



IMPACTFUL GOVERNANCE  
Community Interest Company

“Creating sustainability by imbuing independence and strength into community organisations; supporting effective and efficient services.”

## **Safeguarding Policy 2022**

The purpose of this policy is to:-

- Safeguard adults who receive Impactful Governance – Community Interest Company’s services.
- Provide Impactful Governance Consultants, staff and volunteers with guidance on the procedures and conduct they should adopt during their work for Impactful Governance - Community Interest Company.

Impactful Governance works with adults, usually at Board, Executive and management level although we may encounter other adults in a workplace environment and believes it is probable that we could encounter vulnerability at some stage in our interactions. It is unacceptable for anyone to experience abuse of any kind and we recognise our responsibility to safeguard the welfare of those at risk. In providing its services, Impactful Governance is committed to safeguarding and promoting the welfare of staff, volunteers and clients.

In particular, Impactful Governance is committed to:-

- Working together to prevent and protect adults at risk from abuse.
- Empowering and supporting people to make their own choices.
- Reporting actual or suspected physical, mental or verbal abuse and neglect.
- signposting adults who are identified as at risk (those who are experiencing abuse, neglect or exploitation), to professional services or authorities.

Impactful Governance recognises that:-

- The safety and welfare of the adult at risk is paramount.
- All adults at risk have the right to equal protection from all types of harm or abuse.
- Working in partnership with other agencies is essential in promoting the welfare of adults at risk.

Impactful Governance will ensure its recruitment and working practices reflect these policy commitments.

In this policy and subsequent procedures “staff and staff members” means all Impactful Governance employees, Consultants and volunteers (including Directors).

“Protecting Adults at Risk” means the document:

“Protecting Adults at Risk:- London Multi-Agency Policy & Procedures to Safeguard Adults from Abuse (Jan 2014)”, produced by the Social Care Institute for Excellence with the Pan London Adult Safeguarding Editorial Board Procedures is further guidance.

The Responsible Person is the lead Consultant during any work interaction with the client and the Chief Executive is also responsible for the overview of the Local Safeguarding Adults at risk Board requirements.

## **What is Abuse?**

Abuse can be viewed in terms of the following categories:-

- Physical
- Sexual
- Psychological/emotional
- Financial and material
- Neglect and acts of omission
- Discriminatory
- Institutional
- Modern Slavery
- Self-neglect

Abuse may be:-

- A single act or repeated act
- An act of neglect or a failure to act
- Multiple acts, for example, an adult at risk may be neglected and also being financially abused.

Abuse is the misuse of power and control that one person has over another.

Intent is not an issue at the point of deciding whether an act or a failure to act is abuse; it is the impact of the act on the person and the harm or risk of harm to that individual.

Who may be an abuser:-

Abuse may take place in domestic, institutional or public settings and it takes place in all cultures, religions and at all levels of society. An abuser may be anyone including a member of the person's family, friend, neighbour, partner, carer, care worker, manager, volunteer, another service user, or any other person who comes into contact with a vulnerable adult.

Responding to potential abuse or neglect – general:-

All staff has a duty to protect all adults at risk from abuse and to be alert to the possibility of abuse.

All staff has a duty to act on any concern of abuse of an adult at risk adult.

The first priority should always be the safety of the adult at risk. Where there is an immediate risk of harm, all staff should take all reasonable steps to offer the adult at risk immediate protection.

If there are any concerns about a member of staff it is essential that it reported to the Responsible Person immediately, or to the Customer Service Director. When the concern is about the Responsible person it should be reported to the Customer Service Director (see Contact numbers and Other Details, below). In this context, you should also refer to Impactful Governance's Whistleblowing Policy and Procedure.

If any member of staff is contacted about a safeguarding matter by the local authority, social care, the police or any other agency, the member of staff should tell the Chief Executive immediately before any information is imparted.

