



Nottingham Forest Community Trust

**To engage, inspire and empower the people of Nottingham
to live happier, healthier and more fulfilling lives.**



Vulnerable Adults Safeguarding Policies & Procedures Handbook May 2017

NFCT's Vulnerable Adults Safeguarding Policies and Procedures Handbook

This handbook covers all the relevant policies and procedures relating to the safeguarding of vulnerable adults. Because of the nature of the work undertaken by Nottingham Forest Community Trust (NFCT), it is required by law to have in place robust policies and procedures to ensure the protection of children, young people and other vulnerable adults. This handbook has been put together to specifically address how NFCT will take all steps necessary to protect and safeguard adults who utilise the Company's facilities and services – and who may be classed as vulnerable adults. It is essential that all NFCT staff members and volunteers read every section of this handbook - as it clearly explains responsibilities - and how to respond in any given situation. If NFCT's staff members or volunteers are ever in any doubt about how to deal with a situation that may arise in relation to the safeguarding of vulnerable adults, then they should immediately speak to either their line manager or NFCT's Designated Safeguarding Officer.

In developing this handbook, NFCT has framed its approach by following the most up to date best practice in regard to supporting vulnerable adults. To this end, NFCT referred to latest legislation contained within **The Care Act 2014**, as well as following the eight minimum standards of best practice and guidance developed by Volunteer Now - in consultation with a safeguarding vulnerable adult's advisory expert group - which was drawn from key organisations who work with vulnerable adults in the voluntary, community and independent sectors.

The eight minimum standards are drawn from the **Safeguarding Vulnerable Adults - A Shared Responsibility** guidance and NFCT has used this as the foundation of its own **Vulnerable Adults Safeguarding Policies and Procedures Handbook**, because it is applicable to the work undertaken by the organisation with different vulnerable adult groups and the different areas of vulnerability experienced. **Therefore, this handbook addresses the following eight core standards of best practice:**

1. **NFCT has a safeguarding vulnerable adult policy supported by robust procedures.**
2. **NFCT consistently applies a thorough and clearly defined method of recruiting staff and volunteers in line with legislative requirements and best practice.**
3. **NFCT has procedures in place for the effective management, support, supervision and training of staff and volunteers.**
4. **NFCT has clearly defined procedures for raising awareness of, responding to, recording and reporting concerns about actual or suspected incidents or abuse.**
5. **NFCT operates an effective procedure for assessing and managing risks with regard to safeguarding vulnerable adults.**
6. **NFCT has clear procedures for receiving comments and suggestions and for dealing with concerns and complaints about the organisation**
7. **NFCT has a clear policy on the management of records, confidentiality, and sharing of information.**
8. **NFCT has a written code that outlines the behaviour expected of all involved with the organisation, including visitors.**

Understanding what is meant by safeguarding: Generally, safeguarding is a term used to describe how NFCT protects adults from abuse or neglect. It is an important shared priority of many public services, and a key responsibility of local authorities. It is also NFCT's responsibility to safeguard vulnerable adults - or adults at risk - who use NFCT's services. Vulnerable adult safeguarding is about protecting certain people (aged 18 years and over) who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions - or lack of action - of another person. NFCT will always work in partnership with the relevant Safeguarding Adults Boards (SAB's) to identify adults at risk - and put steps in place to help prevent abuse or neglect.

At times the term 'adult at risk' will be used to replace 'vulnerable adult'. This is because the term 'vulnerable adult' can sometimes wrongly imply that some of the fault for the abuse lies with the victim of abuse. Where NFCT uses 'adult at risk' it is as an exact replacement for 'vulnerable adult'.

NFCT, through these policies, is committed to the following principles in all aspects of its safeguarding work with vulnerable adults:

- **Empowerment:** Which means putting people first and helping those who lack mental capacity to feel involved and informed
- **Protection:** This is about supporting victims so they can take action
- **Prevention:** Achieved by NFCT responding quickly to suspected cases of abuse
- **Proportionality:** Making sure that what NFCT does is appropriate to the situation and for the individual
- **Partnership:** Through sharing the right information in the right way
- **Accountability:** Which is about making sure that all staff and volunteers understand their role and responsibilities for safeguarding vulnerable adults

References & Resources Used in Developing NFCT's Safeguarding Polices & Procedures

NFCT's Vulnerable Adults Safeguarding Handbook has been produced with particular regard to the following references and resources:

- Volunteer Now's 2010 Safeguarding Vulnerable Adults - A Shared Responsibility Guidance
- The Care Act 2014
- The Mental Capacity Act 2005
- The 2000 (updated 2015) No Secrets Guidance on Protecting Vulnerable Adults in Care
- The Equality Act 2010
- The Data Protection Act 1998
- The Football Associations (FA) "Safeguarding for All - Raising Awareness":

<http://www.thefa.com/football-rules-governance/safeguarding/raising-awareness---downloads-section>

In addition, the above link provides a **Best Practice Download Section** which hosts many useful safeguarding resources. All NFCT staff members and volunteers are encouraged to use these resources to develop their safeguarding knowledge and practice.

- The Affiliated Football's Safeguarding Policy and Procedures:

<http://www.thefa.com/-/media/files/thefaportal/governance-docs/safeguarding/raising-awareness/affiliated-footballs-safeguarding-policy-and-procedures.ashx>

- The Home Office's "Prevent Duty Guidance March 2015" (updated March 2016):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_-_England_Wales_V2-Interactive.pdf

- The Department for Education and Home Office's "Female Genital Mutilation Legislation October 2015" (updated December 2016):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

In addition to the above, NFCT will follow Local Authority and Local Safeguarding Board guidelines and take fully into account the guidance issued by the FA relating to the Protection of Freedoms Act 2012.

Reviewed & Updated: May 2017

NFCT will review this References & Resources Used in Developing NFCT's Safeguarding Polices & Procedures and good practice at least annually.

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An up to date version of this Vulnerable Adults Safeguarding Handbook is held by NFCT's Designated Safeguarding Officer. Should you need to seek further clarification or information on any of the policies or procedures contained in this Handbook, staff members and volunteers should either speak to their line manager or NFCT's Designated Safeguarding Officer.

1. Safeguarding Vulnerable Adults Policy

This policy applies to all persons over the age of 18 years old. Issues relating to the safeguarding of children and young people (or young people aged up to 21 in some circumstances) will be dealt with by reference to NFCT's Child Protection & Safeguarding Handbook and the organisations Designated Safeguarding Officer. NFCT will raise concerns and allegations about people who are not covered by our policies to the police, local authorities and the Local Safeguarding Adult Board and/or children's services.

Policy statement: Abuse is a violation of an individual's human and civil rights. Abuse can take many forms. The staff and volunteers of NFCT are committed to work in such a way which promotes the welfare of vulnerable adults and safeguards them from harm. Staff and volunteers of NFCT accept and recognise their responsibilities to develop awareness of the issues that cause vulnerable adults harm - and to establish and maintain a safe environment for them. NFCT will not tolerate any form of abuse, wherever it occurs or whoever is responsible.

Purpose & aim of policy: NFCT are committed to promoting an atmosphere of inclusion, transparency and openness and are open to feedback from the people who the organisations services, as well as carers, advocates and NFCT staff members and volunteers - with a view to how it may continuously improve NFCT's services and activities.

This Vulnerable Adults Safeguarding Handbook - as well as all the core policies and procedures that it contains - apply to all NFCT staff members, including Trustees and senior managers, other paid staff, sessional workers, agency staff, students and unpaid volunteers, as well as anyone else working on behalf of NFCT such as contractors and suppliers.

NFCT will endeavour to safeguard vulnerable adults by:

1. Adhering to our safeguarding vulnerable adult policy and ensuring that it is supported by robust procedures
2. Carefully following the procedures laid down for the recruitment and selection of staff and volunteers
3. Providing effective management for staff and volunteers through supervision, support and training
4. Implementing clear procedures for raising awareness of and responding to abuse within the organisation and for reporting concerns to statutory agencies that need to know, while involving carers and vulnerable adults appropriately
5. Ensuring general safety and risk management procedures are adhered to
6. Promoting full participation and having clear procedures for dealing with concerns and complaints
7. Managing personal information, confidentiality and information sharing
8. Safeguarding vulnerable adults by implementing a code of behaviour for all involved with the organisation, including visitors.

NFCT will ensure that the organisations Designated Safeguarding Officer will undertake a review of the Vulnerable Adults Safeguarding Handbook (and all of the corresponding policies and procedures) annually - or following a major incident.

Reviewed & Updated: May 2017

NFCT will review this Safeguarding Vulnerable Adults Policy and good practice at least annually.



Graham Moran, Chief Executive Officer

2. Accountabilities for NFCT's Vulnerable Adults Safeguarding Responsibilities

The following information is provided to help direct NFCT staff members, volunteers, adults, parents and carers to the right person for help, guidance and/or advice. This page details in one place all of the relevant contacts - and their contact details - to assist with contacting the right person without delay.

- Safeguarding Board Lead: Karen Frankland (Trustee) - Telephone Number: 07947 318882 - Email: langtonhall@live.co.uk
- Safeguarding Senior Manager (SSM): Calum Osborne (Chief Operating Officer) - Office Telephone Number: 0115 982 4334 & Mobile Telephone Number: 07887 615182 Email: calum.osborne@nottinghamforest.co.uk
- Designated Safeguarding Officer (DSO): Richie Holmes (Workforce Manager) - Office Telephone Number: 0115 982 4398 & Mobile Telephone Number: 075383 531316 Email: richie.holmes@nottinghamforest.co.uk
- NCS Designated Safeguarding Officer (NCS DSO): Patrick Connor - Office Telephone Number: 0115 982 4357 & Mobile Telephone Number: 07498 918855 Email: patrick.connor@nottinghamforest.co.uk
- E-safety Coordinator: Calum Osborne (Chief Operating Officer) - Office Telephone Number: 0115 982 4334 & Mobile Telephone Number: 07887 615182 Email: calum.osborne@nottinghamforest.co.uk
- Health & Safety Officer: Calum Osborne (Chief Operating Officer) - Office Telephone Number: 0115 982 4334 & Mobile Telephone Number: 07887 615182 Email: calum.osborne@nottinghamforest.co.uk
- Local Police: West Bridgford Police Station Rectory - Telephone Number: 101 Non-Emergency & 999 Emergency
- NFCT's Local Safeguarding Adults Board (LSAB): Nottinghamshire County Council LSAB Telephone Number: Monday to Friday 8am to 8pm - 0300 500 8080; or outside of these hours telephone the Emergency Duty Team on 0300 456 4546

In addition to the above designated safeguarding personnel and statutory bodies, NFCT's Designated Safeguarding Officer will also liaise with the following Safeguarding Leads for the Football Club and the FA and/or the EFL Trust whenever there is a safeguarding concern:

- Football Club's Designated Safeguarding Officer: Martin Hollingsworth - Office Telephone Number: 0115 982 4444 Email: martin.hollingsworth@nottinghamforest.co.uk
- FA Local Welfare Officer: Ali Howie - Office Telephone Number: 0115 983 7400 Email: Alison.howie@nottinghamshirefa.com
- EFL Trust's Designated Safeguarding Officer: Clare Taylor - Office Telephone Number: 0800 169 1863 & Mobile Telephone Number: 07964 9058652 Email: ctaylor@eflt.com

Reviewed & Updated: May 2017

NFCT will review these Accountabilities for NFCT's Vulnerable Adults Safeguarding Responsibilities every time a change in personnel and/or good practice dictates, but always least annually.

3. Safer Recruitment Policy

Policy Statement: NFCT is committed to promoting the welfare of all adults who use and interact with the Company's services and for keeping them safe. In line with the **Equal Opportunities Policy** contained in this Handbook, NFCT is committed to equality, valuing diversity and working inclusively across all of its activities - and this applies also to the selection, recruitment and induction of new staff and volunteers. To this end, NFCT aims to have a workforce that reflects a variety of backgrounds and cultures and who can provide the relevant knowledge, abilities and skills that are required for the organisation.

All elements of NFCT's **Safer Recruitment Policies & Procedures** applies to any person responsible for the recruitment, selection and induction of employees and volunteers at NFCT - as well as those who participate in shortlisting and interview panels.

The purpose of this Safer Recruitment Policy is to ensure that NFCT:

- Recruits and selects the best possible people available to join the organisation
- Takes all reasonable steps to prevent unsuitable people joining the organisation
- Recruits, selects and manages all employees and volunteers in a way that complies with legislation designed to combat inequality and discrimination
- Does all it can to achieve and maintain a diverse workforce
- Has recruitment and selection processes that are consistent and transparent
- Assesses and judges applicants as competent before an offer of employment/volunteering is made
- Inducts properly and fully all new staff and volunteers

NFCT recognises that:

- Its workforce is its greatest asset
- Unsuitable individuals sometimes seek out opportunities via employment and volunteering to have contact with vulnerable adults in order to harm them
- Some groups face unfair discrimination in the workplace
- Vulnerable adults, as well as their families and carers, all benefit from the organisation's efforts to recruit and select a skilled and committed workforce, drawn from a diverse range of backgrounds
- Newly recruited employees and volunteers cannot possibly perform their roles effectively unless they are inducted properly and receive on-going support and supervision as appropriate.

Single central record: NFCT will ensure it meets its legal requirements for vetting staff and volunteers who work with vulnerable adults and work in Regulated Activity. To this end, NFCT will ensure its safe recruitment processes are recorded on a Single Central Record - and which will include information on DBS checks. NFCT's Single Central Record is a comprehensive record on which the safe recruitment of all NFCT staff and volunteers (who work with vulnerable adults) will be recorded. The details collated on NFCT's Single Central Record will include the following information relating to the staff member or volunteer:

- **Identity details:** Including full name, full address, date of birth, date employment/volunteering commenced and ID verification details.
- **Role details:** Including job role, department and contract type.
- **Safeguarding qualifications:** Including copies of certificates, dates of safeguarding training and FAN number.
- **Vetting details:** Including dates of checks relating to DBS.
- **Right to work details:** Including types of evidence used to complete the check.
- **YD2 self-declarations:** Where these are required.
- **Referencing details:** Including when references were requested and received and who checked them.
- **Leaver details:** Including dates, exit interviews and whether references have been issued.

Where an NFCT staff member or volunteer leaves the organisation - as a consequence of a safeguarding concern, complaint or allegation - the Single Central Record will record this event. NFCT will always have taken advice in line with NFCT's Vulnerable Adults Safeguarding Protection Procedures in these circumstances prior to this happening.

NFCT uses the Single Central Record to support its Safer Recruitment of Staff and Volunteers.

Reviewed & Updated: May 2017

NFCT will review this Safer Recruitment Policy and good practice at least annually.

4. Safer Recruitment Procedure

To implement this Safer Recruitment Policy, NFCT will commit to undertake each part of the following procedure whenever it seeks to recruit to fill a vacancy:

1	Job description:	For every vacancy, prior to commencing advertising, NFCT will produce a clear job description outlining the tasks that the successful applicant will be required to undertake.
2	Role profile:	For every vacancy, prior to commencing advertising, NFCT will produce a clear role profile which will detail the skills that the successful applicant will be expected to have.
3	Application form:	NFCT does not believe that CV's are the best way to accurately assess applicants, as a consequence of the varying nature of the information provided on them. Therefore, every applicant will be required to complete the Company's standard application form to enable them to be considered for the role. The completed application form will be used to initially assess the applicant's suitability for the role advertised. The use of a standard application form will enable NFCT to more easily compare the experience and skills of job applicants and will ensure that all the important and relevant information is collected consistently.
4	Vulnerable adult safeguarding awareness:	Every advertisement will make it clear that NFCT has a commitment to safeguarding and protecting vulnerable adults. To this end, every job applicant will receive NFCT's Safeguarding Vulnerable Adults Policy statement as part of the Company's job application pack.
5	Applicant shortlisting for interview:	All shortlisting for interviews will be carried out by more than one person and will be against the job description, role profile and NFCT's standard application form.
6	Face to face interviews:	All short-listed applicants will be required to undergo a face-to-face interview with at least two interviewers present. At the interview, pre-prepared and clear questions will be asked in pursuit of selecting the most suitable person for the vacancy.
7	Questioning:	Every applicant that is interviewed will be asked specifically whether they have any criminal convictions, cautions, other legal restrictions or pending cases that might affect their suitability to work with vulnerable adults.
8	Identity checks:	Every applicant that is invited to an interview will be required to bring original photographic identification - as well as one other form of identification - which will be from the prescribed list of acceptable photographic identification required for a Disclosure & Barring Service (DBS) check.
9	Qualifications & certificates:	Where qualifications and/or certificates are a condition of employment, applicants will be required to demonstrate (prior to being made a conditional offer of employment) that they actually hold any relevant qualifications/certificates that they say they have. This will be achieved by requiring applicants to produce the original documents or through providing the required information to enable verification to be made with the awarding body or establishment that provided the training.
10	Disclosure & Barring Service check:	Every applicant who is made a conditional offer of employment (and where the post requires them to possess one) will be required to undergo an enhanced DBS check which proves satisfactory to NFCT. If the job role involves regulated activity, the DBS check will also include a check against the barred list. All new staff and volunteers in posts requiring any level of DBS check will be required to subscribe to the DBS online update service.
11	Employment references:	Every applicant who is made a conditional offer of employment/volunteering will have a minimum of two references (covering the last five years of employment) taken up. The reference will specifically enquire from the referee whether the individual is considered suitable to work with vulnerable adults.
12	Vulnerable adults safeguarding policies and procedures:	Every new recruit will receive a copy of NFCT's Vulnerable Adults Safeguarding Handbook and will be required to sign their statement of terms and conditions of employment/volunteers agreement agreeing to abide by all policies and procedures contained within this document.
13	Induction training:	All new recruits will be given an induction plan - appropriate to the role they have been recruited for - to enable them to effectively undertake their responsibilities. Part of this induction training will include training and awareness on how to keep vulnerable adults safe that use the organisation's services.
14	Probationary period:	All job offers will be conditional on the successful completion of a defined probationary period being completed. No new recruit will be confirmed in to post until they have completed their probationary period (and any extension of that period) and have been formally reviewed through the completion of a post-induction review form.

Reviewed & Updated: May 2017

NFCT will review this Safer Recruitment Procedure and good practice at least annually.

5. Recruitment, Selection & Induction Process Flow Overview

When undertaking any recruitment process on behalf of NFCT, line managers must ensure that the steps - set out in this flowchart - are followed at all times. No part of this process is optional and all steps must be adhered to...

Step 1:	Identify the vacancy.
Step 2:	Review NFCT's Safer Recruitment Policies & Procedures .
Step 3:	Analyse the job role and produce the role profile using the Role Profile Template available from NFCT's Designated Safeguarding Officer.
Step 4:	Using the completed role profile, produce or update the job description using the Job Description Template available from NFCT's Designated Safeguarding Officer.
Step 5:	Plan the recruitment & selection process taking into account where the role will be advertised, and who will be responsible for each stage of the recruitment, selection and induction process - with reference to the minimum standards outlined in NFCT's Safer Recruitment Policies & Procedures .
Step 6:	Advertise the vacancy ensuring that the advert refers to NFCT's commitment to safeguarding and protecting vulnerable adults.
Step 7:	Ensure every interested applicant receives a copy of NFCT's Standard Application Form as well as a copy of NFCT's Safeguarding Vulnerable Adults Policy Statement .
Step 8:	Review all applications forms that are returned against the criteria in the job description and the role profile.
Step 9:	Create a shortlist of suitable applicants ensuring that at least two people are involved in ratifying the short-list.
Step 10:	With reference to the role profile and the assessments methods identified on it, prepare and agree on the interview questions.
Step 11:	Invite the short-listed candidates to a face to face interview (ensuring that all interviewees are informed to bring original photographic ID and originals of certificates with them) and where at least two people will conduct the interviews.
Step 12:	Conduct the interviews against the prepared questions and assessments and verify each candidate's identity and qualifications.
Step 13:	Consider any confidential information that the candidate has submitted along with their application, and discuss this with the candidate.
Step 14:	Make a decision on suitable appointment of candidate/s.
Step 15:	Make a conditional offer of employment/volunteering subject to return of a signed copy of the statement and terms and conditions of employment/volunteers agreement; satisfactory completion of a probationary period; receipt of a DBS that proves satisfactory; receipt of references that prove satisfactory; as well as satisfactory validation and verification of all information provided on the application form, CV and discussed at interview.
Step 16:	Plan the induction and prepare the induction checklist.
Step 17:	Complete the take up of references and all other verification checks required.
Step 18:	If any issues arise from references, DBS checks and other verification checks speak to the employee/volunteer.

