



Supporting Vulnerable People & Safeguarding Policy

Policy aims and key objectives

This policy has been developed to embed safeguarding practices and procedures throughout Raise and to support the creation of a safer culture by reinforcing the safeguarding and wellbeing of adults and children at risk who use our services.

The aim of the policy is to improve the experience and outcome for vulnerable clients regardless of the channels they use to access our services.

Key Contacts

Role	Name	When to contact
Designated Safeguarding lead DSL	Linda Daley Raise Operations Manager ldaley@raiseadvice.org.uk 0151 459 1556 Ext: 108 07906432733	All Adult and Child safeguarding issues should be raised to the Designated Safeguarding Lead either direct or via a team leader First point of contact if Safeguarding issue raised against a member of staff
Deputy Designated Safeguarding Lead		Second point of contact if Chief Officer not available
Trustee Board Designated Lead	Chris Hudson Chair, Raise Trustee Board	Third point of contact if Operations Manager not available First Point of contact if Safeguarding issue is against or involves the Operations Manager
Liverpool	Careline: Liverpool only 0151 459 2606 - covers 2 services <ul style="list-style-type: none"> • One for adults called Adult Access • And one for children, called the Children's Advice and Support Service (CASS). 	https://liverpoolscp.org.uk/scp/local-authority-designated-officer-lado/what-is-the-lado-and-what-do-they-do Catherine Ballans, LADO & Risk Manager: Tel: 0771 670 2034 Pauline Trubshaw, LADO: Tel: 0784 172 7309 All referrals should be sent by email to the LADO at lado@liverpool.gov.uk (mailto:lado@liverpool.gov.uk) Use the link to access the form to make a referral to LADO: LADO Referral Form

	AlderHey Safeguarding & statutory service	(http://www.domain.com/assets/1/lado_referral_form_january_2022_.docx)
Halton	<p><u>Adults</u> Halton Safeguarding Adults Board 0151 907 8306 safeguarding.unit@halton.gcsx.gov.uk</p> <p><u>Children</u> Halton Children and Young People Safeguarding Partnership Integrated Contact and Referral Team (iCART) 0151 907 8305 contactandreferralteam@halton.gov.uk</p>	<p>Out of hours Emergency duty team 0345 050 0148</p> <p>Concern for Child safety (halton.gov.uk)</p> <p>All referrals must be made in writing using the LADO Consultation Form below:</p> <ul style="list-style-type: none"> • LADO Consultation Form • LADO contact number 0151 511 7925. <p>To ensure that the cover arrangements for LADO are consistently responded to, all emails and or referrals should be sent to: safeguarding.adminteam@halton.gov.uk and CC your LADO using LADO@halton.gov.uk</p>
Sefton	<p>Adult safeguarding Team 0345 140 0845</p> <p>CHAT (Childrens Help and Advice Team) 0151 934 4013</p>	<p>https://www.sefton.gov.uk/adult-social-care/i-need-help/safeguarding/raising-a-concern/</p> <p>https://www.sefton.gov.uk/social-care-and-health/children-and-young-people/report-a-child-or-young-person-at-risk/information-for-professionals</p> <p>Sefton's LADO REFERRAL FORM - Please return completed referral form via secure email to safeguardingunitadmin@sefton.gov.uk</p>
Wirral	<p><u>Adults</u> Central Advice and Duty Team 0151 606 2006 Out of hours 0151 677 6557 email: cadt@wirral.gov.uk</p>	<p>https://www.wirral.gov.uk/health-and-social-care/adult-social-</p>

