



# specialists in care. believers in people.



# Forward

Welcome to the first annual safeguarding report from Active Care Group. We hope you enjoy the read and are as excited as we are to take our safeguarding agenda to the next level. This report will describe and celebrate our achievements so far and what we intend to do in the coming months. We have had the privilege of defining the safeguarding structure and agenda and have been amazed by the support of our operational colleagues in doing so. We have more to do but are very proud of the journey thus far.

Active Care Group (ACG) is a national provider of care services. We have over 30 years of specialist knowledge and experience in managing complex conditions including ventilation and respiratory, spinal injury, brain injury, epilepsy, neurological conditions, mental health and learning disabilities.

Our vision is 'a world where people with the most complex problems are surrounded by the collaborative, holistic and expert care they require and the kindness they deserve, to live a brighter future and their best lives.' We are committed to providing the best and most expert care possible in our residential homes, independent living services and hospitals. We want every person who uses our services to achieve the best possible outcomes and experience kind and compassionate care.

The behaviours that guide our vision are that we will 'listen, learn and act'; we will be 'fair and inclusive', and we will be 'kind and honest'.

ACG recognises that one of the most important principles of safeguarding is that it is 'everyone's responsibility'. Safeguarding children, young people and adults cannot be done in isolation; it is only truly effective when we work collaboratively and protect all those at risk of harm, abuse, or neglect.

It should be recognised that Safeguarding is complex and challenging and our plans for the year ahead are ambitious, but they are achievable. They are underpinned by our vision and behaviours, to ensure our services are person-centred, fair, collaborative, accountable and empower the people we care for. We know that safeguarding support, supervision, and training, is key to prevent harm. Every person who enters our care should feel safe, supported, and have a positive experience. Safeguarding processes should be more than process, it must always be meaningful to the person experiencing the process. We will always aim to ensure that our patients and residents will be fully involved and informed and decisions will be taken in partnership with the person, their families and carers.

Natasha Sloman Executive lead for Safeguarding.

### Introduction

Welcome to the first Safeguarding Annual Report 2022. Active Care Group, the executive team, our safeguarding leads, and mangers are absolutely committed to leading safe services, where people are protected from harm. We have worked hard over the last year to ensure that our structures and governance identifies those areas we need to focus on, what we are doing well and the experiences of those using our services. In 2022 we have achieved visibility on all of our services and our mock inspection programme reviewed local safeguarding arrangements in detail. This gave us a good baseline of custom and practice in each of our sites. The intelligence we gleaned from this programme of work has led us to identify two key quality priorities for the organisation. These are identifying emerging signs of a closed culture and protecting our residents/patients and colleagues from harm.

