action required	Lead	Timescale	Evidence/ progress	Rag rating
2 a	Safeguarding is an everyday business across the organisation evidenced in all areas of the Trust's activities and business.	<ul style="list-style-type: none"> • Ensure that there is representation at the safeguarding committee from a range of Directorates and professions • All areas are compliant with safeguarding training 	Chief Nurse and Borough Directors	October 2019 – April 2020	Staff are aware of their safeguarding responsibilities and raise alerts and concerns appropriately	

2b	Ensure staff understand that safeguarding is everybody's responsibility	<ul style="list-style-type: none"> • Details in all Job Descriptions • Review Appraisal documents to see if safeguarding features as a competence • Review the number/ appropriateness of concerns /referrals 	<p>Human Resources</p> <p>Directorates HR Business Partners</p> <p>Corporate Safeguarding Team</p>	October 2019	Staff are confident and competent in raising safeguarding concerns and making referrals.	
2c	Ensure patients are protected by Organisational Policies and Processes that are underpinned by safeguarding principles i.e. good practice	<ul style="list-style-type: none"> • HR policies are up to date regarding safeguarding and voicing concerns • Monitor and evaluate staff surveys • Ensure that Safeguarding policies up to date • Ensure that the Mental Capacity Act and the DOLs framework is incorporated into Safeguarding training practice and intervention 	<p>Chief Nurse and Director of Nursing</p> <p>Associate Directors Safeguarding Children and Adults and Lead Nurse for Mental Health Law and Mental Capacity Act (MCA)</p>	October 2019	Policies are updated in accordance with National and Regional guidance.	

2d	Ensure that staff receive appropriate support and training to be able to deliver high standards of Safeguarding practice and intervention	<ul style="list-style-type: none"> Safeguarding Team to work in collaboration with the lead Mental Health Act nurse and MCA and DOLs advisor Develop opportunities for themed learning lessons events across directorates so the learning is shared across Community Health, Learning Disabilities and Mental Health services 	Named Professionals for Safeguarding and directorate Safeguarding leads	November 2019	Practice recommendations from SARs and SCRs are incorporated into Safeguarding training and supervision.	
No 3	Improved Staff experience	Action required	Lead	Timescale	Evidence/ progress	Rag rating
3	To ensure that staff are empowered to speak up and act when they see or suspect safeguarding issues by ensuring that they receive appropriate levels of training based on national and local guidelines	<ul style="list-style-type: none"> Undertake incident review of SGA and SGC on the DATIX system Monitor training compliance Monitor quality of referrals to social care 	Corporate Safeguarding Team Service Directors Corporate Safeguarding Team	February 2020	Improved staff confidence	

No 4	Improved Value	Action required	Lead	Timescale	Evidence/ progress	Rag rating
4a	To work in partnership with other agencies leading on health so that co-operation in a transparent and productive way progresses safeguarding	<ul style="list-style-type: none"> • Attendance at multi-agency meetings • Joint working in relation to inspections and working together • Promote joint learning lessons events regarding SCRs and SARs • Share learning and evidence from SCR and SAR in relation to partnership working 	<p>Corporate Safeguarding Team and Service Directors</p> <p>Chief Nurse</p> <p>Service Directors</p> <p>Corporate Safeguarding Team and</p>	Ongoing	Reduce variation in clinical practice across the Trust	
4b	To develop a dataset of information to monitor safeguarding activities and ensure that the organisation has sufficient capacity in meeting their statutory requirements.	<ul style="list-style-type: none"> • Quarterly reports to be developed and presented at Trust SG committee • Dashboard to be developed 	<p>JC & AA</p> <p>Safeguarding Team Data Analyst</p>	September 2019	Robust and accurate data is presented to the Trust Board and partner agencies.	

4c	To promote a 'Think Family Approach to Safeguarding'	Develop joined up training for areas of training /supervision where a think family	Corporate Safeguarding Team	Ongoing	Staff approach to patient care is family focused.	
No 5	Improved Partnership working	Action required	Lead	Timescale	Evidence/ progress	Rag rating
5a	To ensure that there is clear accountability and transparency in delivering safeguarding priorities by building an effective governance assurance framework.	<ul style="list-style-type: none"> • Pro-active well attended safeguarding committees fulfilling terms of reference • Measure the quality of work and compliance against regulatory standards • Quarterly upward reports to Quality Assurance Committee 	Director of Nursing	Jan 2020		
5b	Respond to both internal partnerships multi-agency requirements OfSTED, Inspections, CQC and Joint Targeted Area Inspections (JTAI)	<ul style="list-style-type: none"> • Contribute and assist with partnership requirements for SAB and LSCB <p>Ensure robust safeguarding processes are in place for CQC requirements and inspection</p>	<p>Chief Nurse DON</p> <p>Associate Directors for Safeguarding Children and Adults</p>	Ongoing	Legal requirements	

No 6	Aim	Action required	Lead	Timescale	Evidence/ progress	Rag rating
6	Single and multi- agency audits	<ul style="list-style-type: none"> • All audits and reports are collated in calendar and reviewed to establish gaps and repeat as appropriate • Reports are reviewed and any actions implemented 	<p>Associate Directors for Safeguarding</p> <p>Corporate Safeguarding Team and Service Directors</p>	In accordance to audit cycle	Quality processes	

Consultation circulation list

Lorraine Sunduza	Chief Nurse (Executive Lead for Safeguarding)
Paul Gilluley	Chief Medical Officer
Claire McKenna	Director of Nursing
Ruth Bradley	Director of Nursing Integrated Care
Michael McGhee	Director of Community Health Services
Sarah Wilson	Director of Specialist Services
Tanya Carter	Director of Human Resources
Dean Henderson	Borough Director- City & Hackney
Gill Williams	Borough Director- Newham
Edwin Ndlovu	Borough Director – Tower Hamlets
Michelle Bradley	Director of Mental Health & Well Being – Luton and Beds
Philip Baker	Director of Forensic Services
Graeme Lamb	Clinical Director , Children Services
Henry Iwunze	General Manager, Coborn Centre for Adolescent Mental Health
Dudley Manns	Medical Director for Luton and Bedfordshire
David Bridle	Medical Director (Named Doctor AMH)
Kate Corlett	Medical Director, Community Health

Comments / Corrections

Name:		
Job Title:		
Service:		
Comments		
Page	Section	Comment