

Safeguarding adults at risk

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Key point summary

- All LFB staff have a duty to act on any concern or suspicion that an adult's welfare is, has been, or may be at risk of abuse or neglect. If you have any reason to suspect an adult is at risk, you must report your concerns using this procedure as '**doing nothing**' is not an option. Anyone reporting in good faith that an adult is being or is at risk of being abused or neglected will be fully supported by the Brigade, even if it is subsequently proven that abuse or neglect has not happened.
- Under current legislation categories of abuse include: physical abuse, domestic violence, financial or material abuse, modern slavery, discriminatory abuse, organisational abuse, neglect and acts of omission, self-neglect, radicalisation, disability hate crime. This list is not intended to be an exhaustive one, rather a guide as to the sort of behaviour which could give rise to a safeguarding concern.
- Use the mnemonic ABCDE to identify vulnerability factors:
 - **Appearance** – are they clean, able to look after themselves, properly clothed.
 - **Behaviour** – unusual eye contact, aggressive, confused.
 - **Conversation** – are they able to converse effectively, understand what is being said.
 - **Danger** – obvious risks to health, hoarding concerns/location.
 - **Environment** – any hazards or welfare concerns – enough food, adequate living conditions, hoarding level (clutter image rating scale).

Reporting procedures

- What to do if an individual discloses that they are being abused:
 - Listen carefully, allow the person to talk freely.
 - Ask 'tell me **who** it was?', "**when** did it happen?", "**where** did this happen?" If they won't answer, do not push them, or offer suggestions.
 - Avoid leading questions.
 - Do not investigate or jump to conclusions.
 - Do not promise to keep secrets – explain that you have to let your manager know.
 - Where possible ask the person for consent to share their details with relevant parties. Making a safeguarding referral is **not** dependant on consent being given.
 - Make a written record including the date and time of incident and any injuries observed, using the person's own words where possible.
 - A LFB safeguarding referral **must** be made even if a partner agency, such as the police, have made a referral, or when a referral has been raised previously for the same individual/s.
 - You may worry that you could be mistaken about the cause of injuries or disturbing behaviour. If you are unsure please discuss with your line manager, operational manager, or with the Officer Of the Day through the reporting system in order to obtain another perspective. You will not be at fault for reporting a concern of this nature. **If in doubt refer** and all reported concerns will be treated in confidence.
- Refer to the appendices below for guidance on reporting adult safeguarding concerns within the times stated in the table below:
 - Appendix 2 - Person at Risk (PAR) Form
 - Appendix 3 - Adult safeguarding/child protection concern flowcharts.
 - Appendix 4 - Flowchart for reporting adult safeguarding concerns.

SAFEGUARDING REFERRAL PROCESS TO FOLLOW

<p><u>08:00 – 17:00</u> <u>MON-FRI</u></p>	<ol style="list-style-type: none"> 1. Safeguarding concerns should be raised with the Base Station Commander using the Person at Risk (PAR) Form. 2. If the Base SC cannot be reached, the next port of call should be one of the other SCs in the Borough, or the local Borough Commander. 3. If none of the Borough SCs or BC can be reached, the Officer Of the Day should be called and the OOD1/2 will contact another BC or SC in that Area initially, or another Area, if none are available and pass the Safeguarding concern across to them to be referred. The OOD1/2 will refer if no Borough based SC/BC is available, to meet the referral time requirement. 4. Whichever officer reviews the referral, they will make the decision to refer/not refer this to the Local Authority. They will justify and confirm their decision in the Person At Risk (PAR form).
<p><u>ANY OTHER TIME</u></p>	<ol style="list-style-type: none"> 1. Contact the OOD to check availability of Borough based SC or BC for borough concerned. If none are available, another SC or BC in that Area or another area will be contacted and the Safeguarding concern passed cross to them to be referred 2. The OOD1/2 will refer if no Borough based SC/BC is available, to meet the referral time requirement. 3. Whichever officer reviews the referral, they will make the decision to refer/not refer this to the Local Authority. They will justify and confirm their decision in the PAR form.

1 Introduction

- 1.1 This policy outlines the roles and responsibilities of **all** London Fire Brigade (LFB) staff in relation to the safeguarding of adults who are suffering from, or are at risk of abuse, neglect, or self-neglect. A key principle of this policy is that all adults at risk, irrespective of age, gender, disability, racial or ethnic origin, religious belief or sexual identity have a right to protection from harm.
- 1.2 The Care Act 2014 is the first piece of primary legislation for adult safeguarding and places a great emphasis on prevention. The Act recognises that local authorities can only safeguard individuals by working together with relevant partners/organisations on preventative strategies and by raising general public awareness. Fears of sharing information should not stand in the way of protecting adults at risk of abuse or neglect.
- 1.3 It is recognised that the LFB is not the primary authority in relation to safeguarding adults at risk – that responsibility rests mainly with local authorities. However, the LFB does have a responsibility to ensure that all its staff, many of whom come into contact with members of the public as part of their normal duties, are aware of the issues associated with safeguarding adults at risk and what they should do if they become aware of situations involving these issues.
- 1.4 Any member of LFB staff who has concerns must report them using the reporting procedure within this policy; 'doing nothing' is not an option. Anyone reporting in good faith that an adult is being or is at risk of being abused or neglected will be fully supported by the Brigade, even if it is subsequently proven that abuse or neglect has not happened.

2 Definitions

- 2.1 Adult safeguarding means 'protecting an adult's right to live in safety free from abuse and neglect' and aims to prevent abuse or neglect of adults and respond to concerns.
- 2.2 In line with legislation on adult safeguarding specific safeguarding duties apply to someone who:
 - Is aged 18 years and over who has needs for care and support (whether or not the local authority is meeting any of those needs);
 - is experiencing, or at risk of, abuse or neglect; and
 - 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.
- 2.3 Adult safeguarding is built on six principles that are used to evaluate safety from and prevention of abuse or neglect with an adult's capacity to make their own decisions:
 - **Empowerment:** support and encourage adults to make decisions and informed consent.
 - **Prevention:** develop strategies to prevent abuse and promote resilience and self-determination.
 - **Proportionality:** take the least intrusive and most appropriate response to the risk presented.
 - **Protection:** support and representation for those in greatest need.
 - **Partnership:** local solutions through services working with their communities.
 - **Accountability:** accountability and transparency in delivering a safeguarding response.
- 2.4 People with care and support needs are not inherently vulnerable, but they may come to be at risk of abuse or neglect at any point due to physical or mental health, acquired disability, advancing age, lack of support networks, inappropriate accommodation, financial circumstances or social isolation.

3 Recognising abuse and neglect to adults

- 3.1 The Care Act (2014) sets out varying types and patterns of abuse (and neglect) and the different circumstances in which they may take place, rather than providing an overarching definition. The list of categories of abuse provided within the Act is not intended to be an exhaustive one, rather a guide as to the sort of behaviour which could give rise to a safeguarding concern.
- 3.2 The categories may overlap and an abused adult may suffer more than one type of abuse. Also, there may not always be clear evidence of abuse or neglect and therefore some referrals will legitimately be based on a degree of (personal) inference.

Physical abuse – including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Sexual exploitation – Involves exploitative situations, contexts and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. It affects men as well as women. People who are sexually exploited do not always perceive that they are being exploited. Signs to look out for are not being able to speak to the adult alone, observation of the adult seeking approval from the exploiter to respond and the person exploiting the adult answering for them and making decisions without consulting them.

Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Modern slavery¹ – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse – including forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion².

¹[https://www.gov.uk/government/publications/modern-slavery-uk-action-to-tackle-the-](https://www.gov.uk/government/publications/modern-slavery-uk-action-to-tackle-the-crime)

crime ² Equality Act 2010. <https://www.gov.uk/discrimination-your-rights>

Organisational abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It can occur as a result of mental health issues, personality disorders, substance abuse, dementia, advancing of age, social isolation, and cognitive impairment or through personal choice.

