



Annual Safeguarding Report

SAFEGUARDING ANNUAL REPORT

1 April 2025 to 31st March 2026

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 May 2026

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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 FY2025/2026.

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 out 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. All staff are expected to recognise, respond to and report safeguarding concerns, and clear mechanisms are in place to support them in doing so.

Here undertakes an annual safeguarding audit to provide assurance to the Board that, as a provider of NHS services, it is meeting its statutory safeguarding roles, responsibilities and duties ([Appendix ii](#)).

The Here organisational safeguarding model ([Appendix iii](#)), supported by safeguarding flowcharts ([Appendices iv](#) and [v](#)), demonstrates how safeguarding policies and procedures are embedded within our culture of safety, wellbeing and continuous learning. The model sets out clear arrangements for reporting and escalating concerns, a robust and resilient framework for advice, supervision and support, and defined routes for sharing learning and feedback across all levels of the organisation.

3.1 Policy guidance

The Here Safeguarding Children and Adults Policy was last updated in March 2026 and is scheduled for review in March 2028, or earlier if there are changes to relevant guidance.

All colleagues are introduced to the policy as part of their organisational induction. Any subsequent updates or revisions are communicated to all staff, with read-receipt tracking in place to confirm acknowledgement.

All organisational policies are centrally managed by Human Resources and made accessible to staff via a shared platform. This system also notifies staff when policies are updated.

3.2 Specialist advice

All staff have access to specialist safeguarding advice from a named Safeguarding Lead within their service, as well as the organisation's Safeguarding Leads, who are linked to the Sussex safeguarding network and can access wider support where required.

In addition, we work closely with partner organisations to ensure our safeguarding approach is aligned, supporting effective partnership working and shared learning. Colleagues within the Sussex MSK Health Partnership are able to access the SCFT Safeguarding Team for advice and support.

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 \(rcn.org.uk\)](http://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.

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. Here Safeguarding Leads are required to complete Level 4 training and access external safeguarding supervision.

4.1 Training compliance

2025/6 saw the People Team continuing to focus on Statutory and Mandatory Training compliance throughout the organisation including Safeguarding training, with oversight of HR and Quasar. Cross-organisational training compliance as of March 2026 is outlined below against a compliance threshold rate of 85%.

Statutory and Mandatory Training	Organisational Compliance
Safeguarding adults – Level 1:	94%
Safeguarding adults – Level 2	97%
Safeguarding adults – Level 3	90%
Safeguarding adults – Level 4 (Here Safeguarding Leads)	100%
Safeguarding children - Level 1	96%
Safeguarding children – Level 2	99%
Safeguarding children - Level 3	88%
Safeguarding children – Level 4 (Here Safeguarding Leads)	100%
Preventing radicalisation - basic prevent awareness	96%
Preventing radicalisation – Level 3 (Safeguarding Leads)	100%
Identifying and supporting victims of modern slavery	97%
Oliver McGowan - learning disabilities and autism	95%

5 Annual safeguarding audit

Safeguarding for this period is reported for our CQC-registered clinical portfolio included the Memory Assessment Service (MAS), The Dementia Clinic Sussex (TDC), and Additional Primary Care (APC) until its closure in June. In addition, we worked in partnership with Sussex Community foundation Trust (SCFT) to deliver Sussex MSK Health (SMSKH), for which SCFT held the CQC registration. As part of this partnership, we were responsible for providing quality assurance to SCFT for the areas of the service we hold.

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

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

Safeguarding concerns raised between 1st April 2025 and 31st March 2026

Service	Concerns - ADULT	Concerns - CHILD
MSK	7	2
MAS (Memory Assessment Service)	40	0
APC (Additional Primary Care)	0	1
TDC (The Dementia Clinic Sussex)	0	0
TOTAL	47	3

During the reporting period, MAS raised 40 safeguarding alerts, an 8.11% increase compared to 2024/25.

APC service raised only 1 safeguarding, related to a child, prior to its closure in June.

TDC saw a very low volume of adults, resulting in no safeguarding alerts.

SMSKH services raised seven adult safeguarding concerns and two child safeguarding concerns, with the child concerns identified within the context of adult cases.

SMSKH safeguarding reporting and governance transferred to SCFT in October 2025. Future safeguarding activity will be reported through partnership board arrangements in lieu of this report.

Annual audit of safeguarding alerts April 2026 - March 2026:

Service	Alerts Raised	Type of Alert	
MAS	X 0 Child		
	X 40 Adults	6	Physical
		3	Neglect
		21	Self-Neglect
		4	Financial or material
		4	Psychological or emotional
		4	Domestic Violence or abuse
		1	Organisational or institutional
MSK	X 2 Child	2	Neglect
	X 7 Adults	2	Domestic Violence or abuse
		2	Self-Harm
		1	Psychological or emotional
		1	Discriminatory
APC	X 1 Child	1	Neglect

The chart below shows safeguarding concerns raised by categories of abuse and illustrates that nearly half of all referrals were made for self-neglect, prominently from MAS. The next most reported categories were physical violence, domestic abuse and neglect, arising from MSK.



