

Safeguarding Strategy

Version	2.6
Ratified by	Quality Committee / Operational Leadership Team
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Responsible Committee / Board	Ashford and Canterbury Quality Assurance Groups
Review Date	December 2017
Target Audience	All employees of NHS Ashford and NHS Canterbury and Coastal Clinical Commissioning Group (hereafter referred to as the CCG), Governing Body Members including Lay Members, contracted third parties (including agency staff) students / trainees, secondees and other staff on placement with the CCG.

Review Date	Version	Summary of Changes
October 2015	2.5	Updated contact details
November 2015	2.6	The policy had an end of term review by the Designated Child and Adult Safeguarding Nurses and on their recommendation the wording was changed in 6.2 to reflect both Quality Committees. Policy was also adopted across both CCG's

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1. Introduction

- 1.1 The CCG holds the value that living a life that is free from harm and abuse is a fundamental right of every person. It acknowledges its statutory responsibility to promote the welfare of children and young people and to protect adults from abuse and risk of harm.
- 1.2 This Commissioning Strategy does not detail procedure and operational policies required for the management of safeguarding children and adults. Rather, these are developed in partnership with, and available through, the multi-agency operational policies approved by Kent Safeguarding Children Board (KSCB) and Kent and Medway Safeguarding Adults Board (SAB).
- 1.3 The CCG will work with the Safeguarding Boards, statutory agencies and its provider organisations to ensure the effectiveness of multi-agency arrangements to safeguard and promote the well-being of children, young people and adults at risk from harm or abuse.
- 1.4 Evidence of continuous improvement and compliance in quality and safety outcomes for commissioned services will be achieved through the use of specific contractual arrangements and metrics with provider organisations. This would include having in place: Key Performance Indicators (KPI), Commissioning for Quality and Innovation (CQUIN) targets, quality schedules, systems to embed learning from incidents and complaints, comprehensive single and multiagency safeguarding policies and procedures and a safeguarding training strategy and framework.
- 1.5 In addition the CCG will support specific Francis recommendations relating to improving safety for vulnerable groups to develop an ongoing culture of quality across the health economy.
- 1.6 Safeguarding priorities are central to ensuring high quality and safe care. NHS England NHS, Outcomes Framework 2014/15, particularly:
 - Domain 3 : Ensuring people have a positive experience of care
 - Domain 5 : Treating and caring for people in a safe environment protecting them from avoidable harm
- 1.7 This safeguarding strategy must be read in conjunction with the CCG Safeguarding Policy, Safeguarding Training Strategy and other relevant policies.
- 1.8 The CCG employees who identify a safeguarding concern about a child, young person or adult must discuss their concern immediately with their line manager and/or the designated nurse or contact the Central Referral Unit (CRU) to get appropriate advice and support. Contact details for the designated nurses and CRU (both in and out of hours) are listed on page 9 of this strategy.

2. Responsibilities

- 2.1 Overall accountability for safeguarding within the CCG rests with the Accountable Officer (AO). The Chief Nurse (CN) is responsible for senior clinical leadership and advocating for vulnerable groups across the CCG health economy.
- 2.2 The AO and CN are responsible for ensuring that robust constitution and governance arrangements are in place and maintained, and include succession planning, to ensure the delivery of all safeguarding duties and objectives.

3. Background

- 3.1 The publication of the *Safeguarding Vulnerable People in the Reformed NHS Accountability and Assurance Framework (March 2013)*, gives background to the primary care health systems where CCGs will be statutorily responsible for ensuring that the organisations from which they commission services, will provide a safe system that safeguards children and vulnerable adults. The Mandate from the Government to the NHS Commissioning Board (NHS CB) for April 2013 to March 2015 (published in November 2012) says:

“We expect to see the NHS, working together with schools and children's social services, supporting and safeguarding vulnerable, looked-after and adopted children, through a more joined-up approach to addressing their needs.”

