

DECODED SAFEGUARDING POLICY

STATEMENT OF COMMITMENT

This document outlines Decoded's Safeguarding Policy for application across all staff and learners in the United Kingdom.

Safeguarding is a framework to protect a person's right to live in safety, free from abuse, harm and neglect.

Decoded is committed to promoting and protecting the rights of all staff and learners and ensuring they are kept safe from abuse, harm and neglect, and are treated with dignity and respect.

Decoded will strive to provide a safe learning environment for all learners, particularly those who are identified as vulnerable adults.

This policy is based on the following principles:

- The safeguarding and welfare of our learners is our primary concern.
- All learners and staff have a right to protection from abuse.
- All vulnerable adults have a right to safeguarding from abuse.
- It is everyone's responsibility to report any concerns about abuse to the Safeguarding Officers and the responsibility of the statutory authorities to conduct an investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the Data Protection Act (and from May 2018, in accordance with the General Data Protection Regulation).

Policies will be reviewed and updated where necessary, and particularly in response to any changes in legislation or risk as identified by ongoing risk assessments.

SAFEGUARDING ADULTS

The Safeguarding Vulnerable Groups Act 2006 Section 59 defines a 'vulnerable adult' as a person aged 18 and over and:

- Receiving a social care service
- Receiving a health service
- Living in sheltered accommodation

- Detained in custody or under a probation order
- Requiring assistance in the conduct of his/her affairs
- Receiving a service or participating in an activity targeted at older people
- Persons with disabilities (learning or physical)
- Persons with mental health conditions

We recognise that all employees of Decoded are in positions of trust with learners and external employers. We commit to ensuring all employees are aware of this at all times, and act in the appropriate manner.

Decoded has defined and implemented robust and comprehensive processes which check and ensure the suitability of its staff to work with learners or to deliver learning in settings where there may be vulnerable adults.

WHAT IS ADULT ABUSE?

Abuse is defined as any behaviour that deliberately or unknowingly causes harm, endangers life or violates the rights of the individual. Abuse of adults can happen anywhere. It can happen at home, in a residential or nursing home, in a hospital, at work or in the street. There are different types of abuse, which include:

- Physical - being hurt or harmed either deliberately or through rough, careless or thoughtless physical behaviour.
- Emotional abuse or bullying - Being humiliated or put down or made to feel anxious or frightened.
- Financial abuse or theft - someone using your money or possessions in a way that you don't want.
- Neglect - not being given the things you need to feel safe and comfortable or not making sure you get the care or treatment you need.
- Sexual abuse - being made to do something that you don't want to do.
- Discrimination - including racist, sexist or abuse about a person's disability.
- Domestic abuse - examples include psychological, physical, sexual, financial, emotional abuse or 'honour'-based violence.
- Modern slavery - includes slavery, human trafficking and forced labour.
- Organisational abuse - include neglect and poor care within an institution or specific care setting such as a hospital or care home.
- Self-neglect - includes not caring for personal cleanliness, health or surroundings and includes behaviour such as hoarding.

How can I spot adult abuse?

At first, you might not recognise the signs of abuse. Examples of adult abuse include:

General signs of abuse

- Frequent arguments between a carer and the elderly person.
- Changes in personality or behaviour in the person being abused.

Physical abuse

- Unexplained signs of injury such as bruises, burns or scars, or more serious unexplained injuries such as broken bones.
- Report of a person taking too much of their medicines or not taking their medicines regularly (a prescription has more remaining than it should).
- Broken eye glasses or frames.
- Signs of being restrained, such as bruises on the wrists.
- Staff in a care home refusing to allow you to see the elderly person alone.

Emotional abuse

- Threatening, belittling, or controlling behaviour by the abuser.
- Behaviour from the abused person that seems like dementia, such as rocking, sucking, or mumbling to themselves.

Neglect by caregivers or self-neglect

- Unusual weight loss because of not eating enough food or drinking enough fluids.
- Untreated physical problems, such as bedsores.
- Dirty living conditions: dirt, bugs, soiled bedding and clothes.
- Being left dirty or unbathed.
- Unsafe living conditions (no heat or running water; faulty electrical wiring, other fire hazards).

Financial exploitation

This may include:

- Significant withdrawals from the vulnerable person's bank account.
- Items or cash missing.
- Suspicious changes in wills, power of attorney, policies or other documents.
- Suspicious addition of names to the person's signature card.
- Unnecessary services, goods or subscriptions.

STAFF RESPONSIBILITIES

Decoded's commitment to safeguarding starts at the most senior level. Co-CEO, Richard Peters has executive responsibility and ultimate accountability for embedding our policies throughout the organisation and learning environments.

At each level, and within each function, Decoded managers are responsible for ensuring everyone within their team is informed of the Safeguarding Policy when they begin working with Decoded.

Decoded has appointed two Safeguarding Officers for holding responsibility and ensuring any questions or safeguarding issues are addressed appropriately and without unreasonable delay.