	<p><u>Children</u> Wirral Integrated front door team 0151 606 2008 Out of hours 0151 677 6557 E-mail: IFD@wirral.gov.uk</p>	<p>care/safeguarding-adults/reporting-abuse-or-neglect-adult</p> <p>https://www.wirralsafeguarding.co.uk/professionals/lado-allegations/</p> <p>Children</p> <p>Please ensure referrals are sent to LADO Allegations at safeguardingunit@wirral.gov.uk</p>
<u>Knowsley</u>	<p><u>Knowsley Multi-Agency Safeguarding Hub (MASH) 0151 443 2600</u></p> <p><u>AdultsOnline form</u></p> <p>Children</p>	<p>https://www.knowsley.gov.uk/adult-social-care/safeguarding-adults#</p> <p>https://www.knowsley.gov.uk/children-young-people-and-families/child-protection-and-safeguarding/safeguarding-children</p> <p><u>Knowsley LADO Diane Kitcher 0151 443 4077</u></p>
St Helens	<p><u>St Helens MASH team</u></p> <p><u>01744 676767</u></p> <p><u>Emergency Duty Team contact details:</u></p> <ul style="list-style-type: none"> • <u>Via Contact Cares: 01744 676767 from 9am until 9pm (option 1 for Contact Cares, option 2 for EDT)</u> • <u>Direct line: 0345 0500 148</u> 	<p>https://www.sthelens.gov.uk/article/3520/Tell-us-about-an-adult-being-abused-or-neglected</p> <p>https://www.sthelens.gov.uk/concern</p> <p>LADO 01744 671252 report the allegation to the LADO using the LADO referral form</p>

	<u>Adults</u> contactcares@sthelens.gov.uk <u>Children</u>	sthelenslado@sthelens.gov.uk
Cheshire West & Chester	Cheshire West and Chester Children Social care – i-ART Cheshire West and Chester Adult Social Care:	i-ART Email: i-ART@cheshirewestandchester.gov.uk Telephone: i-ART - 0300 123 7047 The team can be contacted 8.30am to 5pm from Monday to Thursday and 8.30am - 4.30pm on Friday. Outside of these hours, or over a bank holiday, please call 01244 977277 (Emergency Duty Team). Email: accesswest@cheshirewestandchester.gov.uk Telephone: 0300 123 7034 (Cheshire West Community Access Team) or 01244 977277 (Emergency Duty Team - out of office hours)

Raise Procedures

	Who	Step	Notes
1	Person advised	In an emergency call 999 for police or ambulance	e.g in a violent situation or if you feel threatened
2	Person advised	Inform your Team Leader	In all cases of concern, allegation or disclosure of abuse you must inform your team leader as soon as possible and certainly on same day NB if the suspicion is that the Designated Safeguarding lead is involved in the abuse or is not actioning allegations of abuse, report to the designated Safeguarding Trustee : Chair of Trustee Board
3	Person advised	Record incident	Make a record of the incident: see guidance notes below If no action required- go to step 7
4	Team leader	Inform Designated Safeguarding Lead	Inform Designated safeguarding lead on same day as soon as possible Agree next steps Record actions and facts

5	Designated Safeguarding Lead	Inform or discuss with relevant Safeguarding Board, Police, Doctor, Housing Association or relevant body	<p>Determine the correct referral or escalation route based on consent or non-consent of the vulnerable person or person reporting abuse or concerns.</p> <p>Record actions taken and facts of reporting e.g, timeline. NB Raise should not participate in any form of investigation</p> <p>Consent</p> <p>If the person making the allegation indicates that they are willing to report the allegation to social services or the police, then RAISE should offer to assist the individual to make contact with the relevant authorities.</p> <p>Consent withheld</p> <p>Where the person making the allegation refuses to allow disclosure of the allegation the Designated Safeguarding Lead must consult with the contact the relevant authority or Safeguarding Board to discuss the situation further.</p> <p>Forms are often changing, so when reporting by phone request most up to date form if you are required to complete one.</p>
6	Designated Safeguarding lead	Follow up action	As advised by the Safeguarding Board or notified person
7	Team leader and/or Designated Safeguarding lead	Close case	Record summary in spreadsheet

Guidance notes for recording incident

- If someone is making an allegation or disclosing abuse which could include self-harm to you, you must make a note as soon as possible of what they said. Make sure that you use the person's own words.
- Keep a record of the incident. Note down what happened and when. Describe whereabouts in the room people and relevant objects such as weapons were when you first entered. Describe what the whole scene looked like.