Once you have arrived at **Step 18**, you must take the appropriate course of action identified below - and which is dependent on how you answer the first question "**Are the issues now resolved?**"

Are the issues now resolved?	
Yes	No
Confirm the offer of employment/volunteering on a probationary period, or continue the probationary period.	Withdraw the offer of employment/volunteering or terminate employment/volunteering.

Recruitment, Selection & Induction Process Flow Overview continued...

Step 19:	New staff member or volunteer starts. Follow through the induction programme.	
Step 20:	Conduct the scheduled reviews using the relevant review forms which are available from NFCT's Designated Safeguarding Officer.	
Step 21:	At the end of the probationary period carry out a post induction review.	
Has the employee/volunteer satisfactorily completed their probationary period?		
Yes		No
Confirm the appointment and continue with regular supervision and appraisals.		Either extend the probationary period or terminate employment/volunteering.
Step 22:	If at the end of the probationary period extension, the employee/volunteer has still not reached the required standards, then terminate employment/volunteering. If the employee/volunteer has now reached the required standards, then confirm their appointment and continue with regular supervision and reviews.	

Reviewed & Updated: May 2017

NFCT will review this Recruitment, Selection & Induction Process Flow Overview and good practice at least annually.

6. Equal Opportunities Policy

Policy statement: NFCT is an equal opportunity employer and is fully committed to a policy of treating all of its employees and volunteers - as well as applicants for employment or volunteering equally. NFCT will avoid unlawful discrimination in all aspects of recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment or volunteering arrangements - as well as discipline, selection for redundancy and dismissal/termination.

- **Protected characteristics:** NFCT will take all reasonable steps to engage, train and promote employees and volunteers on the basis of their experience, abilities and qualifications - without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy, these are known as the "protected characteristics".

Employees and volunteers have a duty to co-operate with NFCT to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination. Serious breaches of this equal opportunities policy statement will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated.

All NFCT employees and volunteers must always bear in mind that they can be held personally liable for any act of unlawful discrimination.

- **Duty to report and not victimise:** All NFCT employees and volunteers must draw the attention of their line manager to suspected discriminatory acts or practices. No NFCT employee or volunteer is to victimise or retaliate against an employee or volunteer who has made allegations or complaints of discrimination; or who has provided information about such discrimination. Such behaviour will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated. All NFCT employees and volunteers are expected to support colleagues who suffer such treatment and are making a complaint.
- **Direct discrimination:** Direct discrimination occurs when, because of one of the protected characteristics, an applicant or an employee/volunteer is treated less favourably than other applicants or employees/volunteers are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the applicant or employee/volunteer is associated - and not on the applicant's or employee's/volunteer's own protected characteristic. In addition, it can include cases where it is perceived that an applicant or an employee/volunteer has a particular protected characteristic, when in fact they do not.

Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment/volunteering relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

NFCT will take all reasonable steps to eliminate direct discrimination in all aspects of employment and volunteering.

- **Indirect discrimination:** Indirect discrimination is treatment that may be equal in the sense that it applies to all applicants or employees/volunteers, but which is discriminatory in its effect on, for example, one particular sex or racial group. Indirect discrimination occurs when there is applied to the applicant or employee/volunteer, a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the applicants or employees/volunteers. **A PCP is discriminatory in relation to a protected characteristic of the applicants or employees/volunteers if:**
 - It is applied, or would be applied, to persons with whom the applicant or employee/volunteer does not share the protected characteristic
 - The PCP puts, or would put, persons with whom the applicant or employee/volunteer shares the protected characteristic at a particular disadvantage when compared with persons with whom the applicant or employee/volunteer does not share it
 - It puts, or would put, the applicant or employee/volunteer at that disadvantage, and
 - It cannot be shown by NFCT to be a proportionate means of achieving a legitimate aim.

NFCT will take all reasonable steps to eliminate indirect discrimination in all aspects of employment and volunteering.

- **Victimisation:** Victimisation occurs when an employee or volunteer is subjected to a detriment - such as being denied a training opportunity or a promotion - because they have raised or supported a grievance or complaint of unlawful discrimination; or because they have issued employment tribunal proceedings for unlawful discrimination; or they have given evidence in connection with unlawful discrimination proceedings brought by another employee or volunteer. However, an employee or volunteer is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith.

Equal Opportunities Policy continued...

Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

NFCT will take all reasonable steps to eliminate victimisation in all aspects of employment and volunteering.

- **Recruitment, advertising and selection:** The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the post in terms of relevant experience, abilities and qualifications. NFCT is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising vacancies - and in order to attract applications from all sections of the community - NFCT will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
2. Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees and volunteers in such a way that they do not restrict applications from employees and volunteers with a particular protected characteristic.

However - where having regard to the nature and context of the work - having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, NFCT will apply that requirement to the role and this may therefore be specified in the advertisement.

The selection process will be carried out consistently for all jobs at all levels; and all applications will be processed in the same way. All NFCT line managers will strictly follow the **Safer Recruitment Policies & Procedures** detailed in this handbook.

NFCT will have regard to its duty to make reasonable adjustments to work/volunteering provisions, criteria and practices or to physical features of its premises or to provide auxiliary aids or services in order to ensure that a disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

If it is necessary to assess whether personal circumstances will affect the performance of the role (for example, if the role involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

- **Training and promotion:** NFCT will train all line managers in its policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices. Line managers will be responsible for ensuring they actively promote equality of opportunity within the areas for which they are responsible. NFCT will also train all line managers in its policy relating to safer recruitment of staff and volunteers.

NFCT will provide training to all employees and volunteers to help them understand their rights and responsibilities in relation to equal opportunities; and to help them understand and contribute to creating a working environment that is free from discrimination in all its forms.

Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice. When a group of workers/volunteers - who predominantly have a particular protected characteristic - appear to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

- **Terms of employment/volunteering, benefits, facilities and services:** All terms of employment/ volunteering, benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.
- **Equal pay and equality of terms:** NFCT is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like work, work rated as equivalent, or work of equal value. In order to achieve this, NFCT will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.
- **Reporting complaints:** All allegations of discrimination will be dealt with seriously, confidentially and speedily. NFCT will not ignore or treat lightly grievances or complaints of unlawful discrimination from employees and volunteers.

Equal Opportunities Policy continued...

If any employee or volunteer wishes to make a complaint of discrimination, they should do so promptly by bringing the matter to the attention of either their line manager - or where the line manager may be the subject of the complaint - to another more senior NFCT manager or NFCT's Designated Safeguarding Officer.

Monitoring equal opportunity: NFCT will regularly monitor the effects of its selection decisions, personnel structure, pay practices and other procedures in order to assess whether equal opportunity is being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, NFCT will implement them. NFCT will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

Reviewed & Updated: May 2017

NFCT will review this Equal Opportunities Policy and good practice at least annually.

7. Dignity at Work Policy

Policy statement: NFCT are committed to providing a work environment in which all employees and volunteers are treated with respect and dignity - and which is free from any form of bullying or harassment based upon age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or belief, sex, sexual orientation or upon any other ground. In this policy, these are known as the “protected characteristics”.

Employees and volunteers have a duty to co-operate with NFCT to make sure that this policy is effective in preventing harassment or bullying. Appropriate action will be taken against any employee or volunteer who is found to have committed an act of improper or unlawful harassment, bullying or intimidation. Serious breaches of this dignity at work policy statement will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated.

All NFCT employees and volunteers must always bear in mind that they can be held personally liable for any act of unlawful harassment. Employees or volunteers who commit serious acts of harassment may also be guilty of a criminal offence.

All employees and volunteer are responsible for conducting themselves in accordance with this policy. NFCT will not condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by employees, volunteers or by outside third parties who do business with NFCT, such as clients, customers, contractors and suppliers.

- **Duty to report and not victimise:** All NFCT employees and volunteers must draw the attention of their line manager to suspected cases of harassment, bullying or intimidation. No NFCT employee or volunteer is to victimise or retaliate against an employee or volunteer who has made allegations or complaints of harassment, or who has provided information about such harassment. Such behaviour will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated. All NFCT employees and volunteers are expected to support colleagues who suffer such treatment and are making a complaint.

NFCT will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment, bullying or intimidation against its employees.

This policy covers harassment, bullying and intimidation both in the workplace and in any work-related setting outside the workplace, for example during business trips, at external training events or at work-related social events.

- **Bullying and harassment:** Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee or volunteer.

An employee/volunteer unlawfully harasses another employee/volunteer if they engage in unwanted conduct related to a protected characteristic, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person.

An employee/volunteer also unlawfully harasses another person if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

Finally, an employee/volunteer unlawfully harasses another person if they - or a third party - engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person, and because of that other person's rejection of or submission to the conduct, they treat that other person less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party with whom the person is associated and not on that particular person's own protected characteristic, or if it was directed at someone other than that person, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that a person has a particular protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the employee/volunteer intended to offend. Something intended as a “joke” or as “office banter” may offend another person. This is because different people find different levels of behaviour acceptable; and everyone has the right to decide for themselves what behaviour they find acceptable to them.

- Behaviour which a reasonable person would realise would be likely to offend another person will always constitute harassment - without the need for the other person having to make it clear that such behaviour is unacceptable e.g. touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular person e.g. “office banter” and “jokes”. In these cases, the behaviour will constitute harassment if the conduct continues after the person has made it clear - by words or conduct - that such behaviour is unacceptable to them. A single incident can amount to harassment if it is sufficiently serious.

Dignity at Work Policy continued...

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- Unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature
 - Subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to a protected characteristic
 - The offer of rewards for going along with sexual advances or threats for rejecting sexual advances
 - Jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a protected characteristic
 - Demeaning comments about another person's appearance
 - Questions about a person's sex life
 - The use of nicknames related to a protected characteristic - whether made orally or by e-mail
 - Picking on or ridiculing a person because of a protected characteristic
 - Isolating a person or excluding them from social activities, or relevant work-related matters, because of a protected characteristic.
- **Reporting complaints:** All allegations of harassment, bullying or intimidation will be dealt with seriously, confidentially and speedily. NFCT will not ignore or treat lightly grievances or complaints of harassment, bullying or intimidation from employees and volunteers.
- NFCT encourages employees and volunteers - who believe they are being harassed, bullied or intimidated - to notify the offender (by words or by conduct) that the behaviour is unwelcome, if at all possible. However, NFCT also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal direct communication is either ineffective or impractical - or the situation is too serious to be dealt with informally - employees and volunteers should then promptly bring the matter to the attention of either their line manager - or where the line manager may be the subject of the complaint - to another more senior NFCT manager or NFCT's Designated Safeguarding Officer.
- **Disciplinary action:** Any employee or volunteer who is found to have harassed another person in violation of this policy will be subject to the appropriate action. Serious breaches of this dignity at work policy will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated. In addition, any NFCT line managers who had knowledge that such harassment had occurred in their departments - but who had taken no action to eliminate it - will also be subject to disciplinary action under the Company's disciplinary procedure.
- **Training:** NFCT will train all line managers in the Company's policy on dignity at work and in helping them identify and deal effectively with harassment, bullying or intimidation. NFCT line managers will be responsible for ensuring they actively promote dignity at work within the departments for which they are responsible.
- NFCT will provide training to all employees and volunteers to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment that is free from harassment, bullying and intimidation.

Reviewed & Updated: May 2017

NFCT will review this Dignity at Work Policy and good practice at least annually.

8. Engagement of Ex-Offenders Policy

Policy statement: NFCT is an equal opportunity employer and is fully committed to a policy of treating all of its job applicants fairly and equally. NFCT aims to select people for employment and volunteering on the basis of their skills, experience, abilities and qualifications. NFCT will therefore consider ex-offenders for employment and volunteering on their individual merits. Having a criminal record will not necessarily bar a person from working for NFCT. This will depend on the nature of the job role and the circumstances and background of the criminal offences.

NFCT's approach towards engaging ex-offenders differs depending on whether the job role is, or is not, exempt from the provisions of the Rehabilitation of Offenders Act 1974 (ROA).

Job roles exempt from the Rehabilitation of Offenders Act 1974: If the job role into which NFCT is seeking to recruit is one of the excluded jobs listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 or, in Scotland, the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2003, NFCT will require the applicant to disclose all convictions and cautions, whether spent or unspent. If an applicant has a conviction or caution, NFCT may, at its absolute discretion, decline to select the person for the particular role. If the job role is exempt, once NFCT has selected the applicant to whom it wishes to offer employment or volunteering to, it may seek documentary evidence about that person's criminal convictions. NFCT may seek the applicant's agreement to make a joint application to the Disclosure and Barring Service or Disclosure Scotland for a Criminal Record Certificate (also known as Standard Disclosure) or an Enhanced Criminal Record Certificate (also known as Enhanced Disclosure), as appropriate. In this case, any offer of employment or volunteering will be made conditional on this documentation being obtained to NFCT's satisfaction.

Where there is a requirement for a DBS check, this will be made clear to all applicants early in the recruitment process, for example in the job advertisement, or on the application form.

NFCT will always discuss any matter revealed in a disclosure with the applicant, before taking a decision to withdraw a conditional offer of employment.

Spent convictions: NFCT will not refuse to employ an applicant just because they have a spent conviction or caution and it acknowledges that, unless the job role is exempt from the Rehabilitation of Offenders Act 1974, job applicants are under no obligation to disclose spent convictions or cautions. Applicants will therefore not be asked any questions about spent convictions or cautions during the recruitment process and, where information on criminal convictions is requested, it will be made clear that spent convictions or cautions do not need to be declared or disclosed.

Unspent convictions: NFCT will not automatically refuse employment or volunteering opportunities with an applicant just because they have an existing or unspent conviction or caution. During the recruitment process, applicants may be asked to disclose any unspent convictions or cautions. If an applicant has a conviction that is not spent and if the nature of the offence is relevant to the job for which they have applied, NFCT will review the particular circumstances of the case and it may, at its absolute discretion, decline to select the person for employment or volunteering.

Failure to disclose information about convictions or cautions when asked to do so during the recruitment process - where either the job role is exempt, or they are unspent - could lead withdrawal of an offer of employment or volunteering with NFCT; or alternatively, to termination of the working relationship if the applicant has already commenced work.

Ultimately, although a person's criminal record, in itself, will not debar that person from being appointed to a post with NFCT - where the **Protection of Vulnerable adults Act 1999**, the **Criminal Justice and Court Services Act 2000** and/or the **Care Standards Act 2000** applies - this will be an automatic bar to working for NFCT. In addition, discretion will be exercised where it is felt that a recent and/or serious conviction might mean that a person might re-offend or cause harm.

Data protection requirements: NFCT is committed to ensuring that all information about a person's criminal convictions or cautions, including any information released in disclosures, is used and processed fairly and stored confidentially and in accordance with the provisions of the **Data Protection Act 1998**. In particular, personal data about a person's criminal convictions will only be held for as long as it is required for employment or volunteering purposes, it will only be seen by those who need to see it as part of the recruitment and engagement process and it will not be shared with or disclosed to any other employer, prospective employer or other unauthorised third party.

NFCT will also take guidance from NACRO's **Recruiting Safely & Fairly - A Practical Guide to Employing Ex-offenders**.

Reviewed & Updated: May 2017

NFCT will review this References & Verification Policy and good practice at least annually.

9. Disclosure & Barring Service Checks Policy

Policy statement: It is a mandatory requirement that any person that seeks to work with NFCT in a position defined in law as “**Regulated Activity**”; or who will undertake normal job duties which include “**coaching**”, “**teaching**”, “**training & instruction**”, “**caring for & supervising**”, or “**advice & guidance on the wellbeing for vulnerable adults**” must possess a valid **Enhanced Disclosure & Barring Service Check** (DBS).

Therefore, no person will be permitted to commence any form of paid or unpaid work with the organisation, prior to NFCT being satisfied that the DBS certificate permits them to be engaged in post.

NFCT will ensure that applicants are shown as being accepted on **The FA Whole Game** database before taking up a post.

Conflicts of interest: NFCT requires that all staff members and volunteers immediately disclose any matters that could reasonably be considered to be a conflict of interest to NFCT. All disclosures of a potential conflict of interest will be treated confidentially. Examples that may be considered as a conflict of interest - and which is not intended to be an exhaustive list - are as follows:

- A complaint of wrong doing being made against you by another person or organisation - whether substantiated or not
- Any situation that could result in a report being filed with the Disclosure & Barring Service
- Any situation which could potentially result in the withdrawal of your DBS certification
- Undertaking work for another organisation that could reasonably be considered as being in conflict with the work and ethos of NFCT
- Anything happening inside or outside of work - that if you were linked with NFCT through that incident - could reasonably be considered as bringing NFCT into disrepute

If you are in any doubt as to whether a particular situation could be considered a conflict of interest that requires disclosure, you are encouraged to bring this to NFCT’s attention so that a decision can be made as to the appropriate steps that should be taken.

If you fail to voluntarily disclose to NFCT something of a nature that a reasonable person would consider to be a potential conflict of interest, it will be assumed that there may have been an attempt to cover up wrong doing and this will result in formal disciplinary action being taken. Depending on the seriousness of the cover up and the conflict of interest, it may amount to potential gross misconduct and could result in your summary dismissal, or the termination of your volunteering agreement.

Reviewed & Updated: May 2017

NFCT will review this Disclosure & Barring Service Checks Policy and good practice at least annually.

10. References & Verification Policy

Introduction: The purpose of NFCT seeking references and verification on a new staff member or volunteer is to ensure that enough information relating to that individual - along with that gained through the selection process - can be used to determine their suitability for a particular post.

- **References:** Accordingly, it is the Company's policy to seek at least two written references, one of which must be from a previous employer (or, if this is the person's first job, their school teacher or higher or further education lecturer) and to ask for documentary proof of qualifications and eligibility to work in the UK. Any offer of working with NFCT will therefore be conditional on this information and documentation being satisfactory to NFCT. Before references are taken up, the individual's consent will be sought first.

Only the Chief Executive is authorised to provide written references on behalf of NFCT. All other NFCT employees and volunteers are absolutely prohibited from providing references on behalf of NFCT. If any NFCT manager, staff member or volunteer should ever be approached to provide a reference for an ex-employee, or ex-volunteer, they must in all circumstances refer that request to NFCT's Chief Executive.

- **Verification:** NFCT will take the necessary steps to verify any of the information provided on the staff member or volunteer's CV and application form. In all cases where verification is being undertaken, NFCT will explain to the individual - in advance - the nature of its verification process and the methods to be used to carry it out, including details of any external sources that will be used.

Where it is considered necessary to secure the release of documents or information from a third party, the individual's consent will be sought first. If any verification checks produce discrepancies - when compared to information already provided by the individual - NFCT will always give them the opportunity to make representations and provide an explanation of the inconsistencies, before any decision is taken to withdraw a conditional offer of employment or volunteering.

Where an individual has provided website links on their CV, or in their application form, to their social media personal website pages, NFCT may check these links once an offer of employment/volunteering is about to be made. Until that stage, however, these links will be disregarded in the recruitment process.

Reviewed & Updated: May 2017

NFCT will review this References & Verification Policy and good practice at least annually.

11. Probationary Period Policy

Policy Statement: NFCT's **Probationary Period Policy** is an integral part of the Company's **Safer Recruitment Policy**. This policy's aim is to ensure that all appointment decisions are sound and that the person who has been recruited is an appropriate person who would not pose a risk to vulnerable adults. The probationary period allows NFCT a period of time to undertake, collect and verify all relevant information that it is required to have on a new employee or volunteer, to be able to confirm them in post - following successful completion of the relevant probationary period. This information includes, but is not limited to, past employment references, DBS checks, verification of training, qualifications and certification - as well as any other information that was provided at interview and on application forms and CV's.

- **Probationary period:** Employment/volunteering with NFCT is subject to a probationary period of six months during which the new employee or volunteer will be required to demonstrate their suitability for the position in which they have been recruited for. To this end a new employee or volunteer will have their progress against their induction plan assessed on a regular basis throughout the probationary period.
- **Extension of probationary period:** The probationary period may be extended at NFCT's discretion up to a maximum of nine months and this is without prejudice to the Company's right to terminate employment/volunteering before the expiry of the probationary period. An extension to the probationary period may be implemented in circumstances where the employee/volunteer's performance or conduct has not been entirely satisfactory, but it is thought that an extension may lead to improvement.

An extension to the probationary period may also be considered in circumstances when the employee/volunteer has been absent from work (for any reason) for a significant period during the probationary period.

Employment or volunteering may be terminated at any time during, or at the end of, the probationary period (or during, or at the end of, any extension of the probationary period) on the grounds of unsuitability for the role, poor or unsatisfactory performance, misconduct, poor attendance, poor timekeeping, lack of capability, for reasons of health and safety, or if it is believed or established that the employee/volunteer does not have the qualifications, experience or knowledge that was claimed at the time of recruitment. This list is not intended to be exhaustive. Any termination will be confirmed in writing and there will be no right of appeal.

