



Shropshire, Telford
and Wrekin



Integrated
Care System
Shropshire, Telford and Wrekin

Document Control Sheet

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1	January 2013	New CCG Policy – A. Scott-Ryan
1.1	September 2013	Formatting; addition of references to Working Together 2013; updated contact details and organizational references – A. Scott-Ryan / J. Stevenson
2	August 2015	Updated in line with current legislation – D. Coan
3	August 2016	No change – D. Coan
4	April 2019	Updated in line with current legislation – D. Coan

5	June 2021	J. Bell; A. Scott-Ryan
6	September 2022	A. Scott-Ryan, R Dale. Updated to reflect CCG change to ICB and updates to legislation.

The formally approved version of this document is that held on the NHS Shropshire, Telford and Wrekin ICB website:

<https://www.shropshiretelfordandwrekin.nhs.uk/>

Printed copies or those saved electronically must be checked to ensure they match the current online version.

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1 Introduction

- 1.1 It is the statutory responsibility of every NHS funded organisation and every health care professional working in the NHS to ensure that the principles and duties of safeguarding adults and children are holistically, consistently, and conscientiously applied to ensure that wellbeing is at the heart of all that we do.
- 1.2 This policy sets out the NHS Shropshire, Telford & Wrekin Integrated Care Board (ICB), formerly Shropshire, Telford and Wrekin Clinical Commissioning Group (CCG) approach to safeguarding and promoting the welfare of children. (Along with all CCG's, Shropshire, Telford and Wrekin CCG ceased on 1st July 2022 and became NHS Shropshire, Telford and Wrekin ICB).

The policy is to be seen as an adjunct to the West Midlands Child Protection and Safeguarding Procedures Manual <http://westmidlands.procedures.org.uk/> (the latter policy was created for nine Local Safeguarding Children Boards in the West Midlands). This policy is updated electronically and used as the main source of advice and guidance in relation to safeguarding children for all organisations, voluntary groups, etc. that work with children in Shropshire and Telford. This was to develop a more regional approach to multi-agency working around safeguarding, especially in light of the fact that so many partner organisations (including Police, Probation, Health and many others) span an area that crosses local authority boundaries.

2 Safeguarding Partners

- 2.1 Following the Statutory Changes in 2018, CCG's became part of the three safeguarding partners, who agree on ways to co-ordinate their safeguarding services, act as part of a strategic leadership group in supporting and engaging others and implement local and national learning from serious child safeguarding incidents, Shropshire Telford and Wrekin ICB now hold all responsibility of the former CCG as a statutory safeguarding partner.
- 2.2 A safeguarding partner in relation to a Local Authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:
 - (a) The Local Authority;
 - (b) An Integrated Care Board for an area any part of which falls within the Local Authority area;
 - (c) The Chief Officer of Police for an area any part of which falls within the Local Authority area.

3 Scope

- 3.1 This policy applies to all staff working within the ICB, including Students and specialist contractors within the ICB (hereafter referred to as employees/staff). The key principles are also applicable to all services commissioned by the ICB.
- 3.2 All employees of the ICB have an individual responsibility for the protection and safeguarding of children and young people.

- 3.3 All managers must ensure their staff are aware of and able to access this policy along with the West Midlands Child Protection and Safeguarding Procedures Manual <http://westmidlands.procedures.org.uk>. This is to ensure implementation in their line of responsibility and accountability.
- 3.4 To empower all members of NHS Shropshire, Telford and Wrekin ICB by providing advice and guidance to enable them to fulfil their safeguarding children and young people responsibilities.
- 3.5 The ICB is committed to and has a statutory responsibility for ensuring through commissioning that there are safe systems of care for children. As such, commissioning standards are clearly set out by the ICB and all contract providers must demonstrate compliance (and Duty to Cooperate) to Section 11 of the Children Act 2004.
- The ICB works in partnership with other Commissioners and Providers of Health and Social care services, Statutory and voluntary Organisations to ensure that Children and their families get timely and appropriate care, of high quality and equitable provision of public resources. This is to ensure that children are being:
- Protected from maltreatment.
 - To prevent impairment of children's health or development.
 - To ensure that children are growing up in circumstances consistent with the provision of safe and effective care.
 - Protected by taking action to enable all children to have the best outcomes (Working Together 2018, revised December 2020).
- 3.6 This policy is intended for NHS Shropshire, Telford and Wrekin ICB and its aim is to support all other Healthcare Providers who are also required to have their own organisational policy for safeguarding children.

