

MACMILLAN POLICY

**WE ARE
MACMILLAN.
CANCER SUPPORT**

Macmillan Cancer Support Safeguarding Policy

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1. Statement of Policy

The activities carried out by Macmillan Cancer Support mean that there are a range of employees and volunteers who may come into contact with people who are at risk of harm, including children and adults who the law says are vulnerable. The contact may happen in different ways, for example face to face, on the telephone or on-line.

Macmillan is committed to safeguarding the well-being of all service users, employees and volunteers who are involved in or affected by our work. All children and adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse and the right to be treated with respect and dignity.

All employees and volunteers have a duty to prevent the abuse of children and adults and report any safeguarding concerns to the relevant person.

This policy sets out our approach to removing, reducing and managing risks our work and the agreed action that staff and volunteers are required to take to follow best practice in dealing with Safeguarding concerns.

Our approach can be summarised under the two headings of Safeguarding Service Users and Safeguarding our Employees and Volunteers:

Safeguarding Service Users:

Macmillan will:

- Carry out criminal background checks on applicants for eligible employee and volunteer roles. The overwhelming majority of Macmillan roles are not eligible for criminal background checks. We will not request a check unless it can be clearly demonstrated by the recruiting manager that such a check is justified under the relevant national law.
- Treat any disclosure of previous criminal background fairly and make a decision on whether to appoint to a role based on a transparent set of procedures, with clear accountability and reasons for the decision.
- Keep appropriate records of dates of criminal background checks and ensure that eligible employees and volunteers have their checks renewed in-line with sector best practice.
- Ensure that allegations of abuse or concerns about the safety and wellbeing raised by or on behalf of service users are properly investigated and that any action necessary to protect a service user from harm is taken promptly and in-line with established organisational procedures and guidance and any legal requirements.
- Ensure that responsibility for safeguarding is clearly identified in relevant roles and have a robust structure for escalating concerns about safeguarding where required.
- Have a nominated Safeguarding Manager who has organisational responsibility for monitoring safeguarding issues, ensuring compliance with this policy and acts as the main point of contact for external organisations who want to discuss safeguarding.
- Ensure that staff across the organisation receive training in safeguarding which is appropriate to the role they are undertaking, understand the [Code of Conduct \(Child and Vulnerable People\) \(Appendix A\)](#) and are clear about the process to follow if they are concerned about the welfare of a service user.

Safeguarding our employees and volunteers:

Macmillan will:

- Provide staff and volunteers who regularly work or volunteer alone in the community with suitable support and training, including a lone worker device where appropriate, to minimise the risks associated with these activities.
- Provide a Macmillan contact whenever activities take place, including out of office hours, to provide advice and support on safeguarding issues.
- Offer planned and emergency emotional support to those employees and volunteers whose roles involve dealing with sensitive, challenging or difficult issues, for example, employees and volunteers working or volunteering on the Macmillan Support Line or in Direct Volunteering Services.
- Use risk assessments to ensure that where potential risk to an individual is identified, appropriate measures are put in place to mitigate such risk.

2. Accountability and Responsibility for this Policy

Accountability for this policy rests with the Director of People but all employees and volunteers have a duty to know what action to take if they are concerned that a service user or colleague is at risk.

Individual teams will have [specific policies and procedures](#) around safeguarding for their own area of work, and the Safeguarding Manager should be involved in the development and review of such policies. These include, but not exclusive to:

- Volunteering – for dealing with concerns and allegations about the welfare of vulnerable people who are supported by volunteers, and for providing support to such volunteers [in both cases particularly within Direct Volunteering Services and TeamUp]
- Macmillan Support Line –which includes Cancer Information Support, Cancer Information Nurses, Welfare Rights and Financial Guidance
- Mobile Information and Support Service for dealing with visits from children and potentially vulnerable adults
- Digital – for safeguarding vulnerable people who are using / being featured in or who are seeking peer support using Macmillan digital media.
- HR – for recruitment best practice and training and for DBS checks and referrals
- Fundraising – for dealing with concerns raised by supporters and for safeguarding issues at events.

Managers in Service Development Teams have a responsibility to ensure that any new activity requested by or for service users (such as childcare or personal care) is appropriate and acceptable. As a minimum this will involve discussing the activity with the Safeguarding Team and agreeing any required conditions and control measures with Macmillan's insurers before the activity is carried out.

Failure to follow this policy is a serious matter and may be dealt with under the disciplinary policy (for employees) and the problem solving procedure (for volunteers).

3. Safeguarding Team and Safeguarding Officers

A Safeguarding Team, consisting of Safeguarding Officers and led by the Safeguarding Manager, has been formed in order to provide advice and support in relation to this policy.

The Safeguarding Officers are responsible for:

- Providing advice and support as described in this policy
- For dealing with any urgent concerns that any abuse is ongoing; and
- For operating an on-call system whereby they are available as first point of contact where a safeguarding concern arises out of hours

The Safeguarding Manager (based in Human Resources) is responsible for:

- Providing advice and support to the Safeguarding Officers, including developing a community of best practice
- Providing expert advice to the organisation about all elements of safeguarding and child protection
- Managing the Referral Process to the DBS, Access NI and Disclosure Scotland and liaising with statutory services as required
- Overseeing investigations into allegations of abuse made against Macmillan employees and volunteers
- Ensuring compliance with this policy
- Acting as the independent person within Macmillan – any child or vulnerable adult who wishes to discuss a concern within Macmillan should be able to contact an independent person.