The London Multi-Agency Adult Safeguarding Policy and Procedures adds further types of abuse or neglect to the above list. These are:

Radicalisation – is comparable to other forms of exploitation as it aims to attract people to and extreme views and reasoning and to persuade vulnerable individuals of the legitimacy of their case. Following the introduction of the Counter-Terrorism and Security Act 2015 (CT&S Act), The Prevent element within the counter terrorism strategy CONTEST, has become a statutory duty. Please refer to Appendix 1: Prevent: Counter Terrorism Strategy

Disability hate crime – the Criminal Justice System defines disability hate crime as any criminal offence, which is perceived, by the victim or any other person, to be motivated by hostility or prejudice based on the person's disability or perceived disability. The Police monitor five strands of hate crime: disability; race; religion; sexual orientation; transgender.

Female genital mutilation (FGM) – involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act (2004) makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. Further information on safeguarding women and girls at risk of FGM is available via this link.

Forced marriage – is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. In a situation where there is concern that an adult is being forced into a marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as urgent action may need to be taken.

Hate Crime – the police define Hate Crime as 'any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability'. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence.

Honour-based violence – it has or may have been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Many victims are so isolated and controlled that they are unable to seek help. Adult safeguarding concerns that may indicate honour-based violence include domestic violence, concerns about forced marriage, enforced house arrest and missing person's reports. If an adult safeguarding concern is raised, and there is a suspicion that the adult is the victim of honour-based violence, referring to the police must always be considered as they have the necessary expertise to manage the risk.

Human trafficking – is actively being used by Serious and Organised Crime Groups to make considerable amounts of money. It is run like a business with the supply of people and services to a customer, all for the purpose of making a profit. Traffickers exploit the social, cultural or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim's life, with little regard for the victim's welfare and health.

Mate crime – a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate crime is often difficult for police to investigate, due to its sometimes ambiguous nature, but should be reported to the police who will make a decision about whether or not a criminal offence has been committed. Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Restrain – unlawful or inappropriate use of restraint or physical interventions. In extreme circumstances unlawful or inappropriate use of restraint may constitute a criminal offence. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not. Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something, or does not do something they want to do, for example, the use of key pads to prevent people from going where they want from a closed environment.

4 Signs of self-neglect – additional information

- 4.1 The Care Act has introduced significant change by including self-neglect under the legal definition of abuse or neglect relevant to individuals with care and support needs. For this reason, when self-neglect poses a risk to the safety, health and wellbeing of the individual and/or others, a safeguarding concern should be raised to the local authority.
- 4.2 Self-neglect can result from the unwillingness and/or inability to care for oneself. It covers a wide range of behaviour which can be categorised under three main areas:
 - Lack of self-care - this includes neglect of one's personal hygiene, nutrition and hydration, or health, to an extent that may endanger safety or well-being.
 - Lack of care of one's environment - this includes situations that may lead to domestic squalor or elevated levels of risk in the domestic environment (e.g. health or fire risks caused by hoarding).

- Refusal of assistance that might alleviate these issues. This might include refusal of care services in either their home or a care environment or of health assessments or interventions, even if previously agreed.
- 4.3 Self-neglect includes behaviour such as hoarding. When such behaviour is encountered, the Clutter Image Rating (CIR) should be used to assess the level of clutter in the premises. In cases where hoarding is classified as CIR level 5 or above a safeguarding concern needs to be raised. When a home is identified as being up to level 4 of the CIR, staff will act in accordance to Policy number 829 - Hoarding.
- 4.4 These behaviours can be the result of (an interplay between) mental health issues, substance abuse, advancing age, social isolation or personal choice. When dealing with concerns about self-neglect, it is necessary to find the right balance between a person's autonomy and the duty to protect the person's health and wellbeing. A robust risk assessment, which is preferably multi-agency and includes the views of the adult, is pivotal to decision making.
- 4.5 If the individual does not give or is unable to give their consent to information sharing and/or safeguarding actions, refer to section 5 below of this policy. All the decisions need to be fully explained and recorded and other agencies are to be informed and involved as necessary.

5 Mental capacity within adults safeguarding

- 5.1 Any safeguarding or welfare concern that LFB staff raise needs to clarify whether an individual has agreed to provide consent for their information to be shared with third parties. All decision for concerns must take into account the individual(s)' ability to make an informed choice about the way they want to live their life and the risk they want to take. To this end, understanding a person's mental capacity is important in determining whether they can make decisions in their best interest. This includes the ability to:
- Understand the implications of their situation;
 - Take action themselves to prevent abuse/the escalation of risk;
 - Participate to the fullest extent in the decision for referral.
- 5.2 The Mental Capacity Act 2005 (MCA 2005) provides a statutory framework to protect people who cannot make decisions for themselves due to a temporary or permanent impairment or disturbance. The Act also states that we should always start from the assumption that a person has the capacity to make decisions; therefore, the referrer is not expected to make a professional medical assessment but to ascertain if the person has mental capacity at one point in time to:
- Understand the information relevant to the decision;
 - Retain that information long enough for them to make the decision;
 - Use or weigh that information as part of the process of making the decision;
 - Communicate their decision (whether by talking, using sign language or by any other means such as muscle movements, blinking an eye or squeezing a hand).
- 5.3 If the individual fails any of the above, then it can be reasonable to believe that they lack the mental capacity at that very moment to make an informed decision in their best interest.
- 5.4 It should also be noted that if an individual has the mental capacity to make informed decisions about their safety and does not want any action to be taken, this does not preclude the sharing of information with relevant agencies. This can be where:
- There is a public interest i.e. not acting will put others at risk.
 - Their vital interest is compromised – i.e. there is a (immediate) risk of death or major harm.

- There is a duty of care i.e. a crime has been or may be committed.

5.5 Reasons for overriding consent must be made clear on the Person at Risk (PAR) Form. Please refer to Appendix 2: Person At Risk (PAR) Form.

6 Welfare concerns

- 6.1 Welfare concern is the term used to refer concerns which do not strictly sit under adult safeguarding processes, because 'abuse' as defined in the Care Act has not happened and/or the person does not meet the criteria listed in the Act. Please refer to Appendix 3 - Adult safeguarding/child protection concern flowcharts.
- 6.2 The Act, however, requires local authorities to ensure the provision of preventative services to help prevent, delay or reduce the development of care and support needs. This means that in line with the Prevention Principle in the new legislation, where the vulnerability of/risk to the person needs further consideration and action to prevent it escalating to a safeguarding issue in the future, concerns must be raised and addressed appropriately.
- 6.3 Welfare concerns may be fire risk related (previously known within LFB by the operational term Serious Outstanding Risk) and/or welfare related and could be triggered by a number of issues including, but not exclusive to, the following:
- Evidence of no or inadequate heating, malnutrition, poor housing and living conditions which are not the consequence of either third party abuse and neglect or self-neglect. Rather, a person may be in need of assistance from the health, housing, the local Social Services Department or from other agencies, but is not accessing these services.
 - Signs of cognitive and/or physical impairments which would increase the risk of fire, hinder the ability to recognise the risk of fire and/or escape the fire.
 - Signs of fire risk such as evidence of unreported previous fires, burns on carpet or clothes, unsafe candle use, hoarding up to level 4. Please refer to Policy number 829 – hoarding.
- 6.4 It is recognised that because an individual may present a combination of characteristics, the above categories are likely to overlap. A person also has the right to make life choices and refuse services. However, as the objective of raising concerns of this nature is to lower the risk of harm to the person and/or third person/ parties(s) and promote their wellbeing and they will not be excluded from the referral processes.
- 6.5 When a welfare concern has been identified during a Home Fire Safety Visit (HFSV), a welfare concern must be raised via the HFSV database. This can be done by checking the tick box for 'Person At Risk' (PAR) on the HFSV database, which in turn will open up the PAR form for staff to use. For further guidance refer to Appendix 1: Adult welfare concern (flowchart B).
- 6.6 When a welfare concern has been identified outside of a HFSV the referrer needs to complete the PAR form with as much relevant detail as possible. The PAR form can be accessed via the safeguarding hotwire page or the start menu..
- 6.7 The base station commander (SC) will signpost the individual to relevant departments/agencies that will be able to provide appropriate assistance and support. This requires a holistic partnership approach to prevention. In these instances, the SC will discuss fire risk measures to put in place such as arson letter boxes, fire retardant bedding, telecare and sprinklers. In regard to fire related risk, in the context of safeguarding the focus is always on the risk to the person rather than the property.
- 6.8 A welfare concern, however identified, must be acted on and referred without delay.