- **Post induction review:** At the end of the probationary period, NFCT will carry out a post induction review within a reasonable time of its expiry. The probationary period will not be deemed to have been completed until NFCT has carried out its review and formally confirmed the position in writing to the employee/volunteer. If the probationary period has been successfully completed, the employee/volunteer's continued engagement by NFCT will then be confirmed.
- **Notice period for employees during probation:** During the probationary period (and during any extension of the probationary period) - and until NFCT has carried out its review at the end of it and formally confirmed the position in writing to the employee - the notice period will be one week and the Company's disciplinary and/or capability procedure/s will not apply.

Reviewed & Updated: May 2017

NFCT will review this Probationary Policy and good practice at least annually.

12. Safer Induction Policy

Policy statement: NFCT recognises that all new employees and volunteers will require adjustment in their new role. NFCT aims to give support all new starters through a structured induction programme appropriate to the role being undertaken. All employees and volunteers who are included in NFCT's Safer Induction Programme will be given every required support throughout their induction programme.

- **Objectives of induction:** The induction programme exists to ensure that all new employees and volunteers understand:
 - How NFCT operates
 - The work of the different departments
 - The history and culture of the business
 - The business plan and goals of NFCT for the forthcoming years
 - How their job role fits in with the other members of their department and NFCT as a whole
 - Their own targets and performance objectives up until the first formal appraisal
 - Their role and responsibility in safeguarding and promoting the welfare of all vulnerable adults.
- **Safeguarding induction:** With regard to safeguarding, all new starters who will be working with vulnerable adults (or be in contact with them) will undergo induction and necessary training on the safeguarding and promoting the welfare of vulnerable adults. This element of induction training will be undertaken by NFCT's Designated Safeguarding Officer - and will include the familiarisation with the Designated Safeguarding Officer's role and responsibilities; an overview of NFCT's safeguarding policy and commitment; and an outline of the procedures to be followed in the event of a concern existing about a vulnerable adults safety or welfare.

As part of NFCT's safeguarding induction process, all staff and volunteers who will be working with vulnerable adults will receive a copy of each of the following:

- **NFCT's Safeguarding Vulnerable Adults Handbook**
- **Football Association's Handbook relating to Safeguarding**

Part of NFCT's commitment to safeguarding will entail the Designated Safeguarding Officer testing the maturity and the understanding of boundaries and the position of trust of all new starters - prior to them undertaking work with vulnerable adults that use the services of the organisation.

- **Induction programme:** The safer induction programme will be put in place once an applicant has formally accepted a conditional offer to work from NFCT. The detail and exact content of the induction programme will vary according to the seniority of the role; the individual needs of the new starter; as well as the role description. However, in the first week, all new starters will be introduced to their work colleagues; as well as meeting with their line manager and other relevant senior members of the management team, as appropriate. **At this point it will be the line managers responsibility to go through the following:**
 - Main terms and conditions of employment or volunteers agreement
 - Working or volunteering arrangements, including sickness absence reporting procedures
 - Role description, which will include duties and responsibilities
 - Employee Handbook or Volunteer Handbook
 - Child Protection & Safeguarding Handbook
 - Vulnerable Adults Safeguarding Handbook
 - Health and safety rules and procedures, including first aid facilities, accident reporting and emergency evacuation procedures
 - Equal opportunities and dignity at work
 - Targets and performance objectives up until the first formal appraisal
 - Training and development plan up until the first formal appraisal
 - Information about the structure and organisation of NFCT
 - Information about the department/team the new starter will work in
 - Location of entrances, exits, fire exits, kitchen, rest rooms, toilets and any other facilities
 - Location of NFCT notice board
 - Location of workstation or work area
 - Use and operation of equipment and location of office supplies
 - Useful contact numbers
 - Bank details, P45, National Insurance number, contact details, next of kin etc. as appropriate for either employee or volunteer

The NFCT manager responsible for the induction, will use an induction checklist to ensure that all matters are covered - and will sign this off once the induction programme has been completed. NFCT may involve other managers, employees and volunteers in the induction programme as appropriate.

Safer Induction Policy continued...

- **Mentoring & coaching:** New starters will also be allocated a mentor upon commencement. This appointed mentor will meet with the new starter during their first week with the organisation and their role will be to assist the new starter with any day-to-day matters in the first three months of working with NFCT. The mentors role is not to coach or train the new starter, but to give advice and assistance as appropriate. The relevant line manager is responsible for training the new starter and for supporting them in their new duties and tasks.
- **Induction reviews:** All new starters will have their progress reviewed via formal and structured induction reviews - which will be carried out at the end of week 1; the end of month 1; the end of month 2 and the end of month 3. The purpose of these reviews is to discuss how the induction training is progressing and to identify and address any gaps in the desired results of the induction training.

Reviewed & Updated: May 2017

NFCT will review this Safer Induction Policy and good practice at least annually.

13. Supervision Policy

Policy statement: NFCT recognises the need for regular and effective supervision of its employees and volunteers to ensure that they feel well supported and motivated in their work; that the Company is delivering quality services to the people that use its services; and that the organisation can function effectively.

- **Purpose of Supervision:** This is an opportunity to review an employee/volunteer's work programme, as well as to monitor their progress and to review the direction of their work. Supervision is also an opportunity to identify any gaps in skills and training, with a focus on enhancing professional development.

Just as importantly, the employee/volunteer's successes and achievements in their work can also be identified and celebrated. Supervision is also a place where an employee/volunteer can be challenged supportively and constructively within mutually agreed and accepted boundaries. Issues relating to the workplace and to working practices can be identified and discussed.

Ultimately, supervision is an ideal opportunity to demonstrate that the employee/volunteer is a valued member of the team at NFCT and offers them a chance to ensure that their emotional well-being is considered and that their personal development needs are being met. During the session, the employee/volunteer will be able to 'offload' their concerns and have these discussed in a supportive environment. **In summary, the purpose of supervision includes:**

- Review of work programme
 - A place to be challenged, supportively and constructively
 - Issues related to the workplace are addressed
 - A place to identify skills gaps and training needs - professional development
 - Employee's experiences are valued
 - Working practices are discussed
 - Achievements are identified and celebrated
 - Work progress is monitored and direction is reviewed
 - Emotional well-being/work-life balance and a place for personal development
 - Mutually agreed and acceptable boundaries
 - A place to offload
- **What the employee/volunteer can expect from supervision:** This is an opportunity for the employee/volunteer to review their current workload with their line manager and discuss future work and agree on targets. The line manager will acknowledge the work that the employee/volunteer is responsible for and offer praise and constructive feedback where appropriate. Support and guidance can also be offered where necessary.

This is also a time when the line manager can challenge the employee/volunteer appropriately and address actions and anticipated follow-up relating to these. Training needs will also be identified during the meeting and notes will be made by the line manager and copied to the employee/volunteer which will serve as a record to refer back to at the next supervision. Employees/volunteers should feel able to raise any issues or concerns, both related to work; or personal things unrelated to work. **In summary, the employee/volunteer can expect the following from supervision:**

- A place where guidance is received
 - To be challenged appropriately by their line manager
 - A place to address actions and follow up
 - That notes and records of the supervision are made and stored/copied
 - An assessment of training needs is made
 - Support is offered
 - That their supervisor has an understanding of their work and workload
 - Acknowledgement and praise is received
 - Work is discussed and targets agreed
 - A place where personal things (including those that are not work related) can be discussed if the employee/volunteer so desires
 - A place to talk about any concerns and issues
- **Frequency of supervision:** Frequency and length of supervision is expected to be in line with the following minimums:
 - Full time employees should receive supervision no less than once every six weeks for a minimum of 60 minutes
 - Part time employees/volunteers should receive supervision no less than once every eight weeks for a minimum of 60 minutes

Supervision Policy continued...

Any supervisory sessions must be re-booked for as soon as possible after the missed sessions to maintain the minimum regularity set out above.

- **Location of supervision:** Supervision should take place in a private and uninterrupted space during the employees/volunteers scheduled working day.
- **Recording supervision sessions:** It is the line manager's responsibility to take notes and ensure that the employee/volunteer receives a copy and that a copy goes on file. Both the line manager and the employee/volunteer must agree and sign a final copy of the supervision records - which will then be kept in individual supervision files in a secure place. After six months, supervision notes should be archived and held in the employees HR folder for six years.

Records will be made in a manner that works for each line manager, however a summary action sheet will be completed during or immediately after each session. It is important that any agreed actions are given to the employee/volunteer and that the line manager ensures that actions are reviewed & agreements followed up - with negotiation around timescales & outcomes where necessary - in future sessions.

- **Access to supervision sessions:** Should the line manager with responsibility for supervision of an employee/volunteer leave, they are required to provide access - to the person taking over responsibility for that employee/volunteer's future supervision - to six months of previous supervision notes.
- **Confidentiality:** There will be three levels relating to the need to breach confidentiality within supervision as set out below. This explanation is provided so that all employees/volunteers receiving supervision within their work role at NFCT are clear about what can - and cannot - remain confidential:

Issues	Level
<ul style="list-style-type: none"> ▪ If the behaviour or activities would bring NFCT into disrepute ▪ If it is about harm to self and/or others ▪ If it involves illegal activity - depending on currency and severity of activity ▪ If it concerns actions of gross misconduct ▪ If it concerns activities where vulnerable adults protection & safeguarding policies apply 	<ul style="list-style-type: none"> ▪ There is a duty as a line manager to report/action via NFCT's most senior person responsible for HR & appropriate public authorities - where appropriate.
<ul style="list-style-type: none"> ▪ If it concerns activities that may lead to disciplinary action being taken ▪ If it concerns actions relating to performance or capability 	<ul style="list-style-type: none"> ▪ Items may need to be reported via line management structures to NFCT's most senior person responsible for HR.
<ul style="list-style-type: none"> ▪ If the information given by the employee/volunteer will have significant impact on NFCT e.g. long term sickness/absence 	<ul style="list-style-type: none"> ▪ Items may need to be reported through the line management structure and to NFCT's most senior person responsible for HR.

Reviewed & Updated: May 2017

NFCT will review this Supervision Policy and good practice at least annually.

14. Appraisal Policy

Policy statement: A performance appraisal will be carried out on each employee at least once per year. The timing of that review may vary depending upon the employee's job and, in any event, is in the absolute discretion of NFCT. The purpose of the annual appraisal is to review the performance of the employee and provide constructive feedback; whilst identifying areas of satisfaction and where improvements can be made. In addition, discussions will focus on future goals, development and training needs.

- **Structure of appraisals:** The employee will attend a meeting with their line manager to discuss their work performance. **The objectives of the meeting will be to:**
 - Discuss the previous year's achievements
 - Identify any shortfalls in achieving objectives and establish the reasons for any shortfalls
 - If necessary, agree any changes required to objectives and actions required to improve the employee's performance and/or to enable them to achieve their full potential in the work they carry out for NFCT
 - Consider any future training, development and career needs for the employee
 - Discuss opportunities for advancement or alternative work.
- **Personal development:** The employee should also set out what actions they intend to take to develop themselves and they must assist in making the performance review process a worthwhile exercise. The meeting will be an open forum where views can be exchanged and agreed conclusions reached.
- **Preparation for the appraisal:** Employees should prepare for their appraisal meeting by considering what points they wish to discuss about their performance. They should consider their achievements over the previous year and the progress they have made in achieving objectives and they should be prepared to explain the reasons for any shortfalls.
- **Appraisal documentation:** During and after the meeting, the employee's line manager will complete an appraisal form as a record of the discussions that took place at the meeting. This will then be given to the employee for agreement and signature.

If the employee disagrees with any of the comments made, they will be able to record this on the form. Once the employee has signed the form, they should return it to their line manager and retain a copy for their own safekeeping.

The form will be kept confidential and will be held on the employee's personnel file and a copy. The appraisal process will be reviewed by the most senior person in the organisation to ensure the fairness and effectiveness of each line manager's approach to the process.

The completed appraisal form must be viewed as a working document and as such should be continually referred to and reviewed throughout the year by both employees and line managers.

- **Disagreements:** Any employee who feels that their appraisal was entirely unsatisfactory, or unfair to them, may ask that a more senior NFCT manager review the appraisal with them and their line manager - or where a more senior manager is not available - to request a meeting to discuss concerns and issues.
- **Employees in probationary period:** Those employees who are still in their probationary period will not receive an annual appraisal. Instead, their performance will be reviewed, independently of the annual appraisal process, during and at the end of the probationary period as outlined in the **Safer Induction Policy** in this Handbook .
- **Volunteers:** All NFCT volunteers will be appraised as part of their regular supervision; and at the intervals referred to in the **Supervision Policy** in this Handbook.

Reviewed & Updated: May 2017

NFCT will review this Appraisal Policy and good practice at least annually.

15. Recognising the Signs or Suspicions of Abuse in Vulnerable Adults

The following procedure applies to any paid member of staff or volunteer who may be concerned about the safety and protection of a vulnerable adult.

Purpose and aim of procedure: We aim to ensure that adults who may be at risk and who attend and/or participate in activities or events organised by NFCT, and any other vulnerable adults who may come to the attention of NFCT, receive the protection and support they need if they are at risk of abuse or radicalisation. NFCT believes that every person is entitled to have their civil and human rights upheld and to live a life free from abuse and neglect. Being able to respond appropriately to signs or suspicions of abuse of vulnerable adults requires an understanding of what vulnerability and abuse is.

Understanding what can contribute to vulnerability in adulthood: An adult may be vulnerable to abuse because they have a mental health problem, a disability, a sensory impairment, is old or frail, has some form of illness or because of their living circumstances - for example, living alone, or in isolation, or in a residential care home, nursing home or other institutional setting. Staff and volunteers of NFCT need to be aware of circumstances that may leave an adult vulnerable to abuse and be able to recognise the possible signs of abuse. They should be alert to the demeanour and behaviour of vulnerable adults - as well as those around them - and changes that may indicate that something is wrong.

Understanding the definition of abuse in relation to adults at risk: Abuse is a violation of an individual's human and civil rights by any other person or persons. Many incidents of abuse are criminal acts. **Abuse is defined as:**

“The physical, psychological, emotional, financial or sexual maltreatment or neglect of a vulnerable adult by another person. The abuse may be a single act or repeated over a period of time. It may take one form or a multiple of forms. The lack of appropriate action can also be a form of abuse. Abuse can occur in a relationship where there is an expectation of trust and can be perpetrated by a person/persons, in breach of that trust, who have influence over the life of a dependant, whether they be formal or informal carers, staff or family members or others. It can also occur outside such a relationship.”

Abuse can be either deliberate or the result of ignorance, or lack of training, knowledge or understanding. Often if a person is being abused in one way, they are also being abused in other ways. **Abuse can take many forms including the following:**

Sexual abuse: This includes indecent exposure, sexual harassment, inappropriate looking or touching, as well as rape. Sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts, and sexual acts that an individual did not agree to or were pressured into consenting to all count as sexual abuse. **Possible indicators of sexual abuse may include:**

- Unexpected or unexplained change in behaviour
- Torn, stained or bloody underwear
- Sexually transmitted diseases
- Loss of sleep
- Bruising
- A preoccupation with anything sexual
- Soreness around the genitals
- Indecent Assault
- Pregnancy
- Rape

Sexual exploitation is a subset of sexual abuse. It involves exploitative situations and relationships where people receive 'something' (e.g. accommodation, alcohol, affection, money) as a result of them performing, or others performing on them, sexual activities.

Physical abuse: This can include being assaulted, hit, slapped, pushed, restrained, being denied food or water, or not being helped to go to the bathroom when the person needs to go. It can also include misuse of an individual's medication. **Possible indicators of physical abuse may include:**

- Assault (can be intentional or reckless)
- Multiple bruising
- Fractures
- Burns
- Unexplained weight loss
- Depression
- Bed sores
- Fear

Discriminatory abuse: This includes some forms of harassment, slurs or similar unfair treatment relating to race, gender and gender identity, age, disability, sexual orientation, or religion. **Possible indicators of discriminatory abuse may include:**

- Expressing anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic
- The person appears withdrawn and isolated

Psychological and emotional abuse: This includes someone emotionally abusing an individual or threatening to hurt or abandon them, stopping them from seeing people, and humiliating, blaming, controlling, intimidating or harassing them. It also includes verbal abuse, cyber bullying and isolation, or an unreasonable and unjustified withdrawal of services or support networks. **Possible indicators of psychological and emotional abuse may include:**

Recognising the Signs or Suspicions of Abuse in Vulnerable Adults continued...

- Deprivation of liberty (false imprisonment)
- Aggressive shouting causing fear of violence
- Depression
- Fear
- Unexpected or unexplained change in behaviour
- Loss of sleep
- Confusion

If aggressive shouting (which causes fear) is carried out in a public place it may be an offence against Public Order Act 1986, or harassment under the Protection from Harassment Act 1997.

Financial and material abuse: This could be someone stealing money or other valuables from an individual, or it might be someone who is appointed to look after a person's money on their behalf using the money inappropriately or coercing them into spending it in a way they are not happy with. Internet scams and doorstep crime are also common forms of financial abuse. **Possible indicators of financial and material abuse may include:**

- Unexplained withdrawals from the bank
- Unexplained shortage of money
- Fraud
- Reluctance on the part of the person with responsibility for the funds to provide basic food & clothes
- Unusual activity in the bank accounts
- Unpaid bills
- Theft

Domestic abuse: This is typically an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is, or has been, an intimate partner or family member - regardless of gender or sexuality. Domestic abuse also includes psychological, physical, sexual, financial, & emotional abuse. In addition, female genital mutilation (FGM), forced marriage, as well as so called 'honour based violence are all classed as domestic abuse.

Possible indicators of domestic abuse may include:

- Evidence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Damage to home or property
- Limited access to money
- Feeling that the abuse is their fault when it isn't
- Isolation - not seeing friends and family
- Fear of outside intervention
- Low self-esteem

The age range for domestic abuse has been extended down to 16 and if domestic abuse was a concern in an individual then NFCT's safeguarding children arrangements would be followed.

Please note that there is no requirement for automatic referral of adult women with FGM to adult social services or the police. Referral to the police must not be introduced as an automatic response when identifying adult women with FGM, and each case must be individually assessed. Adult women with FGM be supported by offering referral to community groups who can provide support, and clinical intervention or other services as appropriate, for example through an NHS FGM clinic. The wishes of the woman must be respected at all times. If the woman is pregnant, the welfare of the unborn child or others in her extended family must be considered at this point, as these children are potentially at risk and safeguarding action must be taken accordingly.

Institutional abuse, neglect &/or poor practice: This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct. **Possible indicators of institutional abuse, neglect &/or poor practice may include:**

- People being hungry or dehydrated
- Inadequate staffing levels
- Lack of management overview and support
- Poor standards of care
- Few social, recreational & educational activities
- Failure to whistleblow on issues when internal procedures to highlight issues are exhausted
- Lack of personal clothing and possessions and communal use of personal items
- Lack of flexibility and choice for people using the service
- Unnecessary exposure during bathing or using the toilet
- Public discussion of personal matters
- Lack of adequate procedures
- Absence of individual care plans
- Poor record-keeping and missing documents
- Absence of visitors

Self-Neglect: This particular area has now been recognised within **The Care Act 2014** as part of the safeguarding framework and includes various behaviours such as a disregarding of personal hygiene, health or surroundings which results in a risk of impacting on the individual's wellbeing. Self-neglect could include such behaviours as hoarding.

Possible indicators of self-neglect may include:

- Living in squalid or unsanitary conditions
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Unkempt appearance
- Inability or unwillingness to take medication or treat illness or injury
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Neglecting household maintenance
- Very poor personal hygiene
- Hoarding

Recognising the Signs or Suspicions of Abuse in Vulnerable Adults continued...

Neglect and acts of omission: Neglect is also a form of abuse. Neglect includes not being provided with enough food or the right kind of food, or not being taken proper care of. Leaving an individual without help to wash or change dirty or wet clothes, not getting them to a doctor when they need one, or not making sure the person has the right medicines all count as neglect. **Possible indicators of neglect and acts of omission may include:**

- Untreated medical problems
- Malnutrition
- Deprivation of meals - can be “wilful neglect”
- Over-sedation
- Bed sores
- Confusion

Modern slavery: Modern Slavery is an international crime, it can include victims that have been brought from overseas, and vulnerable people in the UK. Slave Masters and Traffickers will deceive, coerce and force adults into a life of abuse, callous treatment and slavery. **Possible indicators of modern slavery may include:**

- Signs of physical or emotional abuse
- Fear of law enforcers
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Isolation from the community, seeming under the control or influence of others
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Appearing to be malnourished, unkempt or withdrawn
- Always wearing the same clothes
- Lack of personal items/identification documents

Despite the types of abuse and indicators listed above, staff and volunteers of NFCT should also remember that any adult with care and support needs - such as older people or people with disabilities - are more likely to be abused or neglected. They may be seen as an easy target and may be less likely to identify abuse themselves or to report it. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.