All policies are kept up to date with changes in legislation/best practice and will be reviewed annually by the Company Secretary.

Section A: Safeguarding Service Users

4. Understanding the law

The law in England, Wales, Scotland and Northern Ireland makes it clear that criminal background checks can be used as part of recruiting paid staff and volunteers under certain circumstances:

- Macmillan has a legal duty to carry out full criminal background checks for a limited number of roles – these are roles that are involved with carrying out very specific tasks that are called regulated activity or regulated work.
- Macmillan is entitled to carry out full criminal background checks for some roles – these are roles that involve substantial, unsupervised contact with children or vulnerable adults but do not involve carrying out tasks that constitute regulated activity or regulated work.
- Macmillan is not eligible to ask for full criminal background checks for any other roles.
- Macmillan is entitled to ask for details of any unspent convictions for any role, but chooses not to at point of application.

This means that we cannot just decide to ask for a full criminal background check because we want to – there has to be a clear legal reason for requesting the check. Requesting a full criminal background check for a role that is not eligible is unlawful.

The overwhelming majority of roles within Macmillan are not subject to any form of criminal background check.

National Variation

The Law in England, Wales and Northern Ireland is the same with regards to eligibility for a criminal background check. The law in Scotland is different.

In England and Wales Criminal Background checks are carried out by the Disclosure and Barring Service (DBS), in Northern Ireland by Access NI and in Scotland by Disclosure Scotland.

In England, Wales and Northern Ireland applicants are checked for suitability to carry out a role (a DBS/AccessNI Check). In Scotland applicants join a register of people who are approved to carry out certain roles (PVG scheme membership).

In England and Wales, applicants for DBS checks can also apply to join an update service which allows for instant verification of a DBS form. All applicants for DBS checks will be required to join the update service.

In Scotland existing members of the PVG scheme can apply for a scheme update record, which verifies an existing PVG scheme membership.

There is no update service currently available for Northern Ireland.

All Criminal Background Checks will be renewed or updated as a minimum every three years. Any employee or volunteer can be required by Macmillan to update or renew their DBS/AccessNI/PVG membership at any point whilst working for Macmillan.

5. What is regulated activity and regulated work and why is it important?

Regulated activity (England, Wales and Northern Ireland) and Regulated Work (Scotland) are types of work which the Government has specified as having particular responsibilities, being

positions of trust and/or offering the opportunity for high levels of unsupervised contact with vulnerable adults or children.

Some people are barred (banned) from carrying out regulated work with adults and/or children due to previous criminal activity. When checking the criminal background of applicants for regulated activity and regulated work a check is also made to see whether the applicant is barred from undertaking such work.

Understanding and defining regulated activity correctly is essential for Macmillan because:

- It is a criminal offence for Macmillan to knowingly employ a barred person to do regulated activity or work.
- It is a criminal offence for a barred person to seek to work, or work in, activities from which they are barred.
- Macmillan has a legal duty to make a referral to the Disclosure and Barring Service (DBS) or Disclosure Scotland when one of our employees or volunteers has harmed or poses a risk of harm to a child or vulnerable adult.

6. Regulated activity and regulated work with Adults

In England, Wales and Northern Ireland an adult is deemed to be vulnerable if he or she is over 18 years of age and is receiving a service which is classified as a regulated activity or regulated work. It is the receipt of such a service that makes an adult vulnerable, not any disability or health condition.

Regulated activity constitutes 6 specific types of work:

- providing health care by, or under the direction or supervision of, a health care professional,
- providing relevant personal care – for example physical assistance with washing, dressing, hair and nail care
- social work provided by a social care worker - for example work in a care home or social services
- providing assistance with general household matters to an adult who is in need of it by reason of age, illness or disability – specifically shopping and paying bills
- any relevant assistance in the conduct of an adult's own affairs – most commonly taking power of attorney
- providing transport to people as a result of their age, illness or disability – this only applies to transport to health or social care services, and does not include transport to leisure activities.

Such an activity only has to occur once for it to be regulated.

Within Macmillan the most common type of regulated activity with adults is currently assistance with shopping and/or paying bills. We do not provide health or social care or personal care under the meaning of the law.

In Scotland the term regulated work is used. This is defined more broadly than regulated activity. In order to be carrying out regulated work an individual has to be working with a vulnerable adult (referred to as a protected adult in Scotland) and providing

- a registered care service – for example a care home or adult placement service
- a health service – provided by the NHS or a private health provider
- a community care service – social and mental health services provided by a local authority
- a welfare service - a service which provides support, assistance, advice or counselling to individuals with particular needs

In Scotland an adult is anyone aged 16 or over.

Within Macmillan the only type of regulated work with adults will be providing a welfare service. We do not provide registered care services, health services or community care services under the meaning of Scottish law. A [welfare service is defined in APPENDIX I](#)

7. Regulated activity and regulated work with children

A child is defined across the UK as someone aged under 18.