4 National Context

The Mandate from the Government is within the Safeguarding children, young people and adults at risk in the NHS Safeguarding accountability and assurance framework Version 3, 21 July 2022. NHS England clearly sets out the safeguarding roles, duties and responsibilities of all organisations commissioning NHS health and social care:

“As per the published Integrated Care Systems (ICSs): design framework (version 1, June 2021), all clinical commissioning group (CCG) functions and duties have transferred to an ICB along with all CCG assets and liabilities including their commissioning responsibilities and contracts. Relevant statutory safeguarding duties of the previous CCGs will transition to ICB executive leads in consultation with the regional chief nurses and regional safeguarding leads.

ICSs are partnerships of health and care organisations that have come together to plan and deliver joined up services and to improve the health of people who live and work in their area. They exist to achieve four aims:

- improve outcomes in population health and healthcare

- tackle inequalities in outcomes, experience and access
- 17 | Safeguarding accountability and assurance framework
- enhance productivity and value for money

- help the NHS support broader social and economic development.

Following several years of locally led development, and based on the recommendations of NHS England, the government and the Department of Health and Social Care (DHSC) has put ICBs and integrated care partnerships (ICPs) on a statutory footing. DHSC will be publishing guidance regarding ICPs.

The SAAF governance processes will replicate ICB guidance and the ICB executive chief nurse will be accountable for the statutory commissioning assurance functions of NHS Safeguarding as per the agreed timelines with the regional chief nurse.

These programmes will include:

- CP-IS
- FGM
- Prevent
- Working Together
- Modern Slavery and Human Trafficking
- Domestic Abuse
- Liberty Protection Safeguards.

The core principles of the executive accountability, including protecting the paramountcy of every child, will be sustained via the NHS SAAF. The ICB will also have accountabilities for prevention and strategic workforce planning.”

5 Policy Context

This section lists the key documents from the extensive guidance, national regulations, reports and legislation that govern best practice, provision, management and monitoring of services:

- [The Children Act 1989 and 2004 \(HM Govt\).](#)
- [Working Together to Safeguard Children \(HM Govt Dec 2020\).](#)
- [Information sharing advice for practitioners \(Dept. for Education 2018\)](#)
- [Data Protection Act 1998](#)
- [Human Rights Act 1998](#)
- [Intercollegiate Safeguarding Children and Young People: Roles and competencies for healthcare staff \(2019\)](#)
- [Safeguarding children, young people and adults at risk in the NHS Safeguarding accountability and assurance framework Version 3, 21](#)

July 2022

- NHS Oversight Framework 27 June 2022
- Children and Social Care Act 2017
- Domestic Abuse Act 2021
- Health and Social Care Act 2022

5.1 This policy is supported by a number of ICB process and policy documents, further supporting and demonstrating the organisation's ability to meet its statutory safeguarding requirements and promoting best practice. This information can be accessed on the ICB website:

<https://www.shropshiretelfordandwrekin.nhs.uk/>

6 Roles and Responsibilities

6.1 Duties

Safeguarding accountabilities for ICB's are set out in the Safeguarding children, young people and adults at risk in the NHS Safeguarding accountability and assurance framework (Version 3, 21 July 2022), ~~NHS England Accountability and Assurance framework (2018)~~, Working Together (2020) and Children and Social Work act 2017 and includes a clear line of accountability for safeguarding is properly reflected in the ICB Governance arrangements.

6.2 NHS England

NHS England (NHSE) has a statutory duty to be a member of the Local Safeguarding Children arrangements working in partnership with Local Authorities to fulfil their safeguarding responsibilities. It is also responsible for ensuring that the health commissioning system as a whole is working effectively to safeguard and improve the outcomes for children and adults at risk and their families, and thus promotes their welfare.

NHSE provides oversight and assurance of ICBs' safeguarding arrangements and supports ICBs in meeting their responsibilities. It is responsible for ensuring in conjunction with local ICBs that there are effective arrangements for the employment and development of Named GP/Named Professionals for Primary Care in order to support safeguarding in the local Primary Care areas.

Within each Region, the Executive Director of Nursing has the lead responsibility for safeguarding for both children and adults, and acts as the main conduit of advice and support to area team colleagues and the wider system.

The NHSE team hosts a Regional Safeguarding Network Meeting which acts as a source of expertise and underpins improvements in safeguarding practice. This forum is open to all Designated Nurses and Doctors for safeguarding children and children in care and attended by the ICB Safeguarding Team.