- The adviser must make a note of the time and date that the allegation was made, who made it and the nature of the allegation.
- The adviser must record only the facts, preferably in the language / words used by the person making the allegation.
- **You must never keep secrets**, even if the person asks you not to tell anyone else. You must always share concerns, allegations or disclosures with your supervisor
- The adviser should tell the person making the allegation that the adviser will discuss this with the supervisor. He or she should also be told that, although the supervisor will not automatically report the allegation, this may happen.
- You will be expected to co-operate with the investigation. You may be required to provide a statement, attend a strategy meeting or be interviewed by the police.
- If the alleged perpetrator contacts you, you must not talk to them about the incident. Do not give them any information about the person.
- Do not discuss what has happened with carers or relatives of the person or with other workers.

3.13 Safeguarding behaviours around adults

No member of RAISE staff will:

- Visit a vulnerable adult in their home unless on an official pre-arranged visit
- Transport a vulnerable adult alone in their car unless prior arrangements have been made with RAISE manager or in case of a medical emergency
- Make any comments with sexual overtones, even in humour, or partake in any 'horse play' with a vulnerable adult
- Allow a vulnerable adult into their home
- Engage in rough physical games – apart from structured sports activities which may be part of a community event etc.
- Allow or engage in inappropriate touching of any form
- Allow a vulnerable adult to use inappropriate language unchallenged
- Make sexually suggestive comments about or to a vulnerable adult, even in fun
- Let allegations a vulnerable adult makes go unchallenged or unrecorded
- Do things of a personal nature for a vulnerable adult that they can do for themselves
- Lend money to or borrow money or possessions from a vulnerable adult. They will not agree to make any purchases, or undertake any financial transactions, on behalf of the client.
- Connect with them through social media or outside of work.

In addition:

- If the client has access to third party support e.g. housing worker, social worker, then joint visits or office appointments will be made where necessary;
- If a referral indicates that the client should not be visited alone, or if an adviser has any concerns about visiting a vulnerable adult on their own, then steps should be taken to ensure that a joint visit is arranged

2.10 Safeguarding behaviours around children

Raise takes measures to ensure that all clients are protected from any form of harm or abuse and to minimise the risk of advisers having allegations made against them. The steps taken to do this will apply to working with all clients, but for clarity, examples specific to children are listed here:

- Staff will not look after children out of sight of a parent or carer who is seeking advice.
- Be aware that a person under the age of 18 is legally a child, even if they look and express themselves like an adult.
- Where possible, arrange for activities involving a child working with an adult to take place in a room which can be easily observed by others, This needs to be balanced with client confidentiality.
- An adviser must always make their supervisor aware when a child is being interviewed alone.
- An adviser must never visit a child in their home unaccompanied. The adviser must ensure that a parent or guardian will be present.
- Staff and volunteers must never transport a child in their car unless prior arrangements have been made or in exceptional circumstances such as a medical emergency, where this is appropriate.
- Anyone working on a project specifically aimed at those under the age of 18 must have had an enhanced DBS check.

Anyone working in a childcare setting, regardless of the target client group, must

- have had an enhanced DBS check.
- Anyone undertaking home visits must have had an enhanced DBS check.
- Staff and volunteers must never make any comments which may be interpreted as sexual in nature, to a child
- A child must never be allowed into a staff member's home.
- Raise has sound recruitment practices which aim to prevent anyone considered to be a risk to children from working within Raise.
- Staff and volunteers must not engage in any physical games with a child – apart from structured sports activities which may be part of a community event etc.
- Staff and volunteers must not engage in sexually provocative games.
- Staff and volunteers must not allow children to use inappropriate language unchallenged.
- If a child is distressed, offer comfort with words rather than touching them.
- The content of conversations must be professional and pertinent to the advice giving process.
- Staff and volunteers must not let allegations that a child makes go unchallenged or unrecorded.
- Staff and volunteers must not do things of a personal nature for children that they can do themselves.
- Do not take photographs of children
- Do not connect with children through social media or outside of work

Adult Safeguarding Statement

Raise recognises its responsibility to contribute to the safeguarding of the adults at risk that it works with, and to act on any concerns when someone is at risk of abuse. Everyone who works with adults at risk has a responsibility for promoting their welfare and keeping them safe, and all of our staff, volunteers, Board members and Trustees will help us to deliver this through identifying concerns, sharing information and taking prompt and appropriate action.