In England Wales and Northern Ireland regulated activity with children has a precise definition:

- Teaching, training, instruction, care for or supervision of children if carried out by the same person frequently or overnight.
- Advice or guidance (except legal advice) provided wholly or mainly for children which relates to their physical, emotional or educational well-being if carried out by the same person frequently or overnight.
- Activity within specified establishments such as schools and children's homes carried out frequently.
- Healthcare provided to a child by a health care professional or by a person acting under the direction or supervision of a healthcare professional.
- Personal Care of a child (any frequency) – providing physical help with eating, drinking, toileting, dressing etc.
- Moderating a public electronic interactive communication service likely to be used wholly or mainly by children and carried out by the same person frequently
- Driving a vehicle being used only for conveying children and their carers
- Early years or later years childminding (any frequency)
- Fostering a child (any frequency)
- Day to day management of regulated activity

Frequently means at least once a week or 4 times in any 30 day period.

Within Macmillan, staff and volunteers do not currently carry out regulated activity with children.

Within Scotland, regulated work with children is defined as:

- Caring for children
- Teaching, instructing, training or supervising children
- Being in sole charge of children
- Unsupervised contact with children under arrangements made by a responsible person (such as a parent)
- Providing advice or guidance to a child or to particular children which relates to physical or emotional well-being, education or training
- Moderating a public electronic interactive communication service which is intended for use wholly or mainly by children
- Providing, or working for an organisation which provides, a care home service which is provided exclusively or mainly for children.
- Providing, or working for an organisation which provides, an independent health care service which is provided exclusively or mainly for children.
- Work on any part of day care premises at times when children are being looked after in that part.
- Being a host parent

There is no frequency attached to regulated work in Scotland.

Within Macmillan, staff and volunteers do not currently carry out regulated work with children. Any contact with children (such as that provided by MSL) is classed as incidental and is not considered to be regulated work.

In Scotland it is possible for someone to be a child (aged under 18) and a protected adult (aged over 16) at the same time.

Anyone who manages someone carrying out regulated activity or regulated work is also carrying out regulated activity or regulated work

8. Incidental contact with children

It is important to note that in order to be regulated activity/regulated work children must be the focus of the service. The mere presence of children (for example when a service is provided to an adult who has children with them) does not meet the criteria for regulated activity.

Additionally, there are exceptions in the law covering the workplace – this means that staff who supervise someone under 18 in a work setting (for example if a child is doing work experience) are not carrying out regulated activity or regulated work.

9. Posts and roles which are not regulated activity but are eligible for a criminal backgrounds check in England, Wales and Northern Ireland

In England, Wales and Northern Ireland there is additional legislation that allows Macmillan to ask for a criminal background check.

Macmillan can request an enhanced DBS or AccessNI check where an employee or volunteer provides certain types of work with vulnerable adults or children frequently (at least once a week or four times in any 30 day period) or overnight.

Details are provided in [Appendices G](#) and [H](#) but in summary, Macmillan is allowed to check any role that involves:

- any form of assistance, advice or guidance provided wholly or mainly for vulnerable adults, where a vulnerable adult is someone who is receiving a service from Macmillan which provides support, assistance, advice or counselling to individuals with particular needs
- any form of teaching, training, care for or supervision of children, and any form of advice or guidance provided to children (unless this is merely incidental to providing a service to adults)
- moderating online chat or online media

There is no Scottish Equivalent to an enhanced DBS check for these circumstances.

10. Other types of criminal background check

There are two other types of criminal background checks that exist – Standard and Basic checks. Standard checks are only available for a set of professions that are defined in law (such as members of the judiciary and firearms dealers) and for people who are eligible for an enhanced DBS check. Where Macmillan is entitled to request an enhanced DBS check we will do so – hence Macmillan does not use standard DBS checks.

Basic checks are requested by an individual through Disclosure Scotland. They only provide details of unspent convictions. Macmillan does not use basic checks unless agreed with Human Resources.

11. Summary of the types of Criminal Background Checks eligible for Macmillan

Nation	Name of Check	Contents	Format
England and Wales	Enhanced DBS Check with Barring	<ul style="list-style-type: none"> All relevant spent and unspent convictions, cautions and warnings Other relevant information provided by the police Check on whether the applicant is barred from carrying out regulated work 	Paper certificate provided to applicant only
England and Wales	Enhanced DBS Check	<ul style="list-style-type: none"> All relevant spent and unspent convictions, cautions and warnings Other relevant information provided by the police 	Paper certificate provided to applicant only
Northern Ireland	Enhanced Access NI Check with Barring	<ul style="list-style-type: none"> All relevant spent and unspent convictions, cautions and warnings Other relevant information provided by the police Check on whether the applicant is barred from carrying out regulated work 	Paper certificate provided to applicant and Macmillan
Northern Ireland	Enhanced AccessNI Check	<ul style="list-style-type: none"> All relevant spent and unspent convictions, cautions and warnings Other relevant information provided by the police 	Paper certificate provided to applicant and Macmillan
Scotland	PVG Scheme Registration or Update	<ul style="list-style-type: none"> All relevant spent and unspent convictions, cautions and warnings Other relevant information provided by the police Check on whether the applicant is barred from carrying out regulated work 	Paper certificate provided to applicant and Macmillan

12. Recruitment of employees and volunteers

The key principles are:

Macmillan will carry out the appropriate level of criminal background check on successful applicants for employee and volunteer roles where we are eligible to do so. We will not request a check unless it can be clearly demonstrated by the recruiting manager that such a check is justified under the relevant national law.

Macmillan must obtain an enhanced criminal record check and the relevant barred list check if we are recruiting someone (paid or unpaid) who will be providing or participating in a regulated activity with children or adults. This check must be completed before the applicant starts work.