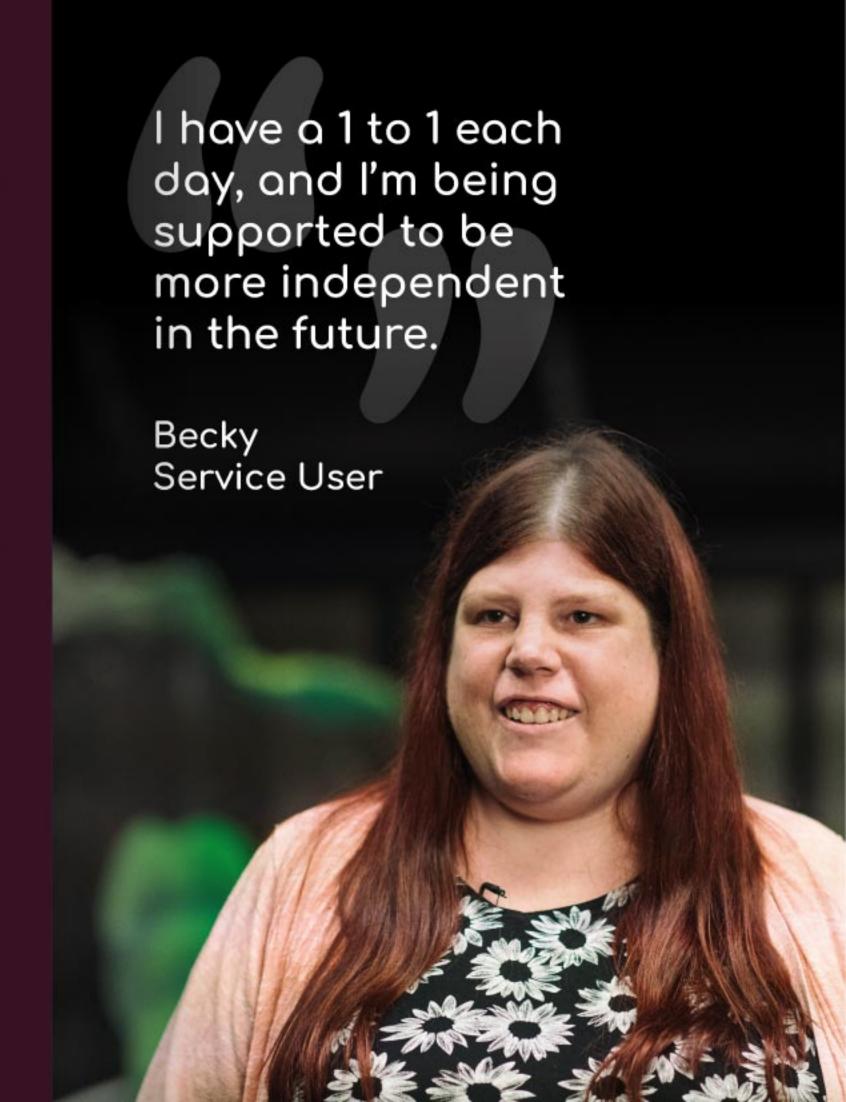
Everybody has the right to be safe and free from abuse and protected from harm, no matter who they are, or what their circumstances. The term 'safeguarding' encompasses all activities to assist children, young people, and adults 'at risk' to live a life that is free from abuse and neglect and to enable independence, wellbeing, dignity, and choice. Safeguarding includes the early identification and/or prevention of harm, exploitation, and abuse by using national guidelines and local multi-agency procedures.

It is essential that we disseminate 'lessons learnt' across our services and promote best practice from any serious incidents, to improve future service development and delivery for patients, residents, and colleagues.

Moving forward we also recognise that more work is required to ensure that safeguarding processes are meaningful, person centred and that our colleagues are confident in managing the relationship with the local authority. A joint children and adult approach have been adopted in line with ACG shared safeguarding agendas, principles, and duties of care to all those in our services.

This report will provide:

- A declaration of assurance that ACG is fulfilling its duties and responsibilities in relation to promoting the welfare of children, young people, adults and their families or carers who come into contact with our services.
- An overview of safeguarding practices, progress and achievements across regions and sites and services.
- Assurance that ACG is meeting its statutory obligations and the required national standards with regard to safeguarding.
- Describe future priorities and work plans for safeguarding and to demonstrate continuous improvement on the arrangements currently in place.



# **ACG** services

Our services stretch across England, Wales and Scotland and provide complex care and rehabilitation services in various settings from hospitals, residential homes, service users homes and rehabilitation units.

- Neuro rehabilitation therapy services are supporting people with complex Conditions such as acquired brain injury, spinal injury, neurological learning disabilities and respiratory and ventilation.
- Supported living service is designed to support people living with complex needs to live independently within their own homes.
- Residential care services provide care to both children and adults alike with a wide range of conditions through our network of purpose-built facilities.
- Care in the home provides bespoke packages of care to all ages with conditions such as brain injury, neurological degenerative diseases, respiratory and gastrointestinal conditions.
- Inpatient and residential mental health services, which caters for children and young people and adult services, providing care to meet a wide range of mental health needs.
- Case management services which support adults and under 18's with complex physical and neurological injuries and are supported at whatever stage they are in their journey from the acute stage to long term rehabilitation.