Decoded's Safeguarding Officers are:

Tess Y

safeguarding@decoded.com

020 3583 0972

Dan K

safeguarding@decoded.com

020 3583 0972

The role of the Safeguarding Officer is:

- To receive information from Decoded employees who have any safeguarding concerns and record it appropriately;
- To monitor the Safeguarding inbox: safeguarding@decoded.com
- To assess the information promptly and carefully, clarifying and obtaining more information about the matter sensitively and as appropriate
- To make a formal referral to a statutory safeguarding agency or the police where necessary.

Staff must call 999 for any emergency, wherever the person's life or immediate safety is deemed to be at risk.

POLICY DETAIL

Decoded's induction programmes will include training on our Safeguarding Policies and practices, and this will be refreshed at least annually to ensure ongoing compliance. Decoded wish to create a culture of safety and comfort for all learners. Any of our team members working directly with our learners will attend specific safeguard training at regular intervals to ensure safeguarding principles are embedded in all they do at all times.

Decoded will work in partnership with local safeguarding boards and welfare statutory agencies in relation to any investigation under these procedures, as appropriate. This includes sharing information with learners' sponsors and employers where required for safeguarding purposes. Data protection principles will be adhered to at all times.

Decoded has in place for its staff a comprehensive Bullying and Harassment (Dignity at Work) Policy, which prohibits bullying and harassment behaviour of any kind. These principles are extended to all

learners within the Decoded environment, and are further enhanced to prohibit abuse of any kind.

Decoded employees are required, during the recruitment process, to complete a declaration and undergo a disclosure process to detail any offences. DBS checks are required for all new starters, and they will not be permitted to directly work with any vulnerable persons until appropriate clearance has been confirmed.

All employees are required to declare or report any criminal offences subsequent to their initial employment checks to the Safeguarding Officer.

Where possible Decoded will identify vulnerable adults, and put in place appropriate support measures for them. It will be our intention to undertake this process as soon as it becomes apparent, or they consider that the person meets the criteria of 'vulnerable'.

Any Decoded employee who has concerns regarding a learner or any individual whom they believe to be, or know to be vulnerable must contact the Safeguarding Officer.

REPORTING AND MONITORING PROCESS

The Managing a Disclosure of Abuse flowchart on the following page gives full details of this process and timescales.

- All Decoded team members must be alert to possibilities of abuse.
- It is the duty of all team members to be alert only and not to investigate.
- If Decoded team members are made aware of any safeguarding issue at any time this must be treated as a priority over all other work.
- Guidance about a specific incident may be obtained from the designated Safeguarding Officer
- A verbal, and then written report should be provided to the Safeguarding Officer who will keep a confidential record of any such incidents.
- Reports of abuse will be made to the relevant statutory agencies responsible for Investigation.
- For monitoring and tracking purposes, all disclosures are recorded in the Safeguarding Log, which is maintained by the Safeguarding Officer. This will detail the name of the learner and will summarise the allegations and whether this has led to a formal disclosure.

A verbal disclosure is made by the learner to a Decoded team member

Team member will remain calm, reassure the learner and listen

Team member will carefully seek additional information and question the learner in a sympathetic manner to the facts - this stage is not an investigation

Team member should not promise confidentiality

Team member will complete the Safeguarding Reporting form and contact the Safeguarding Officer ASAP (on the same day)

Safeguarding Officer will make formal disclosure to the relevant authorities/ Police if required

DISCLOSURE PROCESS

Good practice guidance for disclosure:

- Speak in a private and safe place
- Accept what the person is saying
- Don't 'interview' the person; but establish the basic facts avoiding asking the same questions more than once
- Ask them what they would like to happen and what they would like you to do
- Don't promise the person that you'll keep what they tell you confidential; explain who you will tell and why
- If there are grounds to override a person's consent to share information, explain what these are
- Explain how the adult will be involved and kept informed. The adult will be
- Provide information and advice on keeping safe and the safeguarding process
- Make a best interest decision about the risks and protection needed if the person is unable to provide informed consent

Establish:

- The risks and what immediate steps to take
- Communication needs
- Whether it is likely that advocacy may be required
- Personal care and support arrangements
- Mental capacity to make decisions about whether the adult is able to protect themselves and understand the safeguarding process

LEARNER WELLBEING

Learners may disclose personal difficulties and wellbeing problems with staff, particularly their Data Mentor. Examples of wellbeing problems relate to stress at work, mental health, bereavement, long term health conditions relationships, and personal finance amongst other issues.

Please speak to a Safeguarding Officer if you would like guidance about how to handle a learner wellbeing concern.

Decoded's Learner Wellbeing Resource directory is available for internal staff and provides information about client-led and national-led wellbeing support services.

DECODED PREVENT POLICY

All Decoded team members have a duty to comply with the Prevent Duty and this includes the responsibility to:

- Understand the potential indicators that someone may be drawn into terrorism
- Recognise potential signs of individual vulnerability to radicalisation
- Exemplify and promote British values
- Encourage all learners and staff to respect other people with particular regard to the protected characteristics under the 2010 Equality Act
- Know how to report a concern or suspicion

Training and awareness will be provided to Decoded team members who work with vulnerable adults on the Prevent policy on a regular basis to ensure they are able to adhere to the above responsibilities.