



## Annual Safeguarding Report

### SAFEGUARDING ANNUAL REPORT

1 April 2024 to 31<sup>st</sup> March 2025

**Purpose:**

The purpose of this report is to provide assurance to the Here Board that the services for which it is accountable are operating and responding appropriately and within best practice guidelines with regards to the safeguarding of adults, young people and children. This report will also demonstrate Here's compliance with CQC Regulation 13: Safeguarding service users from abuse and improper treatment.

**Audience:**

Here Board April 2025

**Author:**

Kristin Francis - Enabling Team Safeguarding Lead

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## 1 Purpose

The following report and action plan for Here has been compiled by the Here Safeguarding Lead and Service Safeguarding Leads and provides an overview of activity and progress in relation to our responsibilities towards the safeguarding of vulnerable children and adults during 2024/2025.

## 2 Our Safeguarding Framework

In June 2024, NHS England published Safeguarding Children, Young People and Adults at risk in the NHS – Safeguarding Accountability and Assurance Framework (SAAF) which incorporates and implements the Children’s Social Care Reforms and the Working Together to Safeguard Children 2023 revised legislation for multi-agency safeguarding arrangements. [NHS England » Safeguarding children, young people and adults at risk in the NHS](#)

The SAAF set outs the safeguarding roles and responsibilities of all individuals working in providers of NHS-funded care settings and NHS commissioning organisations.

The framework provides guidance and minimum standards to:

- Identify and clarify how relationships between health and other systems work at both strategic and operational levels to safeguard children, young people and adults under the care of the NHS at risk of abuse or neglect.
- Clearly set out the legal framework for safeguarding children and adults as it relates to the various NHS organisations, to support them in discharging their statutory duties and requirements to safeguard children and adults.
- Outline principles, attitudes, expectations, and ways of working that recognise safeguarding is everybody’s responsibility, and that the safety and wellbeing of those in vulnerable circumstances are at the forefront of our business.
- Outline the ways in which NHS England Regional and National teams support integrated care boards (ICBs) accountability and leadership at local level, fostering effective place-based partnerships.
- Identify clear arrangements and processes to be used to support evidence-based practice and provide assurance at all levels, including NHS England Board, that safeguarding arrangements are in place and are effective.
- Promote equality by ensuring that health inequalities are addressed and are at the heart of NHS England, ICB and provider values.

The responsibilities for safeguarding identified in the SAAF inform the statutory functions for our approach. We are also steered by national policy and CQC guidance (appendix i).

The Here approach towards safeguarding children (individuals under the age of 18 years), young people (aged 16-18yrs) and adults (individuals over the age of 18 years) is defined in the Here Safeguarding Children and Adults Policy and aligns to Here’s purpose of delivering **exceptional care, for everyone.**

### **3 Current approach to safeguarding**

Safeguarding is everyone's responsibility to both recognise and report concerns and we have mechanisms in place to support staff to manage this, following appropriate procedures and always taking consideration of what is in the best interests of the individual or individuals identified.

Here undertakes an annual safeguarding audit to provide assurance that we, as a provider organisation of NHS services, are fulfilling our statutory roles, responsibilities and functions (appendix ii). The Here organisational safeguarding model (appendix iii) and flowcharts (appendices iv and v) were developed to demonstrate how our safeguarding policies and procedures feed into our culture of safety, wellbeing, and collaborative learning. The model shows processes for reporting and escalating safeguarding concerns, a resilient structure in place for support, advice and supervision, and flow of communication to share learning throughout the organisation at all levels.

#### **3.1 Procedures**

The Here Safeguarding Children and Adults Policy was updated in July 2024 in line with new legislation and is now due for renewal July 2026.

All colleagues are made aware of the policy during their induction to the organisation. All organisational policies are held by HR on a central platform which all staff have access to and alerts them as policies are updated.

#### **3.1 Specialist advice**

All clinicians have access to specialist advice from a named safeguarding lead within their service, in addition to the organisation safeguarding lead, who is connected to the Sussex safeguarding network for wider support where required.

In addition, we work closely with our partner organisations to ensure our safeguarding approach is aligned to support partnership working and wider learning.

### **4 Training**

Here Safeguarding training is provided by e-LfH (Health Education England) an e-learning programme in partnership with the NHS and Professional bodies providing high quality training of the NHS workforce across the UK and Sussex.