Evidence of any one of the indicators identified above should not be taken on its own as proof that abuse is occurring. However, it should NFCT’s staff and volunteers to make further enquiries and to consider other associated factors. The lists of possible indicators and examples of behaviour provided above are not exhaustive and individuals may be subject to a number of abuse types at the same time.

Understanding where might abuse occur: Abuse can happen anywhere and it is important to realise that it’s not specific to any one type of place or setting:

- In someone’s own home
- At work or in educational settings
- Within day care, residential care, nursing care or other institutional settings
- In rented accommodation or commercial premises
- At a carer’s home
- In public places

Understanding who can be an abuser: An abuser can be anyone who has contact with the vulnerable person. This means that abusers can be a partner, spouse, child, relative, friend, informal carer, a healthcare, social care or other worker, a peer or – but less commonly - a stranger. **On the following page, further detail is provided about each of the core areas mentioned about who can be abusers:**

Domestic/familial abuse: This is where the abuse of a vulnerable adult comes from a family member such as a partner, son, daughter and/or sibling.

Professional abuse: This is defined as the misuse of power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability as a result of poor management systems.

Peer abuse: This would occur when there is abuse of one vulnerable adult by another vulnerable adult within a care setting. It can occur in group or communal settings, such as day care centres, clubs, residential care homes, nursing homes or other institutional settings.

Stranger abuse: A vulnerable adult may be abused by someone who they do not know, such as a stranger, a member of the public or a person who deliberately targets vulnerable people.

Reviewed & Updated: May 2017

NFCT will review this Recognising the Signs or Suspicions of Abuse in Vulnerable Adults and good practice at least annually.

16. The Nominated Manager for Dealing with Actual or Suspected Abuse Policy

Policy statement: Due to the nature of the work undertaken by NFCT through working with vulnerable adults, the organisation has appointed two Nominated Managers who will be accountable and responsible for acting as a source of information and support to all NFCT staff and volunteers - and for dealing with allegations or suspicions of abuse that arise. As part of every employee and volunteer induction, NFCT will ensure that the names of the Nominated Managers are made clear, including an overview of what their role entails and how they can be contacted.

Nominated Managers: Due to the importance of this role NFCT have selected and trained two senior managers who have good knowledge of the organisation, can communicate well internally with all NFCT staff and volunteers - and where appropriate and necessary - with externally with the appropriate authorities. Both of the nominated managers are also responsible for safeguarding throughout the organisation. **The two nominated managers for NFCT are as follows:**

- **Designated Safeguarding Officer (DSO): Richie Holmes (Workforce Manager) - Office Telephone Number: 0115 982 4398 & Mobile Telephone Number: 075383 531316 Email: richie.holmes@nottinghamforest.co.uk**
- **NCS Designated Safeguarding Officer (NCS DSO): Patrick Connor - Office Telephone Number: 0115 982 4357 & Mobile Telephone Number: 07498 918855 Email: patrick.connor@nottinghamforest.co.uk**

The above NFCT managers have been nominated due to their knowledge and awareness about vulnerable adult safeguarding issues and they will undertake any additional training as may be considered necessary to ensure that they keep up to date with developments in safeguarding. **The role of NFCT's Nominated Managers is to undertake the following:**

1. Establish contact with the relevant person or persons in the Safeguarding Adults Board/s applicable to the geographical areas covered by the work of NFCT
2. Establish contact with the relevant person or persons in the local police service who acts as the Police Liaison Officer for Adult Safeguarding in the geographical areas covered by the work of NFCT
3. Provide information and advice on safeguarding vulnerable adults within NFCT
4. Ensure that NFCT's vulnerable adults safeguarding policies and procedures are followed
5. To inform NFCT's Safeguarding Senior Manager and the Board Safeguarding Lead, as well as the relevant person within the Local Safeguarding Adults Board and/or the Police Liaison Officer, of safeguarding concerns about individual adults
6. Ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing - under confidential cover - using the appropriate NFCT documentation
7. Liaise with the Local Safeguarding Adults Board's, the Police Liaison Officer, as well as any other agencies as appropriate and required
8. Keep relevant people within NFCT - particularly NFCT's Safeguarding Senior Manager and the Board Safeguarding Lead - informed about any action taken and any further action required
9. Ensure that an individual case record is maintained of concerns about abuse and the action taken by NFCT, the liaison with other agencies and the outcome
10. Advise NFCT of safeguarding vulnerable adult training needs

Reviewed & Updated: May 2017

NFCT will review this The Nominated Manager for Dealing with Actual or Suspected Abuse Policy and good practice at least annually.

17. Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse

Policy statement: When there are concerns or a disclosure and/or allegations are made in relation to adult abuse, people will often feel anxious about passing on the information to anyone else. It is not unusual for a concerned individual to ask themselves: “**What if I’m wrong?**” This thought can hold back the person from taking action. Therefore, it is important for staff and volunteers of NFCT to know that they are not responsible for deciding whether or not abuse has occurred; and neither are staff and volunteers responsible for conducting an investigation - as this is the role of the appropriate authorities. However, staff and volunteers do need to pass on any concerns they have through NFCT’s reporting procedures. Most importantly, this responding, recording and reporting procedure is in place to ensure that NFCT’s staff or volunteers do not attempt to deal with the situation alone.

Methods that adults at risk may use to alert another to signs of abuse or neglect: There are a variety of ways that staff or volunteers of NFCT could be alerted to the fact that a vulnerable adult is suffering harm. **Some of these ways are listed below:**

- A vulnerable adult may self-disclose
- Someone else may raise their concerns or something may happen that causes concern
- A vulnerable adult may show some signs of physical injury for which there does not appear to be a satisfactory or credible explanation
- A vulnerable adult’s demeanour and/or behaviour may lead suspicions of abuse or neglect
- The behaviour of a person close to the vulnerable adult may make others feel uncomfortable - which can include another staff member, volunteer, peer or family member
- Through general good neighbourliness and social guardianship

Being alert to potential abuse plays a major role in ensuring that vulnerable adults are safeguarded and it is important that all concerns about possible abuse are reported.

Steps to take if a vulnerable adult discloses abuse: In cases where a vulnerable adult discloses abuse to a staff member or volunteer of NFCT, it is important that the individual knows how to react appropriately and in accordance with the guidelines provided in this handbook. **Important things to remember to do include:**

- Do stay calm
- Do listen and hear
- Do express concern and sympathy about what has happened
- Do reassure the person by telling them that they have done the right thing in speaking up
- Do let the person know that the information will be taken seriously and give them information about what will happen next
- If urgent medical and/or police help is required always call the emergency services
- Do ensure the safety of the person
- Do be aware that medical and forensic evidence might be needed
- Do let the person know that they will be kept involved at every stage
- Do record in writing using NFCT’s **Vulnerable Adult Abuse Report Form**, ensuring that it is dated and signed where indicated and report directly - and without any delay - to NFCT’s Designated Safeguarding Officer or Deputy Designated Safeguarding Officer who are NFCT’s Nominated Managers in matters of adult safeguarding
- Do act without delay

Important things to remember not to do include:

- Do not stop someone disclosing
- Do not promise to keep secrets
- Do not press the person for more details or make them repeat the story
- Do not gossip about the disclosure or pass on the information to anyone who does not have a legitimate need to know
- Do not contact the alleged abuser
- Do not attempt to investigate yourself
- Do not leave details of your concerns on a voicemail or by email
- Do not delay

Checking out: Staff and volunteers should be aware that there may need to be some initial ‘checking out’ with the vulnerable adult who has disclosed information to them in order to ensure the adult at risk’s safety **e.g.** if a staff member or volunteer notices a bruise on a vulnerable adult’s arm, it would be appropriate to ask, “**I see you have a bruise on your arm. How did that happen?**” However, NFCT’s staff and volunteers should be careful not to start investigating - as there is a clear distinction between ‘checking out’ and an investigation. For the avoidance of doubt, NFCT’s staff and volunteers should not begin to investigate alleged or suspected abuse by asking questions that relate to the detail, or circumstances of the alleged abuse, beyond initial listening, expressing concern and checking out.

Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse continued...

Reporting and recording: Whilst NFCT accepts that there will be emergency situations where it will be appropriate for the staff member or volunteer to contact the police and/or emergency services immediately, in general - whatever the circumstances of the concern, disclosure, allegation or suspicion - it is vital that the staff member or volunteer records the details and reports to their Line Manager or NFCT's Nominated Manager without delay. Whenever there are concerns, disclosures, allegations and/or suspicions a record must always be made using the **Vulnerable Adult Abuse Report Form** which is available from NFCT's Designated Safeguarding Officer. In circumstances where a staff member or volunteer reports to a Line Manager, then the Line Manager will be accountable for reporting to NFCT's Nominated Manager immediately.

Using the Vulnerable Adults Abuse Report Form, an accurate record should be made of the date and time that the member of staff or volunteer became aware of the concerns, the parties who were involved, and any action taken **e.g.** if first aid was administered. Any questions that staff or volunteers asked in **checking out** the concerns must be recorded using exactly the words used. Above all, the record made should be clear and factual as this information will be invaluable to professionals investigating the incident - and may at some time in the future be used as evidence in court. Once this form has been completed NFCT's Nominated Officer will ensure that the information (whether electronic or paper-based) will be kept securely and will only be shared with those who need to know about the concerns, disclosures, allegations or suspicions of abuse.

Staff and volunteers are asked to make a personal record of the fact that they made a report, with the date and to whom the report was made.

Confidentiality: NFCT will ensure that all information relating to a vulnerable adult - or any concerns about a vulnerable adult - will always be kept confidential and shared on a 'need to know' basis only. NFCT's staff and volunteers must never discuss information relating to a concern, disclosure or allegation or suspicion - either inside or outside the organisation - other than with those that need to know such as their Line Manager or NFCT's Nominated Manager. NFCT's Data Protection policies and principles will underpin the maintenance of all records, which includes records of abuse or suspected abuse in relation to vulnerable adults. **When NFCT's Nominated Manager is alerted to concerns about a vulnerable adult they will act promptly and ensure:**

1. That the vulnerable adult is in no immediate danger and that any medical or police assistance required has been sought
2. Due consideration is given to whether the concern is a safeguarding issue or not – which may involve some **checking out** of information, whilst taking every concern to not stray into the realm of investigation

Action to be taken in the event of a non-safeguarding issue being raised: If NFCT's Nominated Manager considers that the matter is not a safeguarding issue and as such no referral to a statutory authority is required, then the following action must be taken:

- A written record must be made of the concern
- Details must be kept on file
- Details of any action taken must be noted
- Details of the reasons for not referring must be noted
- The situation must continue to be monitored on an ongoing basis

An example of a non-safeguarding occurrence could be an individual who, whilst normally very particular about their appearance and clothes, turns up unkempt with items of clothing on inside out for two days in a row. It would be important to record the details of the concern about the person's appearance and any action taken and the outcome of that action. In this example, the action taken may include speaking to the individual and to their carer (if appropriate) and recording the responses. The carer's response may indicate that they had also noticed the uncharacteristic change in appearance and is equally concerned.

If, as a consequence of appropriate **checking out**, it is then decided that a referral is not required at this stage, then NFCT's Nominated Manager will record the decision not to refer and the reasons for not making a referral. In this example, the situation should be monitored so that a referral can be made if the situation deteriorates. Everything in this example - including the outcome of monitoring and any further concerns coming to light - should be recorded.

Action to be taken in the event of a safeguarding issue being identified: Where it is considered that the concerns represent a safeguarding issue the NFCT's Nominated Manager will discuss the case with the relevant authorities who will help determine whether a crime may have been committed. NFCT's Nominated Manager, as well as any other NFCT's staff or volunteers who were involved in the raising of the concerns are to remain available as required to assist with any resulting investigation.

Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse continued...

Information required to make a referral: If a referral is made, then as a minimum the following information will be required:

- The name and address of the vulnerable adult and their current location
- The nature of the harm
- The need for medical attention if required
- The reasons for suspicions of abuse
- Any action already taken
- Any other information that may be useful to an investigation **e.g.** information related to the alleged perpetrator and their location and whether or not the vulnerable adult is aware of/and has agreed to the referral

All referrals must be made without delay to NFCT's Nominated Manager. However, the first priority must always be to ensure the immediate safety and protection of the vulnerable adult. In life threatening situations - such as severe physical abuse - then contact the relevant emergency services immediately.

Reviewed & Updated: May 2017

NFCT will review this Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse and good practice at least annually.

18. Procedure for Dealing with Allegations made against an Employee or Volunteer

Policy statement: NFCT accepts that where an allegation against a member of staff or a volunteer is made, this can prove a very difficult situation to deal with, particularly if the staff or volunteer who first hears of the allegation finds that the subject of the allegation is a close colleague or friend. Nevertheless, NFCT want to ensure that any allegations of abuse will be dealt with consistently - regardless of any relationships or loyalties. NFCT acknowledges that when responding to an allegation made against a member of staff or volunteer, the organisation has a dual responsibility. Firstly - and most importantly - NFCT has a responsibility to the vulnerable adult; and secondly, to the NFCT staff member or volunteer. The following procedure will run in conjunction with NFCT's **Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse**.

Allegation procedure to be followed: Where an allegation is made against an NFCT staff member or volunteer it will be NFCT's nominated manager who will be responsible for recording the details of the incident in full and passing it on to NFCT's Chief Executive. NFCT's Chief Executive will then follow the procedure outlined below:

1. Through NFCT's Nominated Manager, consultation will take place with the relevant authorities to ensure that any subsequent action taken in relation to the allegations does not prejudice any external investigation
2. Following step 1 being completed, NFCT's Chief Executive will inform the staff member or volunteer that an allegation has been made against them and provide the individual with an opportunity to respond to the allegation with the response to the allegation being recorded in full
3. Through NFCT's Nominated Manager, further consultation will take place with the relevant authorities to agree the most appropriate way forward
4. In all cases where allegations have been made against an NFCT staff member or volunteer, protective measures will be taken - which may include either suspending the individual or moving them to alternative duties.

Where suspension takes place it will always be a neutral act to allow the investigation to proceed and to remove the NFCT staff member or volunteer from the possibility of any further allegation. Suspension will always be for the shortest possible time and will be dealt sensitively. At all times NFCT's disciplinary procedure will be followed and NFCT will have due regard to any guidance provided by the relevant authorities.

Possible outcomes of investigation: As a result of the investigation, the allegation may or may not be substantiated. NFCT's considers that there are four possible outcomes to an investigation as outlined below:

- a. **Allegation substantiated - resulting in an individual being excluded from regulated activity:** On the basis that the investigation finds that the allegation is substantiated and that either harm or risk of harm to a vulnerable adult has occurred, then the individual will be removed from regulated activity. In these circumstances NFCT will then be under a statutory duty to refer the incident to the Disclosure and Barring Service (DBS). This referral to DBS will be triggered as soon as the investigation determines either harm or risk of harm has occurred - which could be at this at any stage during the disciplinary process and not necessarily when the process concludes.

If in the event of an allegation having been made against an NFCT staff member or volunteer the individual under investigation subsequently resigns or retires prior to the investigation process being complete, NFCT will always complete the investigation. Should the investigation conclude that harm, or risk of harm to a vulnerable adult has occurred, a DBS referral will still be made.

- b. **Allegation substantiated - resulting in an individual being reinstated to regulated activity:** In a situation where an investigation concludes that the allegation is substantiated, but the circumstances of the case are such that the individual can be reinstated to their role - subject to appropriate disciplinary sanctions then appropriate training/retraining will be undertaken and support and supervision arrangements will be put in place. If a NFCT staff member or volunteer is permitted to return to their post in the above circumstances, then a referral to the DBS will not be required.
- c. **Allegation unsubstantiated - however, ongoing concerns remain:** Where the investigation finds that the allegation is unsubstantiated and that the individual has not harmed, or placed at risk of harm, a vulnerable adult - but ongoing concerns about the conduct of NFCT's staff member or volunteer remains - then NFCT may conclude that the individual can be reinstated with additional support, supervision and training/retraining.
- d. **Allegation unsubstantiated - no ongoing concerns remain:** Should the investigation conclude that the allegation is unsubstantiated and therefore no individual has harmed, or placed at risk of harm, a vulnerable adult - then the staff member or volunteer will be reinstated and provided with appropriate support, training and supervision as necessary.

NFCT fully appreciates that where allegations against any of its staff members or volunteers are made this can be traumatic and unsettling time for the organisation as a whole. For this reason, NFCT's staff and volunteers should be reassured that any allegations made against them will be dealt with as outlined in this procedure and will always be consistently implemented with due regard to NFCT's disciplinary procedures outlined in the employee handbook and the volunteer's handbook. NFCT will always endeavour to handle any investigation into an allegation made against its staff members or volunteers sensitively from initiation to conclusion; whilst managing any anxieties expressed or demonstrated by any vulnerable adult, carer, family member, advocate or any other NFCT staff member or volunteer.

Procedure for Dealing with Allegations made against an Employee or Volunteer continued...

To ensure that all NFCT staff members and volunteers understand the procedure to be followed in the event of concerns or allegations being made NFCT will ensure that induction training thoroughly covers adult safeguarding during induction and through on-going training.

Should any staff member or volunteer of NFCT feel that a safeguarding issue is/has not been taken seriously - having followed the procedure outlined here - then they should invoke the whistle-blowing procedure which is detailed on the next page.

Reviewed & Updated: May 2017

NFCT will review this Procedure for Dealing with Allegations made against an Employee or Volunteer and good practice at least annually.

19. Whistleblowing Policy

Policy statement: Whistleblowing occurs when an NFCT staff member or volunteer raises a concern about misconduct, illegal or underhand practices by individuals and/or an organisation; and in as far as safeguarding goes - about the way care and support is being provided, such as practices that cause harm, or the risk of harm to others, or are abusive, discriminatory or exploitative. Officially this is called 'making a disclosure in the public interest'. NFCT understands that sometimes things go wrong. If they do, then we ask you to tell us.

This policy would also include situations where a staff member's or volunteer's concerns are not acted upon by in accordance with the **Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse** and/or the **Procedure for Dealing with Allegations made against an Employee or Volunteer** as outlined in this handbook.

- **Purpose:** The purpose of this Whistleblowing Policy is to make it clear that NFCT takes poor or malpractice seriously; and that NFCT staff members or volunteers can whistleblow without fear of victimisation, subsequent discrimination or disadvantage. This Whistleblowing Policy is therefore intended to encourage and enable everyone to raise serious concerns directly to NFCT, rather than overlooking a problem or seeking a resolution of the problem outside of the organisation.

All NFCT staff members and volunteers have a responsibility to maintain the highest standards of care towards everyone they come into contact with through their work with and for the organisation. This Whistleblowing Policy aims to ensure that serious concerns can be properly raised and addressed within the organisation and are recognised as a way of enabling the delivery of good practice - and which will help to ensure the protection of all adults.

- **Responsibilities:** NFCT believes that all staff members and volunteers are professional and skilful in the work and tasks they undertake. However, occasionally it may be that a staff member or volunteer has concerns about another person's conduct or standards of practice e.g. they may be worried that a vulnerable adult is not being cared for properly; is being abused; or even at serious risk. It could be that they have concerns about fraud; financial irregularity; or other issues they have become aware of within while working for NFCT. All NFCT staff members and volunteers have a responsibility to raise those concerns so that they can be resolved.

NFCT acknowledges that raising concerns can be an extremely difficult and courageous thing to do. Any NFCT staff member or volunteer who has good grounds on which to base their concerns - even if they do not have proof - will be listened to.

Please remember though, that it is not your responsibility to investigate the matter - this is NFCT's responsibility.

- **Procedure for raising concerns:** In most circumstances, staff members and volunteers wishing to raise their concerns, should ideally discuss the matter with their line manager. If this is not possible, perhaps because this person is thought to be involved or colluding in the suspected wrongdoing, another NFCT manager or NFCT's DSO or SSM should be contacted. The person that the staff member or volunteer raises their concerns to, will be responsible for ensuring the concerns are looked into or passed to the most appropriate person within NFCT - in line with the organisations Disclosures in the Public Interest Policy contained in the Employee Handbook .
- **Follow-up:** Depending on the nature of the concern raised, a response regarding the action taken will be supplied to the staff member or volunteer raising it as soon as possible. However, it is important to be aware that it might not always be appropriate to reveal the full extent of the investigation, where this relates to personal issues involving a third party.
- **Conclusion:** Once the organisation's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff or volunteers. If no action is to be taken, the reasons for this will be explained.
- **What to do if you're still concerned:** If, on conclusion of the above stages, the individual making the disclosure reasonably believe that appropriate action has not been taken, then they may then report the matter externally to the proper authority in accordance with the provisions of the Act. The Act sets out a number of prescribed external bodies or persons to which qualifying disclosures may be made and these can be accessed at:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

However, NFCT always encourages all employees and volunteers to raise concerns internally in the first instance, rather than externally. This enables issues to be dealt with promptly and speedily.