Macmillan will treat any disclosure of previous criminal background fairly and make a decision on whether to appoint to a role based on a transparent set of procedures, with clear accountability and reasons for the decision.

Although any employer is entitled to ask all employees and volunteers to disclose unspent convictions on their application form, Macmillan does not do this. However, successful candidates who reach the short listing stage will be asked to disclose unspent convictions irrespective of whether a criminal background check is required.

Recruiting managers (including volunteer managers) must follow the relevant guidance for [England and Wales](#), [Northern Ireland](#) or [Scotland](#) and discuss eligibility for all criminal backgrounds check with Human Resources.

Human resources will advise on the appropriate process (including ID checking) to be followed depending on the nation where the recruitment is occurring.

For the purposes of this policy, the recruiting/volunteer manager is the person who is responsible for the recruitment process and for selecting the successful applicant. This will usually be the person who will line manage the successful candidate(s).

13. Which roles require Criminal Background checks?

It is impossible to provide a list of roles with details of the level of check required, not least because the legislative differences between Scotland and the rest of the UK. This means that a nurse working on the Macmillan Support Line in Glasgow will be subject to a different level of check from one working in an identical role in London.

Each role needs to be looked at by a manager who understands the service and the relevant national law. A decision on whether to check a role can be complex and it is not possible to say “all roles that involve x are eligible for a check”. Some services which on paper look the same (for example Direct Volunteering Schemes offering Practical Support) will have different eligibility based on the individual service specification.

The recruiting manager’s guidance for [England and Wales](#), [Northern Ireland](#) and [Scotland](#) provides a series of flowcharts that managers must use when planning recruitment.

14. Dealing with Positive Disclosures

Possession of a criminal conviction or caution does not automatically make a candidate unsuitable for employment or volunteering at Macmillan. Understanding the nature of the offence(s) and the circumstances surrounding it is essential in making a fair decision about whether to appoint someone.

Therefore, whenever a criminal records check is returned containing information about criminal background this must be discussed with the applicant. This discussion must take place before any offer of employment or volunteering is made.

The recruiting manager (and additional support if felt necessary) should arrange a time specifically to discuss the offence(s) and be open about the reason for the discussion. The manager should explain that Macmillan’s policy is to have a standard process for understanding the nature of any offences that a criminal background check shows.

Applicants should be provided with a copy of this policy prior to the discussion/meeting.

Before the discussion takes place the manager must ensure that they have:

- a quiet, confidential space for the discussion
- enough time to fully discuss and understand the offences
- familiarised themselves with this policy and sought advice from the Safeguarding Team as required.

The recruiting manager should take notes during the discussion – if this is taking place by phone the manager should ensure that the applicant knows that notes are being taken.

The recruiting manager should discuss any offence listed on the DBS/AccessNI or PVG Scheme record, which gives cause for concern, separately with the applicant. They should seek to understand:

- the nature of the offence
- the circumstances surrounding the offence including any mitigating factors
- what action the applicant has taken to change their behaviour since the offence
- the views of the applicant on the offence, including how they would deal with similar circumstances now

Additionally if the applicant has failed to provide information about the offence when given an opportunity (e.g. when filling in a DBS application form or if raised as part of interview process) they should be asked why they did not disclose this information.

The recruiting manager should complete a [Criminal Background Disclosure Form \(Appendix B\)](#) and send it through to the Safeguarding Manager marked confidential. Only authorised and relevant personnel will have access to this information.

All staff involved in recruitment decisions involving criminal background checks must remember that an individual has the right to see any data we hold on them so ensure that any observations are objective.

A decision on whether to appoint will be made by the Safeguarding Manager in conjunction with the recruiting manager. In reaching a decision the Safeguarding Manager will consider:

- the seriousness of the offence and its relevance to the safety of Macmillan employees, clients, customers and property
- whether the applicant disclosed the offence during the recruitment process
- the age of the applicant when the offence occurred
- the length of time since the offence occurred
- any relevant information offered by the applicant about the circumstances which led to the offence being committed, for example the influence of domestic difficulties
- whether the offence was a one-off or part of a history of offending
- whether the applicant's circumstances have changed since the offence was committed, making re-offending less likely
- whether the offence has since been decriminalised by Parliament
- the degree of remorse, or otherwise, expressed by the applicant and their motivation to change
- the level of risk posed to Macmillan's reputation

If a decision is made not to appoint due to criminal background the Safeguarding Manager will write to the applicant to explain the rationale for the decision.

15. Storage and Handling of Criminal Background Information

Information provided through a DBS, AccessNI or PVG check must be treated in the strictest confidence. Every organisation who requests criminal background checks must have a policy relating to how they handle any information received. This policy is included in [Appendix E](#) but can be summarised as:

- criminal records information will only be used to assess the suitability of an applicant for a specific position of trust for which they have applied

- all certificates and information about criminal records will be kept securely
- information will only be released to staff members who are entitled to see it as part of their role – in general this will mean the recruiting manager and director and members of the HR and Volunteering Teams
- criminal records information will be destroyed once it is no longer needed. Unless there are exceptional circumstances, information will be destroyed or deleted no more than 6 months after receipt.
- Macmillan will keep electronic records showing
 - a record of the date of issue of a certificate
 - the name of the subject
 - the type of certificate requested
 - the position for which the certificate was requested
 - the unique reference number of the certificates
 - the details of the recruitment decision taken.

16. Additional Information

Volunteers/Staff from overseas or who have only been in the UK for a short period of time.