# Our Safeguarding structure & governance

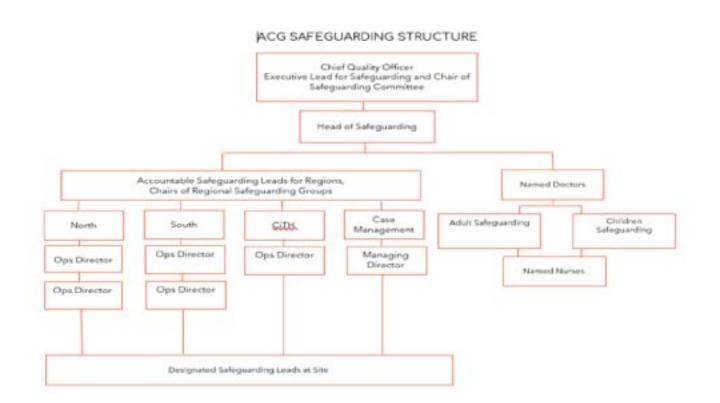
The Safeguarding structure is led by the ACG Group executive lead who reports to the chief executive officer. The executive lead is supported by the head of safeguarding and operational directors, who are accountable safeguarding leads for their regions nationally.

Within the structure there are named doctors and named nurses and accountable safeguarding leads for regions. These align to our structure and in line with the Intercollegiate Documents for Adults 2018 and Children and Young People 2019. This structure ensures that our organisation is working within our statutory responsibilities.

Local site leads across Active Care Group report to regional leads and comprise of multi-professionals who provide specialist advice, support, and supervision to their respective service. Site and service teams support the local safeguarding lead to fulfil safeguarding responsibilities and duties on a wide range of safeguarding issues affecting the people we look after and their families and carers.

The Safeguarding leads in services strive to ensure all safeguarding processes are robust and effective and responsive. This enables us to achieve compliance against all our safeguarding standards. But more importantly we ensure that the person at risk of or suffering neglect, harm or abuse always remain at the centre of all we do.

### Safeguarding Governance Structure





# Our statutory responsibilities

Active Care Group are required to:

Work within key pieces of legislation for adults and children across England, Wales, and Scotland. These statutory responsibilities are core to our safeguarding policies, procedures, and practices within all our services.

The Care Act (2014) established the legal framework for Safeguarding adults outlining statutory requirements; It places a duty on each Local Authority to establish a Safeguarding Adult Board (SAB) and specifies the responsibilities of the Local Authority and connected partners with whom they work, to protect adults at risk of abuse or neglect.

The statutory guidance for The Care Act 2014 describes adult safeguarding as:

"Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time, making sure that the adult's wellbeing is promoted including where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances.

The Children Act (1989) provides the legislative framework for child protection in England and the Children Act (2004) encouraged partnerships between agencies and created more accountability by placing statutory obligation for named agencies and individuals to co-operate to safeguard children and promote their welfare. Section 11 of the Act makes clear to whom this duty applies and indicates that they must 'make arrangements for ensuring that their functions are discharged, having regard to the need to safeguard and promote welfare of children'

Working Together to Safeguard Children is statutory guidance that provides children's safeguarding with a legal framework, setting out the responsibilities of Local Authorities and their partners. From a statutory perspective the three legally required bodies are:

Local Authority, Police and CCG (now know Integrated care boards ICB's) 'Working together' promoted the importance of safeguarding children being 'everyone's responsibility'

Our sites in Wales work to Social Services and Well Being Wales Act (2014) and statutory safeguarding guidance - Working together to Safeguard people.

Our services in Scotland work within The Adult Support and Protection (Scotland) Act 2007 that introduced duties and powers to safeguard adults who may be at risk of harm

In England and Wales our services work within The Domestic Abuse Act 2021 that defined domestic violence as not only physical violence but that of emotional, coercive and controlling behaviour and economic abuse that can be limited to a single event or a series of actions. Children are given statutory recognition as "victims" rather than "witnesses" if they see, hear or experience abuse in the home.