Whistleblowing Policy continued...

- **Never keep quiet about wrongdoing:** NFCT staff members or volunteers - who do not report bad practice or abuse, neglect or ill treatment of a child, young person or adult, or for that matter anything else illegal that they are suspicious about - may be seen as colluding with that unacceptable practice. Such collusion constitutes a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteers procedure (for volunteers) and could result in the termination of the working relationship - as well as the information being forwarded to the appropriate authorities.
- **False and/or malicious allegations:** No NFCT staff member or volunteer will ever be penalised for whistleblowing - even if it is not upheld - unless they made a false accusation which they knew was both untrue and made with malice. If it is found that a false accusation was knowingly made, this would be treated as gross misconduct in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteers procedure (for volunteers) and could result in the termination of the working relationship.

Reviewed & Updated: May 2017

NFCT will review this Whistle Blowing Policy and good practice at least annually.

20. Procedure for Assessing & Managing Risks in the Safeguarding of Vulnerable Adults

Policy statement: Assessing and managing risks to vulnerable adults is integral to NFCT's risk management strategy. Risks may relate to the working of the organisation; its provision of services; its delivery of individual activities; or its social guardianship responsibility.

Understanding what is meant by risk assessment: Assessment of risk is the process of examining what could possibly cause harm to vulnerable adults, staff members, volunteers or others - in the context of the activities and services NFCT provides; in the interactions with and between vulnerable adults; and with the wider community. **Risk of harm can be posed by actions and inactions in many different situations such as:**

- Intimidation and other threatening behaviours
- Behaviours resulting in injury, neglect, abuse, and exploitation by self or others
- The use of medication
- The misuse of drugs or alcohol
- Aggression and violence
- Suicide or self-harm
- A person's impairment or disability
- Accidents, for example, whilst out in the community or participating in a social event or activity

Individual risk: For the individual, the level of risk (which means the likelihood of an event occurring and the impact it might have) depends on numerous factors which includes the nature of the person concerned, their relationships with others, the choices open to them and the circumstances in which they find themselves.

Organisational risk: For NFCT, the level of risk will depend on the balance achieved between the right of a vulnerable adult to be safeguarded; the duty of care owed to the vulnerable adults served by NFCT; the duty of care owed by NFCT to its staff members and volunteers; the legal duties of statutory bodies and service providers; and the right of vulnerable adults to make informed lifestyle choices and take part in activities.

No endeavour or activity, or indeed interaction, is entirely risk free and even with good planning, it may be impossible to completely eliminate risks from any activity, service or interaction. However, NFCT believes that having in place good risk assessment and management practice is essential to reduce the likelihood and impact of identified risks. In some situations, living with a risk can be outweighed by the benefit of having a lifestyle that the individual really wants, values and freely chooses. In such circumstances, risk-taking can be considered to be a positive action.

Consequently, as well as considering the dangers associated with risk, the potential benefits of risk-taking have to be considered.

The purpose of assessing and managing risk: When NFCT assesses and manages risks, the aim is to minimise either the likelihood of risk or its potential impacts. In safeguarding terms, the aim of risk assessment and management is to prevent abuse occurring, to reduce the likelihood of it occurring and to minimise the impacts of abuse by responding effectively when it does occur. NFCT prioritises the time required to identify, evaluate and put in place risk-reducing measures.

Principles of working with risk: When NFCT undertakes risk assessments and risk management in relation to vulnerable adults it takes into account the following principles:

- The assessment and management of risk should promote the independence, real choices and social inclusion of vulnerable adults
- Risks change as circumstances change
- Risks can be minimised, but not eliminated
- Information relating to vulnerable adults, activities, relationships and circumstances will sometimes be incomplete and possibly inaccurate
- Identification of risk then carries a duty to do something about it **i.e.** risk management
- Involvement of vulnerable adults, their families, advocates and practitioners from a range of services and organisations helps to improve the quality of risk assessments and decision making
- Only decisions that have been based on clear reasoning will be defensible
- Risk-taking can involve everybody working together to achieve positive outcomes
- Whilst confidentiality is a right, it is not an absolute right in that it may need to be breached in exceptional **e.g.** in circumstances when people are deemed to be at serious risk of harm or it is in the public interest
- NFCT will ensure that staff members and volunteers understand the standards of practice expected of them to provide them with the confidence to support decisions to take risk
- Sensitivity will be shown to the experience of people affected by any risks that have been taken and where an event has occurred.

Procedure for Assessing & Managing Risks in the Safeguarding of Vulnerable Adults continued...

The risk assessment process: In assessing and managing any risk associated with the safeguarding of vulnerable adults, NFCT will follow the risk assessment methodology outlined below. NFCT's risk assessment process involves:

1. **Identification of the risk or risks**
2. **Determining the level of risk or risks - by evaluating its potential impact and the likelihood of it happening**

1. **Identification of the risk or risks:** This involves identifying in advance what risks may be associated with all of the activities undertaken by NFCT and the services that are provided.

Risks will always vary dependant on the individual concerned and the nature and extent of their vulnerability. When NFCT identifies risk it would always take a balanced approach which will involve looking at what is and what is not an acceptable risk. When identifying risks, NFCT will specifically focus on safeguarding risks **e.g.** by identifying the circumstances where abuse or exploitation are more likely to occur. **NFCT acknowledges that risk to vulnerable adults is known to be greater when:**

- The vulnerable adult is emotionally or socially isolated
- A pattern of violence exists or has existed in the past
- Drugs or alcohol are being misused
- Relationships are placed under stress

When care services are provided, NFCT accepts that abuse is more likely to occur if staff members and volunteers are:

- Inadequately trained
- Poorly supervised
- Lacking support or working in isolation.

In addition, to the known risk factors, a range of other factors may increase the likelihood of abuse:

- Where an illness causes unpredictable behaviour
- Where the person is experiencing communication difficulties
- Where the person concerned demands more than the carer can offer
- Where the family dynamics undergoes change in circumstances **e.g.** the sudden death of partner, unemployment, divorce
- Where a carer has been forced to change their lifestyle as a result of becoming a carer
- Where a carer experiences disturbed nights on a regular basis
- Where a carer becomes isolated and is offered no relief from a demanding role
- Where other relationships are unstable or placed under pressure whilst caring
- Where persistent financial problems exist
- Where a partner abuses drugs (especially alcohol), is unemployed or underemployed, is poorly educated or has been in a previous - perhaps turbulent - relationship with the victim
- Where a victim seeks to disclose abuse, get support and/or to leave an abusive relationship

The circumstances and factors listed above are neither exhaustive nor placed in order of priority.

2. **Determining the level of risk or risks:** NFCT will determine the level of risk - high, medium or low - associated with the risks identified for step 1 above. The purpose of determining the level of risk is to establish which risks warrant most attention. NFCT, as well as its staff members and volunteers, whilst being mindful of all risk, will be able to prioritise and give the greatest and most urgent attention to those risks that have been determined as high.

The level of risk will always be a combination of likelihood and resulting impact. For each risk identified, the risk will be rated according to the likelihood of it happening (**e.g.** from unlikely to likely) and the seriousness of the impact (**e.g.** from minor to major) if it were to happen.

An example of this approach could be that if NFCT was providing services to adults with epilepsy, it would be fair to assess the level of risk associated with an adult with severe epilepsy having a seizure as high - on the grounds that a seizure is 'likely to occur' and will have a 'major impact' if it does. Therefore, as a risk reducing measure, NFCT would want to ensure that it had sufficient numbers of staff available and trained in responding appropriately to seizures.

As another example, the abuse of a vulnerable adult would in all cases be considered as having a major impact on the adult involved. To reduce the likelihood of the risk of abuse occurring, NFCT would need to put in place a range of safeguarding measures with the aim of reducing the likelihood of abuse.

The matrix below is an illustration of what this approach to risk assessment looks like pictorially and maps 'likelihood' against 'impact' and results in an overall risk level of high, medium or low.

Procedure for Assessing & Managing Risks in the Safeguarding of Vulnerable Adults continued...

LIKELIHOOD of the identified risk	Determining the levels of risk		
Likely	Medium	Medium	High
Possible	Low	Medium	High
Unlikely	Low	Medium	High
	Minor	Moderate	Major
			
	IMPACT of the identified risk		

You will note that the level of risk - assessed as high, medium or low - is a combination of the likelihood of an identified risk occurring and the impact it would have if it did occur. So where a risk is:

- Likely to occur and of major impact - the level of risk is high
- Possible and of moderate impact - the level of risk is medium
- Unlikely and of minor impact - the level of risk is low

3. The management of risk: Having carried out the risk assessment using the two steps outlined above, the next step is to look at what can be done to reduce the likelihood of the risk occurring and - in the event of the risk event occurring - what steps could be taken to lessen the impact of those identified risks. Risks can be managed in a number of ways and it is the responsibility of NFCT - the risk owner - to ensure that each identified risk is properly managed. Risk ownership is an ongoing process for the lifetime of the identified risk. The risk owner in NFCT will ultimately be the organisation, but this will become the responsibility of a senior NFCT manager who will be named in NFCT's risk log.

NFCT works to establish a culture, which is mindful of and has a zero tolerance of abuse - wherever it occurs and whoever causes it. For NFCT, the primary aim of the organisations Safeguarding Policy is to manage the risk of abuse to vulnerable adults by establishing an organisational culture in which the rights of vulnerable adults are fully respected and by putting in place the range of policies and procedures that are contained within this handbook.

Therefore, NFCT's Safeguarding Policy has been designed to reduce both the likelihood and impact of abuse by:

- Preventing unsuitable people from joining NFCT through good recruitment and selection practice
- Making NFCT's staff members and volunteers aware of the indicators of vulnerability and risk and the possible signs of abuse - and equipping them to respond quickly to concerns about actual, alleged or suspected abuse
- Ensuring that NFCT's staff members and volunteers are properly inducted, trained, supported and supervised in their work with vulnerable adults
- Ensuring that NFCT's staff and volunteers know what constitutes acceptable behaviours and good practice and that they are supported when they challenge poor practice
- Promoting a culture of inclusion, transparency and openness throughout NFCT and its services and activities
- Making NFCT staff members and volunteers aware of how information about vulnerable adults should be handled
- Having in place good overall organisational management and practice supported by a range of NFCT policies and procedures

Risk management options: NFCT will manage identified risks in one of five ways – by avoiding the risk; controlling the risk; financing the risk; transferring the risk; or accepting the risk as described below:

a. Avoiding the risk: If NFCT feels that the level of risk cannot be satisfactorily reduced through other means, then it will make the decision not to engage in a particular activity or provide a particular service **e.g.** due to widespread travel disruption there is a high risk of an insufficient number of NFCT staff members or volunteers being present to safely supervise an activity for vulnerable adults with physical disabilities who require assistance to participate. As the risk of injury is considered too great in this example, the activity would be cancelled.

Procedure for Assessing & Managing Risks in the Safeguarding of Vulnerable Adults continued...

- b. Controlling the risk:** Controlling risk would involve NFCT implementing measures to both reduce the likelihood of a harmful event occurring and to minimise the impact of such an occurrence. This would be achieved by identifying the good practice policies that need to be adhered to and the NFCT staff members and volunteers undergoing the necessary training that would be required to reduce risk and harm **e.g.** if NFCT were providing an activity for an adult with severe epilepsy, then the organisation would ensure that there were suitably trained NFCT staff members and volunteers present at all times to deal with the situation should the adult at risk have a seizure. While the likelihood of a seizure happening may be high, the impact would be reduced by having in place sufficient numbers of NFCT staff members and volunteers who had been trained to deal with seizures.
- c. Financing the risk:** NFCT will provide sufficient resources to meet the liabilities caused by identified risks **e.g.** NFCT could risk losing its volunteers if some of them were out of pocket through their volunteering had to give up volunteering. By NFCT allocating a budget to cover volunteer expenses, the high impact of losing volunteers would have been mitigated by reducing the likelihood of it happening - as a consequence of financing the risk.
- d. Transferring the risk:** At times, when perhaps the only option appears to avoid a risk, NFCT may decide to have a qualified third party carry out a particular activity so that the risk is transferred to that third party **e.g.** If NFCT did not have adequately qualified NFCT staff members or volunteers to take a group of physically disabled adults canoeing it could choose to commission qualified instructors to do the activity instead. Risk of financial loss can be mitigated through insurance, indemnity or exemption from liability. However, NFCT will always be required to take reasonable steps to prevent and manage risk, because if there is a failure to do so, then NFCT may still be liable - even where insurance, indemnity or exemption from liability is in place.
- e. Accepting the risk:** This approach would be used when despite the risk, perhaps because no reasonable action can be taken to mitigate it, or the likelihood of the risk occurring and its impact are at an acceptable level, then NFCT would tolerate the risk. NFCT would only ever accept risks which had been assessed to be at a very low level - otherwise some other form of risk-reducing measure would have to be put into place before it could be accepted. The reason for this approach would be to have due regard to the positive outcomes for the vulnerable adult that may accrue from positive risk taking.

Risk log: NFCT operates a risk log to manage the organisations risk assessment responsibilities. By using a risk log NFCT can demonstrate that it specifically deals with safeguarding risks as part of its risk management. NFCT keeps under regular review all risks and risk-reducing measures by reviewing them no less than once every 12 months. Situations that would result in NFCT carrying out reviews more frequently would be in circumstances that there is any organisational process of change **e.g.** where NFCT merged with another organisation with different cultures or experience; or where NFCT took on a new activity or service.

Positive risk taking: NFCT does not want a culture which is totally risk averse as these can stifle and constrain opportunity and can lead to inappropriate restrictions being placed upon an individual's rights. Life is never risk free and an appropriate amount of risk is an essential part of fostering independence **e.g.** where an activity or set of circumstances is identified as potentially risky to a vulnerable adult or group of vulnerable adults, this risk will always be offset in the risk management process against the benefits which the individual or group might draw from taking part in that activity. NFCT will pursue risk taking in a context of promoting opportunities and safety - not poor practice. Therefore, NFCT will foster a culture of positive risk-taking and seek to involve everyone affected in the assessment of risk taking, such as vulnerable adults and carers, advocates, NFCT staff members and volunteers and - where they are involved - health and social care staff.

Reviewed & Updated: May 2017

NFCT will review this Procedure for Assessing & Managing Risks in the Safeguarding of Vulnerable Adults and good practice at least annually.

21. Procedure for Reporting, Recording & Reviewing Accidents, Incidents & Near Misses

Policy statement: NFCT believes that there are lessons to be learned from accidents, incidents or near misses - which may occur despite the most robust risk assessment and risk management process being in place. As a consequence of NFCT having this policy, there is a defined procedure in place for reporting and recording any accidents, incidents and/or near misses that may occur. All NFCT staff members and volunteers will be made aware of this procedure during induction and through regular refresher training after that.

Opportunity to learn: NFCT knows that accidents, incidents and near misses - particularly those which are recurring - can be indicators of organisational risk (including a risk to safeguarding) which needs to be managed. Therefore, NFCT's risk assessment documentation and process makes reference to reported accidents, incidents and near misses. NFCT will ensure that the learnings that come from reporting, recording and reviewing accidents, incidents and near misses are:

- a. Identified and disseminated to NFCT staff members and volunteers
- b. Used to inform changes in NFCT practice, policy and procedures

Where an accident, incident or near miss is in some way connected to a safeguarding matter, it will immediately be drawn to the attention of NFCT's Nominated Manager for appropriate action.

Please use the Accident/Incident/Near Miss Report Form which is available from NFCT's Designated Safeguarding Officer.

Reviewed & Updated: May 2017

NFCT will review this Procedure for Reporting, Recording & Reviewing Accidents, Incidents & Near Misses and good practice at least annually.

22. Principles for Receiving Comments & Suggestions to Deal with Concerns & Complaints

Policy statement: NFCT fosters a culture of inclusion, transparency and openness as this will support demonstrating that it has nothing to hide in terms of its practice. Therefore, NFCT is open to feedback from vulnerable adults, carers and advocates - as well as NFCT staff members and volunteers - as this will assist the organisation in improving how it carries out its activities and delivers its services. NFCT, as an organisation which treats vulnerable adults with dignity and respect - is committed to safeguarding them from harm and will seek to encourage and enable them to take an active role in planning and decision-making in all ways that are appropriate. **NFCT will seek to achieve this policy through:**

1. A commitment to a listening environment within the organisation.
2. The inviting of suggestions to give everyone an opportunity to make suggestions about how things could be improved.
3. An opportunity for vulnerable adults and NFFCitC staff members and volunteers to discuss matters affecting their interests.
4. Maintaining a record of matters and suggestions made by vulnerable adults and their representatives - and the actions taken.
5. Involvement of vulnerable adults on interview panels where appropriate.
6. Providing regular feedback on actions taken and developments within NFFCitC.

How NFCT will involve carers and advocates of vulnerable adults: NFCT realises that carers and advocates have a wealth of knowledge about the emotional, physical and cultural needs of vulnerable adults for whom they care for, or work with. NFCT therefore believes that it is important to establish and maintain contact with the carers and advocates of vulnerable adults who are involved with the organisation. This will be achieved through the involvement of carers and advocates making representations to management committees and/or their participation in services or activities provided by NFCT for vulnerable adults. Such involvement will also be an important source of reassurance and support for carers.

How NFCT will involve staff members and volunteers working with vulnerable adults: As far as NFCT staff members and volunteers are concerned, supervision and support will enable line managers to gain valuable insights and learn lessons to ensure that the organisation is operating effectively.

In addition to the above processes, NFCT will seek and encourage feedback from satisfaction surveys that staff members and volunteers, carers, advocates and vulnerable adults can complete anonymously.

How carers and advocates of vulnerable adults can raise concerns or complaints: NFCT encourages all carers and advocates of vulnerable adults - who have a concern or complaint about some aspect of the organisation - to use NFCT's complaints procedure. **NFCT's complaints procedure provides the following:**

- A fair and clear process to raise concerns or complaints
- A named first point of contact - as well as a named alternative - should the first point of contact be unavailable, or is the subject of the complaint
- An appeals process in cases where a complaint cannot be resolved at the first stage
- Who within NFCT has the final decision in relation to a concern or complaint
- Realistic time limits for each stage of the complaints procedure to ensure matters are dealt with promptly

Procedure principles: Everyone involved in a complaint (complainant and the subject/s of the complaint) will be provided with the opportunity to represent their side of the case. In the case of a complaint from a vulnerable adult, representation can include input from a carer or an advocate. In the case of a complaint made by a carer, representation can include input from a friend or family member. Where the complaint is regarding a staff member or volunteer of NFCT - or about a family member or carer acting inappropriately - the person dealing with the complaint will ensure that there is absolute clarity regarding:

- The particular incident of concern and whether there have been any previous incidents
- Any remedial action to be taken **e.g.** an apology and any new behaviour expected
- What will happen if the agreed arrangements are not adhered to

NFCT's procedure will ensure that records of discussions - and any information shared at each stage of the complaints procedure - will be made clearly, accurately, kept confidentially and stored in a secure location.

Where a complaint is in relation to a particularly serious incident e.g. where abuse or exploitation is suspected, then the reporting procedure detailed in this handbook takes precedence over this complaints procedure.

Reviewed & Updated: May 2017

NFCT will review this Principles for Receiving Comments & Suggestions to Deal with Concerns & Complaints and good practice at least annually.

23. Complaints Policy

NFCT recognises that everyone who uses our services, activities and/or facilities has the right to a high standard of service and a right to complain if they are not happy with any aspect of what we do. Learning from complaints helps us to improve the service we provide. The purpose of this policy and procedure is to:

- a. Help us to provide a service of the highest standard to all those who come to NFCT
- b. Help us to ensure that everyone that uses - or wishes to use - our services know they have a right to complain about our service if they need to
- c. Help us to deal with complaints in a positive way and use them to improve our service
- d. Set out the issues that could be covered under this procedure
- e. Set out the steps everyone should take if they wish to make a complaint
- f. Set out how NFCT will deal with complaints in a fair and consistent way

This policy and procedure applies to all vulnerable adults and families, as well as carer and advocates -attending or wishing make use of NFCT's services.