Volunteers and employees who are recruited from overseas or who have not been in the country long will not have a checkable history in the UK. Where they are recruited to roles requiring a criminal background check, Macmillan still needs to satisfy itself that on the basis of reasonable checks, the person is not unfit to work with children or vulnerable adults.

When recruiting people who have lived outside the UK for more than 6 months in the last five years, they should be asked to provide evidence of their fitness to work with vulnerable adults from the country where they have lived. Such people cannot commence their work or volunteering with Macmillan without such proof

In most cases the relevant embassy may be able to provide them with this, in a form commonly referred to as a certificate of good conduct. Macmillan will pay for the cost of these certificates for volunteers but potential employees will be responsible for paying for these themselves. Where information is returned from an embassy, Macmillan will meet the cost of having the information translated where required.

Where such information is not available or where it is impossible for an applicant to get the information (such as in the case of refugees) the application must be discussed with the relevant Human Resources Business Partner and the Safeguarding Manager to discuss what other safeguards can be put in place and decide on whether the applicant can be offered the role.

Details for embassies in the UK can be found on the [Foreign Embassies section of the GOV.UK website](#), or telephone **020 7008 1500** for details, including the cost of an enquiry.

People who lack identity documents

Some people may lack the necessary identity documents to get a DBS, AccessNI or PVG check carried out. This includes some people who have been or are homeless, Gypsies and travellers, asylum seekers, and ex-offenders who have recently been released from prison.

In such cases it is possible to get a check carried out using fingerprints but advice should always be taken from the relevant Human Resources Business Partner and the Safeguarding Manager before requesting fingerprinting.

17. Training for Employees and Volunteers

All employees and volunteers should be aware of what action to take if they are concerned about the welfare of someone they come into contact with or are notified that someone is at risk. All employees and volunteers should complete appropriate guidance and training in safeguarding. The types of training provided are outlined in [Appendix L](#)

Certain roles will require additional safeguarding training to ensure that they have the necessary knowledge and skills to identify and take appropriate action when someone is at risk. These roles are set out in the individual team procedures.

These roles include, but are not limited to:

- employees and volunteers working on Macmillan Support Line
- employees and volunteers providing advice on the mobile information support service
- employees and volunteers working in direct volunteering services
- employees and volunteers who moderate the online community
- employees and volunteers working on the Skype buddying service

Safeguarding Officers will require a higher level training, to enable them to provide the appropriate level of support to employees, volunteers and service users.

18. Dealing with Allegations of Abuse or Suspected Abuse

There are a variety of behaviours, activities and circumstances that may put a service user or other person at risk of harm. Some of these will be deliberate acts that are intended to cause harm, others may be well-intentioned acts that are harmful whilst others may be acts of omission (not doing something).

For the purposes of this policy, all acts that put the safety and welfare of someone at risk are referred to as abuse.

The key principles if abuse is disclosed or suspected are:

- an employee or volunteer's primary responsibility is to protect themselves and the child or vulnerable adult if they are at risk
- every employee or volunteer has a duty to take action
- employees or volunteers should not have to cope alone
- all suspicions or evidence of abuse or risk to safety must be reported

19. Recording and Reporting Concerns

It is essential that employees and volunteers report concerns about the welfare of people they come into contact with. These may be about people affected by cancer (including the children of people we are supporting), or may relate to the behaviour of other staff or volunteers, or working practices in place. As representatives of Macmillan, employees and volunteers have a duty of care to people affected by cancer and a responsibility to take action and report any concerns about their safety.

In some cases employees and volunteers may directly witness abuse or someone may report that they have been harmed or are worried about their safety. For example, a service user may tell a volunteer or employee that a carer is stealing money from them, or that a family member has hurt them, or that they have not eaten for several days.

In other cases, employees and volunteers may have suspicions (but no evidence) of abuse or abuse may be alleged by a third party. For example a neighbour may report that a service user

has been threatened, or an employee or volunteer may be worried about bruising on a service users arms.

In all circumstances employees and volunteers should take the following action

- ensure their own safety – leave the situation if they are at risk of harm
- where there is clear evidence of harm or an imminent danger call the emergency services immediately
- treat all allegations of abuse seriously
- where abuse is witnessed or directly reported by a service user, and it is safe to do so, offer support to the service user and attempt to understand what action they wish to take
- make a record of the date, time and details on a Safeguarding Reporting Form and send this to the Safeguarding Manager
- report concerns to a (manager/Safeguarding Officer/on-call) as soon as possible

Any safeguarding concerns that the Safeguarding Team, or any individual, believes should be escalated to the Macmillan Board of Trustees, should be addressed to the nominated trustee (currently the Chair of Remco).

Individual employees and volunteers must never investigate an allegation of abuse unless appointed to do so by the Safeguarding Manager.

A flowchart showing the steps to take is included in [APPENDIX C](#)

20. Self Harm or Threats of Suicide

Some service users may express thoughts of self harm, self injury or even suicide. If this happens, or if an employee or volunteer believes that someone is considering serious self harm, serious self injury or suicide, then the actions set out in sections 18 and 19 must still be followed.

There is further guidance relating to [suicidal service users in APPENDICES J and K](#)

21. Exceptions

The duty to report and record concerns may be amended in exceptional circumstances, such as where Macmillan works in prisons and total confidentiality is essential in order to provide the service and to protect employees and volunteers from harm if they are perceived to have broken confidentiality.