Additionally, our Safeguarding systems and policies ensure that we carry out the requirements of The Counterterrorism and Security Act (2015) and the Prevent Statutory Duty.

The Counter-Terrorism and Security Act 2015, places a specific duty on statutory bodies including the police, local authorities and health organisations to have 'due regard' to help 'prevent' people being drawn into terrorism

Active Care Group have a role in the 'Prevent' section of the UK's CONTEST strategy that aims to reduce the risk to the UK from terrorism, This strategy is underpinned by the Counter-Terrorism and Security Act 2015.

Services registered by Care Inspectorate Wales (CIW) comply with Care Standards Act 2000 and The Independent Health Care (Wales) Regulations 2011 Welsh Government (2022) Working Together to Safeguard People:

Care Inspectorate Scotland (CIS) regulated sites in Scotland compliance with Health and Social Care Standards 2017 and The Regulation of Care (Requirements as to Care Services) (Scotland) Regulations 2002

We will ensure that appropriate actions in line with our legal responsibilities are implemented to reduce the potential for abuse and/or neglect occurring. ACG is fully committed to its responsibilities for ensuring that there are "reliable systems, processes, and practices in place to keep people safe and to safeguard them from abuse and neglect" (CQC 2015)

Passion and compassion is the thread through everything we do at Active Care Group.

Suzanne
Care in the Home Manager









## National update what have we achieved in 2022

### Key achievements and outcomes

In May 2021 we established our quarterly national safeguarding Group. This is set out in our overarching governance framework. This Group has focused on reviewing incident trends, receiving national updates, reviewing, and monitoring training and supervision arrangements for key safeguarding colleagues. It is chaired by the ACG executive lead for safeguarding.

ACG executive board gains information and assurances through a number of channels; namely but not limited to, information and data from local services, intelligence from internal and external visits and other sources on information. The quarterly national safeguarding group has oversight from the Quality Assurance Committee. We established the Quality Assurance Committee with the aim of continuously improving the safety and quality of our services care and treatment and the experience of those we care for.

All services are robustly monitored by our internal quality team. Clinical audits and service reviews are an effective way to assess if the care we provide is safe and in line with best practice and standards. Each of our services has undergone a robust mock inspection in 2022. Safeguarding is a key line of enquiry within our internal inspection methodology. Information we obtained from these inspections have shaped our quality priorities for 2023. Our Quality assurance framework of group wide audits has twice yearly audits of Safeguarding across all services; This is overseen by the Quality Assurance Committee.

Our safeguarding governance structure

Executive Board

Quality Assurance Committee

National Safeguarding Group

Regional Safeguarding Meetings

Site based Safegaurding discussions and links with LADO

We have supported frontline colleagues to focus on completing relevant training.

We have undertaken the Midlands Safeguarding development framework (this is congruent with Section 11 of the Children Act 1989) in partnership with NHS England Midlands Safeguarding Lead professional. The framework is This is inclusive of Safeguarding Children, Young People and Adults at Risk in the NHS: Safeguarding Accountability and Assurance Framework. This is known as the SAAF. (NHS England, 2022).

We are pleased with the results of the audit as we have demonstrated a strong level of compliance in a number of areas and highlights including.

- We have leadership and organisational accountability notably having executive leads for; Safeguarding children and adults, Prevent and managing allegations against colleagues.
- We have partnership working to develop a strategic view of the population and client group that ACG serves.
- We have cultural development where colleagues are aware of their personal responsibilities for safeguarding and information sharing.
- We have governance systems, including a suite of policies namely safer recruitment, managing allegations against colleagues, whistleblowing, disciplinary, management of visitors. All of which support local multi agency safeguarding procedures.
- We have safer recruitment and HR processes safe management of requests for volunteers, students, celebrities to access site.
- We have developed a just and learning culture to ensure continuous improvement and development of the lessons learned framework.