It is not intended to be used by NFCT's staff members or volunteers who are unhappy about their own experience in the workplace. In these circumstances, staff members should use the Grievance Procedure found in section four of the Employee Handbook and volunteers should use the Complaints Procedure for Volunteers found in the Volunteers Handbook.

It is also not intended to cover concerns that staff members or volunteers may have about issues of possible malpractice or wrongdoing in the workplace. These should be dealt with under the Whistle Blowing Procedure found in this handbook.

If anyone, whether an NFCT staff member, volunteer, vulnerable adult, family member, carer or advocate is concerned that a vulnerable adult may be at risk of harm, they should use the relevant procedures contained within this Vulnerable Adults Safeguarding Handbook rather than this complaints policy and procedure.

NFCT will seek to deal with complaints by:

- Defining clearly what is mean by a complaint
- Setting out a procedure that can be easily followed and understood
- Making sure that everyone knows about this policy and procedure
- Producing vulnerable adult friendly material explaining this policy and procedure
- Reassuring people that they will not be penalised in any way for using the complaints procedure and that NFCT will respond positively to any complaints made in good faith
- Offering extra support to those who need help to make a complaint
- Taking a staged approach to complaints that takes account of the level of seriousness and the possibility of resolution at different points
- Investigating each complaint as objectively and fully as we reasonably can
- Keeping the complainant informed during the course of the investigation and of the outcome of their complaint
- Keeping clear records of complaints and of how they are resolved

Reviewed & Updated: May 2017

NFCT will review this Complaints Procedure and good practice at least annually.

24. Complaints Procedure

Definition of a complaint: A complaint is a statement from someone that they are not happy about the service provided to them by NFCT and would like this to be improved. **The complaint might be about:**

- a. The behaviour of an NFCT staff member or volunteer. If this relates to allegations that someone may have harmed a vulnerable adult - or be at risk of doing so – the relevant policy in this handbook should be used instead
- b. The behaviour of adults in the group – although please note the comment in point one above
- c. The level of service received
- d. The type of service received
- e. Being refused a service altogether
- f. The building or facilities
- g. Written information
- h. Service received over the telephone **e.g.** not being able to get through or being kept waiting
- i. A vulnerable adult, family member, carer or advocate feeling that they have been treated unfairly, or in a way that is discriminatory
- j. A specific activity or outing
- k. Anything else related to the service provided by NFCT

Procedure for making a complaint:

1. If possible, the person should discuss the complaint with NFCT's Nominated Manager. If this is not possible - for example the complainant does not feel comfortable speaking to NFCT's Nominated Manager because the relationship is too difficult - the discussion should be with the another NFCT manager.
2. NFCT's Nominated Manager or alternative NFCT manager will, in the first instance, try to resolve the matter informally. This is often possible and can mean that the problem is sorted out simply and more quickly.
3. If an informal solution has been tried before and has not worked, or if the complainant does not feel that informal discussions are adequate or likely to be effective, stage one of the complaints procedure should be followed.

Stage One of Formal Complaints Procedure

4. The complainant should put their concerns in writing to NFCT's Nominated Manager or, if the Nominated Manager is the subject of the complaint, to the Nominated Manager's line manager. If they need help to do this, and a family member is not able to offer this support, help should be provided by NFCT's Nominated Manager, or, if the Nominated Manager is the subject of the complaint, by another member of NFCT staff identified by the Nominated Manager's line manager.
5. NFCT's Nominated Manager will acknowledge the complaint **within two working days** by sending a brief letter to:
 - Thank the complainant for getting in touch & express regret that a complaint has been necessary
 - Assure them that the matter will be investigated
 - Set a provisional timescale for the investigation that is achievable, but avoids delay as much as possible
 - Explain when they will next be in contact
 - Offer a contact name - usually this will be NFCT's Nominated Manager or another senior manager - in case the complainant has any questions in the meantime
 - Make any temporary arrangements that may be necessary pending the outcome of the investigation into the complaint
6. Normally the service to the complainant should continue as normal during the investigation into the complaint. If this is not possible **e.g.** because an individual has had to be excluded from an activity, or because the complainant does not want to use the service at that point, or because it would not be appropriate for the NFCT staff members or volunteers to continue working with the vulnerable adult - then this should be acknowledged and temporary alternative arrangements made, if possible.
7. If the complaint is about a specific NFCT staff member, volunteer or other vulnerable adult, then that person (and the parent/carers/advocate where applicable) should be informed **within two working days** - or as soon as possible - that a complaint has been made against them and the nature of the complaint. However, the person should not be informed if doing so would compromise anyone's safety or a police investigation.
8. NFCT's Nominated Manager should normally be responsible for investigating a stage one complaint. The Nominated Manager should plan the investigation according to the nature of the complaint, taking into account any witnesses or specialist opinion that should be sought.

As a minimum, the complainant (and parent/carers/advocate if the complainant is a vulnerable adult) should be interviewed. Any person who might be the subject of the complaint should also be interviewed, provided that doing so would not compromise anyone's safety or a police investigation.

9. If the complaint is about a building, facilities or equipment, then this should be examined.
10. If the complaint is about access to a service, the reasoning behind a decision to offer or not offer a particular service should be examined.

Complaints Procedure continued...

11. If, at any point during the investigation, it appears that a criminal offence may have been committed, the matter should be reported to the police. Discussions should be held with the police about whether the investigation into the complaint can continue alongside their own enquiries.
12. If it emerges at any point that a vulnerable adult may have been caused significant harm or may be at risk of significant harm, vulnerable adult safeguarding procedures should be instigated **immediately**.
13. NFCT's Nominated Manager should make notes of the investigation, including notes of any meetings that take place, and should write a report based on their findings. The report should state clearly whether the complaint is upheld or not, and should make recommendations about how the matter can be taken forward. The report should be shared with both the complainant and any specific member of NFCT staff member, volunteer or other person, who may be involved. Any comments that either party may wish to make about the extent to which they accept or reject the findings of the report should be noted.
14. Once a way forward has been agreed, this should be reviewed regularly.
15. If either the complainant - or a person who is the subject of the complaint - is not prepared to accept the findings of the report, they should confirm this in writing. The matter then becomes a stage two complaint.
16. A complaint also progresses to stage two if it has previously been handled within the last 12 months as a stage one complaint, but has re-surfaced.

Stage Two of Formal Complaints Procedure

17. A stage two complaint may come about for one of two reasons. It may be a complaint that has escalated from stage one because the complainant or a person who was the subject of the complaint wishes to challenge the findings from a stage one investigation. Alternatively, it may relate to matters that were investigated as a stage one complaint within the previous 12 months and have resurfaced.
18. Stage two complaints should be investigated either by a manager senior to NFCT's Nominated Manager who was investigating at stage one. Alternatively, it can be investigated by a completely independent person who is not an employee or acting as a volunteer for NFCT and who should be nominated by the Chief Executive of NFCT. The investigation should be commissioned by the Chief Executive and the findings reported back to them.
19. If a complaint is to progress to stage two, the complainant - this could be the original complainant or a person who was the subject of the original complaint - should again indicate in writing that they wish to complain (or complain further) and should state the reason for this.
20. The written statement should be presented to the Chief Executive, who should then, within two working days, respond in writing to the complainant in the same way as indicated in the stage one procedures. In addition, the Chief Executive should provide the complainant with the name of the person who will investigate the stage two complaint.
21. The procedure for the investigation and sharing of the report should be similar to that outlined in the stage one procedure.
22. Stage two is the final stage of the complaints procedure. If any party wishes to complain further following the completion of stage two, this should be taken up with an external party **e.g.** local councillor, MP or an appropriate statutory authority.

Keeping a record of the complaint: Regardless of whether a complaint is dealt with formally or informally, accurate notes should be made by NFCT's Nominated Manager or the person conducting the investigation of each stage of the process, including records of meetings. Copies of the final report should be given to the person making the complaint and to anyone who may be the subject of the complaint. If the complaint leads to any disciplinary action or a referral to a statutory authority, copies of the notes made during the investigation and the report of the investigation (together with any notes relating to the outcome) should be kept confidentially on the file of any person who is the subject of the complaint.

Anonymous summary notes of any complaint should also be kept on the complaints file with a reference number. This will assist NFCT in the process of monitoring and learning from complaints.

Reviewed & Updated: May 2017

NFCT will review this Complaints Procedure and good practice at least annually.

25. Principles of Recording & Storing Information

Policy statement: NFCT understands the importance of recording and storing information that meets the requirements of the Data Protection Act 1998. To this end, NFCT will ensure that all records relating to its work with vulnerable adults adhere to the following principles:

- While NFCT is required to have a record kept of each contact with a vulnerable adult, that record will always be proportionate to the type of activity/service the vulnerable adult is accessing.
- NFCT will ensure that records clearly distinguish between fact and opinion.
- NFCT will ensure that personal information outside of the an individual's name will always be kept separate from information about relating to other people.
- NFCT will ensure that staff and volunteers sign and date any records that they make.
- NFCT sets time limits in which records must be completed (as soon as possible after contact) and trains staff and volunteers to follow those time limits.
- Through the wide communication its Vulnerable Adults Safeguarding Policies and Procedures, NFCT make vulnerable adults and their parents/carers/advocates aware that it keeps records - and the purpose and use of those records.
- Through the implementation of its Data Protection Policy & Procedure, NFCT permits access by vulnerable adults and parents/carers/advocates to records made and kept by the organisation - unless such access would be contrary to a vulnerable adult's best interests.
- NFCT will ensure that all hard copies of records and any portable electronic equipment that holds or provides access to personal information will be stored securely in a locked cabinet at the offices of NFCT. Where an NFCT staff member does not have an office base, then NFCT's Designated Safeguarding Officer will ensure that any such records are stored at home in equally secure conditions.
- NFCT will ensure that unauthorised access to electronically stored personal and sensitive information is prevented by the use of appropriate security measures - including the use of user names, passwords and appropriate encryption of files.
- NFCT will ensure that during any activities, NFCT staff and volunteers will have ready access to the emergency contact details for a vulnerable adult.
- NFCT will induct and train staff and volunteers to record and place on file any concerns that a vulnerable adult may be in need, or at risk of abuse. Details of how the concerns have been dealt with will also be recorded.
- NFCT will ensure that where a referral is made to a statutory agency relating to concerns for a vulnerable adult (as covered by the relevant policy/procedures in this Handbook) this will be confirmed in writing within 48 hours and a copy placed on the vulnerable adult's file.
- NFCT has a clear policy relating to the retaining and destruction of records.
- All NFCT staff and volunteers are inducted, trained and re-trained to ensure they are able to implement and follow the organisation's policies and procedures relating to the recording and storage of information. Support is provided by NFCT's Designated Safeguarding Officer to assist staff and volunteers to meet these expectations.

Reviewed & Updated: May 2017

NFCT will review this Principles of Recording & Storing Information and good practice at least annually.

26. Confidentiality Policy

Policy statement: NFCT believe that the safety, wellbeing and protection of all vulnerable adults - who use our services and facilities - is of the utmost importance in all decisions relating to confidentiality of information. Therefore, the appropriate sharing of information between NFCT staff and volunteers is essential for ensuring vulnerable adult safety, wellbeing and protection. Trust is an essential element of vulnerable adult protection at NFCT, as it enables everyone (staff, volunteers, vulnerable adults and their parents/carers/advocates) to seek advice and support - both inside and outside of the organisation.

NFCT's **Confidentiality Policy** is designed to establish the boundaries of confidentiality to enable everyone to feel safe and comfortable in discussing personal issues and concerns. This policy aims to be easily understood by everyone and to establish trust in the boundaries of confidentiality that NFCT will adhere to.

- **Aims of NFCT's Confidentiality Policy:** What must be acknowledged and understood is that NFCT cannot offer absolute confidentiality in certain prescribed circumstances. Therefore, this **Confidentiality Policy** aims to make clear the situations when information will need to be shared, so that everyone can make informed decisions about who the most appropriate person to speak to - about a particular issue - is.
- **Policy development:** This **Confidentiality Policy** has been developed - and will continue to be so - through consultation with NFCT staff, volunteers and partner agencies as appropriate. All staff, volunteers, vulnerable adults and parents/carers/advocates are informed of this policy through the wide circulation of NFCT's Vulnerable Adults Safeguarding Handbook and forms the basis of every new starters induction.
- **Definition of confidentiality:** This is defined as "that state of keeping secret or private, something which is spoken or provided in some other form privately".
 - **Example:** In practice this could be a vulnerable adult asking for their conversation with an NFCT staff member to be kept private. If an NFCT staff member was to offer absolute confidentiality to a vulnerable adult, they would in effect be offering to keep the content of the conversation completely secret and that they would discuss it with no-one.

As may be obvious from the above example, there are actually very few situations where NFCT should ever be offering absolute confidentiality. The challenge is always to strike a balance between ensuring the safety, wellbeing and protection of all vulnerable adults; furthering NFCT's ethos of trust; and at the same time ensuring that essential personal information is shared to further vulnerable adult protection and good practice.

- **Limited confidentiality:** The reality is, that in most cases, what NFCT can actually offer is limited confidentiality. This means that the content of a conversation might well be discussed with other professionals, but in general this would not identify the person who had made the disclosure.

Therefore, NFCT staff and volunteers should always make it clear at the outset of a conversation that there are limits to confidentiality. It should be reinforced that these limits are in place to ensure vulnerable adults safety and wellbeing. NFCT will always ensure that a vulnerable adult will be informed when a confidence has to be broken for this reason and they will be involved in the information sharing.

As already stated, the safety, wellbeing and protection of vulnerable adults is the paramount consideration in all decisions that NFCT staff and volunteers make about confidentiality. However, NFCT staff and volunteers are **not** obliged to break confidentiality, other than in circumstances where vulnerable adult protection is - or may be - an issue. Notwithstanding this, NFCT firmly believes that it is vitally important that all NFCT staff and volunteers are able to share their concerns about relating to a vulnerable adult's safety and wellbeing.

- **Safeguarding training of staff and volunteers:** All NFCT staff and volunteers undergo full safeguarding training and regular refresher safeguarding training and as such are expected to be able to use their professional judgement when considering and advising a vulnerable adult about making a disclosure in confidence - and whether such a confidence could then be maintained having heard the information. When an NFCT staff member or volunteer is exercising their professional judgement they must always consider the best interests of the vulnerable adult - including the need to both ensure trust to provide safeguards for vulnerable adults - and possible vulnerable adult protection issues.

Paramount in all cases of disclosure, is that NFCT staff and volunteers must at all times follow the organisation's Vulnerable Adults Safeguarding Policies and Procedures detailed throughout this Handbook.

All staff, volunteers, vulnerable adults, parents/carers/advocates, as well as any other concerned individual can at all times speak with NFCT's Designated Safeguarding Officer. Any conversation with NFCT's Designated Safeguarding Officer will be confidential - other than as defined within this Handbook.

Confidentiality Policy continued...

Whenever there arises doubt as to whether information should be shared, NFCT will seek guidance and advice from the Local Safeguarding Adults Board.

- **Support of NFCT staff and volunteers:** Staff and volunteers are encouraged to seek the support of NFCT's Designated Safeguarding Officer if they have any support needs in dealing with personal issues disclosed by a vulnerable adult. This is important because NFCT would rather staff and volunteers asked for help than possibly make a poor decision because they don't have all the facts, or the necessary training, or end up taking worries about a vulnerable adult home with them.

Reviewed & Updated: May 2017

NFCT will review this Confidentiality Policy and good practice at least annually.

27. Data Protection Policy

Policy statement: NFCT expects the utmost confidentiality of all records relating to its safeguarding work with vulnerable adults. NFCT's staff members and volunteers will come into contact with personal and sensitive details about the lives of the vulnerable adults with whom they will work. None of this information - or information about a vulnerable adult's parents/carers/advocates - should ever be the subject of gossip, or be passed on to anyone else without good cause or reason. Great care should be taken to ensure that when cases do have to be discussed with colleagues, that the details cannot be overheard by anyone else. For the avoidance of doubt, information of a confidential nature should only be communicated on a need-to-know basis and - in most circumstances - with the consent of the vulnerable adult and/or their parents/carers/advocates.

However, not-with-standing the above, NFCT staff members and volunteers should always be clear that in circumstances where there are concerns about an individual's safety and welfare - or the safety of others - they will always be required to pass on information that may have been received in confidence. In these circumstances, any information should be passed NFCT's Designated Safeguarding Officer.

NFCT's Data Protection Policy: The under-pinning principles of NFCT's responsibility in relation to the gathering, storage, usage and sharing of personal information is in line with the requirements of the Data Protection Act 1998.

Introduction: In the course of a staff members or volunteers work with NFCT, they will come into contact with, or use, confidential information relating to vulnerable adults. The Data Protection Act 1998 (the Act) contains principles affecting vulnerable adults information and personal records. Information protected by the Act includes not only personal data held on computer, but also certain manual records containing personal data e.g. vulnerable adults information files that form part of a structured filing system. The purpose of these rules is to ensure that no NFCT staff member or volunteer breaches the Act. If a staff member or volunteer is in any doubt about what can or cannot be disclosed and to whom, then the default position is not to disclose any personal information until advice has been provided by NFCT's Data Protection Officer.

Under the Act, all NFCT staff members and volunteers are personally accountable for their actions and can be held criminally liable if they knowingly, or recklessly, breach it. Any serious breach of data protection legislation will also be regarded as misconduct and will be dealt with under the Company's disciplinary procedures. Any access of a vulnerable adults and young people's records - without authority - constitutes a gross misconduct offence and could lead to summary dismissal or termination of a volunteering agreement.

The data protection principles: There are eight data protection principles that are central to the Act. NFCT and all its staff members and volunteers must comply with these principles at all times in its information-handling practices. **In brief, the principles say that personal data must be:**

1. **Processed fairly and lawfully and must not be processed unless certain conditions are met in relation to personal data - and additional conditions are met in relation to sensitive personal data.** The conditions are either that the individual has given consent to the processing, or the processing is necessary for the various purposes set out in the Act.
2. **Obtained only for one or more specified and lawful purposes, and not processed in a manner incompatible with those purposes.**
3. **Adequate, relevant and not excessive.** NFCT will only collect essential personal details of vulnerable adults for whom it provides services or activities to. **Essential joining information will include:**
 - The name, address and contact number of all vulnerable adults - and where appropriate their carers, advocates or next of kin
 - Any medical and health issues or particular requirements
 - Contact with other professionals or agencies, if any.

NFCT will also keep records which reflect the vulnerable adult's ongoing engagement with the organisation. This will include records on attendance, activities participated in and any incidents, accidents and/or near misses that occur.

4. **Accurate and kept up-to-date.** Where personal information relating to a vulnerable adult changes, NFCT will need to be informed promptly by so that appropriate records can be updated. NFCT cannot be held responsible for any errors unless they organisation has been notified of the relevant change.
5. **Not kept for longer than is necessary:** NFCT will dispose of vulnerable adults information within the timescales that are in keeping with the requirements of the Data Protection Act.
6. **Processed in accordance with the rights of vulnerable adults under the Act.** The uses that NFCT anticipates that collected personal data will be used for can include such things as:
 - To better manage, plan and improve the services and/or activities provided
 - To help train and teach NFCT staff members and volunteers
 - To help with research, but only with the vulnerable adult's agreement
 - To provide statistics about NFCT services and activities delivered by the organisation - whilst ensuring that personal information will not be disclosed or used in this way and will never be shared with anyone, other than in the circumstances set out below

Data Protection Policy continued...

7. **Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data:** All written records will be stored in a secure location and accessed by authorised personnel only. Electronic records held on computers will also be appropriately secured by way of password protection and restricted access.
8. **Not transferred to a country or territory outside the European Economic Area unless that country ensures an adequate level of protection for the processing of personal data.**

NFCT's staff members and volunteer's obligations in relation to personal information: Any staff member or volunteer - who as part of their job duties and responsibilities - are required to collect personal information about vulnerable adults, must comply with this policy. This includes ensuring the information is processed in accordance with the Act; is only processed for the purposes for which it is held; is kept secure; and is not kept for longer than necessary. **The following guidelines must be complied with at all times:**

All NFCT staff members and volunteers must:

- Never disclose confidential personal information to anyone except the data subject or to a person authorised by the data subject. In particular, unless the data subject has given their explicit prior written consent, personal information should not be:
 - a) Given to someone from the same family
 - b) Passed to any other unauthorised third party
 - c) Placed on the Company's website
 - d) Posted on the Internet in any form
- Be aware that those seeking information sometimes use deception in order to gain access to it. Always verify the identity of the data subject and the legitimacy of the request, particularly before releasing personal information by telephone
- Where NFCT provides staff members and volunteers with code words or passwords to be used before releasing personal information **e.g.** by telephone, always strictly follow the Company's requirements in this regard
- Only transmit personal information between locations by fax or e-mail if a secure network is in place **e.g.** a confidential fax machine or encryption is used for e-mail
- Forward all requests for personal information about a vulnerable adult to NFCT's Data Protection Officer without delay
- Keep all personal data securely, either in a locked filing cabinet or, if computerised, by it being password protected so that it is protected from unintended destruction or change and is not seen by unauthorised persons
- Not access any vulnerable adult's records without authority as this will be treated as gross misconduct and it is a criminal offence
- Never write down (in electronic or hard copy form) opinions or facts concerning a data subject which it would be inappropriate to share with that data subject
- Never remove personal information from the workplace with the intention of processing it elsewhere, unless this is necessary to enable you to carry out your job duties and has been prior authorised by an NFCT line manager
- Ensure that, when working on personal information as part of designated job duties when away from NFCT's workplace - and with the prior authorisation of a line manager – the terms of this policy and the Act continue to be observed at all times, particularly in matters of data security
- Ensure that hard copy personal information is disposed of securely **e.g.** by cross-shredding
- Remember that compliance with the Act is each individual's personal responsibility. If staff members or volunteers ever have any questions or concerns about the interpretation of these rules, they should immediately contact NFCT's Data Protection Officer.