ICBs are required to comply with the legislation as successors of Primary Care Trusts (PCTs), initially defined in the legislation as follows:

6.3 The Children Act (2004)

Section 10 places a statutory duty on ICBs and NHS England to cooperate with local authorities in making arrangements to improve the wellbeing of all children in the authority's area, which includes protection from harm and neglect.

Section 11 places a statutory duty on all NHS organisations including ICBs, NHS England, NHS Trusts and Foundation Trusts to have effective arrangements in place to safeguard children.

Section 13 requires NHS England, ICBs, NHS Trusts and Foundation Trusts to cooperate and engage fully with partner agencies as competent members of their Local Safeguarding Children Executive (LSCE).

Section 16 as amended by the Children and Social Care Act 2017 (in parts 16B(7), 16C(2), 16K, 16Q) requires that NHS bodies must, in exercising their functions relating to Safeguarding Children have regard to any guidance given to them by the Secretary of State. One such piece of guidance is **Working Together to Safeguard Children, (HM Govt 2018, updated December 2020)** which describes in detail the legislative requirements and expectations on individual services to safeguard and promote the welfare of children.

6.4 The Children Act (1989)

Section 17 requires NHS England, ICBs, NHS Trusts and Foundation Trusts to cooperate with the Local Authority in helping children in need.

Section 47 requires NHS England, ICBs NHS Trusts and Foundation Trusts to cooperate with Local Authorities in their enquiries regarding children at risk of significant harm.

7 NHS Shropshire, Telford and Wrekin ICB Safeguarding Responsible Roles

The ICB, as a legal entity, has statutory requirements for safeguarding and is identified as one of three statutory partners in both the Shropshire and Telford & Wrekin Safeguarding Partnership arrangements.

7.1 Accountable Officer

Shropshire, Telford and Wrekin ICB Accountable Officer has the responsibility for ensuring the contribution of health services to safeguarding and promoting the welfare of children; ensuring that this is discharged effectively across the whole health economy. Within the ICB the role is supported through the Chief Nursing Officer, who holds delegated Board accountability shared with the Accountable Officer. The Accountable Officer role specifically must ensure:

- The Health services contribution to safeguarding and promoting the welfare of children and that this is discharged effectively across the whole health economy through the organisations commissioning arrangements.

- Safeguarding is a priority area in all strategic planning processes
- That commissioned services are linked into the local Safeguarding Boards, have senior representation and that there is contribution to multi- agency working.
- Public health responsibility is assured to ensure all service users are safeguarded from abuse or the risk of abuse.

7.2 Chief Nursing Officer

The Chief Nursing Officer is responsible in providing leadership and direction for ensuring the monitoring and improvement of safeguarding systems across NHS Shropshire, Telford and Wrekin ICB and is the Executive member of the Children Safeguarding Partnership Board representing the ICB. This role includes ensuring all commissioned services have systems in place to fulfil the requirements and expectation of the Children Safeguarding Board and that safeguarding matters are reported within the Quality and Performance Committee and are escalated, as required.

The Chief Nursing Officer and Assistant Director Safeguarding will contribute to strategic development of all children and adult services, working across a broad range of organisational and agency boundaries, influencing, implementing and working with the priorities of the safeguarding partnerships and partner agencies for the Looked After Child.

External reporting to key stakeholders in all aspects of safeguarding working with national, regional and local teams to ensure statutory duties are met.

Issues requiring a corporate media response will be led by the Chief Nursing Officer with appropriate Director / Assistant level colleague support.

7.3 Directors

Directors have a collective responsibility to ensure the ICB has Designated clinical experts that are embedded in the clinical decision making of the organisation. They are expected to support the work of the Local Authority and Police to influence thinking and practice around the local health economies including Commissioning Children's health care and jointly commissioned service provision for children in care and continuing health care.

Directors need to ensure that staff employed by the ICB are aware of their responsibilities for safeguarding and know who to contact and how to act on concerns in accordance with the West Midlands Child Protection and Safeguarding Procedures Manual <http://westmidlands.procedures.org.uk/>

7.4 Managers

Managers will be required to ensure all staff, are trained and competent to be alert to the potential indications of child abuse or neglect and can actively promote children and must fulfil their responsibilities in line with national and local safeguarding polices and guidance.

Managers should promote a culture of listening to and engaging in dialogue with vulnerable groups taking into account their wishes and feelings for the establishment and development of improvements of service.