This Safeguarding Adults Policy applies to all our staff, volunteers, sessional workers, Board members, Trustees and anyone else working on behalf of the Raise.

Our policy and procedures relate to the safeguarding of adults at risk, who are defined by the Care Act (2014) as:

- People who are aged 18 or over and:
- **Has** care and support needs
- **Is** experiencing, or is at risk of, abuse or neglect
- **As a result** of those care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect

The purpose of our safeguarding policy is to:

- Stop abuse or neglect wherever possible; prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- Outline the duty and responsibilities of our staff, volunteers and trustees in relation to protecting adults at risk from abuse, neglect and exploitation
- Ensure all staff, volunteers and trustees, service users and carers/families are familiar with the policy and associated procedures for safeguarding adults
- Support staff to recognise the different types of abuse (signs, symptoms and indicators)
- Provide staff, volunteers and trustees with a clear procedure to implement where vulnerable adult protection issues arise

Care and support is the mixture of practical, financial and emotional support for adults who need extra help to manage their lives and be independent – including older people, people with a disability or long-term illness, people with mental health problems, and carers.

We are committed to working in ways that protect adults at risk and keep them safe at all times. We will review this policy regularly to ensure it remains fit for purpose, reflects current policy and legislation, and ultimately supports us to effectively safeguard adults at risk. Specifically, this policy will be reviewed annually, or in the following circumstances:

- A change in legislation and / or government guidance
- As required by the Liverpool City Region Safeguarding Adult's Board
- As a result of any other significant event

We will seek to keep adults who are at risk safe by:

- Ensuring everyone in the organisation understands their role and responsibilities in relation to safeguarding vulnerable adults

- All staff, volunteers and trustees promoting the welfare and safety of vulnerable adults and acting on any suspicion, or evidence of abuse or neglect
- Sharing information and concerns to a responsible person / agency
- Appointing a Designated Safeguarding Lead (DSO), and a lead Board member for safeguarding
- Providing effective management for staff and volunteers through effective supervision, support, training and quality assurance measures
- Ensuring appropriate action is taken in the event of an incident or concern being raised
- Working within the framework of the Liverpool City Region's Safeguarding Adult's Board
- Managing any allegations against staff and volunteers appropriately
- Having effective complaints procedures in place

Types of abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes him or her harm, endangers their life or violates their rights.

Abuse may be physical, sexual, psychological, financial or through neglect.

An individual, a group or an organisation may perpetrate abuse

Abuse concerns the misuse of power; control and/or authority and can manifest itself as:

- Domestic violence, sexual assault or sexual harassment
- Racially or religiously motivated assaults
- Discrimination and oppression
- Institutional abuse
- Financial abuse

People can be abused in the place where they live, that is, in their own home, residential or nursing homes and in places where they spend their days, that is, in day centres, places of work, college. People can also be abused in any setting.

Perpetrators can be any of the following:

- Informal carers, including neighbours, friends and relatives
- Partners, ex-partners and other family members
- People in a position of trust
- People paid to offer care or services
- Other users of services
- Strangers
- Organisations by the way they conduct their day to day practice can abuse and cause harm
- Those who deliberately target others, whom they perceive as vulnerable, in order to exploit them.

Risk Factors

There are certain factors and situations that may place people at particular risk of being abused. The presence of one or more of these factors does not automatically imply abuse

will result, but may increase the likelihood:

- Need for intimate personal care. Certain personal care needs may present more opportunity for abuse
- Role reversal, for example, the adult child taking over the parental role
- Living in the same household as a known abuser
- Where there is a family history of abuse
- Where an adult is dependent on others or others are dependent on them
- Inappropriate or dangerous physical or emotional environment, for example, lack of personal space
- Where there is a change in the life style of a member of the household, for example, unemployment, employment, illness
- A member of the household experiencing emotional or social isolation
- The existence of financial problems
- Difference in communication or a breakdown in communication

Duty to report abuse

Everyone reading this document must regard himself or herself as an alerter.