7 Reporting procedures

- 7.1 All LFB staff have a duty and must act on any concern or suspicion that an adult at risk is being, has been or is at risk of being abused, neglected or exploited.
- 7.2 It is acknowledged that reporting concerns can be challenging, particularly if those concerns involve another member of LFB staff. The LFB will support anyone who, in good faith, reports concerns about a member of staff that relate to an adult at risk being - or at risk of being - abused or neglected, even if those concerns are proven to be unfounded. For further information, refer to the Policy number 569 – Confidential Reporting ("whistleblowing") policy. **Please note that this method of raising concerns about abuse/neglect of an adult at risk is only applicable where members of staff are suspected to be involved.** All other concerns should be raised using the process outlined below.
- 7.3 Although staff are encouraged to be alert to signs and indicators of abuse, incidents may only come to light because the person discloses the information themselves. It is important to remember that, if an adult at risk tells someone that they are being abused, they are usually doing it because they want it to stop, even if they ask that person to do nothing with the information.
- 7.4 Staff receiving disclosures about abuse should respond sensitively.
- Listen carefully, allow the person to talk freely.
 - Gather relevant information by asking 'tell me **who** it was?', '**when** did it happen?', '**where** did this happen?' If they won't answer, do not push them or offer suggestions.
 - Avoid asking leading questions.
 - Do not investigate, make judgements or jump to conclusions.
 - Do not promise to keep secrets - explain that you have to let your manager know so that they can speak to the people who could help protect them.
 - Where possible, ask the person for consent to pass their details on to people who may be able to help them. The first decision is whether or not to override the wishes of the adult at risk, if they do not consent to any action being taken. There will be some circumstances where consent should **not** be sought i.e. where it may place the person at increased risk of harm, where it may hamper the prevention or investigation of a serious crime and/or where it may lead to an unjustified delay in raising a concern/or where there is a public or vital interest to do so.
 - Make a written record of your concerns as soon after they have been identified as possible. This should include the date and time of incident and any injuries observed, using the person's own words where possible, as this will assist as to what action be taken. This informal record must be kept secure and securely disposed of in accordance with the requirements of the GDPR and/or Data Protection Law once no longer needed.
- 7.5 Where there is, or there is the possibility of, an immediate risk or a crime has been committed, LFB staff must act in the best interests of the adult at risk and contact the police straight away via Control or on 999 as well as following LFB internal procedures for reporting concerns by following Appendix 4 - Flowchart for reporting adult safeguarding referrals/welfare concerns. In such circumstances, if it is possible to do so and without compromising their own safety, two members of staff should stay with the person at risk until the police arrive.
- 7.6 Where other agencies are present, such as the police, and they have made the decision to raise a safeguarding concern, **the LFB are also required to raise a separate concern**, following the internal procedures. Likewise, where LFB have previously raised a concern for the individual at risk, staff are still required to raise a new one.

- 7.7 The designated safeguarding team (DST) comprises of the base station commander (SC), another SC in the borough and the borough commander (BC). During working hours (between 08:00 and 17:00), where there is an immediate risk to the individual, all concerns should be raised with the base station commander OR another station commander in the borough OR the local borough commander in writing using the PAR form within 4 hours, and within 24 hours for all other concerns. In the event that there is no DST member available, the concern will be passed to the OOD who will assume this role.
- 7.8 Outside working hours (between 17:00 and 08:00) concerns should be reported to the officer of the day (OOD) who will check the availability of the DST senior officers in order of above. If no DST senior officer is available, the OOD will assume this role. In all cases, **the referral process should be started, and actions taken, immediately.**
- 7.9 As the base SC/BC will not be the first port of call for making referrals, it is the responsibility of the other DST members/the OOD to update the base SC/BC with details of any concerns raised.
- 7.10 The referrer needs to complete the PAR form with as much relevant detail as possible. The PAR form can be accessed via the safeguarding hotwire page or the start menu. Guidance on completing the PAR is available on the Safeguarding Hotwire page.
- 7.11 In the event that the referral process cannot be completed before those involved go off duty at change of watch, the DST senior officer/OOD (as detailed above) must be contacted, who will decide whether the watch need to stay on duty to complete the referral, or whether the referral can be handed over for completion to the on-coming watch (to prevent any unnecessary delay).
- 7.12 The responsibility for deciding whether to refer the matter to the safeguarding adults team within the local Social Services Department (SSD) lies with the DST senior officer/ OOD. A separate guidance document has been prepared to assist the DST senior officer/OOD to decide when a referral is warranted. Please refer to Appendix 5 - Guidance for senior officers - raising concerns in relation to adults at risk.
- 7.13 On receipt of a concern, liaison with the relevant local Social Services Department (SSD) for guidance should take place, to establish whether the concern should be referred as a safeguarding or welfare concern. If contact is made through a switchboard, personal and sensitive information should only be shared with the duty Social Worker and NOT reception or security staff or operators. Refer to Sections 8 and 9 of this policy for information on handling safeguarding data and information sharing.
- 7.14 Once the decision has been made to refer, this should be confirmed in writing by completing the reviewer's decision section in the PAR form. The Social Issues Mailbox is automatically copied into every PAR form raised.
- 7.15 When raising a concern to SSD, it must be made clear that this is a safeguarding adult at risk or a welfare concern issue. The referral should be made to the borough where the incident happened.
- 7.16 All correspondence that sits outside the PAR form, meaning sent before and/or after raising an official referral using the PAR form, should be marked " OFFICIAL –SENSITIVE PERSONAL DATA" in the subject title of the email and copied to the Social Issues Mailbox. Policy number 619 - LFB security classifications system applies.
- 7.17 By using the 'attach file' function in the PAR form, the referrer and DST/OOD have the ability to attach additional documents/emails to the PAR form when making a referral, or to add retrospectively to the referral e.g. further information/correspondence received from external

agencies etc. Note that attachments cannot be accessed by external agencies. However, this information may be of significant importance for both internal and external auditing, and potential Safeguarding Reviews.

- 7.18 The DST/OOD should be the only points of contact with SSD in respect of safeguarding concerns.
- 7.19 All telephone referrals must be followed-up in writing within 24 hours using the PAR form.
- 7.20 Where it is decided that raising a concern to SSD is not warranted, the relevant base SC will be informed. The Welfare Concern process will then be followed without delay. The decision not to refer to SSD must be recorded on the PAR form by the DST/OOD along with the reason why and any action taken to address the concern.
- 7.21 The deputy assistant commissioner (Prevention and Protection) with responsibility for Prevention will be responsible for managing, maintaining and interrogating the electronic record of all safeguarding concerns raised and for providing statistical information gathered through it as requested. Access to the electronic record of concerns will be strictly limited in line with Data Protection Law principles around the handling of personal and sensitive information.

8 Guidance on handling safeguarding data

- 8.1 The gathering, processing, storing and destruction of personal data is governed by the Data Protection Law. All LFB staff must follow the advice and guidance set out in Policy number 351 - Data Protection and Privacy Policy, when handling personal data, including safeguarding information.
- 8.2 All staff must comply with Policy number 619 - LFB security classifications system. All safeguarding correspondence should be marked 'OFFICIAL – SENSITIVE PERSONAL DATA' in the subject title of the email.
- 8.3 In some circumstances staff may have access to or be given highly sensitive or private information. It is important that these details are appropriately secured at all times and only shared when it is in the interests of the adult at risk to do so. If there is any doubt or uncertainty seek guidance from the Information Access Team and copy in the Social Issues mailbox.
- 8.4 All staff must comply with the Policy number 485 - ICT Acceptable Use Policy (AUP), the safeguarding policy and the Data Protection Law at all times when using LFB's computers and data. When gathering, processing, storing and destruction of safeguarding data you must always be mindful that an adult at risk might suffer harm if safeguarding data is compromised.
- 8.5 You are responsible for:
 - Ensuring you are aware of your information security responsibilities, relevant to your job or function.
 - Operating within the scope of your job function.
 - Only accessing the systems you are authorised to use.
 - Safeguarding the hardware, software and information in your care.
 - Preventing the introduction of malicious software to LFB's information systems by following the best practice advice issued in the AUP.
 - Complying with the AUP at all times when using LFB's computers and data.