Areas identified that are for development included:

- To develop a robust safeguarding supervision structure for adult services.
- To implement sharing, learning, and embedding the learning from local and national reviews.
- To expand and develop the safeguarding structure corporately.
- To develop an annual report for ACG.
- To provide consistency of training compliance in all levels of safeguarding in all our services.
- To develop greater understanding of trends and themes with enhanced data availability on safeguarding incidents.

We reviewed and updated all safeguarding policies including safer recruitment and policies relevant to Wales and Scotland to ensure that policies meet the needs of services within Active Care Group in line with the required regulation.

We have developed a methodology for identifying emerging signs of a closed culture. Closed cultures are acknowledged by the Care Quality Commission as 'a poor culture that can lead to harm, which can include human rights breaches such as abuse'. Responding to risks of closed culture and identification has been a priority on our quality strategy.

### 2022/2023 Key priorities

We must sustain a culture of safeguarding within our services and continue to support our frontline colleagues, so they can make every contact count and to prevent all forms of neglect, exploitation, abuse, and violence.

We will fully embed the ACG safeguarding structure.

We will work on improving the quality of the data we receive which will enable us to better analyse themes and trends and to share learning. This will be through but not limited to, a biannual safeguarding forum for leads, updates on best practice and legislation changes. We will focus more on safeguarding lessons learned bulletins to raise awareness across all services.

We will support any local authority Section 42 investigation made into safeguarding concerns for Adults and Section 47 investigations for concerns involving Children and young people; Furthermore we will contribute to Safeguarding Adults reviews undertaken by Safeguarding Adult boards and Safeguarding practice reviews when required.

We will monitor Section 42 and Section 47 investigation outcomes, share learning across our services and implement any recommendations made to safeguard people in our services.

We will undertake benchmarking exercises against the 'standards and guidance to improve sexual safety in mental health and learning disability in patient pathways.' We will undertake monthly audits of sexual safety incidents to monitor frequency to enable early identification of themes and implement prompt actions.

We want to continue to sustain positive partnership engagement with key stakeholders, to ensure the continuation of robust and transparent conversations in addressing and identifying solutions to rapidly evolving safeguarding issues.

We will sustain awareness of closed cultures and prevention and impact on keeping people safe from harm through introduction of closed culture assessment methodology, central assessment, and meaningful measures to assess impact and outcomes. Key measurables against this quality priority are set out within ACG quality plan.

We will raise awareness and understanding in our colleague groups to the risks of incidents of Prevent and Domestic Abuse and Violence (DAV) within our services and support those in our services to access support and intervention from the statutory agencies. This will be supported by the introduction of a Domestic Abuse Policy.

We will profile the voice and lived experience of those in our services and the care experienced in Active Care Group and develop a new approach to ensuring that the people who use our services are fully involved. We aim to undertake structured interviews with all our services by Spring 2024.

We will continue to create a greater understanding of the Mental Capacity Act and identify gaps in preparedness to ensure the effective implementation of LPS. Compliance with MCA training will sit at 92%.

We will continue to enhance our approach to safeguarding supervision arrangements for those leads working in our adult services. This will support our colleagues facing complex situations and ensure we share learning and best practice. We expect that 95% of our leads will receive safeguarding supervision quarterly.

We will raise awareness of the vulnerabilities of young people to exploitation and abuse as they develop into adults and/or transition to adult services.



# Successes and achievements 2022 and key priorities for 2023 What we have achieved in all our services 2022

The implementation of regional SG meetings led by our regional safeguarding leads as a key element of the overarching ACG governance structure.

The Introduction of one incident recording system into all ACG services, providing more transparency and effective access to information to support identification of safeguarding trends.

The improvement of training towards required levels to ensure colleagues work within the roles and competencies, required to execute their responsibilities for safeguarding.