Alerting or raising a concern about abuse means:

- Recognising signs of abuse/ongoing bad practice
- Responding to a disclosure
- Reporting a concern, allegation or disclosure
- Recording initial information
- Working strictly in accordance with anti-discriminatory practice

As an alerter you are:

Not being asked to verify or prove that information is true

Required to log your concerns and report them to an appropriate person for example your supervisor

Only the Police have the responsibility to establish if a criminal offence has been committed.

Alerting through the formal channels will enable a proper assessment or investigation to be carried forward.

RAISE must report any concerns, allegations or disclosures of abuse through the formal channels, no matter who the alleged perpetrator is.

If you raise a concern about an organisation or an individual, and you are acting in good faith, you will be supported whatever the outcome of the investigation.

Training

Raise will ensure that appropriate safeguarding training is available to all staff and volunteers.

Review of policy

Raise's adult protection policies and procedures will be reviewed bi-annually. Necessary changes that are identified in the interim period, as a result of amendment to legislation, will be made as required.

Child Safeguarding Statement

Purpose

The purpose of this policy is to:

- Promote and prioritise the safety and wellbeing of all children and young people who access the services delivered by Raise, as well as the children of adult's who use our services
- Provide staff, volunteers, Board members and Trustees with the overarching principles that guide our approach to safeguarding and protection, and what to do when they have concerns

We are committed to working in ways that protects children and young people and keeps them safe at all times. We will review this policy annually to ensure it remains fit for purpose, reflects current policy and legislation, and ultimately supports us to effectively safeguard children. This policy may be reviewed earlier in the following circumstances:

- A change in legislation and / or government guidance
- As required by the Local Children's Safeguarding Partnership (LSCP)
- As a result of any other significant event

Raise recognises that:

- The welfare of the child is paramount in all circumstances and that children have a right to be safe and should be protected from all forms of abuse and neglect
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm and abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Safeguarding is everyone's responsibility
- It is better to help children as early as possible, before issues escalate and become more damaging
- Children and families are best supported and protected when there is a co-ordinated response from all agencies working in partnership

We will seek to keep children safe by:

- Promoting and prioritising the safety and wellbeing of children and young people at all times
- Valuing, listening to and respecting children and young people
- Ensuring everyone in the organisation understands their role and responsibilities in relation to safeguarding and is provided with appropriate opportunities to recognise, identify and respond to signs of abuse, neglect or other safeguarding concerns relating to children and young people
- Providing early help, where appropriate, to support children and their families as soon as a problem emerges to prevent needs escalating to a point where intervention would be needed via a statutory assessment
- Adopting child protection and safeguarding practices through our procedures and a code of conduct for all staff and volunteers
- Ensuring appropriate action is taken in the event of an incident or concern being raised and support provided to those who raise or disclose the concern
- Appointing a Designated Safeguarding Lead (DSO) for children and young people, and a lead board member for safeguarding
- Providing effective management for staff and volunteers through providing supervision, support, training and quality assurance measures
- Recruiting staff and volunteers safely, ensuring all necessary checks are always made
- Recording and storing information safely and securely and sharing information about safeguarding and good practice with children, their families, and staff and volunteers via leaflets, 1-2-1 discussions and / or training as appropriate
- Sharing our concerns, along with relevant information, with agencies who need to know, and involving children, young people and their families and carers appropriately
- Managing any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and dealing with any bullying effectively as and when it does arise
- Having effective complaints measures in place
- Providing a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and appropriate regulatory guidance

Further information

All public-facing staff and volunteers will come into contact with children as part of their work. This may be incidental contact, where a client is accompanied by children, or a client may be a child.

Working with child clients may require prolonged contact and case work. It is essential that Raise reassures these clients that when they use our service they will be safe, that any details they reveal will be kept confidential, and that they can trust Raise.