- 3.2 The Mandate also sets the Governing Body a specific objective of continuing to improve safeguarding practice in the NHS, reflecting also the commitment to prevent and reduce the risk of abuse and neglect of adults.
- 3.3 For children and young people, the key legislation includes the Children Act (1989) and the Children Act (2004). Section 10 of the 2004 Act creates a statutory framework for local co-operation between local authorities, partner agencies and other bodies including the voluntary and community sector in order to improve the wellbeing of children in a local area. Statutory guidance such as ‘Making arrangements to promote the welfare of children under section 11 of the Children Act 2004’ (2007) reinforces and describes the duties of health services. Working Together to Safeguard Children (2013) recognises the changing commissioning arrangements within the health service and lays out the role of the CCGs.
- 3.4 The Care Act 2014 and *Clinical Governance and Adult Safeguarding: An Integrated Process (DH, 2010)* provides the framework for adult safeguarding. Key related legislations include the Human Rights Act (1998) Mental Capacity Act (2005), Deprivation of Liberty Safeguards (2009) and the Domestic Violence Crime and Victims Act (2004).
- 3.5 Although the safeguarding frameworks for adults and children are managed separately, nationally they do often link/crossover or can run concurrently, for

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example in domestic abuse concerns, the Multi-Agency Public Protection Arrangements (MAPPA) and Multi-Agency Risk Assessment Conferences (MARAC).

3.6 The lead agency for safeguarding children and adults is the local authority whilst the National Probation Service leads on MAPPA, the Police lead on MARAC and the Community Safety Partnerships lead on domestic abuse and Domestic Homicide Reviews. Health commissioners and providers are expected to contribute to all safeguarding processes and have lead persons identified to support MAPPA and MARAC and have policies in place to respond to domestic abuse.

4. Strategy

4.1 Aim

4.1.1 The CCG aims to commission services that promotes and protects individual human rights and which effectively safeguarded against abuse, neglect, discrimination or poor treatment. The CCG recognises that safeguarding children and adults is a shared responsibility and will ensure appropriate arrangements are in place to co-operate with the local authority in the operation of the safeguarding boards.

4.2 Strategic Objectives

4.2.1 The key strategic objectives are to:

4.2.2 Provide Senior and Board-Level Leadership

- Senior leadership responsibility and lines of accountability for the CCG safeguarding arrangements are clearly outlined to employees and members of the CCG as well as to external partners
- Contribute to the work of KSCB and SAB and their Safeguarding Strategic Plan and provide support to ensure that the boards meet their statutory responsibilities.
- Support designated individuals to contribute to the work of the KSCB and SAB subgroups and other national and local safeguarding implementation networks

4.2.3 Ensure Safeguarding Arrangements Are In Place

- Integrate safeguarding within other CCG functions, such as quality and safety, patient experience, healthcare acquired infections, management of serious incidents
- Secure the expertise of designated professionals. This includes the expertise of a designated doctor for children and for looked after children and a designated paediatrician for unexpected deaths in childhood.

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- Safeguarding professionals have appropriate amount of time and support to complete both individual management reviews and health overview reports
- All relevant actions identified through case reviews, DHRs, SIs following the reviews are carried out according to the timescales set out by the LSCB, SAB and the Community Safety Partnerships (for Domestic Homicide Reviews) Panels scoping and Terms of Reference.
- There is a safeguarding adult lead and a lead for the Mental Capacity Act 2005 and Deprivation of Liberty Safeguards 2009.
- Staff including Governing Bodies are trained to embed safeguarding within the commissioning process and are able to recognise and report safeguarding concerns
- The CCG, through its designated professionals, will actively work to raise awareness of, and ensure robust arrangements are developed and in place, to address the risk and harm associated with both national and local issues such as: human trafficking, child sexual exploitation, missing children and adults and female genital mutilation.
- The CCG will disseminate national and local publications, alerts, information and data relating to safeguarding adults at risk and children
- The CCG publicise on its website contact details for staff with specific safeguarding responsibilities, disseminate key learning and themes from local and national inquiries and provide links to signpost CCG staff and members of the public to organisations and support to safeguard adults and children at risk of or who have suffered significant harm