- 8.6 Access to LFB's safeguarding databases are strictly limited to the deputy assistant commissioner (Prevention and Protection) with responsibility for Prevention and authorised staff. Please refer to Appendix 6 - Protocol for the use of adults at risk databases.
- 8.7 Officers responsible for sharing safeguarding data with partner agencies must ensure that approved facilities are used for transmitting the data using a secure, encrypted solution (the London Fire Brigade uses Egress Switch for email security).
- 8.8 Officers transmitting safeguarding information to external partner agencies must:
- double check the correctness of recipient email addresses before sending
 - copy in the Social Issues (SI) mailbox.
 - attach a record of the communication to the PAR form record.
- This provides an audit trail and quality assurance tool to oversee all safeguarding/welfare concerns from the initial concern through to the decision making that may or may not prompt (further) actions. **Local databases should not be kept within boroughs.**
- 8.9 Access to safeguarding data is restricted to designated staff as it is used to hold all personal data as per Policy number 442 - Information security policy.
- 8.10 All parties will comply with their obligations under the General Data Protection Regulation and the Data Protection Law, ensuring that it processes Personal Data fairly and lawfully in accordance with data protection law.
- 8.11 Any events that are believed to have led to a breach of an individual's personal data, under data protection law must be reported to the LFB's Data Protection Officer (DPO) without undue delay via dataprotectionofficer@london-fire.gov.uk (as described in Policy number 351 - Data protection and privacy).

9 Information sharing

- 9.1 Information sharing is vital to safeguarding. The data protection laws (GDP) and human rights law are **not** barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- 9.2 Wherever possible the best approach is to be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 9.3 While transparency is the best approach, it is not always the case that formal consent can be gained in safeguarding situations and information may need to be shared without formal consent. The GDPR sets a high standard for consent and where this is not possible, the LFB can look for a different lawful basis for the information sharing. Public authorities, employers and other organisations in a position of power over individuals should avoid relying on consent unless they are confident they can demonstrate it is freely given.
- 9.4 Where possible, share information with the family/persons knowledge, and where possible, respect the wishes of those who do not agree to having their information shared. Where that is not possible, you will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have their agreement, be mindful that an individual might not expect information to be shared.

- 9.5 Before any information is shared, all reasonable steps must be taken to ensure that the information being shared is necessary for the purpose for which it is being shared, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion and is shared securely.
- 9.6 The decision about what information is shared and with whom will be taken on a case by case basis will be made/approved by a senior officer (either an assistant commissioner (AC), deputy assistant commissioner (DAC), BC, SC, or the nominated safeguarding officer in the Prevention and Protection Department. A record will be made of what is shared, with whom and for what purpose.
- 9.7 In most cases, the legal basis for sharing information about safeguarding issues will be the LFB's public task to take action in the event, or situation that one or more individuals may die, be injured or become ill (Fire and Rescue Services Act 2004; Section 11). The LFB have further obligations to work with and support safeguarding laws.
- 9.8 The above process describes what should happen on a case by case basis, given the circumstance of one or more individuals. If information about vulnerable people is to be shared on a regular basis with the same trusted organisation, then a data sharing agreement is recommended. A data sharing agreement sets out the purpose of the data sharing, covers what is to happen to the data at each stage, sets standards and helps all parties to be clear about their respective roles. It helps you to demonstrate your accountability under the GDPR/Data Protection Law. Any data sharing agreement is to be run past the Brigade's Information Access Team (IAT) to ensure it meets all requirements under data protection law.

10 Avoiding false allegations

- 10.1 There is much staff can do to avoid situations which may give rise to misinterpretation. This includes:
- In the event of an injury to an adult at risk, ensure that a written record is made as soon as practicable and the statement witnessed by another adult.
 - Keep a record of any allegation made against you and make the OOD aware of the allegation. Never let an allegation go unreported.
 - Never do anything of a personal nature for an adult at risk such as accompanying an individual to the bathroom, helping them change clothes, or bathing them.
 - Respect everyone by treating them courteously and with dignity at all times, irrespective of age, gender, ethnicity, disability or sexual identity.
 - Never trivialise abuse of adults at risk.

11 Disclosure and barring service

- 11.1 The new disclosure and barring service (DBS) was established in 2012 and its aim is to protect both children and adults at risk by preventing those who were known to pose a risk of harm accessing these groups through their work.
- 11.2 The DBS guidance states that employers must refer someone to the DBS if they:
- Dismissed them because they harmed a child or adult.
 - Dismissed them or removed them from working in regulated activity because they might have harmed a child or adult otherwise.
- OR
- Were planning to dismiss them for either of these reasons, but the person resigned first.

- 11.3 To comply with the requirements of the DBS, LFB staff in roles which involve working or volunteering with children or adults at risk in 'regulated activities' will be subject to a DBS check (previously criminal records bureau check) at enhanced level.
- 11.4 Normal operational duties (including delivery of routine community safety provision such as HFSVs) are not considered 'regulated activities' under the Department of Health and Department for Education guidance. However, some FRS roles and volunteer operational roles (working on central youth engagement/intervention schemes for example) will involve participation in 'regulated activities', and as such will require enhanced DBS check clearance.
- 11.5 Policy number 726 – disclosure and barring policy provides details of the roles to which this policy applies. It also sets out the LFB's policy on DBS checks, the disclosure and barring scheme and the recruitment of ex-offenders, and provides information on the circumstances that will trigger a referral to the DBS.

12 Safeguarding adults boards (SABs)

- 12.1 SABs (representing all London boroughs) are multi-agency boards which have been established to promote, inform and support safeguarding adult work. In line with their role of developing links with inter-agency partnerships aimed at promoting the safety and wellbeing of residents at a borough level, most BCs sit on SABs on behalf of LFB. More information on SABs and BCs' work is outlined in Appendix 7 - The role of borough commanders (BCs) at safeguarding adults boards (SABs).

13 Review

- 13.1 This policy will be subject to any necessary updates in line with changes to legislation, guidelines or best practice as issued by the appropriate agencies/bodies.

Appendix 1 - Prevent: Counter Terrorism Strategy

Overview

Prevent forms part of "Contest", the UK Strategy for Countering Terrorism which consists of four strands:

Pursue, Prevent, Protect, Prepare.

Prevent primarily aims to reduce the threat of terrorism by placing preventative measures across agencies to support and divert people vulnerable to radicalisation. This Strategy became a statutory duty in 2015 and, although we are not subject to the statutory duty, our wider prevention role and interaction with communities make us valuable partners in preventing terrorism.

Why is it relevant to the LFB?

Staff may come across indications of terrorist activities whilst conducting Home Fire Safety Visits (HFSVs) or carrying out inspections in a range of commercial and domestic buildings. This may include leaflets, books or posters supporting or encouraging radical views e.g. Right Wing, Islamist extremism.

There could also be a role in the engagement of individuals – particularly in **offering diversionary activities to vulnerable young people through LFB Youth Engagement Programmes**. Indeed, such programmes can represent a powerful tool to understand, prevent and overcome youth marginalisation and consequently, safeguard vulnerable individuals from the threat of radicalisation.

What should staff do to comply with Prevent?

All staff need to be aware of where, how and to whom report concerns related to threat of radicalisation and/or terrorist activities.

Prevent is closely linked to Safeguarding legislation, as radicalisation is considered a form of exploitation and therefore concerns should be raised as detailed in LFB Safeguarding policies. However, should suspicions about any immediate terrorist risk/threat to the public be raised at any time, staff should contact the duty national inter-agency liaison officer (NILO) via Brigade Control. Staff can also contact the Anti-Terrorism Hotline on 0800 789 321 but must inform the duty NILO if they have done so.

Borough Commanders are advised to check with their local authority community safety partnerships or safeguarding boards to confirm the referral path available in their area and the appropriate protocols used for sharing of information.