5.3 Joint Targeted Area Inspection

A Joint Targeted Area Inspection (JTAI) is a multi-agency inspection framework designed to evaluate the effectiveness of partnership working across local services, including police, health, and social care, in safeguarding vulnerable people. These inspections are unannounced and focus on specific safeguarding themes, providing a robust assessment of collective practice.

In 2025, Here participated in the JTAI for Brighton and Hove, which examined the multi-agency response to child sexual abuse within the family environment. The inspection provided a valuable opportunity to critically assess our contribution to safeguarding arrangements, strengthen partnership working, and reflect on best practice. It has also supported further collaboration across agencies to enhance the effectiveness and consistency of the multi-agency safeguarding response.

6 Review of actions from previous report

Task Name	Status	Comments/Notes
Benchmark SG escalations compared to similar organisations	In Progress	Underway but challenging to find data, will be ongoing task for CQI
Advance training and connections for new SG lead(s) on SG, Child Sexual Abuse and Exploitation and Mental Capacity Act/DoLS.	Complete	SG leads have completed level 4 adults and children. Links/supervision opportunities with NHS Sussex adult and children SG teams made. Participated in JTAI audit r/t CSA/exploitation. Leads attended MCA training.
Understand how the ending of APC changes our responsibilities for safeguarding children.	Complete	Decision taken with CEO to keep whole population registration for the moment due to MSK under 18's (by exception). We also raise SG concerns for children of our adult patients etc.
Review safeguarding leads across our remaining registered services and ensure they have the support needed following changes from previous years.	Complete	Structure agreed for MSK as well as other services
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.	In Progress	Agreed with HR; action planned for Q1-Q2 2026
Update SG policy and pathway to reflect changes in leadership, and to include SG supervision structure within the policy.	Complete	completed and sent to HR For uploading on policy library
Review and update SG supervision structure to ensure it is fit for purpose and embeds into the organisation.	Complete	pathway designed and policy updated to reflect plan.
Sign off Consent for Examination Policy	Complete	
Comprehensive programme to raise awareness of Government Prevent Strategy and Prevent Guidance	In Progress	Updated Policy for Prevent section and have developed plan for cross-organisation awareness campaign to be delivered in Q1 2026.

7 Recommendations for additional actions 2026-27

The 2025-26 report, annual audit of safeguarding concerns, review of the new NHS England Safeguarding Accountability and Assurance Framework (SAAF), minutes from governance meetings, and update of the Here Safeguarding Adults and Children Policy identified the following recommendations:

- Ongoing from 2025: Benchmark SG escalations (is numbers etc) compared to similar organisations
- Ongoing from 2025: Comprehensive programme to raise awareness of Government Prevent Strategy and Prevent Guidance
- Ongoing from 2025: SG induction and Datix access/training for all staff.
- Plan an organisation-wide training for new MCA guidance
- Review and update policy guidance for Chaperoning and Privacy & Dignity
- Cross-check ICB roles/responsibilities, contact details: Updated in Q4 as part of SG policy review; however, may require mid-year review due to changes locally and nationally

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
SAFEGUARDING: <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>	https://www.cqc.org.uk/guidance-regulation/providers/regulations	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	Here Safeguarding Children and Adults Policy		

	local multi-agency safeguarding procedures	Welcome to your Pan Sussex Child Protection and Safeguarding Procedures Manual Sussex Child Protection and Safeguarding Procedures Manual		
		Home Sussex Safeguarding Adults Policy and Procedures		
		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 Leads appointed and trained to SG level 4.
		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	All services have SG reporting as part of their local induction,		MAS, TDC, and MSK confirmed SG is part of induction alongside training videos of how to raise Datix/InPhase.
		Here onboarding processes ensure access to and training to incident reporting system.		Discussed with HR recommendations for inclusion of SG and incident reporting system access/training for all staff onboarding; confirmed plan for inclusion in 2026. Will assure as an action in 2026 action plan.
12.	Providing effective safeguarding supervision arrangements for staff, commensurate to their role and function (including for named professionals)	Safeguarding supervision policy		SG supervision structure added to the current SG policy.
		Ad-hoc supervision for admin via service managers and clinical leads.		Other supervision and communications channels now superseded with a functioning ECAG – escalation and queries coming through to safeguarding leads more regularly.
		Ad-hoc supervision for clinicians via clinical leads and safeguarding leads.		
		Shared learning, peer support, escalation and advice seeking embedded via ECAG meeting every 6 weeks with standing agenda item for SG.		Consistency in sharing and discussing case studies to be increased in coming year to at least one per quarter at ECAG and scaled to optimise scale of learning
		Supervision for Here Safeguarding Lead via external Sussex ICB/SCFT		