Managers will be required to ensure that safe recruitment checks on everyone are carried out; including Disclosure and Barring Service (DBS) and references before the individual joins the ICB. Many individuals, including all Staff who have direct contact with children, will be subject to an enhanced DBS check and a check of social media. Managers must ensure that anyone interviewed for a post, either internally or from outside the organisation, will need to show an understanding of safeguarding that is relevant to the role that they are applying for.

7.5 Designated Professionals

The Designated Professionals including the Designated Nurse Safeguarding Children and the Deputy Designated Nurse, the Designated Nurse for Looked After Children, the Designated Doctor for safeguarding, the Designated Paediatrician for Child Deaths take a strategic lead and provide assurance to the Chief Nursing Officer, the Children Safeguarding Board and the Quality and Performance Committee about the arrangements for safeguarding in all commissioned services.

This includes attendance at a number of the Safeguarding partnership and board meetings, including chairing and being part of subgroups of the partnership board, Regional and National Boards, working across operational boundaries.

Other duties relating include but are not limited to:

- National, regional, and local expert advice on safeguarding children to ICB and other key agencies and partner groups.
- Coordination of responses where allegations are made of a child safeguarding nature, about a person working for the ICB.
- Promote partnership working and keeping in regular contact with their counterparts in partner organisations.
- Support and advise commissioners on safeguarding within contracts and commissioned services and in securing assurance from providers that they have effective safeguarding arrangements in place.
- Provide advice to commissioned services on ensuring safeguarding is central to all contracts.
- Provide guidance on identifying children at risk from different sources and in different situations.
- Understand and embed the routes of referral for children at risk across the health system.
- Provide an expert health advisory role as Designated Child Safeguarding Lead to the ICB safeguarding and Child Health & Safeguarding Partnership Boards; taking a lead role to support the Chief Nursing Officer and Assistant Director Safeguarding.

- Take a lead for the ICB in undertaking safeguarding reviews and Child Practice Safeguarding Reviews taking forward any learning for the health economy.
- Carrying out safeguarding quality visits to providers as required.
- Provide assurances around safeguarding across the system; identifying areas of risk and concern.
- Contributing as required to the work of the Child death overview panel and rapid review meetings.
- Providing supervision as appropriate.

7.6 Named GP for Safeguarding

The ICB has two named GPs for safeguarding children who provide advice and support to GPs and their practices along with being the lead to undertake safeguarding reviews for GP practices. Each GP practice must also have a clear nominated Lead GP for safeguarding Children in their practice who liaises on a regular basis with the named GP and other Designated Professionals as required.

7.7 ICB Board Members

ICB Board Members, including the Directors and Non-Executive Directors are to provide appropriate challenge and support concerning safeguarding arrangements in order to help ensure that the ICB's duty to safeguard is met. This will include advice on matters that need to be escalated to the Chief Nursing Officer and/or Board/relevant Sub Committees as required.

7.8 All ICB staff

“Safeguarding is everyone’s business” and all staff in the organisation have a duty to understand when a child may require safeguarding and take the appropriate action dependent upon their role. This is to be supported by undertaking mandatory training and will include reporting any concerns to their line manager or those with specific safeguarding roles.

8 Safeguarding Training

The minimum training requirements are clearly set out in the most current guidance;

[Intercollegiate Guidance Document \(2019\); Safeguarding Children and Young People: Roles and Competencies for Health Care Staff.](#)

All ICB staff must have completed a Safeguarding (Child Protection) Basic Awareness course at a level that matches their work with children and young people and/or their parents and carers. There is a staged approach to training with different staff being required to take training at different levels, dependent on their degree of contact with children and families. This includes staff working in adult services that may be in contact with adults who care for children. Compliance with Safeguarding Children Training should be reviewed

annually as part of staff appraisals and with consideration to staff personal development plans.