22. Support for those who report abuse

All those making a complaint or allegation or expressing concern, whether they are staff, service users, carers or members of the general public should be reassured that:

- They will be taken seriously
- Their comments will usually be treated confidentially, but their concerns may be shared if they or others are at significant risk
- If service users, they will be given support and the allegation or concern will be acted on at the earliest possible opportunity
- If staff or volunteers they will be given support and afforded protection
- We will contact emergency or other support services where we consider it is necessary or appropriate to do so.

23. Investigating Allegations of Abuse

Formally investigating allegations of abuse can be complex and requires great sensitivity and discretion. Macmillan cannot formally investigate allegations of abuse unless they involve an allegation against a Macmillan employee or volunteer as we have no power to take any action and any investigation would need to be duplicated by other agencies if abuse is discovered.

Where a Safeguarding Officer decides that the allegations need to be investigated, the issue should be notified to the appropriate Local Authority or Health and Social Care Trust. Macmillan has no control on what happens after the Local Authority is notified. All employees and volunteers are expected to cooperate as required with any external investigation.

24. Allegations of Abuse made against Macmillan Employees and Volunteers

Where a Macmillan employee or volunteer is alleged to have abused someone this must be investigated by Macmillan.

The employee or volunteer's supervisor must discuss the allegation with the appropriate Human Resources Business Partner and, after consulting with the Safeguarding Manager, make a decision about:

1. whether the allegation needs to be reported to the police and if not
2. whether the employee or volunteer is able to continue in their normal duties or whether adjustments should be made to their work to protect them and/or others.

Adjustments may include:

- Changing their role to temporarily remove them from having direct contact with members of the public
- If they work alone in the community, arranging for them to work with someone else rather than alone
- Temporarily suspending them from working

Making an adjustment to a role does not in any way imply guilt. It is purely an action designed to allow an investigation to be carried out as quickly as possible while minimising risk.

All employees and volunteers who are alleged to have abused someone will be offered appropriate support until any investigation is concluded.

All allegations will be investigated, and as a minimum will involve an initial process to establish the facts and decide whether a formal investigation is warranted.

Any formal investigation will be carried out under the disciplinary policy for employees and the problem solving procedure for volunteers.

The Safeguarding Manager will advise on the investigative process and advise on an appropriate person to carry out any investigation.

25. The Duty to Refer

If, following an investigation into alleged abuse, a decision is made to permanently remove an employee or volunteer from carrying out regulated activity or regulated work, Macmillan has a legal duty to pass this information to the DBS or Disclosure Scotland. The DBS or Disclosure Scotland uses this information to decide whether an individual should be placed on the relevant barring list.

The precise guidance varies between Scotland and the rest of the UK, but can be summarised as Macmillan having a duty to refer when:

The individual has been carrying out a regulated activity or regulated work and Macmillan has decided to remove them permanently from this role or other regulated roles

Because:

An investigation has led us to conclude that their actions (or inactions) have:

- caused harm to someone
- placed someone at risk of harm even if no harm actually occurred (for example leaving a young child alone in a house)
- shown that they pose a risk harm to children or vulnerable adults
- been convicted or cautioned for an offence that carries automatic barring (such as certain sexual offences and violent offences).

The duty to refer also applies where a person carrying out regulated activity or regulated work has voluntarily left their role but would have been subject to permanent removal from their role if they had not left.

The Safeguarding Manager will decide whether a referral is necessary and will manage the referral process.

[Guidance for making a referral is contained in APPENDIX F](#)

26. Out of Hours Services

Macmillan is operating services outside of traditional office hours and this practice will increase. All out of hours services should be aware of who to contact in the event of a safeguarding concern.

Macmillan will ensure that whenever services are planned to take place out of hours that appropriate support is in place, including having an on-call Safeguarding Officer and senior manager available.

Guidance on [out of hours is provided in APPENDIX M](#)

27. Confidentiality

All documentation relating to incidents or allegations of people being harmed, or placed at risk of harm, will be kept and treated confidentially and in accordance with the Data Protection Act (DPA). This includes information from Safeguarding Reporting Forms and details of all investigations and their outcomes. Only those people who need to know about an incident will be informed.

The minimum relevant information should be stored on the CRM system.

It is the responsibility of Director of HR to ensure that any information relating to actual or suspected abuse is kept confidential.

28. Complaints

Any complaint about the way Macmillan has handled a particular safeguarding issue will be logged through our **Complaints Policy** and addressed by the relevant team in accordance with the Complaints policy. If the complaint concerns sensitive or confidential information, or information which is the subject of an ongoing investigation it may be referred to the Safeguarding Manager who will discuss with the relevant people on a 'need to know basis', and respond to the complaint as appropriate having established the facts and bearing in mind the competing interests that may be at stake.

Section B: Safeguarding Employees and Volunteers

29. Background

Some employees and volunteers, particularly those who work alone in the community, are at higher risk of harm as a result of their role.

Macmillan is committed, as far as is reasonably practical, to providing a safe working environment for all of its employees and volunteers and to reducing the risk of harm coming to them during their work with us.

The first step to minimising the risk of harm is that a risk assessment must be carried out on the activity to see whether it is appropriate.

Where the activity involves working alone, then a lone worker risk assessment must also be completed to record what steps are taken to minimise the associated risk.

30. Lone Working

Macmillan has a Lone Working Policy which provides guidance and information about issues relating to lone working.