All individuals, both clinicians and non-clinicians, employed or on a sessional contract must complete Safeguarding Adults and Children training every three years in line with the Intercollegiate competency frameworks:

[Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff | Royal College of Nursing \(rcn.org.uk\)](#)

Safeguarding training is provided through the following Statutory Mandatory Training:

- Safeguarding adults 1,2,3 and 4

- Safeguarding children 1,2 3 and 4
- Preventing radicalisation - Basic Prevent Awareness
- Identifying and supporting victims of modern slavery
- Oliver McGowan - learning disabilities and autism

The Here Statutory and Mandatory Training matrix details appropriate safeguarding training levels for specific roles and is clarified in the Here Safeguarding Children and Adults Policy.

#### 4.1 Training compliance

2024/25 saw the People Team at Here continuing to focus on Statutory and Mandatory Training compliance throughout the organisation including Safeguarding training, with oversight of HR and Quasar and there are clear, organisation-wide standards regarding compliance and monitoring of training. See relevant HR policies for details.

Staff training rates are visible on Power BI and monitored by HR. On a service level, training is monitored by the service leads.

Current training coverage is for Here's clinical service provision only which is shown below.

Non-Clinical staff working within clinical services are expected to complete safeguarding training Level 1 and 2. Clinical staff are expected to complete safeguarding levels 1 to 3 although completion of level 3 negates the need to undertake refresher training at levels 1 and 2 as this is covered. Here Safeguarding Lead is required to complete Level 4 training and access external safeguarding supervision.

Cross-organisational training compliance data as of March 2025 is outlined below against a compliance threshold rate of 85%. Safeguarding Level 4 and Prevent Level 3 are requirements for safeguarding leads/executive set out in Here Safeguarding Children and Adults Policy so are marked in amber/red as training is in progress.

Statutory and Mandatory Training	Organisational Compliance
Safeguarding adults – Level 1:	98%
Safeguarding adults – Level 2	98%
Safeguarding adults – Level 3	98%
Safeguarding adults – Level 4 (New requirement for Here Safeguarding Lead)	0% - mapped to new SG lead and started
Safeguarding children - Level 1	98%
Safeguarding children – Level 2	99%
Safeguarding children - Level 3	98%

Safeguarding children – Level 4 (New requirement for Here Safeguarding Lead)	0% -- mapped to new SG lead
Preventing radicalisation - basic prevent awareness	97%
Preventing radicalisation – Level 3 (New requirement for Here Safeguarding Lead and Executive Safeguarding Lead)	100%
Identifying and supporting victims of modern slavery	96%
Oliver McGowan - learning disabilities and autism	100%

## 5 Annual safeguarding audit

### 5.1 Incidents and complaints

During the reporting period, there were no safeguarding complaints or serious safeguarding incidents or complaints recorded across the organisation's clinical services.

### 5.2 Safeguarding concerns raised

The updated 2024 safeguarding policy clarified an organisational approach to safeguarding concerns and adds a requirement for all safeguarding concerns to be reported on an incident reporting system. This ensures that all services follow-up and action concerns, provides a record of safeguarding advice/support given by safeguarding leads, and enables accurate cross-organisational audit and oversight.

Datix Categories for Reporting Safeguarding Concerns	
Adult	Child
<ul style="list-style-type: none"> <li>Physical</li> <li>Sexual harm and exploitation</li> <li>Neglect</li> <li>Self-Neglect</li> <li>Organisational Neglect</li> <li>Financial</li> <li>Psychological or emotional</li> <li>Discrimination</li> <li>Modern Slavery</li> <li>Preventing Radicalisation</li> </ul>	<ul style="list-style-type: none"> <li>Physical</li> <li>Sexual</li> <li>Neglect</li> <li>Emotional and psychological</li> <li>Female Genital Mutilation (FGM)</li> </ul>

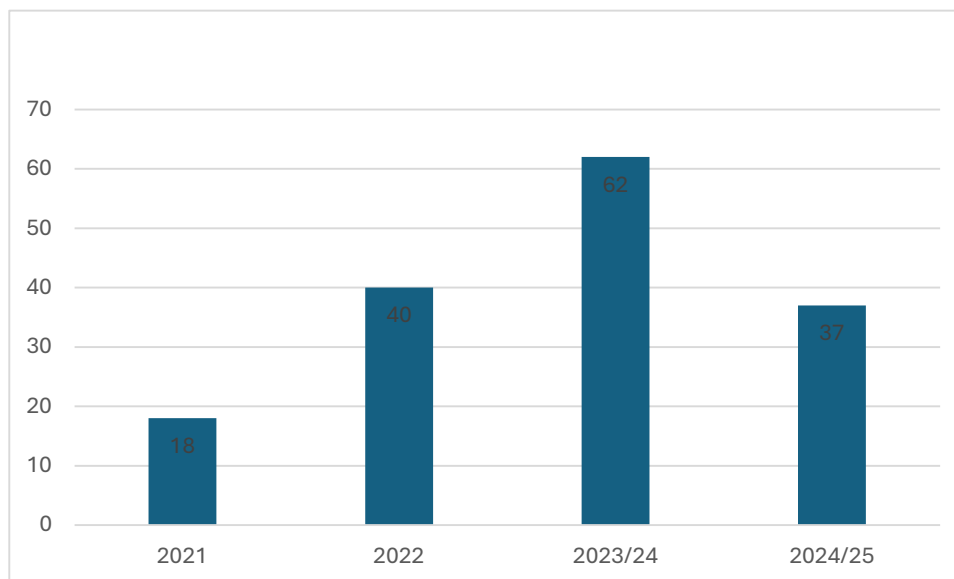
### Safeguarding concerns raised between 1<sup>st</sup> April 2024 and 31<sup>st</sup> March 2025