Equally, it is essential that proper guidelines are in place to ensure that advisers deal appropriately with situations in which children may be at risk. While client confidentiality is paramount to the advice-giving process it is not absolute and there are circumstances under which it is appropriate for the center to breach client confidentiality. The decision to breach confidentiality must be made by a manager or equivalent.

Guidance underpinning this policy

This policy follows guidance on child safeguarding issues set out by the NSPCC.

The NSPCC identifies several situations where children may be at increased risk of harm:

- Deaf or disabled.
- Drug or alcohol misuse.
- Running away.
- Domestic violence.
- Mental health problems.

In addition the NSPCC have identified specific forms of abuse which may be perpetrated against a child. These are:

- Bullying and cyberbullying
- Child sexual exploitation
- Child trafficking
- Domestic abuse
- Emotional abuse.
- Female genital mutilation
- Grooming
- None-recent abuse
- Online abuse
- Physical abuse.
- Neglect.
- Sexual abuse.

Training

Raise will ensure that appropriate safeguarding training is available to all staff and volunteers.

Review of policy

Raise's child protection policies and procedures will be reviewed annually. Necessary changes that are identified in the interim period, as a result of amendment to legislation, will be made as required.

Revised by	Jude Deakin	Date	Nov 2021
Approved by	Board of Trustees	Date	19 January 2022
Revised by	Penny Brown	Date	3 January 2023
Approved by	Board of Trustees	Date	26 July 2023
Revised by	Linda Daley	Date	September 2024
Approved by	Board of Trustees	Date	17 October 2024
Revised by	Linda Daley	Date	July 2025
Approved by	Board of Trustees	Date	5/8/2025

Appendix 1 Dealing with Allegations of Abuse Against Staff or Volunteers Policy

The following guidance for dealing with allegations of abuse against staff(or volunteers should be read and used to assist in identifying and reviewing specific arrangements and responsibilities for dealing with allegations of abuse against staff or volunteers employed by Raise and adapted as necessary. The purpose of this guidance is to ensure that there is a plan in place for how allegations of abuse against staff or volunteers is dealt with and managed, and to ensure that staff and volunteers are aware of their responsibilities and arrangements.

Allegations are made when an adult working in an organisation has:

- Behaved in a way that has harmed or may have harmed a child or vulnerable adult
- Possibly committed a criminal offence against or related to a child or vulnerable adult; or
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.
- Behaved towards a vulnerable adult or adults in a way that indicates s/he is unsuitable to work with vulnerable adults

The Aims of this Guidance

To ensure that any allegation made against staff or volunteers is dealt with fairly, quickly, and consistently, in a way that provides effective protection for children and adults and at the same time supports the person who is the subject of the allegation. This guidance outlines the initial response to an allegation of abuse against staff or volunteers.

Procedures

The Person responsible for dealing with allegation of abuse against staff or volunteers is the Chief Officer/Operations Manager. If the allegation is against Chief Officer/Operations Manager, the person responsible is the Chair of the Trustee Board. Raise has a duty of care to our employees. We will ensure that we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

The current Chair of the Board is: Chris Hudson

Scope

This guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children or vulnerable adults in their present position, or in any capacity. It should be used in respect of all cases in which a staff member or volunteer has an allegation of abuse raised

Initial Action by the Designated Safeguarding Lead

The procedures for dealing with allegations need to be applied with common sense and judgment. When informed of a concern or allegation, the designated lead should not initially investigate the matter or interview the member of staff or volunteer nor the vulnerable adult or child concerned or potential witnesses.

They should:

- Obtain written details of the concern / allegation, signed and dated by the person receiving it (not the child / adult making the allegation);
- Record any information about times, dates and location of incident/s and names of any potential witnesses;
- Record discussions about the child/vulnerable adult and/or member of staff, any decisions made, and the reasons for those decisions

The Local Safeguarding Children's Board Designated Officer (Local Authority) or Merseyside Adults Safeguarding Board must be informed immediately for advice and guidance. Referrals should not be delayed in order to gather information and can be made without parental consent.