All station-based staff should complete the Home Made Explosives Awareness Ad Hoc training entry in the Station Diary.

LFB Youth Engagement Programmes offer a range of activities which are powerful tools to understand, prevent and overcome youth marginalisation, hence safeguarding vulnerable individuals from radicalisation.

Managers should make their staff aware of the need to recognise and report concerns around radicalisation of people and places used to support terrorist activities. They should be aware of staff's changes in attitude and/or behaviour which may be represented as part of a spectrum which ranges from mild interest through "obsession" to "fanaticism" and "extremism" and also unusual access or attempts to gain access to sensitive information outside of the need of their role.

For further information please refer to the following Government documents:

Prevent Duty Guidance (2015)

2010 to 2015 Government Policy: Counter-Terrorism




Appendix 2 - Person at Risk (PAR) Form

Use this form to make a safeguarding or welfare referral for someone you believe is at risk.

Referrer details









Referrer Name *	<input type="text" value="Enter a name or email address..."/>	
Contact Number	<input type="text"/>	
Date/ Time Added	<input type="text" value="28/04/2021"/> <input type="button" value="📅"/> <input type="text" value="06"/> <input type="text" value="27"/> <input type="button" value="🕒"/> 	
Type of referral	<input checked="" type="radio"/> Adult Safeguarding concern - Immediate risk (4hrs) <input type="radio"/> Adult Safeguarding concern - No immediate risk (24hrs) <input type="radio"/> Child Protection concern <input type="radio"/> Welfare concern (adult only)	

Person at risk details

Forename *	<input type="text"/>	
Surname *	<input type="text"/>	
Age or Date of Birth (if known)	<input type="text"/>	
Sex	<input checked="" type="radio"/> Male <input type="radio"/> Female <input type="radio"/> Not disclosed/ Unknown	
Borough *	<input type="text" value="v"/>	
Postcode *	<input type="text"/> <input type="button" value="Lookup Address"/>	
Address *	<input type="text"/>	
Previous Address (if known)	<input type="text"/>	
Previous Post Code (if known)	<input type="text"/>	
Person At Risk Contact Number	<input type="text"/>	
Is the person aware of this referral? *	<input type="radio"/> Yes <input checked="" type="radio"/> No 	
Has consent been given? *	<input type="radio"/> Yes <input checked="" type="radio"/> No	
If 'no' why not?	<input type="text" value="v"/>	
If 'other' and any further details	<input type="text"/>	

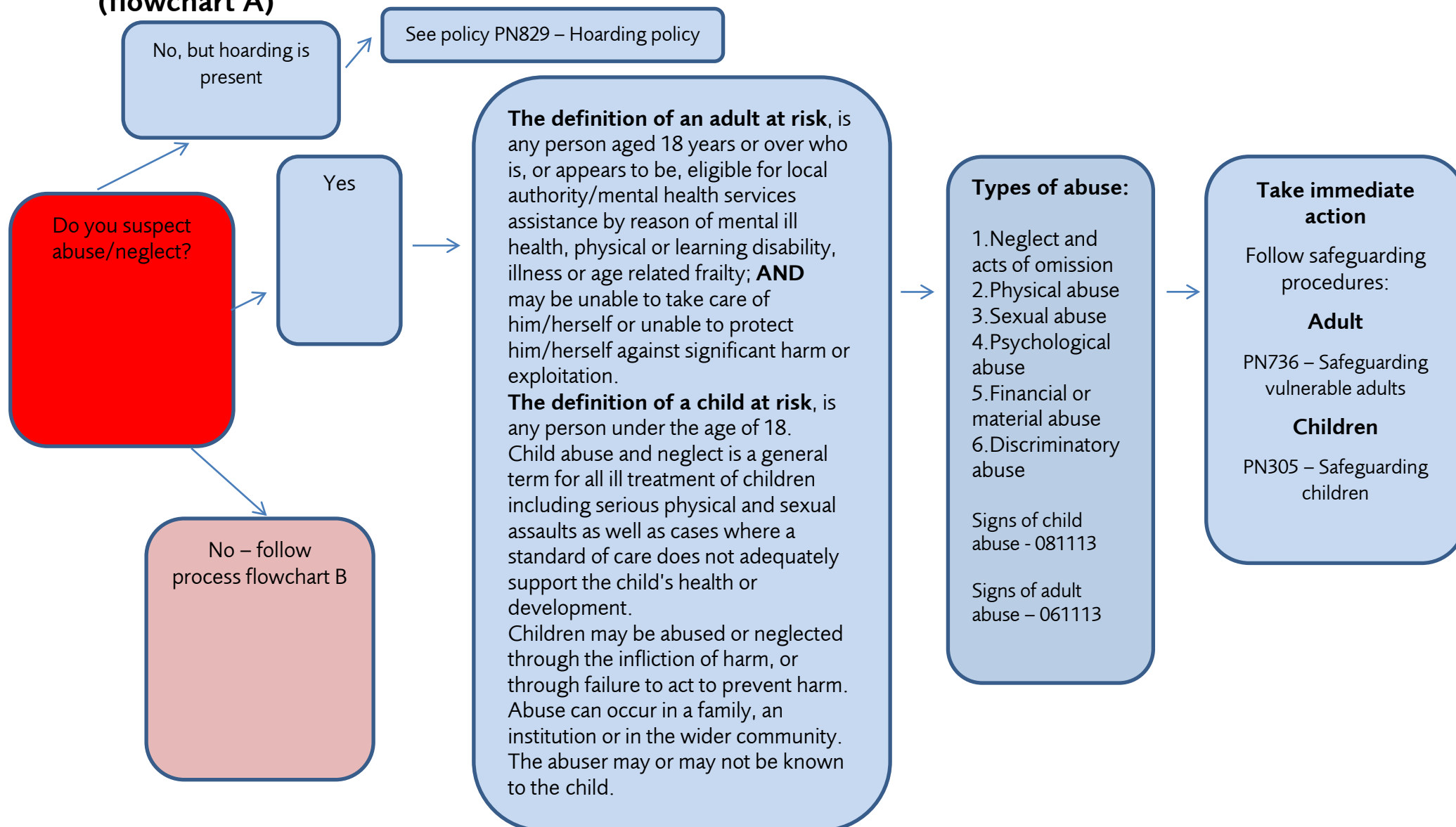
Other Members Of Household	<input type="text"/>	
Child Referral Only (if applicable)		
Parent or Guardian Name	<input type="text"/>	
Parent or Guardian Contact Number	<input type="text"/>	
Adult Referral Only (if applicable)		
Carer or responsible relative	<input type="text"/>	
Carer or responsible relative contact number	<input type="text"/>	
Carer organisation	<input type="text"/>	
All Referrals		
Date and time identified *	<input type="text" value="28/04/2021"/> <input type="text" value="07:00"/>	
Reason For Visit *	<input type="text" value="HFSV"/>	
If Other	<input type="text"/>	
Incident Number/ HFSV Number/ Other ID Number	<input type="text"/>	
Description Of Concern *	<div><div></div></div>	
Source Of Information *	<input type="text"/>	
Immediate Action Taken *	<div><div></div></div>	
What EXTERNAL support would be of benefit?	<input checked="" type="checkbox"/> Referral to Adult Social Care for assessment <input type="checkbox"/> Referral to Children's Social Care for assessment <input type="checkbox"/> Referral to Housing department <input type="checkbox"/> Referral for a mental capacity assessment <input type="checkbox"/> Referral to Environmental Health department <input type="checkbox"/> Support from health teams <input type="checkbox"/> Consideration for a personal protection suppression system <input type="checkbox"/> Recommending telecare with interlinked smoke detection <input type="checkbox"/> Other (please specify below)	
Other (external support)	<input type="text"/>	
What INTERNAL support would be of benefit?	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Flame Retardant Bedding <input type="checkbox"/> Arson Proof Letterbox <input type="checkbox"/> Specialist Fire/ Smoke Detection (such as heat alarms for kitchens or hard of hearing smoke alarms)	
Other (internal support)	<input type="text"/>	
Special Considerations	<input type="text"/>	
PC Shoulder No and/or Police CAD No	<input type="text"/>	
LAS Call Sign and/or Incident No	<input type="text"/>	
<p>Please ensure the appropriate SC/BC/OOD is on duty before you action the referral. If not, please contact the next available officer to action</p>		
Who are you referring this PAR to? SC/ BC/ OOD Name	<input type="text" value="Enter a name or email address..."/>	
SC/BC/OOD Contact No.	<input type="text"/>	
<div> <input type="button" value="Save and Send"/> <input type="button" value="Cancel"/> </div>		