The total number of safeguarding referrals made remained steady for APC. MSK showed an increase in referrals from 3 to 6. MSK clinical leadership contributes this to the introduction of care navigators who are identifying more safeguarding concerns. TDC is a new service that launched in February of 2025.

Service	Concerns - ADULT		Concerns - CHILD
MSK	6		0
MAS (Memory Assessment Service)	37		0
APC (Additional Primary Care)	2		3
TDC (The Dementia Clinic Sussex)	0		0
<b>TOTAL</b>	<b>45</b>		<b>3</b>

Child safeguarding concerns were raised solely by APC as only service who see children 0-16. In the last year MAS raised 37 safeguarding alerts. This is down 3% from 2023/24, proportionate to total number of patients seen. MAS leadership contributes the increased safeguarding escalations in 2023/24 to supplemental funding for lifelong support and annual care plan reviews, increasing points of contact with service users. This funding ceased last year.

### MAS Safeguarding Concerns

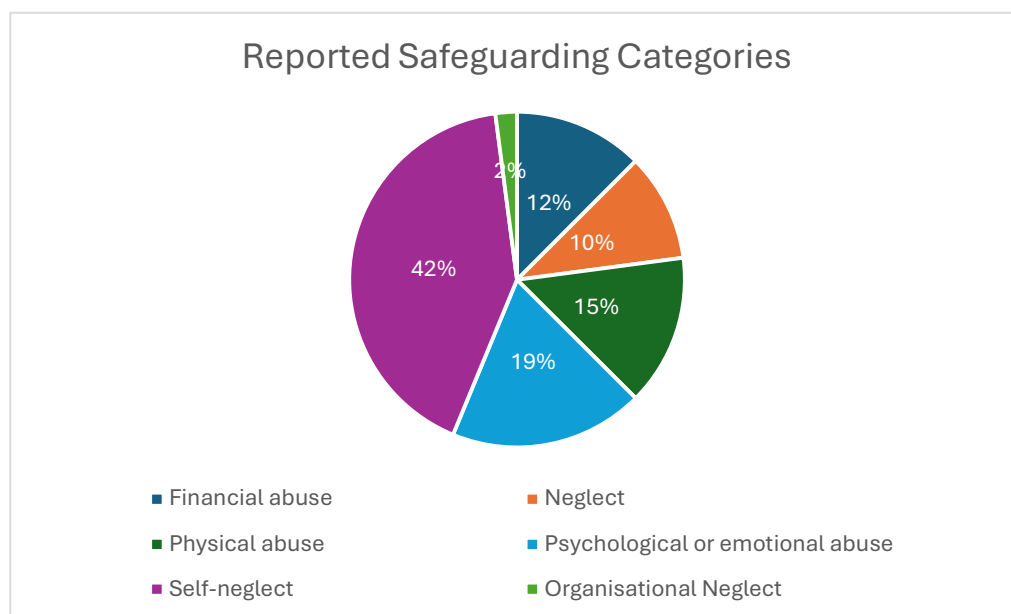


## Annual audit of safeguarding alerts April 2023 - March 2024:

Service	Alerts Raised	Type of Alert	
MAS	X 0 Child		
	X 37 Adults	5	Physical
		3	Neglect
		19	Self-Neglect
		6	Financial
		4	Psychological
MSK	X 0 Child		
	X 6 Adults	2	Physical
		1	Self-Neglect
		1	Organisational Neglect
		2	Psychological and emotional (domestic abuse)
APC	X 3 Child	1	Neglect
		2	Psychological and emotional (domestic abuse)
	X 2 Adults	1	Neglect
		1	Psychological and emotional (domestic abuse)



The chart below shows safeguarding concerns raised by categories of abuse and illustrates that nearly half of all referrals (42%) were made for self-neglect, prominently from MAS. The next most reported category (19%) was domestic abuse, arising from MSK and APC.