Response procedures - the role of the Responsible Person

- 1) When a concern is referred to the Responsible Person, the Responsible Person will be able to offer advice and will decide whether to make a referral to the Local Authority, Adults Social Care.
- 2) Such a referral will be made if there is an allegation or suspicion of abuse of an adult at risk.
- 3) Impactful Governance will ensure that all concerns about abuse identified by it or disclosed to it are appropriately recorded, securely stored and retained indefinitely.

## **Confidentiality and sharing of information:**

- 1) Personal information about an adult at risk should not generally be shared without the consent of the person concerned. However, in the context of safeguarding adults at risk, confidential information may need to be shared without such consent.
- 2) Save in cases of emergency, staff who feel information relating to an Adult at risk needs to be shared must refer to the Chief Executive for guidance. Staff should, in any event, however, note the following points in relation to the sharing of information.
- 3) Not all personal information is confidential. Confidential information is, broadly, information of some sensitivity, which is not already public and which has been shared in a relationship where the person giving it understood that it would not be shared with others.
- 4) Seeking informed consent to the sharing of confidential information from the person who gave it or to whom it relates should be the first option, if appropriate. A refusal of consent or lack of informed consent should not necessarily, however, preclude the sharing of confidential information.
- 5) All staff has a responsibility to share information on a “need to know” basis where it is in the best interests of an adult at risk.
- 6) The amount of confidential information disclosed and the number of people to whom it is disclosed should be no more than is necessary to safeguard the adult at risk. This approach applies whether any proposed disclosure is within Impactful Governance or to an outside agency.
- 7) The context in which information is shared, the information requested, the information shared and with whom, and the justification for sharing the information must be recorded.

### Code of Conduct

In addition to observing the provisions of this policy and procedure, all staff must observe the provisions of the Staff Code of Conduct policy.

### Risk assessments

Impactful Governance recognises that the assessment and management of risk contributes to running safe services and activities. Impactful Governance’s Risk Assessments should be referred to for full details of activities and events and the mitigation of risks identified.

### Recruitment, selection and vetting procedures

Reference should be made to Impactful Governance’s ‘Recruitment Policy and Procedure’ which sets out the conditions of our safe recruitment of staff.

### Providers

1) All third party providers contributing to Impactful Governance’s services or activities (for example, a Consultant's assistant) must be agreed by the Chief Executive beforehand.

Providers, or their relevant representatives, are required to sign the relevant Provider Declaration Form which sets out the conditions of their involvement at our services and activities, all of which act as safeguards.

If a provider or the relevant representative is unable to meet the provisions set out in the Provider Declaration Form, above, they will not be allowed access to the service or activity.

2) Impactful Governance will ensure providers or their relevant representatives are supervised by an identified member of staff (or Consultant) at the service or activity to ensure they do not have unsupervised access to adults at risk.

### Visitors and guests

Any visitors and guests will need to be agreed by the Chief Executive. Should a visitor or guest arrive unexpectedly in circumstances which give cause for concern, the person in charge of the activity (e.g. the Consultant) should seek guidance from the Chief Executive.

Visitors and guests at any activity are required to sign the register and record of attendance on their arrival. The person in charge of the activity must also ensure that the visitor or guest has no unsupervised access to vulnerable adults during our activities.

## **Staff induction, training, supervision and appraisal.**

- 1) Impactful Governance ensures that all staff, volunteers and Directors go through a formal induction, providing evidence and checking eligibility as well as providing policies and instructions for accountability.

A copy of the induction document is held in the office to show progress and is signed by the Chief Executive to evidence compliance and achievement of each section.

Brief discussions about the functions and projects will take place and everyone is encouraged to read the current Impact Report to learn about previous projects and performance during the previous year.

- 2) We also ensure that all staff working specifically with adults at risk, receive the following (according to the type, level and frequency of their role):-

- An induction to the projects or services currently operating. This may involve sharing video recordings or shadowing existing team members.
- Training in safeguarding adults at risk, including the use of this policy and procedure and recognising and responding to concerns about the protection of adults at risk.
- Supervision, in which safeguarding is a regular agenda item.