Reviewed & Updated: May 2017

NFCT will review this Data Protection Policy and good practice at least annually.

28. Sharing of Information Policy

Policy statement: When reaching a decision about the sharing of personal information the following three core ethical principles will be upheld:

1. All individuals have a fundamental right to the confidentiality and privacy of information related to their health and social care
2. All individuals have a right to control access to and the disclosure of their own health and social care information by giving, withholding or withdrawing consent
3. For any disclosure of confidential information, those involved should always have regard to its necessity, proportionality and any risks attached to it

NFCT's policy relating to the sharing of information and working with other organisations will be underpinned by the following seven golden rules of information sharing:

1. The **Data Protection Act 1998** is not a barrier to sharing information, but provides a framework to ensure that personal information about living persons is shared appropriately.
2. NFCT will always be open and honest with the vulnerable adult - and/or their parents/carers/advocates where appropriate - from the outset about why, what, how and with whom information will (or could be shared) and seek their agreement to share, unless doing so would be either unsafe and/or inappropriate.
3. NFCT will seek advice from appropriate sources if there is ever any doubt about sharing information - and will do so without disclosing the identity of the person, where possible.
4. NFCT's objective is to always share with consent where appropriate and, whenever possible, respect the wishes of those who do not consent to share confidential information.

Please note: NFCT will still share information without consent (and in line with NFCT's Confidentiality Policy) when in NFCT's Designated Safeguarding Officer's professional judgement, that lack of consent can be overridden in the public interest. Professional judgement will always be based upon the facts of the case.

5. NFCT will always base information sharing decisions on considerations of the safety and well-being of the person concerned and any others who may be affected by that decision.
6. In line with data protection principles, NFCT will only share information that is necessary, proportionate, relevant, accurate, timely and secure. This means that any information shared by NFCT is necessary for the purpose for which it is being shared; only shared with those people who need to have it; that shared information is accurate and up-to-date; shared in a timely fashion; and is always shared securely.
7. When a decision is made about sharing information, NFCT will ensure that a record is kept of the decision and the reasons for it - whether the decision was to share information or not. When the decision is to share information the record will detail what has been shared; with whom; and for what purpose.

When sharing confidential information and other appropriate management records, NFCT will adhere to the following standards and procedures:

- **Sharing confidential information within the organisation:** Information will be shared within NFCT on a need to know basis only. NFCT line managers will have access to information to check that records are being made and maintained appropriately and to enable them to identify patterns of behaviour emerging from incident reporting.
- **Sharing confidential information with vulnerable adults, parents/carers/advocates:** Vulnerable adults - as well as their parents, carers and advocates - will always be told how information will be used before they are asked to provide it and will be given an opportunity to discuss such uses. Explanations of how information will be used will always be communicated in a way which is clearly understood - and alternative means of communication will be used where necessary.

When a vulnerable adult's information needs to be shared **e.g.** in the case of an emergency, or of suspected abuse, the vulnerable adult and/or their parents/carers/advocates will be told what information was shared as soon as possible, whilst ensuring that this does not expose the vulnerable adult to further risk of harm.

- **Sharing confidential information with external agencies:** While information about vulnerable adults is confidential, it may need to be disclosed to external agencies to ensure the care and safety of an individual, or of others, or where a crime is suspected. Vulnerable adults, in normal circumstances, can expect to see any information held by NFCT about them - and NFCT will take steps to inform them of this right to access their information. This right will apply to both paper and electronic records - and will include access to any care records - unless any of the reasons for limiting access set out below apply.

Access will be provided, if requested, to the vulnerable adult and, with their consent to another person acting on their behalf. NFCT will, where it is possible and reasonable, require all such requests to access records to be made in writing. Regardless of how a request is received NFCT will maintain records of all requests received and their outcomes.

Sharing of Information Policy continued...

- **Limited access:** Where a request to access of a vulnerable adult's records has to be limited, this decision will always be recorded.

Circumstances in which limited access may be applied could include where any part of a record contains confidential information about other people; or information was provided by another person or agency - such as doctor or other professional - and their permission has not been obtained.

There may also be a requirement to limit access to information in circumstances where a care professional thinks access would cause serious harm to the vulnerable adult's, or someone else's physical or mental well-being.

Sharing information following allegations of abuse: In the first instance, any such allegation against an NFCT employee or volunteer will be reported immediately to NFCT's Designated Safeguarding Officer. NFCT's Designated Safeguarding Officer will immediately make NFCT's Chief Executive aware of the allegation; and the Chief Executive will then be responsible for notifying the named Board Safeguarding Lead and the Senior Safeguarding Manager - if different from the Chief Executive.

- **Local authority's designated officer reporting time limits:** NFCT's Designated Safeguarding Officer is accountable for contacting the Local Safeguarding Adults Board and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**
- **EFL & The FA reporting time limits:** NFCT's Designated Safeguarding Officer is accountable for contacting the EFL Trust's Designated Safeguarding Officer and The FA Case Management Team as soon as possible after the allegations have been made - but in any event **within 72 hours of the allegations being made.**
- **DBS Referral reporting time limits:** Where any NFCT employee or volunteer - working in regulated activity - is suspended from their duties as a consequence of concerns, allegations and/or internal investigations related to their work with vulnerable adults, then NFCT's Designated Safeguarding Officer will notify EFL Trust's Designated Safeguarding Officer and The FA Case Management Team as soon as possible after the suspension takes place - but in any event **within 72 hours of the suspension happening.**

As a provider of Regulated Activity, NFCT has a legal duty to make a referral to DBS in certain circumstances. NFCT's Designated Safeguarding Officer - supported by NFCT's Senior Safeguarding Manager - will seek support from the EFL Trust's Child Protection Advisor, when a DBS referral needs to be made.

Reviewed & Updated: May 2017

NFCT will review this Sharing of Information Policy and good practice at least annually.

29. Management of Records Policy

Policy statement: In the process of developing NFCT's safeguarding policies and procedures, the organisation has developed a policy for the management of records - which includes the retention, storage and destruction of records that relate to the welfare of a vulnerable adult, as well as safeguarding records relating to employees and volunteers.

- **Creating records:** When there are concerns relating to a vulnerable adult's welfare or safety, records will be created using NFCT's **Recording & Reporting Concerns, Disclosures & Allegations or Suspicions of Abuse Form** (available for NFCT's Designated Safeguarding Officer). NFCT staff and volunteers are trained to complete the relevant sections of the form and to sign against these at each stage of the procedure. Further information relating to creating this record can be found in this Handbook in the section **Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse**. As a minimum the following information will be recorded:
 - Date and time of incident/disclosure
 - Parties who were involved, including any witnesses to an event
 - What was said or done and by whom
 - Any action taken by the organisation to look into the matter
 - Any further action taken
 - Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency
 - Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such
 - Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details
 - The record must be signed by the person making it.

- **Retention of records:** Once a record has been created it will be retained and stored in line with the **Principles of Recording & Storing Information** and the **Data Protection Policy** outlined in this Handbook. NFCT will always ensure that personal information held will be:
 - Adequate, relevant and not excessive for the purposes for which they are held
 - Accurate and where necessary kept up to date
 - Not kept for longer than is necessary for its purposes

NFCT will use the following good practice guidelines relating to the retention and storage of records:

- Information about concerns, allegations, and referrals will not be kept in one concern log, but will instead ensure that information or items relating to individuals are kept in separate files.
- Compile and label files carefully.
- Files containing sensitive or confidential data will always be locked away and access to the keys will be strictly controlled.
- A key log will be kept so that it is possible to see who has accessed a locked cabinet including when and what files have been accessed.
- Access to records will be limited to NFCT employees in named safeguarding roles who either need to know about the information in those records and/or who manage the records/files e.g. Senior Safeguarding Manager/Designated Safeguarding Manager.
- When files are to be stored long term, arrangements will be made for the keys to be passed from outgoing named safeguarding role holders to their successors.
- When records are stored electronically files will be password protected, which only limited safeguarding staff will have access to.
- Should any part of NFCT cease operating - or otherwise close down - arrangements will be made for the ongoing management of records in compliance with this **Management of Records Policy**.

- **Retention periods of records:** NFCT has developed its retention of records policy by using the guidance contained within the **Data Protection Act 1998: Guidance to Social Services (2000)** which is considered by the **Child Protection in Sport Unit** as best practice. **The guidance states that:**

"Where no legal requirement to retain information beyond the closure of the record exists, an organisation will need to establish its own retention periods. Normally, personal information should not be held for longer than six years after the subjects last contact with the organisation. **Exceptions to the six year period will occur when records:**

 - Need to be retained because the information in them is relevant to legal action that has been started
 - Are required to be kept longer by law.
 - Are archived for historical purposes e.g. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority. **Where there are legal proceedings relating to records, NFCT will seek the appropriate legal advice about the retention period of the particular records.**
 - Consist of a sample of records maintained for the purposes of research.
 - Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.
 - Are held in order to provide, for the subject, aspects of their personal history e.g. where a vulnerable adult might seek access to the file at a later date and the information would not be available elsewhere."

Management of Records Policy continued...

Where files are kept for longer than the above six year period, NFCT will clearly mark the file with the reasons for the extension period.

NFCT will adhere to the retention period guidance provided by the Child Protection in Sport Unit as follows:

Type of Record	Retention Period
Vulnerable Adult concerns that NFCT refers on to Local Safeguarding Adults Board or the Police e.g. this would include concerns about physical, sexual, emotional or neglect of a vulnerable adult; disclosures from a vulnerable adult about being abused; or information from a third party which might suggest a vulnerable adult is being abused; concerns about a parent or another adult that uses the organisation, or a vulnerable adult who has been abused by another vulnerable adult.	The referral should be acknowledged in writing by Local Safeguarding Adults Board and NFCT will keep this on file. Records will be kept for six years after the last contact with the service user unless any of the exemptions listed earlier apply - or if NFCT is required to comply with any other statutory requirements.
Vulnerable adult concerns that NFCT decide, after consultation, do not necessitate a referral to Local Safeguarding Adults Board or the Police. In such circumstances, NFCT will make a record of the concern and the outcome.	NFCT will destroy the record a year after the vulnerable adult concerned ceases to use the service, unless the vulnerable adult is continuing to use the services of the organisation.
Concerns about people (paid and unpaid) who work with vulnerable adults, such as allegations, convictions, disciplinary action, inappropriate behaviour towards vulnerable adults e.g. where an employee has breached the code of conduct, a record of the behaviour, the action taken and outcome will be recorded.	HR files and training records - including disciplinary records and working time records - will be retained for 6 years after employment ceases . NFCT will keep records for a longer period if any of the following apply: <ul style="list-style-type: none"> ▪ There were concerns about the behaviour of an adult who was working with vulnerable adults where they behaved in a way that has harmed, or may have harmed, a vulnerable adult ▪ The adult possibly committed a criminal offence against, or related to, a vulnerable adult ▪ The adult behaved towards a vulnerable adult in a way that indicates that they are unsuitable to work with vulnerable adults. In these circumstances records will be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.
Disclosure and Barring Service Certificate obtained as part of the vetting process.	DBS certificates have a statutory defined retention period and will therefore must be destroyed after six months , unless specific permission has been given to retain them longer. However, NFCT will keep a record of the date of the check, the reference number and the decision about vetting and the outcome.

- **Destruction of records:** When records are due for destruction (by reference to the above table), NFCT will either incinerate or shred them. This will be carried out in the presence of another NFCT Safeguarding employee, or be entrusted to a firm specialising in the destruction of confidential material. This action will be taken at the same time as the electronic record is purged from NFCT systems. If records are not to be shredded immediately, then NFCT will ensure that all confidential records will be held in a secured plastic bag; labelled as confidential and locked in a cupboard or other secure place.

Reviewed & Updated: May 2017

NFCT will review this Management of Records Policy and good practice at least annually.

30. IT Acceptable Usage Policy

Policy statement: NFCT's Acceptable Usage Policy covers the security and use of all the organisations information and IT equipment. It also includes the use of email, internet and mobile IT equipment. This policy applies to all users of NFCT's IT equipment - referred to as "individual" within this policy from this point onwards. In addition, this policy applies to all information, in whatever form, relating to NFCT's business activities - and to all information handled by NFCT relating to other organisations and individuals with whom it deals.

- **An individual's responsibility for computer access control:** Access to the NFCT's IT systems is controlled by the use of user ID's and passwords. All user ID's and passwords will be uniquely assigned to named individuals and consequently, individuals are accountable for all actions on NFCT's IT systems using that user ID and password. **Therefore, individuals must not:**
 - Allow anyone else to use their user ID and password on any IT system.
 - Leave their user accounts logged in at an unattended and unlocked computer.
 - Use someone else's user ID and password to access NFCT's IT systems.
 - Leave their password unprotected **e.g.** by writing it down.
 - Perform any unauthorised changes to NFCT's IT systems or information.
 - Attempt to access data that they are not authorised to use or access.
 - Exceed the limits of their authorisation or specific business need to interrogate the system or data.
 - Connect any non-NFCT authorised device to the NFCT network or IT systems.
 - Store NFCT data on any non-authorised NFCT equipment.
 - Give or transfer NFCT data or software to any person or organisation outside of NFCT without the authority of NFCT.

NFCT line managers will ensure that individuals are given clear direction on the extent and limits of their authority with regard to IT systems and data.

- **Internet and email conditions of use:** Use of NFCT internet and email is intended for use authorised. Personal use is permitted where such use does not affect the individual's performance in what is being undertaken and which is not detrimental to NFCT in any way; nor in breach of any other policy or procedure and which does not place the individual or NFCT in breach of statutory or other legal obligations. All individuals are accountable for their actions on the internet and email systems. **Individuals must not:**
 - Use the internet or email for the purposes of harassment or abuse.
 - Use profanity, obscenities, or derogatory remarks in communications.
 - Access, download, send or receive any data (including images), which NFCT considers offensive in any way, including sexually explicit, discriminatory, defamatory or libellous material.
 - Use the internet or email to make personal gains or conduct a personal business.
 - Use the internet or email to gamble.
 - Use the email systems in a way that could affect its reliability or effectiveness **e.g.** distributing chain letters or spam.
 - Place any information on the Internet that relates to NFCT, alter any information about it, or express any opinion about NFCT, unless they are specifically authorised to do this.
 - Send unprotected sensitive or confidential information externally.
 - Forward NFCT mail to personal non-NFCT email accounts **e.g.** a personal email account.
 - Make official commitments through the internet or email on behalf of NFCT unless authorised to do so.
 - Download copyrighted material such as music media (MP3) files, film and video files (not an exhaustive list) without appropriate approval.
 - In any way infringe any copyright, database rights, trademarks or other intellectual property.
 - Download any software from the internet without prior approval of the NFCT person responsible for IT.
 - Connect NFCT devices to the internet using non-standard connections.
- **Clear screen policy:** In order to reduce the risk of unauthorised access or loss of information, NFCT enforces a clear screen policy as follows:
 - Personal or confidential information must be protected using security features provided **e.g.** secure print on printers.
 - Computers must be logged off/locked or protected with a screen locking mechanism controlled by a password when unattended.
 - Care must be taken to not leave confidential material on printers or photocopiers.
 - All business-related printed matter must be disposed of using confidential waste bins or shredders.
- **Working off-site:** NFCT acknowledges that laptops and mobile devices (where authorised) will be taken off-site. **The following controls must be applied:**
 - Working away from the office must be in line with NFCT's remote working policy.
 - Equipment and media taken off-site must not be left unattended in public places and not left in sight in a car.
 - Laptops must be carried as hand luggage when travelling - unless airport security does not permit this.

IT Acceptable Usage Policy continued...

- Information should be protected against loss or compromise when working remotely **e.g.** at home or in public places. Laptop encryption must be used.
- Particular care should be taken with the use of mobile devices such as laptops, mobile phones, smartphones and tablets. They must be protected at least by a password or a PIN and, where available, encryption.
- **Mobile storage devices:** Mobile devices such as memory sticks, CDs, DVDs and removable hard drives must be used only in situations when network connectivity is unavailable or there is no other secure method of transferring data. Only NFCT authorised mobile storage devices with encryption enabled must be used, when transferring sensitive or confidential data.
- **Software:** Employees must use only software that is authorised by NFCT on NFCT computers. Authorised software must be used in accordance with the software supplier's licensing agreements. All software on NFCT computers must be approved and installed by the NFCT person responsible for IT department. **Individuals must not:**
 - Store personal files such as music, video, photographs or games on NFCT IT equipment.
- **Viruses:** NFCT has implemented centralised, automated virus detection and virus software updates within NFCT. All PC's have antivirus software installed to detect and remove any virus automatically. **Individuals must not:**
 - Remove or disable anti-virus software.
 - Attempt to remove virus-infected files or clean up an infection, other than by the use of approved NFCT anti-virus software and procedures.
- **Monitoring and filtering:** All data that is created and stored on NFCT computers is the property of NFCT and there is no official provision for individual data privacy, however wherever possible NFCT will avoid opening personal emails. IT system logging will take place where appropriate, and investigations will be commenced where reasonable suspicion exists of a breach of this or any other policy. NFCT has the right (under certain conditions) to monitor activity on its systems, including internet and email use, in order to ensure systems security and effective operation, and to protect against misuse.

Any monitoring will be carried out in accordance with audited, controlled internal processes, the UK Data Protection Act 1998, the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice Interception of Communications) Regulations 2000.

This **IT Acceptable Use Policy** must be read in conjunction with NFCT's **Data Protection Policy** and NFCT's **Recording, Storing and Sharing Information Policies and Procedures**.

It is the responsibility of every NFCT employee and volunteer to report suspected breaches of this IT Acceptable Use Policy without delay to their line management.

Reviewed & Updated: May 2017

NFCT will review this IT Acceptable Usage Policy and good practice at least annually.

31. Code of Behaviour for Working with Vulnerable Adults

Policy statement: NFCT believes that its Code of Behaviour for Working with Adults will minimise the opportunity for vulnerable adults to suffer harm. It will also help to protect NFCT staff members and volunteers by ensuring they are clear about the behaviour that is expected of them and the boundaries within which they should operate. As part of the process of encouraging ownership, NFCT involves its staff members and volunteers, vulnerable adults, as well as carers and advocates, in drafting and reviewing the Code of Behaviour for Working with Adults for the organisation. **The following six positive statements underpin NFCT's code of behaviour:**

1. NFCT will protect the rights and promote the interests of vulnerable adults and carers and advocates
2. NFCT will strive to establish and maintain the trust and confidence of vulnerable adults and carers and advocates
3. NFCT will promote the independence of vulnerable adults while protecting them as far as possible from danger or harm
4. NFCT will respect the rights of vulnerable adults while seeking to ensure that their behaviour does not harm themselves or other people
5. NFCT will uphold public trust and confidence in the work that it undertakes with vulnerable adults
6. NFCT will be accountable for the quality of the organisations staff members and volunteers work and take responsibility for maintaining and improving their knowledge and skills.

Behaviours to be avoided: This part of the code of behaviour identifies behaviours that NFCT staff members and volunteers may slip into through lack of experience or training. Although the behaviours listed below are not intentionally harmful, such behaviour can be misconstrued and could ultimately lead to allegations of vulnerable adult abuse being made. **Examples of behaviours to be avoided include NFCT staff members and volunteers not:**

- Spending excessive amounts of time alone with vulnerable adults away from others
- Taking a vulnerable adult to their own home
- Taking a vulnerable adult alone on car journey, unless this forms part of NFCT's core activities

If any of the above behaviours are unavoidable or necessary, then they should only occur with the full knowledge and consent of a senior manager. At all times an appropriate record must be maintained.