## 6 Review of actions from previous report

Objective	Update	Status
<b>2023/24 report:</b> Services to benchmark where possible against other similar services to understand whether there is under or over reporting of safeguarding concerns within our organisation.	We are now able to do this across our organisation using Datix. However, would be useful to benchmark similar services external to Here for a sense of reporting performance.	Ongoing
<b>2020-2024 reports:</b> The creation of SystmOne templates for the purpose of recording safeguarding alerts within the patient / carer record. This would support visibility, reporting at both a service and organisational level.	<b>UPDATE:</b> 2024/25 Reviewed the priority for implementing a safeguarding S1 template which will provide automated information relating to safeguarding activity via Power BI. However, considering APC and MSK moving to InPhase, this would be undertaken only for MAS. Have agreed to explore as part of MAS redesign work in 2025 but will close this action if not deemed to provide sufficient ROI.	On hold pending review of priority as part of MAS redesign
<b>2024-25 report:</b> Complete actions resulting from annual audit	Progress made and documented (appendix ii), and new audit undertaken with actions for coming year.	

## **7 Recommendations for additional actions 2025-26**

The 2024-25 report, annual audit of safeguarding concerns, review of the new NHS England Safeguarding Accountability and Assurance Framework (SAAF), minutes from Safeguarding supervision meeting, and update of the Here Safeguarding Adults and Children Policy identified the following recommendations:

- Advance training and connections for new SG lead(s) on SG, Child Sexual Abuse and Exploitation and Mental Capacity Act/DoLS.
- Understand how new MSK service impacts safeguarding structures and processes, owing to the new contract, structure and CQC registration (which will sit with SCFT).
- Understand how the ending of APC changes our responsibilities for safeguarding children.
- Review safeguarding leads across our remaining registered services and ensure they have the support needed following changes from previous years.
- Link with HR to explore if adding a check against Datix access and SG training would be beneficial as part of general Here onboarding checklist.
- Update SG policy and pathway to reflect changes taking place in leadership, and to include SG supervision structure within the policy.
- Review and update SG supervision structure to ensure it is fit for purpose and embeds into the organisation.
- Sign off Consent for Examination Policy
- Comprehensive programme to raise awareness of Government Prevent Strategy and Prevent Guidance

## Appendix i: Key legislative framework

### Legislative Framework for All:

- [Crime and Disorder Act 1998 \(legislation.gov.uk\)](#)
- [Female Genital Mutilation Act 2003 \(legislation.gov.uk\)](#)
- [Sexual Offences Act 2003 \(legislation.gov.uk\)](#)
- [Mental Capacity Act 2005 \(legislation.gov.uk\)](#)
- [Convention on the Rights of Persons with Disabilities - Articles | Division for Inclusive Social Development \(DISD\) \(un.org\)](#)
- [Mental Health Act 2007 \(legislation.gov.uk\)](#)
- [Children and Families Act 2014 \(legislation.gov.uk\)](#)
- [Modern Slavery Act 2015 \(legislation.gov.uk\)](#)
- [Serious Crime Act 2015 \(legislation.gov.uk\)](#)
- [Mental Capacity \(Amendment\) Act 2019 \(legislation.gov.uk\)](#)
- [The NHS Constitution for England - GOV.UK \(www.gov.uk\)](#)
- [Domestic Abuse Act 2021 \(legislation.gov.uk\)](#)
- [Serious Violence Duty: draft guidance for responsible authorities \(accessible version\) - GOV.UK \(www.gov.uk\)](#)
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#)
- [NHS England » Safeguarding children, young people and adults at risk in the NHS](#)

### Legislative Framework for Adults

- [European Convention on Human Rights \(coe.int\) 1998](#)
- [Care Act 2014 \(legislation.gov.uk\)](#)
- [Care and Support Statutory Guidance- Section 14 Safeguarding \[40573\\\_2902364\\\_DH\\\_Care\\\_Guidance\\\_accessible.pdf \\(publishing.service.gov.uk\\)\]\(#\)](#)
- [Adult Safeguarding: Roles and Competencies for Health Care Staff | Royal College of Nursing \(rcn.org.uk\)](#)
- [Deprivation of Liberty Safeguards 2007](#)
- [Equality Act 2010](#)

### Legislative Framework for Children

- [UN Convention on Rights of a Child \(UNCRC\) - UNICEF UK](#)
- [Children Act 1989 \(legislation.gov.uk\)](#)
- [Children Act 2004 \(legislation.gov.uk\)](#)
- [Promoting the health and wellbeing of looked-after children - GOV.UK \(www.gov.uk\)](#)
- [Children and Social Work Act 2017 \(legislation.gov.uk\)](#)
- [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)
- [Children's social care: reform statement - GOV.UK \(www.gov.uk\)](#)
- [Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff | Royal College of Nursing \(rcn.org.uk\)](#)

- [Looked After Children: Roles and Competencies of Healthcare Staff | Royal College of Nursing \(rcn.org.uk\)](https://www.rcn.org.uk)
- CQC Registration Standards, Health and Social Care 2008 (Regulated Activities) Regulations 2014: Regulation 13: Safeguarding Service users from abuse and improper treatment.