All employees and volunteers who work or volunteer alone should receive training and information about how they access support whilst away from home. This support should include what to do if they are concerned about the welfare of a service user or if they need assistance.

No employee or volunteer should work or volunteer alone in the community unless there is a Macmillan employee available to provide support in an emergency. This support will be available by telephone, including out of hours.

For lone workers in high risk activities, primarily employees and volunteers who work or volunteer alone in the homes of service users and those who regularly, and as a feature of their role, work or volunteer alone and travel outside office hours, Macmillan provides a personal Lone Worker device supported through our partnership with Guardian24 (G24).

G24 provides relevant employees or volunteers with a lone worker device, which also allows them to leave an automated message saying where they are going to be and the expected duration of the visit. The alarm can be raised by pressing a clear but discrete button on the device.

All eligible employees and volunteers are expected to use G24 when lone working or volunteering in the homes of service users or travelling as part of their role. The Safeguarding Manager is responsible for updating the eligibility criteria.

31. Support for Employees and Volunteers at Risk of Emotional Harm

In addition to the physical risks associated with some roles, certain roles within Macmillan increase the risk of mental and emotional harm, such as stress related illnesses. These are roles where employees or volunteers have to deal with sensitive and challenging situations and issues, for example employees and volunteers working on the Macmillan Support Line and providing Medical or Welfare advice and volunteers providing emotional support at end of life in Direct Volunteering Services.

Managers have a duty to ensure that all employees and volunteers in such roles have access to regular supervision and the opportunity to discuss their emotional well-being.

To reduce the risk of emotional harm, managers should consider providing group or clinical supervision, setting up peer support and buddying schemes. All employees and eligible volunteers also have access to 24 hour professional counselling services via the telephone, provided for employees by Health Assured's EAP scheme.

32. Sharing Personal Details

Employees and volunteers should avoid sharing personal information such as personal mobile numbers, addresses, Facebook or other social media details with service users. This helps to maintain professional boundaries with the service user, whilst providing the support required. Further training or advice can be provided in relation to this.

All employees and volunteers must take a common sense approach to their own safety and take steps to avoid risky situations. If one arises they must take steps to remove themselves from the situation and involve G24, the Safeguarding Team, their manager or the emergency services, as required.

Appendix A: Code of Conduct (Children and Vulnerable People)

All staff and volunteers working or volunteering with vulnerable people should behave in accordance with the below Code of Conduct.

In order to protect vulnerable people, and protect staff and volunteers from false accusations, staff and volunteers should never:

- spend time alone with vulnerable people out of sight of others unless the service has been established to provide 1:1 support or agreed in advance with the Safeguarding Team.
- let suspicion, disclosure or allegations of abuse go unrecorded or unreported
- engage in rough, physical, sexually or racially provocative games, or allow the participants to do so
- allow or engage in inappropriate touching of any form
- make sexually suggestive comments about, or to, a vulnerable person, even in fun
- allow bullying behaviour to go unchallenged
- allow the use of inappropriate language or behaviour to go unchallenged
- do things of a personal nature to, or for, vulnerable people that they can do themselves
- take inappropriate photographs of vulnerable people*
- wear inappropriate clothing, or allow vulnerable people to do so
- drive a car on behalf of Macmillan without prior authorisation from the relevant Macmillan team. See the Safe Driving Policy for further information.
- unless unavoidable and only when approved by a line manager, DVSM or member of the Safeguarding Team, take children alone on a car journey
- stay in contact with vulnerable people after an event (ensure that parents / carers / enablers are your point of contact) unless (in exceptional circumstances) your line manager, DVSM or member of the Safeguarding Team has approved this.

*All photographs taken must positively reflect the activity, culture and image that Macmillan wants to portray and employees and volunteers should be vigilant about the type of photographs that are being taken. In every case you should ensure that a photo [consent form](#) is signed.

No photographs should be taken of vulnerable people in embarrassing or compromising positions, for example whilst swimming or whilst partially clothed. It is essential that no information or photographs are used unless and only in accordance with the terms of the photo consent form.

Appendix B: Criminal Records Disclosure Form

Used to record any information received about criminal records following a criminal records check being received.