The relevant forms showing induction, supervision and appraisal are stored in the staff member's personnel file, which are stored securely in the Impactful Governance electronic filing system.

### Staff ratios

Risk assessments are completed to determine the precise staffing ratios needed to deliver an activity involving adults. In any case, the ratios of staff to our clients will not be less than the following:-

- For premise-based activities:- 1:-10 (one staff to ten clients)
- For community based activities:- 2:-20 (one staff to ten clients)

Where clients are isolating or shielding, safe distancing and personal protective equipment will be considered and equipment provided.

## **Lone working & Working in People's Homes**

Consultancy work or Mentoring may be on an individual basis. It is important to keep a written record of the meeting securely within our confidential CRM "HubSpot" although details of the sensitive content remain confidential, apart from any disclosures that could cause harm to the individual, others or are illegal. In these cases it is important to send a written cause for concern letter to the Chief Executive.

Working safely during COVID-19 in other people's homes COVID-19 secure guidance for employers, employees and the selfemployed 3 July 2020, is the guidance document on how to work safely during a pandemic and must be followed to safeguard clients and individual members of staff who visit people in their homes. A hard copy is available in printed format or can be downloaded from <https://assets.publishing.service.gov.uk/media/5eb967e286650c2791ec7100/working-safely-during-covid-19-other-peoples-homes-030720.pdf>

Written records of our services and activities

Written records are completed before visits to show the services and activities we deliver. These are updated after a visit with the progress or action undertaken along with the next steps noted.

These include a searchable register of the client, the staff, any visitors and a de-brief of the session. These records are kept within our CRM system "HubSpot" and must be logged as a written record of visits or contact, particularly in light of Infection Controls, specifically Covid-19 (Ref: Working safely during COVID-19 in other people's homes COVID-19 secure guidance for employers, employees and the self-employed 3 July 2020).

Team meetings

Staff team meetings are every month at a public space or hotel in rotating locations or remotely i.e. Zoom, Skype or other Video Conferencing software.

Safeguarding is a regular agenda item at every meeting and is reflected in the minutes.

### **SAFEGUARDING ADULTS AT RISK**

Impactful Governance's Responsible Person for Safeguarding Adults at risk:-  
Andrew Waite (Chief Executive) Tel:- 01923 231660 Mobile:- 07711 579904

If the Responsible Person is not available, you should contact a member of the management team.  
In the first instance:- Alexandre Oliveira (Customer Service Director) Tel:- 07716 247876  
In the second instance:- Rachel Perry (Director) Tel: 07912 868811

Accident and emergency services –

In an emergency dial 999

Call a local Hospital, near to the delivery venue.

Call the Police - In an emergency dial 999

At no time should any visitor or guest be left alone with or in charge of any adult at risk. In any event, all staff should avoid being left alone with any adult at risk for any significant period.

Under no circumstances must any adult at risk, with prior arrangements for being collected by a carer, be left alone at the end of any session.

Interviewing an adult at risk

If, for any reason, an adult at risk is to be interviewed alone, two members of staff should be present, or if only one can be present, that member of staff should be within sight of another member of staff. Where possible, the gender of the member(s) of staff interviewing should reflect that of the adult at risk interviewed.

Behaviour of adults at risk

An adult at risk should always be told if and why their behaviour is not acceptable.

If any adult at risk presents any challenging behaviour this must be dealt with in accordance with Impactful Governance's Managing Challenging Behaviour Policy and Procedure.

#### Photographic or video images

Photographic or video images can only be used by Impactful Governance for the promotion and publicising of its work; unless Impactful Governance's prior written consent is obtained for another specified use.

If any photographic or video images are to be published in any publicity material, the written consent of the adult included within the publicity or their carer must be obtained.