Here also seeks to demonstrate that the CQC registered services are safe, effective, caring, responsive and well-led by providing evidence that:

- We give sufficient priority to safeguarding adults, young people and children.
- Staff take a proactive approach to safeguarding and focus on prevention and early identification.
- Staff take steps to protect adults and children where there are known risks, respond appropriately to any signs or allegations of abuse, and work effectively with other organisations to implement protection plans.
- There is active and appropriate engagement in local safeguarding procedures, and effective work with other relevant organisations.

[Regulation 13: Safeguarding service users from abuse and improper treatment - Care Quality Commission \(cqc.org.uk\)](https://www.cqc.org.uk)

## Here CQC quality statement on safeguarding

QUALITY STATEMENT ("We" Statement – provider lens)	QUALITY STATEMENT ("I" Statement – user lens)  What matters to them	Associated Guidance	CQC Evidence Required/Questions to Consider
<b>SAFEGUARDING:</b>  <i>We work with people to understand what being safe means to them as well as with our partners on the best way to achieve this. We concentrate on improving people's lives while protecting their right to live in safety, free from bullying, harassment, abuse, discrimination, avoidable harm and neglect. We make sure we share concerns quickly and appropriately.</i>	<i>I feel safe and am supported to understand and manage any risks.</i>	<a href="https://www.cqc.org.uk/guidance-regulation/providers/regulations">https://www.cqc.org.uk/guidance-regulation/providers/regulations</a>	Evidence of collaborative working with partners to review and maintain assurance around management of quality issues relating to the patient pathway
			Evidence that staff appropriately trained in safeguarding according to role
			Safeguarding annual report & Safeguarding examples in quality reports
			Evidence of knowledge of Mental Capacity/DoLs/Human Rights
			Named safeguarding Lead in place
			Evidence of open, transparent and safe culture
			Evidence that staff understand SG and know how to recognise abuse
			Examples of how we have adapted our approach to children and young people
			Evidence that safeguarding concerns are logged appropriately

## Appendix ii - Safeguarding accountability and assurance framework audit Apr 2025

### [NHS England » Safeguarding children, young people and adults at risk in the NHS](#)

All health providers, including provider collaboratives, are required under statute and regulation to have effective arrangements in place to safeguard and promote the welfare of children and adults at risk of harm and abuse in every service that they deliver.

Providers must demonstrate that safeguarding is embedded at every level in their organisation, with effective governance processes evident. Providers must assure themselves, the regulators, and their commissioners that safeguarding arrangements are robust and are working.

	Standard	Actions	Compliance	Comments/Updates
1.	The contractual requirements as laid out in Schedule 32 of the NHS Standard Contract	See below		See NHS Standard Contract: SC32 Safeguarding Children and Adults Checklist for details. (see below)
2.	Identification of a named nurse, named doctor and named midwife (if the organisation provides maternity services) for safeguarding children	Identification of named doctor		ICB Named GPs and Nurses
		Identification of named nurse		
3.	Identification of a named nurse and named doctor for children in care	Identification of named doctor		ICB Named GPs and Nurses
		Identification of named nurse		
4.	Identification of a named lead for adult safeguarding and a Mental Capacity Act (MCA) lead – this role should include the management of adult safeguarding allegations against staff.  This could be a named professional from any relevant professional background	Identification of named lead for adult safeguarding (including the management of adult safeguarding allegations against staff)		Included in safeguarding lead role at Here.
		Identification of Mental Capacity Act (MCA) Lead		
6.	Safe recruitment practices and arrangements for dealing with allegations against staff	Safe recruitment practices		Included in policy
		Clarify/write process/policy for arrangements for dealing with allegations against staff.		
7.	Provision of an executive lead for safeguarding children, adults at risk and Prevent	Identification of executive lead for safeguarding children, adults at risk and Prevent		Identified as Director of Ops
8.	An annual report for safeguarding children, adults and children in care to be submitted to the trust board	Annual report for safeguarding children, adults and children in care to be submitted to the Here Board.		