The establishment of a lead for SG in all services trained to level 4 within the overall safeguarding structure who ensure that all safeguarding processes are robust, effective, and responsive.

The development of a culture of learning embedding local and regional safeguarding lessons learned and shared in line with ACG lessons learned framework.

The development of a Just Culture framework and access to organisational support at senior management team level to support practice development when errors have occurred.

The monitoring of the risk of closed cultures by senior leadership visibility at services.

The continuous improvement of relationships with Local Authorities through openness, information sharing and good communication and effective relationships.

The development of partnerships providing wider networking opportunities and awareness of safeguarding developments regionally and nationally.

The integration of Safeguarding into local governance arrangements, thus raising the profile that Safeguarding is everyone's business.

The provision of additional oversight and assurance from 'external visitors' such as advocates and experts by experience, that can flag concerns and be an additional resource for patients/residents to raise concerns.

The facilitation of external supervision for safeguarding leads in case management and children's services.

#### What next? Priorities for 2023

To continue to improve incident recording quality, content, and accuracy to provide a dataset for developing themes, trends and for shared learning from safeguarding incidents.

To ensure colleagues are competent in fulfilling the safeguarding agenda through training compliance to the required levels, working across our services enabling them to deliver high quality safe care, reduce risk and raise concerns when required.

To embed learning from safeguarding incidents across the services beyond region through a number of mediums including bulletins and quarterly forums.

To enable our safeguarding workforce to remain resilient by ensuring that all Safeguarding leads are effectively supported with a supervision structure regionally.

To recruit to permanent roles to reduce agency reliance and provide care continuity, consistency and reduce risk of safeguarding incidents

To continue to develop newly established regional meetings to support our services within the governance structure to share best practice, lessons learned.

To strengthen the provision of colleague supervision to provide a focus on safeguarding and ensure new starters have safeguarding supervision supporting workforce retention.

To educate colleagues to understand vulnerabilities of those in our care and to raise safeguarding concerns and the associated impact on co production of care plans and documentation to keep people safe.

To undertake Closed Culture audits and monitoring in services with lack of visibility of colleagues in remote locations and no immediate oversight.

To develop a national Safeguarding forum for learning. share best practice guidance, case studies, reflective discussions on safeguarding and risk-based situations.

To support the structured feedback session with patients/residents their families and carers to understand peoples experience of safety.

### Training

ACG continues to demonstrate on-going commitment to safeguarding training, ensuring all colleagues receive the required levels of safeguarding training under guidance of the Intercollegiate Document for Safeguarding Children (2019) and the Intercollegiate Document for Adults (2018). The current safeguarding training is designed to ensure that every colleague is aware of their safeguarding responsibilities, is able to recognise abuse and knows the correct route to act upon that concern.

SG training is a metric on the monthly performance framework, that is made available to regional operations directors, managing directors and to ACG executive board. It is used to inform monthly performance meetings.

Training levels and compliance are also reviewed at Safeguarding regional and national meetings and monthly clinical governance meetings within services. The corporate clinical governance agenda also has Safeguarding as a standard item for review of incident themes and trends. This meeting feeds into a corporate clinical governance quarterly meeting.

At the end of 2022 Safeguarding L 1 &2 e -learning overall and breakdown for:

- Hospitals 92% (level 3 for services requiring this level of training 75%)
- CITH 97%
- Residential and supported living 83%
- Case management 96%

Prevent 90% across ACG services.

ACG compliance target for 2022 was 85%; this has been reviewed for 2023 and will be 90% in light of contractual requirements.

#### Trends and themes

Active Care Group needs to understand the full and accurate picture of the number of safeguarding concerns raised in 2022. This is due to the dual reporting systems being used during the transition phase and integration of services in the establishment of the Active Care Group. Internal inspections had flagged the problems of dual reporting systems and concerns around the incident cycle - from timeliness and quality of reporting and investigation, through to learning the lessons and closing the loop.