To be completed by the SC/ BC**Reviewer's decision**

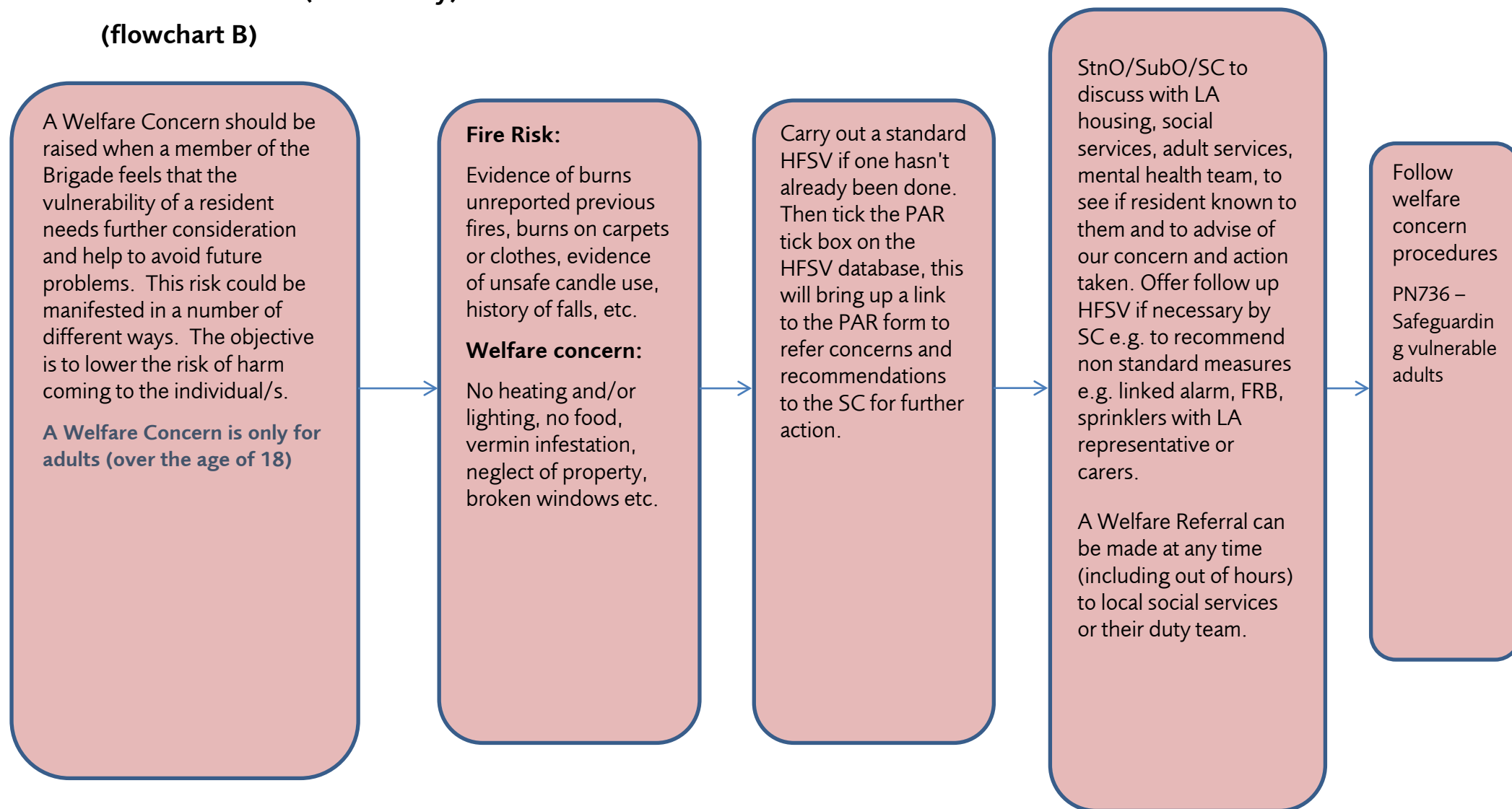
Reviewer's Name	<input type="text" value="Enter a name or email address..."/>	
Reviewer's Contact No.	<input type="text"/>	
Date/ Time Reviewed	<input type="text" value="17/02/2021"/>  <input type="text" value="12:"/> <input type="text" value="44"/>	
Reviewer's decision	<input type="radio"/> Adult Safeguarding concern <input type="radio"/> Child Protection concern <input type="radio"/> Welfare concern (adult only) <input type="radio"/> No further action required 	
Reason for decision to refer/not refer	<input type="text"/>	
Recommendations for Adult/ Child Social Care	<input type="checkbox"/> Referral for Adult Social Care assessment <input type="checkbox"/> Referral for Children's Social Care assessment <input type="checkbox"/> Referral to Housing department <input type="checkbox"/> Referral for a mental capacity assessment <input type="checkbox"/> Referral to Environmental Health department <input type="checkbox"/> Support from health teams <input type="checkbox"/> Recommendation for a personal protection suppression system <input type="checkbox"/> Recommending telecare with interlinked smoke detection to BS5839 Part 6 category LD1 standard <input type="checkbox"/> Other (please specify below) 	
If other, please specify	<input type="text"/>	
SC Name	<input type="text" value="Enter a name or email address..."/>	
SC Contact No	<input type="text"/>	
Local Authority email address	<input type="text"/>	

Appendix 3 - Adult safeguarding/child protection concern flowcharts

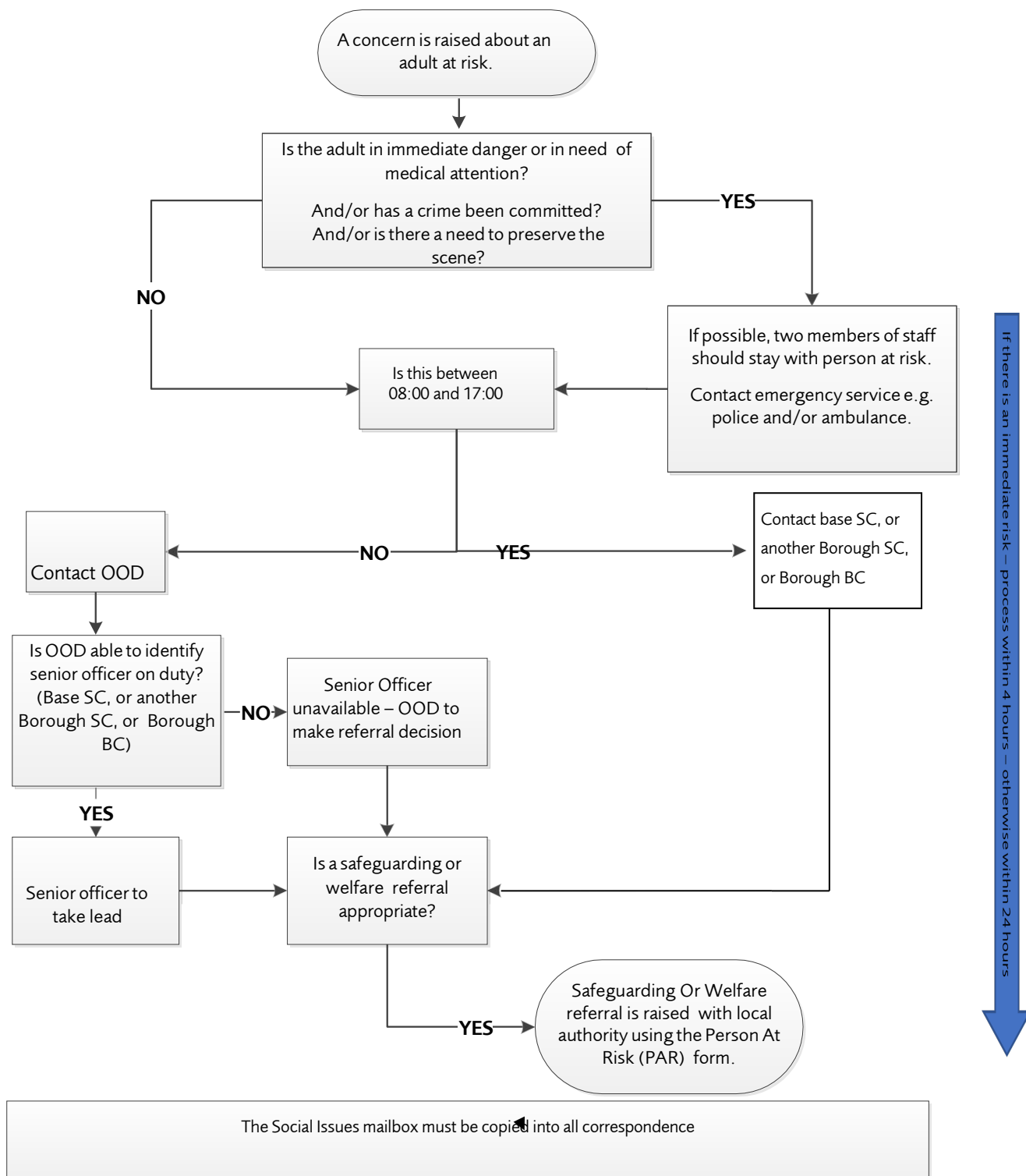
(flowchart A)