9.	A suite of safeguarding policies and procedures that support local multi-agency safeguarding procedures	Here Safeguarding Children and Adults Policy		
		<a href="#">Welcome to your Pan Sussex Child Protection and Safeguarding Procedures Manual   Sussex Child Protection and Safeguarding Procedures Manual</a>		
		<a href="#">Home   Sussex Safeguarding Adults Policy and Procedures</a>		
		Service-specific Guidance		
		Here Safeguarding Learning and Escalation Structure		
10.	Effective training of all staff commensurate with their role and in accordance with the intercollegiate safeguarding competencies	Safeguarding adults and children training mandatory for all non-clinical staff at Levels 1 and 2		New SG Lead and Deputy Lead/champion appointed. New SG lead has started SG Level 4 training.
		Safeguarding adults and children training mandatory for all clinical staff at Level 3		
		Safeguarding adults and children training mandatory for Here Safeguarding Lead at Level 4		
		Here is Learning, PSG, Quasar and/or ECAG sessions on specific safeguarding themes.		
11.	Safeguarding must be included in induction programmes for all staff and volunteers	MSK – confirm inclusion in induction programme		MAS and MSK both confirmed SG is part of induction alongside training videos of how to raise Datix. Consistency in approach and comfort of all staff should be sense ensured this coming year. Recommend adding to general Here induction for all staff as an action for 2025.
		MAS – confirm inclusion in induction programme		
		APC		
12.	Providing effective safeguarding supervision arrangements for staff, commensurate to their role and function (including for named professionals)	Safeguarding supervision policy		SG supervision structure to be added to the current SG policy. Supervision structure was established in 2024 and supervision link with SCFT created; however, these practices are not yet fully embedded.
		Ad-hoc supervision for admin via service managers and clinical leads.		
		Ad-hoc supervision for clinicians via clinical leads and safeguarding leads.		
		Supervision for safeguarding leads via quarterly peer supervision meetings		
		Safeguarding Community of Practice Teams Channel providing peer support, shared learning		

		and supervision for service managers, clinical leads and safeguarding leads.		
		Supervision for Here Safeguarding Lead via external Sussex ICB/SCFT		
13.	Developing an organisational culture where all staff are aware of their personal responsibilities for safeguarding and information sharing	Here Organisational Safeguarding Model		
14.	Developing and promoting a learning culture to ensure continuous improvement	Here Organisational Safeguarding Model		
15.	Policies, arrangements and records, to ensure consent to care and treatment is obtained in line with legislation and guidance	Safeguarding children and adults policy		EDI captured in Publication of Here Charter. Dignity & Privacy and Chaperoning published in 2024. Consent policy in draft form – to be completed.
		Consent policy		
		EDI Policy		
16.	APC only:  The Provider must co-operate fully and liaise appropriately with third party providers of social care services as necessary for the effective operation of the Child Protection Information Sharing Project.	CP-IS implemented in Additional Primary Care		Complete; will be removed for next audit as APC service ending June 30 <sup>th</sup> .
17.	Comply with the principles contained in the Government Prevent Strategy and the Prevent Guidance; and include in relevant policies and procedures a comprehensive programme to raise awareness of the Government Prevent Strategy among Staff and volunteers in line with the NHS England Prevent Training and Competencies Framework.	Identify Prevent lead		Prevent Lead for ICB = Fiona Crimmins
		Comprehensive programme to raise awareness of Government Prevent Strategy and Prevent Guidance		Prevent Lead for Here identified. Need program to increase awareness in 2025
		Prevent training included in STAM		