Behaviours that will always be unacceptable: Unacceptable behaviours are those that must always be avoided in the interests of the safety of vulnerable adults, NFCT staff members and volunteers. **Examples of behaviours to be avoided and which NFCT staff members and volunteers must never do include:**

- Abuse, neglect, harm or place at risk of harm vulnerable adults whether by omission or commission
- Engage in rough physical games with vulnerable adults, including horseplay
- Engage in sexually provocative games with vulnerable adults e.g. spin the bottle and strip poker
- Make sexually suggestive comments to a vulnerable adult
- Form inappropriate relationships with vulnerable adults
- Gossip about personal details of vulnerable adults and their families
- Make and/or accept loans or gifts of money from vulnerable adults

Where NFCT staff members and volunteers are required to have physical contact and/or intimate care of a vulnerable adult they must ensure that:

- Physical contact is person-centred and appropriate to the task required
- Training has been received to understand and implement a vulnerable adult's care plan, where required
- When providing intimate care, it is done sensitively and with respect for the individual's dignity and privacy
- If ever concerned about anything during intimate care, that it is reported without delay to NFCT's Nominated Manager

Use of physical intervention and restraint of vulnerable adults: NFCT's staff members and volunteers should only use forms of restraint for which they have received training and which follow current best practice. **However, regardless of the training received, NFCT's staff members and volunteers should:**

- Seek to defuse a situation and thereby avoid the need to use any form of restraint
- Only use restraint where it is absolutely necessary to protect the vulnerable adult or others from harm
- Ensure that any restraint used is proportionate to the risk of harm
- Record and report any use of restraint
- Review any situation that led to the need for restraint with NFCT's Nominated Manager with a view to avoiding the need for restraint in the future

Behaviour guidelines relating to diversity and the additional care and support needs of vulnerable adults: NFCT staff members and volunteers should always:

- Be open to, and aware of, diversity in the beliefs and practices of vulnerable adults and their families
- Ask how a vulnerable adult's care should be delivered having due regard to the cultural needs of others
- Be aware of the difficulties posed by language barriers, as well as other communication difficulties

Code of Behaviour for Working with Vulnerable Adults continued...

- Ensure never to discriminate against vulnerable adults and their families who have different cultural backgrounds and beliefs from their own
- Use the procedures outlined in this handbook to report any discrimination against vulnerable adults and their families by other staff members and/or volunteers

Behaviour guidelines relating to the handling of vulnerable adults' money: NFCT staff members and volunteers should always:

- Maintain records of vulnerable adults' personal allowances, receipts and expenditure in line with NFCT's related policies
- Ensure never to deny a vulnerable adult access to their money
- Ensure never to gain in any way when using the vulnerable adult's money on their behalf, or guiding the vulnerable adult in the use of their own money
- Ensure never to borrow money from, or lend money to, a vulnerable adult
- Report any suspicions of financial abuse

Behaviour guidelines relating to the use of technology, including photography: NFCT is conscious that new technologies - such as social networking websites and mobile phones - can be misused by those who are intent on harming or exploiting vulnerable adults. To this end, NFCT staff members and volunteers should always ensure that they:

- Never photograph and/or video a vulnerable adult, even by mobile phone, without the vulnerable adult's valid consent
- Ensure that any photographs and/or videos taken of a vulnerable adult are appropriate
- Report any inappropriate use of images of a vulnerable adult
- Report any inappropriate or dangerous behaviour on the internet that involves a vulnerable adult

NFCT believes it is important that vulnerable adults are made aware of the dangers associated with new technology - such as social networking sites and the internet - and know to tell someone if they encounter anything that makes them feel unsafe or threatened.

Sanctions for NFCT staff members and volunteers who breach this code of behaviour: All NFCT staff members and volunteers should understand the following:

- If ever unsure of the correct actions to take, or if it is felt that a breach of this code has occurred then the matter should be brought to the immediate attention of a line manager for advice
- Breaches of this code of behaviour is a serious issue that will be investigated
- Breaches of this code of behaviour may result in disciplinary action, a consequence of which could result in staff members being summarily dismissed for gross misconduct and a volunteer's agreement being terminated
- Where a breach of this code of behaviour constitutes harm and/or risk of harm then referral will be made to the police, DBS and other appropriate regulatory bodies

Behaviour guidelines which apply to everyone in the organisation and everyone who uses NFCT's services, participates in its activities or visits: Every person that is involved with NFCT - whether a manager, staff member, volunteer, vulnerable adult, visitor, participant or user of its activities and services should relate to each other in a mutually respectful way.

The following ground rules should be adhered to by everyone:

- Have respect for each other
- Avoid the use of offensive language
- Do not use alcohol

Any breaches of this code of behaviour by individuals using NFCT services and facilities could lead to their exclusion. Where the behaviour constitutes abuse e.g. of a peer, then referral will be made to the police for further investigation and action.

Reviewed & Updated: May 2017

NFCT will review this Code of Behaviour for Working with Vulnerable Adults and good practice at least annually.

32. Prevent Duty Policy

Background: The Prevent Duty is part of the Counter-Terrorism & Security Act 2015 and commenced with effect on 1st July 2015. Under the Prevent Duty, certain organisations working with adults have a duty to prevent people being drawn into terrorism. As such, NFCT includes its Prevent Duty Policy in its Vulnerable Adults Safeguarding Policies and Procedures. **The Prevent Strategy is seeking to:**

- **Respond to the ideological challenge of terrorism and aspects of extremism, and the threat that is faced from those who promote these views**
- **Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support**
- **Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health**

N.B: Extremism is 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. The definition of extremism for the purposes of NFCT's interpretation of its responsibilities under the Prevent Duty also includes calls for the death of members of our armed forces, whether in this country or overseas.

Policy statement: NFCT is committed to the protection and safeguarding of all adults that utilise the services it offers. As such, NFCT will have due regard to the Prevent Duty and will take the steps outlined in this Prevent Duty Policy as part of its commitment to vulnerable adult safeguarding. **Therefore, this policy demonstrates NFCT's intention to:**

- **Make every effort to identify adults that may be vulnerable to radicalisation and take the appropriate action/s to protect them.**
- **Promote fundamental British Values (where our interactions permit) to help build an individual's resilience to radicalisation and enable them to challenge extremist views.**

NFCT's approach to its responsibilities will focus on four key themes as follows:

1. **Risk assessment**
2. **Working in partnership**
3. **Staff training**
4. **IT policies**

Each of the above core four themes are explained in greater detail below:

1. **Risk Assessment:** As part of its risk assessment processes, NFCT will undertake a risk assessment of vulnerable adults that attend and utilise its services to identify any risk of individuals being drawn into terrorism - including support for extremist ideas that are part of terrorist ideology.

Whilst NFCT realises that there is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, as with managing our other safeguarding risks and responsibilities, NFCT's staff members and volunteers will be alert to changes in an individual's behaviour which could indicate that they may be in need of help or protection. NFCT accepts that adults at risk of radicalisation may display different signs or seek to hide their views. NFCT's staff members and volunteers will use their professional judgement in identifying adults who might be at risk of radicalisation and bring any concerns they have to NFCT's Designated Safeguarding Officer who will ensure that any action taken is proportionate.

The Prevent Duty does not require NFCT's staff members or volunteers to carry out unnecessary intrusion into an adults personal and or family life, but as with any other safeguarding risk, NFCT must take action if there is any behaviour that raises concerns. **Possible signs of radicalisation include:**

- a) The individual's views become increasingly extreme regarding another section of society or government policy
- b) The individual becomes increasingly intolerant of more moderate views
- c) The individual expresses a desire/intent to take part in or support extremist activity
- d) They are observed downloading, viewing or sharing extremist propaganda from the web
- e) They become withdrawn and focused on one ideology
- f) The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

Staff members and volunteers should refer to NFCT's Vulnerable Adults Safeguarding Policies and Procedures relating to the **Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse** if they have any concerns relating to an adult at risk of radicalisation. Where it is felt that there is a concern with regard to radicalisation, then NFCT's Designated Safeguarding Officer will make the referral to the **Channel Programme**.

Prevent Duty Policy continued...

What is the Channel Programme: The Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. **Further information relating to the Channel Programme is available at the end of this policy.**

- 2. Working in partnership:** NFCT will continue to work with and build upon its existing local partnership arrangements with the Safeguarding Adults Boards - who are responsible for co-ordinating what is done by local agencies for the purposes of safeguarding and promoting the welfare of vulnerable adults. NFCT will take in to account the relevant policies and procedures of the SAB's relating to the threshold guidance indicating when a vulnerable adult might be referred for support.

Where NFCT's local authority provides Home Office funded dedicated Prevent co-ordinators, the organisation will work in partnership with them. In addition, NFCT will work with local police and any other civil society organisations that may be able to provide advice and support to the organisation with regard to implementing the duty.

Finally, NFCT will continue to work closely with parents, carers, families and advocates who are in a key position to spot signs of radicalisation. Where concerns are raised, NFCT will assist and advise those involved and point them to the right support mechanisms.

- 3. Staff training:** Where NFCT's risk assessment identifies a high risk of adults who use its services being at risk of radicalisation, it will ensure that the appropriate staff members and volunteers participate in the Home Office's **Workshop to Raise Awareness of Prevent (WRAP)**. As a minimum, NFCT's Designated Safeguarding Officer will undertake the **WRAP** training to ensure that they are able to provide advice and support to other members of NFCT's staff and volunteers on protecting adults from the risk of radicalisation.

However, as part of NFCT's commitment to raise awareness generally about the Prevent Duty and the associated responsibilities, all staff members and volunteers will be required to complete the **Channel General Awareness Training** on-line module and print out their **Certificate of Completion**. The **Channel General Awareness Training Module** can be found here:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

The **Channel General Awareness Training Module** is a free resource and takes just 25 minutes to complete. This on-line module provides an introduction to how to identify factors that can make people vulnerable to radicalisation, as well as case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

- 4. IT policies:** NFCT acknowledges its duty to ensure that vulnerable adults are safe from terrorist and extremist material when using the internet whilst accessing the organisations services. To this end, NFCT has in place suitable internet filtering which it will ensure is regularly updated. NFCT will require every person who accesses the internet via its computers (and other IT equipment that can access the internet) to sign its **E-Safety Agreement** which can be found in the **Vulnerable Adults Safeguarding Policies and Procedures Handbook**.

All of NFCT's staff members and volunteers will need to be aware of the risks posed by the online activity of extremist and terrorist groups and further guidance and advice will be provided by NFCT's Designated Safeguarding Officer.

Reviewed & Updated: May 2017

NFCT will review this Prevent Duty Policy and good practice at least annually.

33. Building Resilience Against the Radicalisation of Vulnerable Adults Policy

Policy statement: NFCT acknowledges its responsibilities in helping to build the resilience - of the vulnerable adults who use its services - to radicalisation. This will be achieved through providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. NFCT will use its notice-boards and appropriate delivery opportunities to promote fundamental British values. **The British values as far as the Prevent Duty is concerned are:**

- **Democracy:** Respect for democracy and support for participation in the democratic process
- **The rule of law:** Respect for the basis on which the law is made and applies in England
- **Individual liberty:** Support and respect for the liberties of all within the law
- **Mutual respect and tolerance of different faiths and beliefs:** Support for equality of opportunity for all and respect and tolerance of different faiths and religious and other beliefs

These fundamental British values will be integrated into the work of NFCT with the vulnerable adults it works with as appropriate. This will include - but is not be limited to - personal, social and health education to explore sensitive or controversial issues and equipping them with the knowledge and skills to understand and manage difficult situations. NFCT will help vulnerable adults to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. This approach can help them develop effective ways of resisting pressures, including knowing when, where and how to get help. NFCT will help the vulnerable adults it works with to develop positive character traits such as resilience, determination, self-esteem, and confidence.

In addition - and always where appropriate to the specific interaction - NFCT will seek to incorporate opportunities to provide the knowledge, skills and understanding to help vulnerable adults to play a full and active part in society. Specifically, this will be to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. Ultimately, the way that NFCT approaches its work with vulnerable adults will always underpin the principles of democracy and give them opportunities to understand how laws are made and upheld.

As a consequence of the diverse backgrounds that the vulnerable adults that access our services come from, NFCT has an excellent opportunity to reinforce the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.

What to do if an NFCT staff member or volunteer has a concern

As mentioned in the **Prevent Duty Policy**, if a staff member or volunteer has a concern that a particular vulnerable adult is at risk of radicalisation, then in the first instance they should refer to NFCT's **Vulnerable Adults Safeguarding Policies and Procedures Handbook**. In particular, this means following the **Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse**. However, in all cases, concerns should be raised with NFCT's Designated Safeguarding Officer.

Reviewed & Updated: May 2017

NFCT will review this Building Resilience Against the Radicalisation of Vulnerable Adults Policy and good practice at least annually.

34. Guidance on Prevent and the Channel Programme

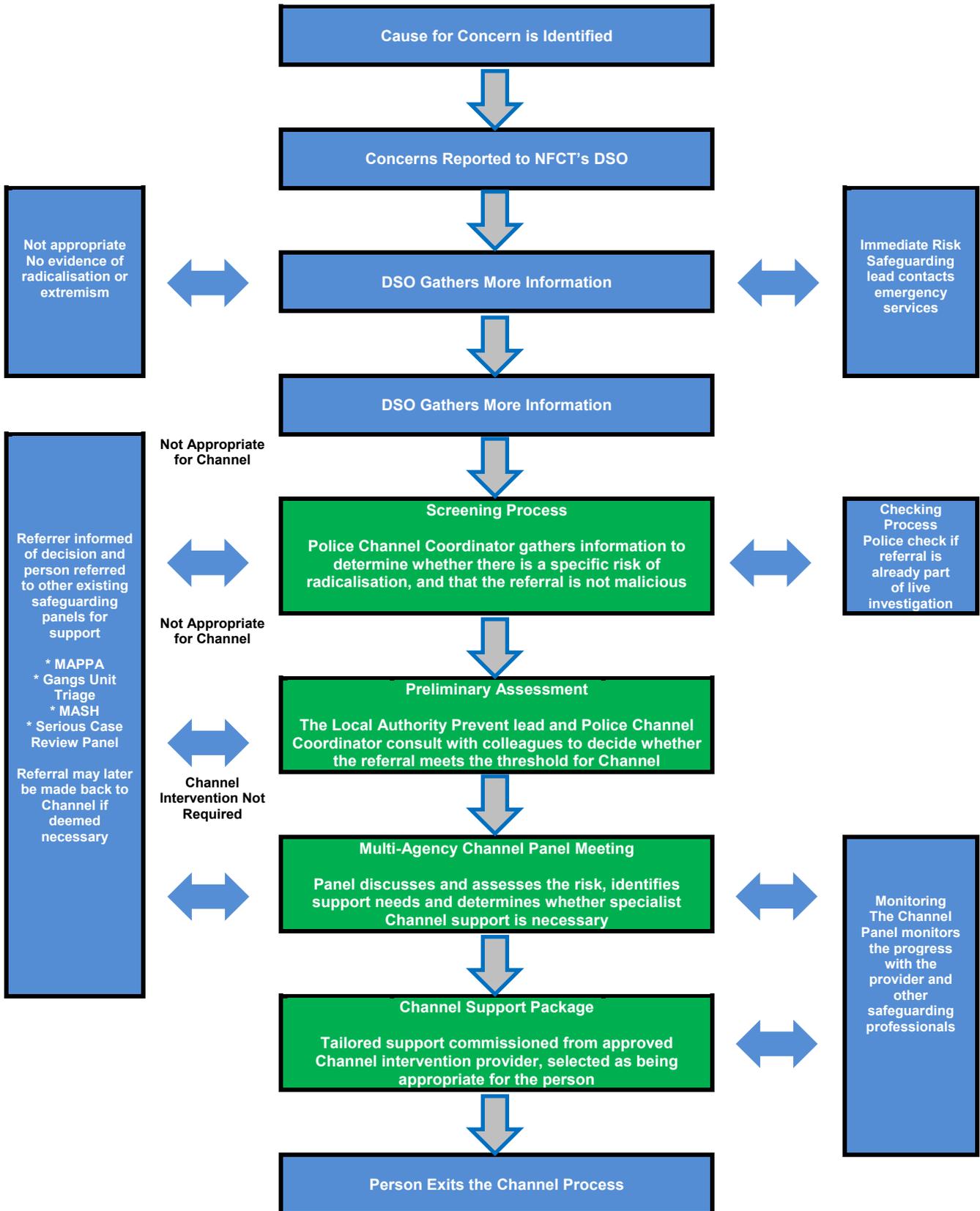
- **What is Prevent?** Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.
- **What is Channel?** Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.
- **Who does Channel work with?** Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.
- **How does Channel work?** Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.
- **What does Channel support look like?** Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.
- **How will the person be involved in this process?** A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.
- **Who can make a referral?** Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.
- **What happens with the referral?** Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.
- **Raising a concern:** If you believe that someone is vulnerable to being exploited or radicalised, please follow NFCT's **Vulnerable Adults Safeguarding Policies and Procedures** and raise your concerns in confidence to NFCT's Designated Safeguarding Officer, who will be responsible for raising concerns to Channel if appropriate.

Reviewed & Updated: May 2017

NFCT will review this Guidance on Prevent and the Channel Programme and good practice at least annually.

Please refer to the flowchart on the next page which identifies the Channel process for NFCT

35. The Channel Process within NFCT



36. E-Safety Policy

This policy and the procedures that it underpins apply to all NFCT staff members, including senior managers, paid staff, volunteers and sessional workers, agency staff, students and anyone working on behalf of NFCT. The purpose of NFCT's e-safety policy is to:

1. Protect vulnerable adults who receive NFCT services and make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with the organisation
2. To provide NFCT staff members and volunteers with the overarching principles that guide the organisations approach to e-safety;
3. To ensure that, as an organisation, NFCT operate in line with its values and within the law in terms of how information technology is used

NFCT recognises that:

- The welfare of vulnerable adults who come into contact with its services is paramount and should govern the approach to the use and management of electronic communications technologies
- All vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- Working in partnership with vulnerable adults, families, carers, advocates and other agencies is essential in promoting vulnerable adult's welfare and in helping them to be responsible in their approach to e-safety
- The use of information technology is an essential part of everyone's lives; it is involved in how NFCT gather and store information; as well as how communication takes place. It is also an intrinsic part of the experience of vulnerable adults and is greatly beneficial to all. However, it can present challenges in terms of how it is used responsibly and, if misused either, can be actually or potentially harmful to individuals.

NFCT will seek to promote e-safety by:

- a. Appointing an NFCT e-safety coordinator
- b. Developing a range of procedures that provide clear and specific directions to NFCT staff members and volunteers on the appropriate use of ICT
- c. Supporting and encouraging the vulnerable adults using NFCT services to use the opportunities offered by mobile phone technology and the internet in a way that keeps them safe and shows respect for others
- d. Supporting and encouraging parents, carers and advocates to do what they can to keep vulnerable adults safe online and when using any other forms of internet connected technology
- e. Incorporating statements about safe and appropriate ICT use into the codes of conduct both for NFCT staff members and volunteers and for vulnerable adults
- f. Developing an e-safety agreement for use with vulnerable adults and their families, carers and advocates
- g. Use NFCT policies and procedures to deal firmly, fairly and decisively with any examples of inappropriate ICT use, complaints or allegations - which may include breaches of filtering, illegal use, cyberbullying, or use of ICT to perpetrate abuse
- h. Informing families, carers and advocates of incidents of concern as appropriate
- i. Reviewing and updating the security of NFCT's information systems regularly
- j. Providing adequate physical security for ICT equipment
- k. Ensuring that user names, logins and passwords are used effectively
- l. Using only official email accounts provided via the organisation, and monitoring these as necessary
- m. Ensuring that the personal information of NFCT staff members, volunteers and service users (including service users' names) are not published on our website
- n. Ensuring that images of vulnerable adults and their families, carers and advocates are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- o. Any social media tools used in the course of our work with vulnerable adults will be risk assessed in advance by the member of staff or volunteer wishing to use them
- p. Providing effective management for NFCT staff members and volunteers on ICT issues, through supervision, support and training
- q. Examining and risk assessing any emerging new technologies before they are used within the organisation

The name of our e-safety coordinator is Calum Osborne (Chief Operating Officer) - Office Telephone Number: 0115 982 4334 & Mobile Telephone Number: 07887 615182 Email: calum.osborne@nottinghamforest.co.uk An example of NFCT's E-Safety Agreement for Use with Vulnerable Adults form can be obtained from NFCT's Designated Safeguarding Officer.

Reviewed & Updated: May 2017

NFCT will review this E-Safety Policy and good practice at least annually.