Welfare Concern (Adults only) (flowchart B)



Appendix 4 - Flowchart for reporting adult safeguarding referrals/welfare concerns



Appendix 5 - Guidance for senior officers - raising concerns in relation to adults at risk

Introduction

This guidance is intended to assist Brigade senior officers in making an informed decision concerning adults at risk. However, it cannot provide a definite answer as to when an adult safeguarding concern is warranted. If in doubt, staff should seek advice from the designated safeguarding team (DST)/officer of the day (OOD), who will in turn seek advice from the relevant Social Services Department (SSD) if needed.

The DST consists of the base station commander (SC), another SC in the borough and the borough commander (BC).

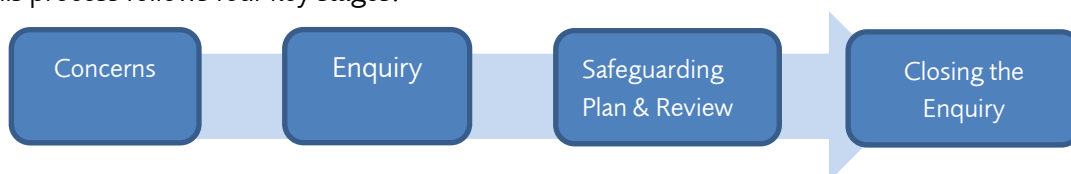
In cases where persons under the age of 18 are involved, the matter would automatically become a child protection issue and Policy number 305 – Safeguarding children applies.

This document should be read in conjunction with Policy number 736 - Safeguarding adults at risk.

The safeguarding adult process

The safeguarding adult process only applies when the adult concerned has care and support needs regardless of whether they are receiving them, and because of these needs are unable to protect themselves from abuse or neglect.

This process follows four key stages:



Stage 1 - Concerns

Under stage one, the person raising the concern is expected to report it through the Brigade's internal reporting procedures. The DST/OOD has the responsibility for deciding the most appropriate course of action, including whether or not to raise a safeguarding concern with the local authority and is therefore accountable for their decision. This decision must be primarily based on an assessment of whether the adult concerned:

- Meets the criteria for an 'adult at risk' (as defined in the Care Act –see section 2 of Policy number 736 – safeguarding adults as risk);
- has the mental capacity to make an informed choice about their own safety;
- is able to protect themselves; and
- whether the situation involves abuse or neglect/self-neglect (refer to section 3 of Policy number 736 – safeguarding adults at risk).

The seriousness or extent of abuse or neglect is often not clear when concern is first expressed. It is important, therefore, when considering raising a concern, to take account for the feelings of the person at risk and to approach reports of incidents or allegations with an open mind. What this means in practice is working through a process of assessment to evaluate if:

- The person is suffering or is likely to suffer abuse or neglect.
- The intervention is in the best interest of the adult(s) and/or in the public interest.
- A crime has been committed.
- Incidents are repetitive and targeted.

- The incident involves a member of LFB staff.
- There are signs of self-neglect/hoarding.
- There are signs of radicalisation.*³

You MUST raise a concern if any of the above criteria applies. This list is by no means exhaustive - in any situation where you feel abuse or neglect has occurred, a zero tolerance approach should be adopted and a referral must be made to the relevant organisation. The need to take action is no less important in those circumstances where abuse or neglect may be unintentional. The primary focus remains how to safeguard the adult.

A safeguarding concern must be raised even if another agency has already raised their own or LFB have raised a concern previously for the same individual.

Mental capacity and consent of adults at risk

All decisions for concerns must take into account the ability of the adults at risk to make informed choices about the way they want to live and the risk they want to take. Capacity must entail both the ability to make a decision in full awareness of its consequences for themselves and others. With regard to consent, the Care Act statutory guidance advises that the first priority in safeguarding should always be to ensure the safety and wellbeing of the adult. Refer to Section 5 of this policy for more information.

When a safeguarding concern is not warranted

You may decide that 'abuse' as defined in the Care Act has not occurred. Yet, in line with the Prevention Principle in the Act, it is highly likely that the individual would benefit from additional support to stop the deterioration of their situation and prevent it leading to a safeguarding issue in the future.

This means that there is still concern about the welfare and safety of the adult at risk and the DST must pass the concern in writing using the Person at Risk (PAR) Form to the relevant base SC. The SC, via the process in the Welfare Concern detailed in section 6 and Appendix 1 of this policy, will signpost the individual to relevant departments/agencies that will be able to provide appropriate assistance and support.

The decision not to refer to SSD must be recorded on the Person at Risk (PAR) form by the DST/OOD along with the reason why and any action taken to address the concern. This information may be used for quality assurance purposes at a later stage.

Other considerations

It should be noted that there is a real danger of staff tolerance growing with continued exposure to seemingly minor issues. This can lead to complacency, an acceptance of behaviour that would not be tolerated in other settings and may result in incidents not being referred when this would be the expected course of action.

Therefore, it is important to record all incidents and monitor trends so that repeated or targeted incidents are identified and that referrals are made when abuse occurs or is alleged.

If, after considering the above you are still in doubt, you should raise a concern or contact the relevant SSD to discuss the incident further.

³ *Please note that the anti-terrorism strategy 'Prevent' is encompassed by Safeguarding legislation. For this reason, BCs are responsible for making their staff aware of this threat and of the need to report concerns around radicalisation of people and/or places used to support terrorist activities. For more information refer to Appendix 6

Stage Two - Enquiry

The purpose of an enquiry is to decide whether or not the local authority or any other organisation/person should take any action to protect the wellbeing and safety of the individual. The scope of the enquiry as well as who leads it is determined by, and proportionate to, the circumstance of each individual case.

Once a decision to refer has been made by the DST, the SC from the ground where the incident happened will then take on the role of liaising with SSD to provide them with any additional information and answer any questions. Although the local authority has the lead role in making enquiries or requesting other agencies to do so, where a crime has been committed or is suspected, early involvement of the Police is essential. However, it is possible that, where the crime is fire related there may be a joint enquiry between the Police and LFB.

Stage 3 – Safeguarding plan and review

The safeguarding plan aims to set out the steps to be taken to assure the wellbeing and safety of the adult at risk, the provision of support, along with any necessary ongoing risk management strategy. The plan should outline the roles and responsibilities of all individuals and agencies involved and identify the lead officer who will monitor and review the plan. The SC/BC is likely to be involved where a fire risk has been identified regardless of whether it was the LFB that raised the original referral. The SC/BC would then be responsible for taking part in a strategy discussion or meeting and implementing the sections of the plan that relate to fire safety/risk.

