# Introduction

Home Counties Community Media (HCCM) is committed to ensuring that adults at risk who use our services are not abused and that working practices minimise the risk of such abuse. All staff and trustees of HCCM have a duty to identify abuse and report it. The government’s PREVENT strategy (see below) also requires us to report any instances of radicalisation and/or extremism.

# Definitions

**An adult at risk** is a person aged 18 years and over who is or may be in need of community services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or is unable to protect him or herself against significant harm or exploitation. It may also include adults who are vulnerable for some other reason, e.g. caring responsibilities, special educational needs, or who suffered abuse or trauma.

**Abuse** is a violation of an individual’s human and civil rights by any other person or persons. This may consist of a single or repeated act of abuse which may be:

* physical
* sexual
* psychological, including emotional abuse and radicalisation
* financial or material
* discriminatory
* neglect and acts of omission
* institutional

Abuse can take place in any setting, public or private, and can be perpetuated by anyone.

**Radicalisation** is the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings.

**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.

# Statement of Policy

It is the policy of HCCM to value individual rights to freedom from abuse, harm and exploitation in all of its activities whether as members of staff, staff of its partners or participants enrolled on programmes which it has commissioned or for which the Partnership is responsible.

HCCM is committed to safeguarding and promoting the welfare of adults at risk, and recognises its role in identifying cases of suspected abuse and making referrals to the appropriate investigating agency (local authority adult services and / or the police).

HCCM reserves the right to refuse admission to any of its provision to a person who may pose a threat to adults at risk. It further reserves the right to require a partner to remove any individual found to be in breach of this policy to safeguard vulnerable adults from the threat of abuse.

We will require partners to verify that staff involved in projects have been DBS checked, where relevant, and reserve the right to veto any staff who have not been checked or who have convictions which bring into question their suitability to work with adults at risk.

These requirements will be set out in service level agreements and their acknowledgement will be a condition of contract for all delivery partners.

## Anti-terrorism and Preventing Radicalisation

The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

The 2011 Prevent strategy has three specific strategic objectives:

* Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
* Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support, and
* Work with sectors and institutions where there are risks of radicalisation that we need to address.

# Staff Training and Support

All staff employed & volunteers of HCCM will be made aware of their responsibilities through team meetings to ensure they understand HCCM policies and procedures surrounding safeguarding adults at risk and all relevant staff & volunteers will undergo Prevent training.

All will sign a declaration to confirm that they have read the policy which will be held on file and will possess an up to date Enhanced DBS disclosure check.

All participants/learners will at induction be made aware of their rights and freedom from abuse as part of the national ‘respect for all ‘agenda. They will be made aware of the process that is available to them for raising any concerns about alleged abuse of adults at risk.

## Allegations against Staff or Volunteers

Where an allegation of abuse is made against a member of staff or a volunteer, the relevant disciplinary procedures may be invoked as well as reporting the case to the appropriate authorities. Any such allegation should be reported to the managing director who will inform the appropriate statutory agency.

All allegations will be investigated internally and disciplinary action taken, where appropriate. See attached procedure and report form.

# Information Storage / Use / Retention

Secure storage, handling, use, retention and disposal of Disclosures & Disclosure information Statement

## General Principles

As an organisation using the DBS Disclosure service to help assess the suitability of applicants for positions of trust, HCCM complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.

It also complies fully with its obligations of Disclosure and Disclosure information and with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. To this end it has a written policy on these matters, which is available to those who wish to see it on request.

## Storage and Access

Disclosure information is never kept on an applicant’s personnel file and is always kept separately and securely, in lockable, non-portable, storage containers. Access to these is strictly controlled and limited to those who are entitled to see it as part of their duties.

## Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. HCCM maintains a record of all those to whom Disclosures or Disclosure information has been revealed and recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant’s full consent has been given.

## Retention

Once a recruitment (or other relevant) decision has been made, HCCM does not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, HCCM will consult the DBS about this and will give full consideration to the Data Protection and Human Rights individual subject before doing so.

Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

## Disposal

Once the retention period has elapsed, HCCM will ensure that any Disclosure information is immediately, suitably destroyed by secure means, i.e. by shredding, pulping or burning.

While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.

However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

# Procedure

Procedure to be followed in the event of an abuse and/or radicalisation allegation.

Any member of staff or volunteer who has knowledge of, or a suspicion that, the adult at risk is or has been suffering abuse or is being radicalised must refer their concern to their line manager, or in their absence, directly to the managing director**.**

All allegations or suspicions of abuse or radicalisation must be taken seriously. The adult at risk must be advised that the information cannot be kept confidential and will be passed on to a senior manager in the first instance, whether or not he or she wishes to make a formal complaint. In all cases, the adult at risk should be encouraged to report the matter formally.

Questions should be kept to the minimum required for clarity, and leading questions must be avoided. Advice will then be sought from the appropriate authorities and the adult at risk will be advised of the outcome, if appropriate.

**Report Form attached.**

### Approval

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| --- | --- | --- | --- |
| Signature: |  | | Martin Steers  Managing Director |
| Board Approved: | June 2018 | Review Date: | June 2019 |

# Safeguarding - Report Form

|  |  |  |  |
| --- | --- | --- | --- |
| **Date:** |  | **Reported To:** |  |
| **Adult at risk name:** |  | | |
| **Address:** | |  | |
| **Local Authority (if known):** | |  | |
| **Reason for referral:** | | | |
| (What you have observed/what has the adult at risk disclosed to you which leads you to believe this is a safeguarding referral where the adult may be at risk of harm or being abused? Give as much detail as possible and attach a copy of any background notes which may be relevant to this referral)  *(continue overleaf or on a separate sheet if necessary)* | | | |
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| --- | --- | --- | --- |
| **Signed:** |  | **Print name:** |  |
| **Position:** |  | **Tel:** |  |

**Please hand this referral personally or via email to:**

* your line manager or the managing director