The executive board concluded that that RADAR system was not meeting the needs of the organisation and decision was made to roll out Datix system to all services across the group.

The roll out of Datix reporting system has improved confidence in the data ACG has for Safeguarding since October 2022. Consequently, data from January – September 2022 may not state the full position of safeguarding in the organisation during this transition period.

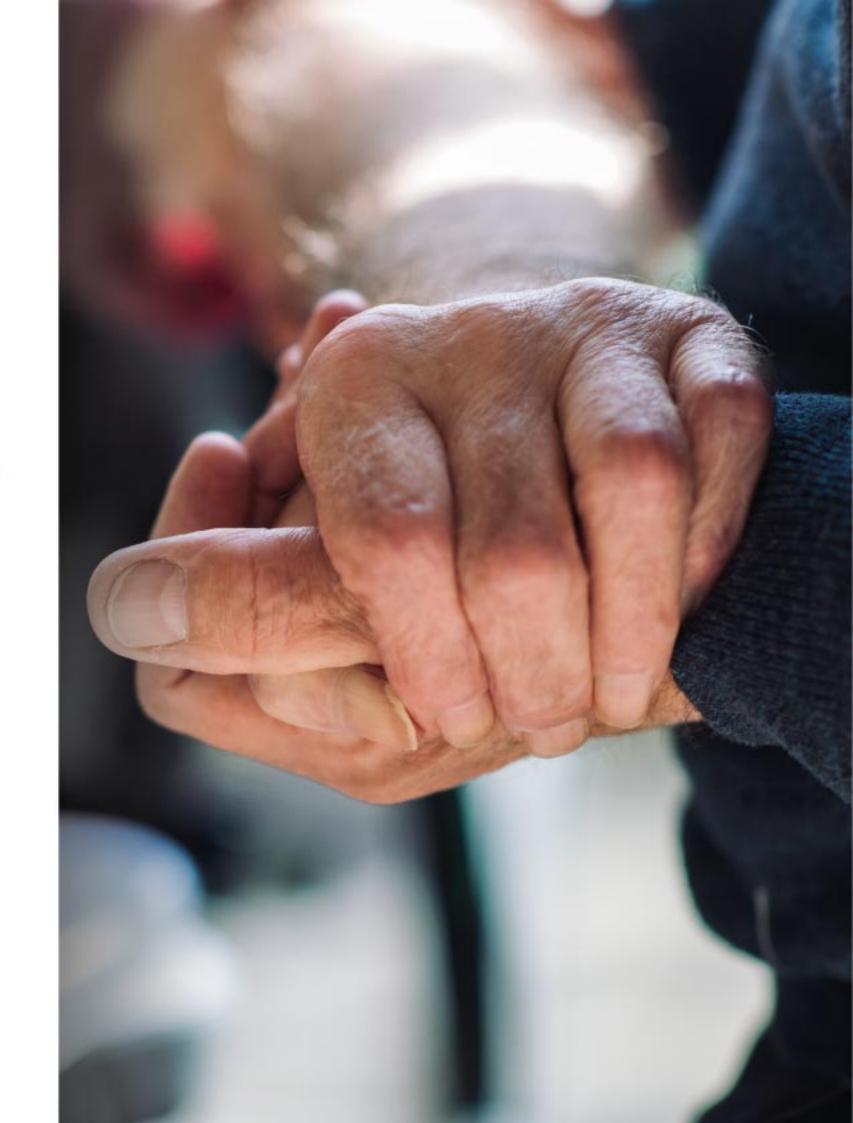
The main reported themes have been resident falls, peer on peer aggression, medication errors, allegations against colleagues of inappropriate behaviours and conduct, historic disclosures, and neglect; Two main themes have been included in the ACG quality priorities with a defined reduction in falls by 30% and reduction in injuries sustained by residents and colleagues due to aggression.