Appendix 2: :The role of the designated safeguarding lead

Choosing a Designated Safeguarding Lead (DSL)

It is recommended that at least one person in your organisation is a “designated safeguarding lead”. This person will take the lead on safeguarding for your organisation. Nominating someone to undertake the role may be the first task your group should consider. The person chosen should:

- be someone with authority in the group such as a manager or team leader
- a paid member of staff if possible
- have a Disclosure and Barring Service (DBS)
- have at least two references which are followed up.
You may wish to consider appointing a deputy in case of sickness or leave.

Responsibilities

1. The Designated Safeguarding Lead are the first point of contact for all staff and volunteers to go to for advice if they are concerned about a child or vulnerable adult (this may also need to be out of hours so staff and volunteers should always know how to contact them or you can also appoint a Deputy);
2. They have a higher level of safeguarding training and knowledge than the rest of the staff and should have completed ‘**understanding the role of the new designated safeguarding lead**’ course at least every two years.
3. They are responsible for ensuring that their organisation’s safeguarding policy is kept up to date.
4. They ensure that they comply with Raise recruitment policy and procedures for new staff members and their induction.
5. They support staff to assist in information regarding concerns and support decision making about whether staff concerns are sufficient enough to notify Children’s Social Services or Merseyside Adult Safeguarding Board or whether other courses of action are more appropriate.
6. They make formal referrals to the Careline.
7. They ensure that concerns are logged and stored securely.
8. They have joint responsibility with the management committee or Board of Trustees to ensure that the organisation’s safeguarding policy and related policies and procedures are followed and regularly updated;
9. They are responsible for promoting a safe environment for children and young people and vulnerable adults;

10. They know the contact details of relevant statutory agencies e.g. Careline, Police, Local Safeguarding Children Partnership, Merseyside Adult Safeguarding Board and the Local Authority Designated Officer (DO) for allegations against staff.

It is not the responsibility of the designated safeguarding lead to decide whether a child or vulnerable adult has been abused or not- that is the responsibility of investigative statutory agencies such as Children's Social Work Services or the police. However keeping children and vulnerable adults safe is everybody's business and all staff should know who to go to and how to report any concerns they may have about a child or vulnerable adult being harmed or at risk of being harmed.

Appendix 3: Supporting Vulnerable Clients in general

This guidance sets out how Raise will support vulnerable clients in general as well as how to safeguard children and adults.

The policy refers to definitions from the Financial Conduct Authority (FCA). You can find these definitions in the FCA's Consumer Credit Sourcebook (CONC).

What is vulnerability?

Vulnerability cannot be defined with a one-size-fits-all statement. It will not always be clear straight away which of our clients are vulnerable. But it is important that as an organisation we have an awareness of the potential of all of our clients to be vulnerable. The following factors could be helpful in determining if a client is vulnerable:

- Individual factors
- Wider circumstances
- Creditor or adviser action or inaction

The Financial Conduct Authority (FCA) has defined a vulnerable consumer as “someone who due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.” (Financial Conduct Authority (2015)

Occasional Paper No. 8 Consumer Vulnerability: Executive summary).

Our approach to identifying and supporting vulnerable clients

As an organisation we will:

- Ensure that we remain aware of the potential for our clients to be vulnerable
- Encourage clients to feel comfortable disclosing any vulnerabilities to us
- Understand that we may need to make adjustments to our standard processes to allow vulnerable clients to request and access our services
- Take vulnerabilities into consideration in how we then provide our service to vulnerable clients

Common areas of concern

Mental capacity

The FCA defines mental capacity as “The ability to make an informed decision at a specific point in time. Clients with mental capacity to make a decision can understand, remember and weigh up information which is presented to them, and communicate their decision.” (CONC 2.10.3G)

Mental capacity limitation is explained by the FCA in the following way: “people with a mental capacity limitation are **unable** to understand, remember or weigh up informed information presented to them, or to communicate a decision.” (CONC 2.10.8.G)

It is important not to presume that all clients with mental health issues also have a mental capacity limitation. Mental capacity is not the same as mental health. Some clients with mental health difficulties may have mental capacity limitations, but some will not.