#### NHS Standard Contract: SC32 Safeguarding Children and Adults

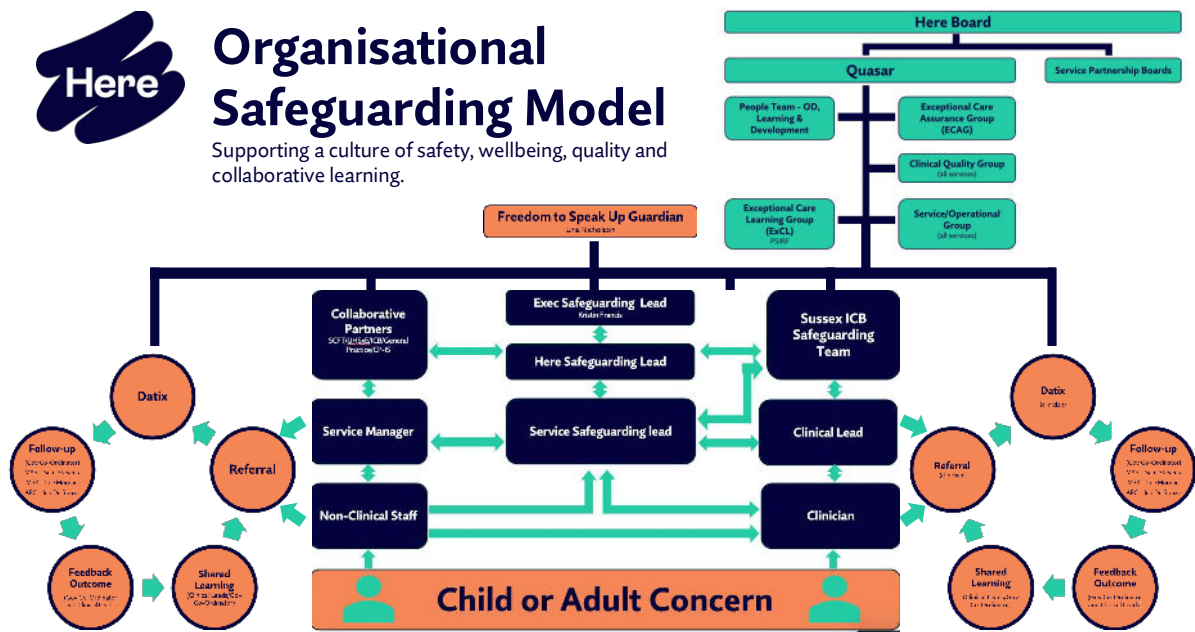
[03-nhs-standard-contract-fl-scs-2324.pdf \(england.nhs.uk\)](https://www.england.nhs.uk/03-nhs-standard-contract-fl-scs-2324.pdf)

Schedule	Standard	Compliance	Comments/Updates
32.1	The Provider must ensure that Service Users are protected from abuse, exploitation, radicalisation, serious violence, grooming, neglect and improper or degrading treatment, and must take appropriate action to respond to any allegation or disclosure of any such behaviours in accordance with the Law.		
32.2	The Provider must nominate:		New SG lead in place for SG, Child Sexual Abuse