With this in mind, it would be necessary to agree responsibility for actions. For instance, where it has been identified that a fire door needed to be replaced with one of the correct fire rating, the responsibility would rest with the landlord or resident's representative, not the SC. Reviews of safeguarding plans and decisions about plans should be communicated and agreed with the adult at risk. The review process may determine that either the safeguarding plan is no longer required or that it needs to continue and may also instigate a new safeguarding enquiry.

Stage 4 – Closing the enquiry

The safeguarding adults process may be closed at any stage if it is agreed that an ongoing enquiry is not needed or if the enquiry has been completed.

Closure records should state the reason for this decision and the views of the adult at risk to the proposed closure. It is the responsibility of the LFB officer supporting the safeguarding enquiry to copy in the Social Issues Mailbox in all correspondence including actions taken, information received from external agencies and closure records and attach it to the PAR form record. To attach a file to the PAR form, click on '**Attach File**' icon on the top left hand side of the form, and then click '**Browse**' to choose and upload files from your computer. This enables the Care, Health and Safeguarding (CHaS) team to monitor information and close the safeguarding file.

Refer to Section 4 of the 'London Multi-Agency Adult Safeguarding Policy and Procedures', for details on each stage. <https://londonadass.org.uk/safeguarding/review-of-the-pan-london-policy-and-procedures/>

Concerns rejected by Social Services Departments

In cases where concerns are rejected by the SSD, the DST/OOD must request a full written explanation as to why a referral is not warranted. The SSD response should be attached to the PAR form. Consideration must be given to raising it as a welfare concern before the case is closed.

Appendix 6 - Protocol for the use of adults at risk databases

Introduction

This protocol applies to any database which is used to store data relating to adults at risk. The director of operational delivery will maintain a central register of such databases. No new database and no significant amendments to existing databases may be undertaken without the prior written approval of the director of operational delivery. The LFB is committed to ensuring that information, including that relating to its clients, along with the IT systems that process, store, display or transmit this information, are properly protected and operated in accordance with data protection legislation.

The aim of the protocol is to manage information about adults at risk so that:

- Access to information is reliable, authorised and properly controlled.
- Assurance is provided such that information can be used with confidence for its accuracy, authenticity and completeness.
- Risks to information assets can be quickly and successfully identified and appropriate, timely and cost-effective mitigating actions can be taken.
- The organisation is compliant with all relevant legislation, its regulatory environment and is following industry best practices.
- Employees are aware of their information security requirements, act on these needs and adopt an attitude of collective responsibility for maintaining information security.

Adults at risk databases

Databases containing personal information relating to adults at risk may only be established for the purpose of administering the LFB's community safety initiatives and schemes, which are run as part of the Brigade's statutory duty to promote fire safety. Databases must be developed and maintained in accordance with the Brigade's standard methodology for software development and must conform to the following Brigade policies and procedures which are outlined in summary form in this protocol but which should be fully reviewed by all users of vulnerable adults' databases:

Policy number 485 - **ICT acceptable use policy (AUP)** which sets out the rules for all LFB staff, including temporary staff, contractors and third parties who are granted access to ECT equipment and networks. It provides guidelines on how to ensure the security of the Brigade's systems e.g.: use of passwords, email accounts, internet.

Policy number 351 – **Data Protection and Privacy Policy** which set out the rules on how to manage and deal with personal data including the right of access to personal data, how long users should keep it, the obligation to correct mistakes, dealing with subject access requests, etc, and the Brigade's approach to information sharing.

Policy number 442 - **Information security policy** which set out the Brigade's approach to information security including responsibilities, access to systems, policy compliance, risk management, etc.

Information stored

Personal information held on vulnerable adults databases is subject to safeguards and restrictions imposed by or under the Data Protection Law and related legislation, concerning the way such information is collected, stored and processed. Only adults at risk personal data necessary for the following should be stored on a database:

- The administration of authorised community safety initiatives and schemes.

AND

- The proper recording of referrals made to other agencies.

In accordance with the principals of the Data Protection Law, all data stored on vulnerable adults databases, must:

- Only be used for the purpose for which it was obtained and shall not be further processed in any manner incompatible with that purpose;
- be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- be accurate and kept up-to-date;
- not be kept longer than is necessary for the purpose(s) for which it is obtained. In the case of data about vulnerable adults, it must be reviewed after six years after the scheme/activity/referral has been completed.

The LFB's deputy assistant commissioner (Prevention and Protection) with responsibility for Prevention or a nominated safeguarding officer in the Prevention and Protection Department is authorised to delete entries after this period.

Individuals have the right to access personal information about themselves held by the LFB by making a subject access request.

Security

Staff who use adults at risk databases are responsible for:

- The security of LFB IT resources and information.
- Operating only within the scope of their job function.
- Only accessing the systems they are authorised to use.
- Safeguarding the hardware, software and information in their care.
- Preventing the introduction of malicious software on the organisation's Information systems.
- Reporting any suspected breach of the Information Security Policy.
- Ensuring that they are aware of their information security responsibilities, relevant to their job or function.
- Access to the Brigade's person at risk database will be strictly limited to duty DACs, BCs, SCs, the safeguarding manager and staff within Prevention with responsibility for recording, managing, maintaining and monitoring safeguarding concerns.

Appendix 7 - The role of borough commanders (BCs) at safeguarding adults boards (SABs)

Background

In November 2010, approval was given by the Authority for London Fire Brigade (LFB) to pursue membership of SABs as it is recognised that there is potential for LFB to contribute to the multi-agency approach to safeguarding adults at risk.⁴ In line with their role of developing links with inter-agency partnerships aimed at promoting the safety of residents at a borough level, BCs were identified as being best placed to attend SABs on behalf of LFB.

The SAB role and structure

SABs are statutory multi-agency boards established by the local authority in each borough. The core members include the Local Authority (LA), Clinical Commissioning Group (CCG), Police, and NHS England. A SAB may also include members that the LA considers appropriate to attend, such as ambulance and fire services.

SABs oversee and lead on adult safeguarding across the community. Their focus is on the prevention of abuse or neglect and on the promotion of adults' wellbeing. As such, their main objective is to ensure local safeguarding arrangements exist and that partners act to help and protect adults who have care and support needs, are at risk of abuse or neglect and unable to protect themselves.

The Board is an important source of advice and communication with other key local partnerships to share information and workplans; SABs therefore represent the appropriate forum for complex and challenging cases such as self-neglect to be discussed and addressed strategically. This means that **BCs are expected to follow up individual safeguarding and welfare concerns that have been previously raised in order to receive an update on progress and actions taken.**

SABs must conduct a Safeguarding Adult Review (SAR) when an adult dies as a result of abuse or neglect, whether known or suspected, and there is concern that partner agencies could have worked more effectively to protect the adult. SAB must also commission a SAR if an adult with care and support needs has not died, but the SAB knows or suspects that the adult has experienced abuse or neglect.

As a result of LFB membership, fire safety, in terms of risks to vulnerable adults and how joined up interventions can result in better outcomes, is now on the Boards' agenda. Consequently, even in those cases which do not warrant a SAR, BCs should be able to convene ad hoc multi agency meetings to look at fire fatalities which could lead to valuable lessons being learned to prevent future fire death.

The BC are expected to assess and disseminate the outcomes of reviews and safeguarding concerns in order to inform wider LFB adult safeguarding policy and prevention strategies.

⁴ LFEPA report FEP 1606, September 2010

Document history

Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	02/02/22	SDIA	L - 11/08/20	HSWIA		RA	
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Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Throughout	Terminology updated in line with the Youth and CS Reviews.	26/04/2022
Throughout	Minor changes.	16/06/2022
Throughout	References to Data Protection Act (DPA) updated to Data Protection Law.	23/06/2022
Throughout	Changes: a) terminology in line with departmental restructure; b) referral timings, c) location of the Person At Risk (PAR) form.	06/09/2022
Page 27	Removed reference to cancelled PN0621 as the content has been transferred into PN0351.	10/02/2026

Subject list

You can find this policy under the following subjects.

Adults	Domestic violence
Harassment	Vulnerable adults
Mobile Data Terminals (MDTs)	

Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	FOIA exemption	Security marking classification