- 8.1 Safeguarding competencies are the set of skills that enable staff to effectively safeguard, protect and promote the welfare of children and young people. They are a combination of skills, knowledge, attitudes, and values that are required for safe and effectual practice.
- 8.2 Different staff groups require different levels of training dependent upon:
- Their role
 - The degree of contact they have with children and young people and families;
 - The nature of their work
 - Their level of responsibility
 - Staff should consult with their line manager or safeguarding team to identify which level of competence they require

Below is a very brief summary of the requirements for the ICBs

Competence level required by role		training material available
LEVEL 1	All staff working in health care settings.	Mandatory electronic training Level 1
LEVEL 2	All staff who have contact families, carers, or the public.	Electronic training Level 2, Children Safeguarding Board training events Designated professional bespoke training on request by the Manager.
LEVEL 3	All registered health and social care Staff working who engage in assessing planning, intervening, and evaluating the needs of concerns of children (as appropriate to role).	Children Safeguarding Board training events Designated Professional bespoke training on request by the Manager.
LEVEL4	Specialist roles; Named Professionals.	NHS England training days National training events
LEVEL 5	Specialist roles; Designated Professionals.	NHS England Training Days National training events

BOARD LEVEL	Chief Executive Officers, Trust and Health board Executive and Non-Executive Directors/members, Commissioning Body Directors. This includes Boards of private, independent health care and voluntary sector as well as statutory Providers.	Training given by the Designated Safeguarding Leads.
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9 Recruitment and personnel processes

The ICB has a duty to ensure full compliance with safe recruitment processes in the safe selection and retention of staff. These must be in accordance with NHS employer's regulations, the ICB HR recruitment policies and the Disclosure and Barring Service (DBS). The ICB has a separate Recruitment and Selection Policy which includes DBS and related requirements and is the responsibility of the Director of Corporate Affairs.

The recruiting officer must comply with the ICB recruitment and selection processes.

10 Commissioning

- 10.1 NHS Shropshire, Telford and Wrekin ICB will ensure that all providers, from whom they commission services, have comprehensive and effective single and multi-agency policies and procedures to safeguard children, which are consistent with current legislation and national and local procedures. This includes compliance with Service Condition 32 of the NHS Standard Contract which governs the requirements for Safeguarding, the Mental Capacity Act and Prevent.
- 10.2 Commissioning with advice from the Designated professionals will ensure that safeguarding children is integral to the national and local contract for any providers and that there is evidence of robust key performance indicators included in provider contracts. These will be reported via the NHS Shropshire, Telford and Wrekin ICB system assurance meetings and other routes including the work undertaken by the Safeguarding Partnership.
- 10.3 NHS Shropshire, Telford and Wrekin ICB will work in partnership to ensure that systems and processes for safeguarding are clearly defined in contracts and Local Quality Requirements
- 10.4 NHS Shropshire, Telford and Wrekin ICB will support primary care access to appropriate safeguarding training. Advice will be available to all GP practices as required.

11. Other relevant policies / ICB documents

This policy should be read alongside ICB Standing Orders, The Adult Safeguarding Policy; the Mental Capacity Act (MCA) and Deprivation of Liberties (DOLs) (future Liberty Protect Safeguards (LPS) Policy; the Safeguarding Supervision Policy and the West Midlands procedures for Child Safeguarding; the Safeguarding Partnership Boards and ICB resources, Management of Allegations against staff policy and Whistleblowing policy.

12. Supporting Documents / Evidence Based References

This policy is supported by a number of additional ICB process and policy documents, further supporting and demonstrating the organisation's ability to meet its statutory safeguarding requirements and promoting best practice.

Information can be accessed on the ICB website:

<https://www.shropshiretelfordandwrekin.nhs.uk/>

Working Together to Safeguard Children 2018 (revised 2020)	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
Female Genital Mutilation Advice and Guidance	https://www.gov.uk/female-genital-mutilation-help-advice
Counter – Terrorism and Security Act 2015 (PREVENT)	https://www.gov.uk/report-terrorism
Care Quality Commission roles and responsibilities for safeguarding children and adults	https://www.cqc.org.uk/file/219564
Child Sexual Exploitation: definition and guide for practitioners Feb 2017	https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners https://www.seeme-hearme.org.uk/helpandadvice
Mental Capacity 2005	https://www.legislation.gov.uk/ukpga/2005/9/contents
NICE guidance Child abuse and neglect 2017	https://www.nice.org.uk/guidance/ng76 https://safelives.org.uk/sites/default/files/resources/Domestic%20abuse%20guidance%20for%20virtual%20health%20settings-

Domestic violence and abuse: multi-agency working	https://www.nice.org.uk/guidance/ph50 https://safelives.org.uk/sites/default/files/resources/Domestic%20abuse%20guidance%20for%20virtual%20health%20settings-%20C19.pdf
Revised PREVENT Duty Guidance: for England and Wales	https://www.gov.uk/government/publications/prevent-duty-guidance
Transition of Young People to Adult services	https://www.rcn.org.uk/library/subject-guides/children-and-young-people-transition-to-adult-services