### Conclusion

Whilst Safeguarding agenda continue to be a challenging area for all services, Active Care Group continues to respond to regional and national developments. This annual report demonstrates that safeguarding vulnerable people remains a significant priority for our organisation and offers assurance that much has been achieved and delivered in 2022. We will continue to meet our statutory duties, as well as proactively developing safeguarding provision and implementing learning from incidents and concerns into everyday practice.

However, we recognise there is much more to achieve and to this end the development and delivery of the future priorities will help ensure that our services are fully engaged in the effective prevention of and response to safeguarding concerns. The underpinning message remains the same, in that safeguarding is everyone's business irrespective of role or position. It is everyone's responsibility to safeguard and protect the most vulnerable adults and children in our society. The child and adult at risk must remain at the centre and be the motivation of our actions.

Alice Rees Head of safeguarding



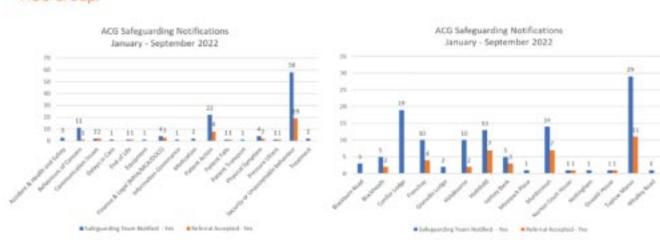
## **Appendices**

### Safeguarding Overview - National Trends and Themes

Safeguarding Notifications – January – September 2022



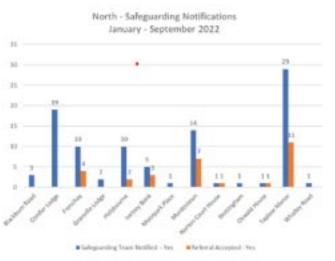
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### Safeguarding Notifications – January – September 2022 North Region:



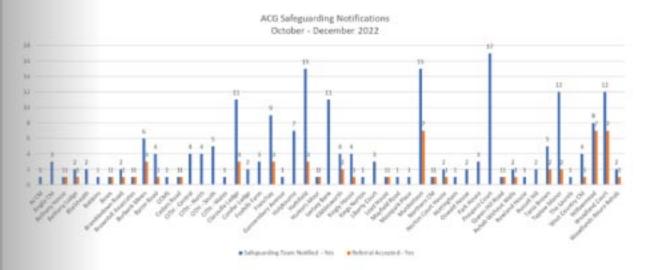




#### Safeguarding Notifications - October - December 2022



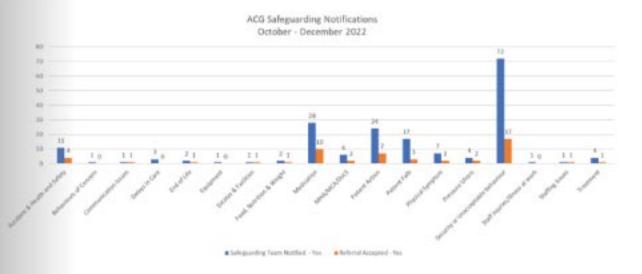
#### ACG Group:



#### Safeguarding Notifications - October - December 2022



#### ACG Group:



#### Safeguarding Natifications - October - December 2022



#### North Region:

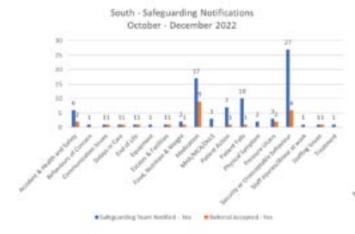


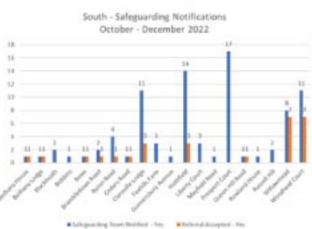


### Safeguarding Notifications - October - December 2022



#### South Region:





#### Safeguarding Notifications - October - December 2022



#### Case Management