Mental capacity limitations can also fluctuate. For example a person with dementia may find that they have capacity in the mornings, but struggle to understand and retain information as the day progresses. In this instance we would accommodate the client by offering advice and appointments in the mornings.

- We will encourage clients to feel comfortable disclosing any potential mental capacity limitations
- We will not solely rely on clients to tell us, but will also look for indicators that a client may be lacking mental capacity
- Where we identify that a client lacks mental capacity we will take reasonable steps to establish this, document it and assist the client to make an informed decision

Disclosures of sensitive personal data

Clients in vulnerable situations will often disclose personal data. We have adopted a data protection policy. We will ensure that all staff are aware of the importance of following this policy. You can read our data protection policy which is filed in BreatheHR

Clients who talk about taking their own life

There may be occasions when staff and volunteers suspect or are told by vulnerable clients that they are considering taking their own lives. We recognise that these situations may be a rarity, but that it is important that staff and volunteers are clear on what action to take.

We will ensure that staff and volunteers are aware of the importance of the following steps

Listening to the client, acknowledging their circumstances and feelings and making it

- clear we are taking them seriously
- Understanding our safeguarding policies which explain the circumstances around breaching client confidentiality and calling 999 in an emergency. You can read our policies for safeguarding adults and children which are detailed below.

We will ensure that staff and volunteers are able to seek support following these challenging situations.

Clients with a terminal, life-threatening or long-term condition

We recognise that being told a client is suffering from a serious illness or condition can be difficult to hear. Staff and volunteers may be concerned about how to respond and the best way to support clients in these circumstances.

We will ensure that our staff and volunteers are aware of the following ways to help in these situations:

- Provide the client with advice and guidance relevant to their situation, recognising that there are likely to be areas of the client's illness or condition in which they are not experts. Staff and volunteers will be aware of their own boundaries and ensure these are communicated to the client
- Acknowledge the disclosure of a serious condition in an appropriate and sympathetic way. Ask the client if they mind talking about the situation, and if it is not an illness or condition they have an awareness of, tell the client this and ask for more information
- Be aware of the importance of listening to a client who has disclosed a serious illness or condition and taking on board what the client feels they need support with rather than presuming
- Demonstrate empathy, but avoid the use of phrases such as "I know how you feel"
- Be aware that clients in these situations may have a range of emotions including confusion, anger, distress, fear, depression and sadness

We will ensure that staff and volunteers are aware of the importance of looking after their own wellbeing and that they can seek support from their line managers whenever needed.

When someone else gives us information about a client

In some situations we may receive advice from a carer or family member about a vulnerable client.

We will ensure that our staff and volunteers understand that whilst they should not discuss a client's case with anyone who does not hold the appropriate authority, this does not mean they cannot listen to the information being provided by a third party.

We recognise that disclosures from carers can be valuable. We are committed to engaging with carers and taking appropriate action, whilst ensuring that we maintain client confidentiality.

Our client confidentiality policy has more detail about this. We will ensure that all staff and volunteers are aware of the policy. You can read our confidentiality policy which is filed on BreatheHR.

Concerns that creditors are failing vulnerable clients

If we are concerned that a creditor agency is failing vulnerable clients, we will consider requesting copies of its policies and procedures for dealing with these customers. We will then use the information provided to assist us in pursuing a client's case and also in making the creditor aware of potential breaches of the regulatory framework which states that:

"A firm must establish and implement clear, effective, and appropriate policies and procedures for:

(1) dealing with customers whose accounts fall into arrears (Note: paragraph 7.2 of ILG)

(2) the fair and appropriate treatment of customers, who the firm understands or reasonably suspects to be particularly vulnerable”

We can also consider using the creditor’s complaints policy, or seeking advice from the national Citizens Advice Creditor Liaison Policy Lead.

Supporting and training staff and volunteers

We will ensure that all staff and volunteers receive appropriate training, to allow them the knowledge to effectively identify and support vulnerable clients.

We recognise that staff and volunteers may require extra advice, support and guidance when working with vulnerable clients. This support is available from their line managers in the first instance.