		Visibility and comms re SG structure to support learning and advice seeking		
13.	Developing an organisational culture where all staff are aware of their personal responsibilities for safeguarding and information sharing	Here Organisational Safeguarding Model is set out in the Safeguarding Policy, which is mandatory that all staff read. We also support safeguarding leads and key contacts to discuss shared learning through governance forums.		
14.	Developing and promoting a learning culture to ensure continuous improvement	Learning culture developed and assured withing our People Team function as part of our Quality and Governance Framework. Described via Here Quality policy.		Quality Policy. EDI captured in Publication of Here Charter. There is a dedicated EDI section on the intranet with information about the EDI working group.
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		Consent policy – decided not to split this out but instead build it into Dignity & Privacy policy. Consent and Dignity & Privacy to be reviewed and updated in 2026. Inclusive of new updates to MCA which also will be added.
		Privacy and Dignity policy contains sections around consent and best practice.		
16.	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, but no other services currently offer unscheduled care for children and young people. Will monitor if this changes.		
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 when checked as part audit in Q4 2026.
		Comprehensive programme to raise awareness of Government Prevent Strategy and Prevent Guidance		Prevent Lead for Here identified.
		Prevent training included in STAM		Still require Prevent comprehensive programme of awareness – outstanding action sitting with Prevent lead Andy Foreman-Lonn
18.	Local Authority and ICB Roles and Responsibilities around reporting safeguarding alerts	Local authorities and councils and ICB's are currently undergoing a nationwide restructure. This may lead to a changing of key contacts, stakeholders and processes, so may trigger a mid-cycle policy review		Updated in Q4 as part of SG policy review; however, may require mid-year review due to changes locally and nationally.

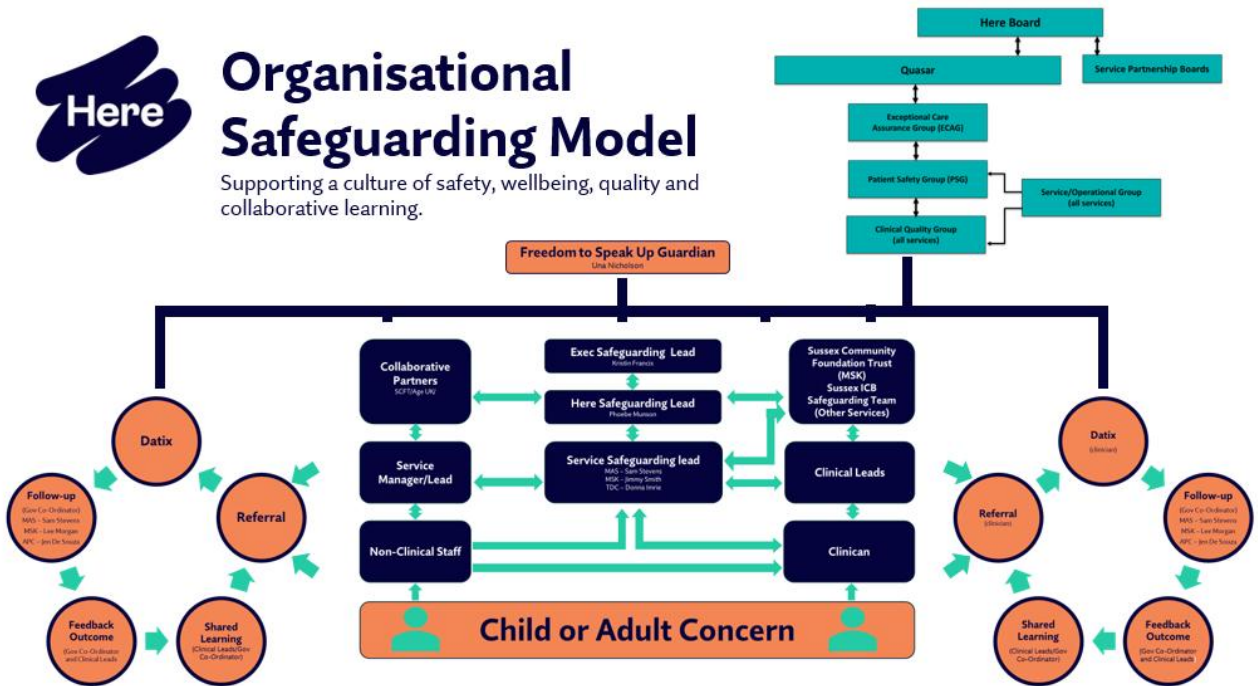
NHS Standard Contract: SC32 Safeguarding Children and Adults

[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	<p>The Provider must nominate:</p> <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>		New SG lead in place for SG, Child Sexual Abuse 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	The Provider has adopted and must comply with the Safeguarding Policies and MCA Policies. The Provider has		

	<p>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. In action plan.

Appendix iii – Organisational safeguarding model



Appendix iv - Flowchart for raising a safeguarding concern - Adult



Appendix v – Flowchart for raising a safeguarding concern - child