#### Confidentiality and security of information

All information held at or relating to an activity or any activity session must be dealt with in accordance with Impactful Governance's Data Protection, Confidentiality and Security of Information Policy and Procedure and complies with G.D.P.R. (General Data Protection Regulations).

#### Internal Audit Guidance for Managers

The senior team will have monthly internal meetings using discussion and Role play for training and monitoring.

## Appendix A Home Visiting Procedures

Where a job role requires Home Visits, this procedure must be followed for the protection of staff, volunteers or people receiving the service:

### **Before a visit**

Prior to commencing the project, log onto the NHS Covid-19 webcheck to check your symptoms and order a Home Testing kit at <https://111.nhs.uk/covid-19>

After taking the Home Test, confirm with your Line Manager by email that you are clear to make Home Visits. This may be easier to log the Testing date in HubSpot under your own contact name. If you are tested positive, you will need to isolate for 14 days before returning to work or conduct a Home Visit.

### **With the client**

By telephone or Zoom, arrange a fixed time and date for a Home Visit meeting and log the details on HubSpot CRM, including the venue address if it is different to the contact's Home Address. Advise the service receiver to open all windows prior to the visit and leave all internal doors open to avoid touching surfaces where infections can be passed on. Anyone shielding MUST be in a separate room to the Home Visit location where we will meet the client.

### **During the visit**

Before entering the Home, use hand sanitiser or put on disposable gloves and wear an Impactful Governance face mask. We would rather not wear visor shields to avoid making our clients feel more fearful however, if it is for personal protection, you may wear a visor as long as you pre-warn the client that this will be worn during the visit. Our aim is to help people feel confident to interact. Do not share equipment, including pens or allow clients to use your mobile phone or laptops (again this could spread the virus to surface that you may touch later).

Keep a distance of at least 1 metre from anyone in the home and if demonstrating or showing information, sit or stand side-to-side where possible, avoiding breathing in the direction of each other.

### **After the visit**

Remove face mask and place in sealable plastic bag for washing.

Remove any disposable gloves (if worn) and place in a plastic sealable bag to dispose of safely. If gloves were chosen not to be worn, wash your hands with hand-sanitiser as soon as you have removed your mask and bagged it.

Write up details of the visit in HubSpot.

This policy and the consequential procedures have been adopted by:

"Impactful Governance - Community Interest Company" (the organisation) by its Directors.

<b>Date of last review</b>	July 2020
<b>Date of next review</b>	July 2022
<b>Date it was first implemented</b>	August 2017
<b>Author(s)</b>	Directors
<b>Audience</b>	All Employees, Volunteers and work placements
<b>Other relevant policies and/or procedures</b>	All Policies & Procedures
<b>Where it is saved</b>	<a href="http://www.ig-cic.org.uk">www.ig-cic.org.uk</a>

Appendix B

**Cause for Concern – Staff observations and recording of incidents**



**Personal details**

Your name: \_\_\_\_\_  
Your Contact address: \_\_\_\_\_ Your phone number: \_\_\_\_\_  
\_\_\_\_\_ Your email: \_\_\_\_\_  
\_\_\_\_\_

Are you Disabled, under the definition of the DDA? Yes/No

**Type of incident/s**

Upset/crying	Verbal comments	Sexual behaviour
About staff or participant?	Physical marks/bruising	Bleeding/sores
Worrying behaviour	Withdrawn/unclean	Other (describe below)

Describe the incident, include date, time and location:

Did the incident involve (please tick):  
A member of staff  
A participant  
A visitor/someone else

Did you witness the incident?  
Do you have a cause for further concern?  
Do you want help or advice?

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**Please pass this form immediately after the incident to the Designated Senior Person (or Chief Executive)**

**Email:** [admin@ig-CIC.org.uk](mailto:admin@ig-CIC.org.uk) **Office:** 01923 231660 **Website:** [www.ig-CIC.org.uk](http://www.ig-CIC.org.uk)

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