4.2.4 Commission Safe Services

- Have a clear strategy for Looked after Children (LAC) and the commissioning of appropriate services
- Ensure that all safeguarding elements are incorporated in all existing provider contracts and Service Level Agreements
- Service developments take account of the need to safeguard all patients, and are informed where appropriate, by the views of service users and by a Quality Impact Assessment
- Processes in place to ensure that adult care placements (such as care homes, nursing homes or independent hospitals) are based on knowledge of standards of care and safeguarding concerns by utilising intelligence from monitoring partners, such as Care Quality Commission (CQC).
- Strengthen contractual arrangements for children and adults in 'out of area' provision for LAC and or / residential care for adults with some elements of specialist health need

- Processes in place to disseminate, monitor and evaluate outcomes of all Serious Case Reviews and Domestic Homicide Reviews recommendations and actions plan within the CCG and with providers
- Demonstrate compliance with the Mental Capacity Act and the Deprivation of Liberty Safeguards through systems and processes
- Ensure that there are effective arrangements for sharing information with partners for the protection of children and adults.
- Monitoring systems for safeguarding training and developments for all NHS providers are undertaken by the designated professionals.
- Seek assurance that commissioned providers are meeting their statutory safeguarding responsibilities, and in particular that staff are following approved NICE guidance, and considering transition of young people to adult services.

5. Deliver the strategy

- 5.1 A timescale will be agreed against each strategic objective and a responsible lead identified through a safeguarding work plan. This work will include additional activities as required through any review processes or changes to local and national guidance and requirements.
- 5.2 The CCG will ensure that its designated clinical experts are an integral to decision making within the CCG and have the authority to work across local health economies, to influence and shape the culture and practice within provider services.
- 5.3 The CCG will, through the designated professionals, work alongside the neighbouring CCGs and Safeguarding Boards to ensure that a proactive approach is maintained both through specific work streams and also in the commissioning of services for children, looked after children and for services for adults at risk of abuse

6. Monitor Assurance

- 6.1 The strategy will be monitored through the Ashford and Canterbury Quality Committees and the development of specific action plans to manage progress of assurance reporting.
- 6.2 Comprehensive service specifications for children and adults' services, of which child and adult protection/ safeguarding is a key component, is evident in all contracts with provider organisations. Service specifications include clear service standards and KPIs (key performance indicators) for safeguarding Children and Adults and promoting their welfare, consistent with WSCB/ WSAB procedures.

- 6.3 Service specifications and service level agreements are reviewed annually to ensure safeguarding and quality elements of care are monitored within provider contracts.
- 6.4 Contract monitoring through regular contract management meetings with providers
- 6.5 Quality assurance visits to commissioned services and independent providers and the collation of quality and patient safety data and 'soft' intelligence will facilitate the identification, monitoring and analysis of safeguarding concerns in relation to vulnerable groups.
- 6.6 An Annual Report will be provided to CCG Governing Bodies and Kent Safeguarding Children and Adults Boards.

Appendix A – What If You Have a Safeguarding Concern

What To Do If You Have A Safeguarding Concern About A Child, Young Person Or Vulnerable Adult?

- Speak to your line manager immediately
- Speak to the designated nurse
- Speak to social services

Designated Nurse Contact details

If worried about an adult contact:

Rosetta Lancaster Designated Nurse for Safeguarding Adults

Tel: 03000 424855 (24855) Mobile: 07545 934548

Email: r.lancaster1@nhs.net

If worried about a child or young person contact:

Celina Grant Designated Nurse for Safeguarding Children

Tel: 03000 424124 (24124) Mobile: 07920 296477

Email: celinagrants@nhs.net

To speak to a social worker if you are worried about a child, young person or adult contact

Central Referral Unit (CRU)

For a telephone consultation

9-5pm: 03000 41 61 61

Out of hours: 03000 41 91 91

(Specify if concerns relate to an adult or child and ask to speak to social worker)

Secure Email: CentralDutyTeam@kentgcsx.gov.uk

Secure fax: 03000 41 23 45