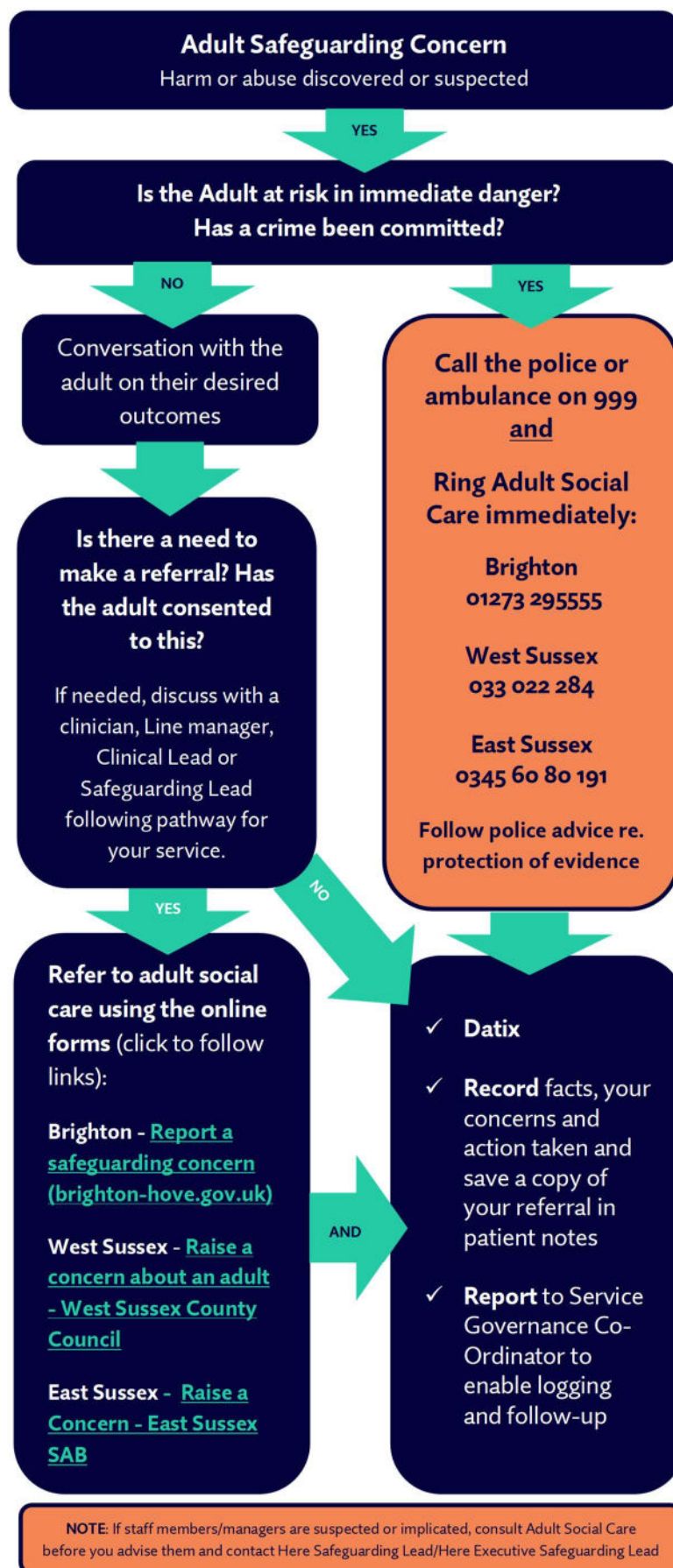
	<p>32.2.1 Safeguarding Leads and/or named professionals for safeguarding children (including looked after children) and for safeguarding adults, in accordance with Safeguarding Guidance;</p> <p>32.2.2 a Child Sexual Abuse and Exploitation Lead;</p> <p>32.2.3 a Mental Capacity and Liberty Protection Safeguards Lead; and</p> <p>32.2.4 a Prevent Lead,</p> <p>and must ensure that the Co-ordinating Commissioner is kept informed at all times of the identity of the persons holding those positions.</p>		and Exploitation and MCA.
32.3	<p>The Provider must comply with the requirements and principles in relation to the safeguarding of children, young people and adults, including in relation to deprivation of liberty safeguards, child sexual abuse and exploitation, domestic abuse, radicalisation and female genital mutilation (as relevant to the Services) set out or referred to in:</p> <p>32.3.1 the 2014 Act and associated Guidance;</p> <p>32.3.2 the 2014 Regulations;</p> <p>32.3.3 the Children Act 1989 and the Children Act 2004 and associated Guidance;</p> <p>32.3.4 the 2005 Act and associated Guidance;</p> <p>32.3.5 the Modern Slavery Act 2015 and associated Guidance;</p> <p>32.3.6 Safeguarding Guidance;</p> <p>32.3.7 Child Sexual Abuse and Exploitation Guidance;</p> <p>32.3.8 Prevent Guidance; and</p> <p>32.3.9 the Domestic Abuse Act 2021 and associated Guidance.</p>		
32.4	<p>The Provider has adopted and must comply with the Safeguarding Policies and MCA Policies. The Provider has ensured and must always ensure that the Safeguarding Policies and MCA Policies reflect and comply with:</p> <p>32.4.1 the Law and Guidance referred to in SC32.3; and</p> <p>32.4.2 the local multi-agency policies and any Commissioner safeguarding and MCA requirements.</p>		
32.5	<p>The Provider must implement comprehensive programmes for safeguarding (including in relation to child sexual abuse and exploitation) and MCA training for all relevant Staff and must have regard to Intercollegiate Guidance in Relation to Safeguarding Training. The Provider must undertake an annual audit of its conduct and completion of those training programmes and of its compliance with the requirements of SC32.1 to 32.4.</p>		
32.6	<p>At the reasonable written request of the Co-ordinating Commissioner, and by no later than 10 Operational Days following receipt of that request, the Provider must provide evidence to the Co-ordinating Commissioner that it is addressing any safeguarding concerns raised through the relevant multi-agency reporting systems</p>		
32.7	<p>If requested by the Co-ordinating Commissioner, the Provider must participate in the development of any local multi-agency safeguarding quality indicators and/or plan.</p>		Connected to JTAI working group
32.8	<p>The Provider must co-operate fully and liaise appropriately with third party providers of social care services as necessary for the effective operation of the Child Protection Information Sharing Project.</p>		
32.9	<p>The Provider must:</p> <p>32.9.1 include in its policies and procedures, and comply with, the principles contained in the Government Prevent Strategy and the Prevent Guidance; and</p> <p>32.9.2 include in relevant policies and procedures a comprehensive programme to raise awareness of the Government Prevent Strategy among Staff and volunteers in line with the NHS England Prevent Training and Competencies Framework and Intercollegiate Guidance in Relation to Safeguarding Training.</p>		Will need to plan training/raise awareness for 2025



## Appendix iii – Organisational safeguarding model



## Appendix iv - Flowchart for raising a safeguarding concern - adult



## Appendix v – Flowchart for raising a safeguarding concern - child