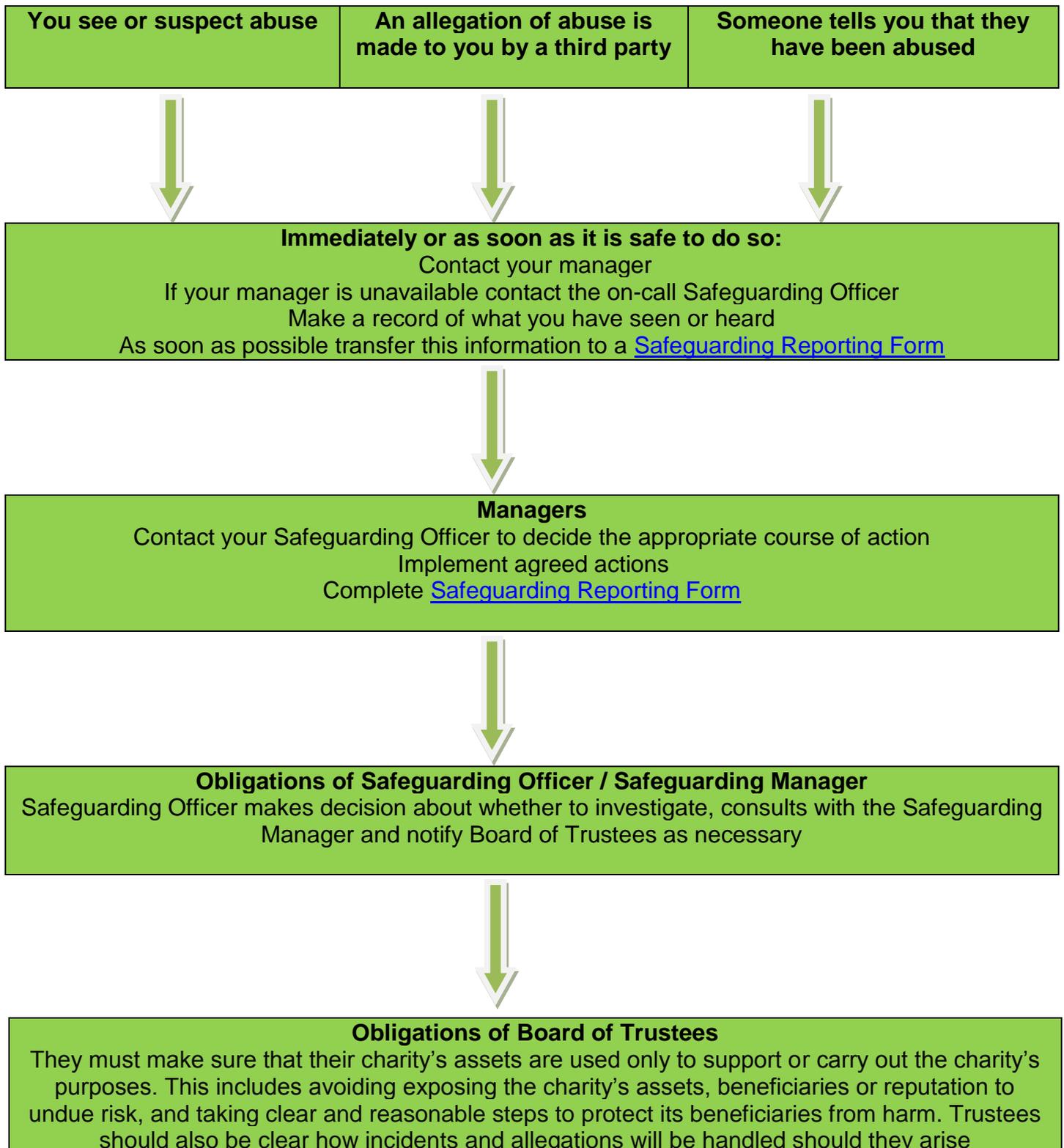
Applicant Details	
Initials of Applicant	
Role	
Location	
Supervisor / manager	

Details of Conviction / Caution	
Nature of DBS (or country equivalent) Information (e.g. conviction, caution)	
Details – name of offence	
Date of conviction / caution	
Was information on these or other offences disclosed during recruitment process – if yes please give details:	

Report from interviewing staff following meeting with applicant
Please provide a record of your discussion and the issues raised – please see paragraph 14 of the safeguarding policy

Decision from Safeguarding Team

Appendix C: Responsibilities and action when a safeguarding concern is identified



Appendix D: Safeguarding Reporting Form

Part A – to be completed by the employee or volunteer reporting the safeguarding concern and sent to the Line Manager or Safeguarding@macmillan.org.uk depending on involvement

Please complete all sections as fully as possible.

Name of employee or volunteer reporting concern	
Job/Volunteer role title	
Telephone number	
Name of individual suspected of being at risk	
Age (approximately if not known)	
Home address (if known)	
Postcode (if known)	
Telephone number (if known)	
Name of carer/parent where relevant	
Please describe the situation that has occurred?	
Please explain what your concerns are?	
Date	

Part B – to be completed by the line manager or Safeguarding Officer dealing with the case and sent to the Safeguarding Manager

Name	
Job title	
Date	
Please give details of any action taken or advice given and explain the reasons why?	

Please ensure that you have contacted the employee or volunteer who raised the concern to check that they are OK and to provide them with a progress report of your actions (in so far as you can without breaching confidentiality)

Appendix E: Handling of DBS (or national equivalent) certificate information - Policy Statement

General principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Macmillan Cancer Support complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

Storage and access

Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate.

However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

Appendix F: Making Referrals to the DBS or Disclosure Scotland

In the event that an employee or volunteer is permanently removed from carrying out regulated activity or regulated work due to concerns about their behaviour, Macmillan has a clear legal duty to report this to the relevant Safeguarding Authority.

In England, Wales and Northern Ireland this is the Disclosure and Barring Service (DBS) and in Scotland it is Disclosure Scotland.

The principles of when to make a referral are consistent across the UK although the specific wording of the law is different in Scotland.

In all cases, Macmillan is legally required to make a referral when the following criteria are all met:

1. The person was in a role that involved carrying out regulated activity or regulated work or have been offered a role doing such work
2. Macmillan have made a decision to permanently remove the person from carrying out regulated activity or work in the future
3. The decision was made following a formal investigation (and any subsequent appeals against the decision)
4. The investigation found that the person had behaved in such a way as to cause harm or risk of harm to a child or vulnerable or protected adult

When all of these are met, Macmillan has to make a referral – there is no discretion in this decision.

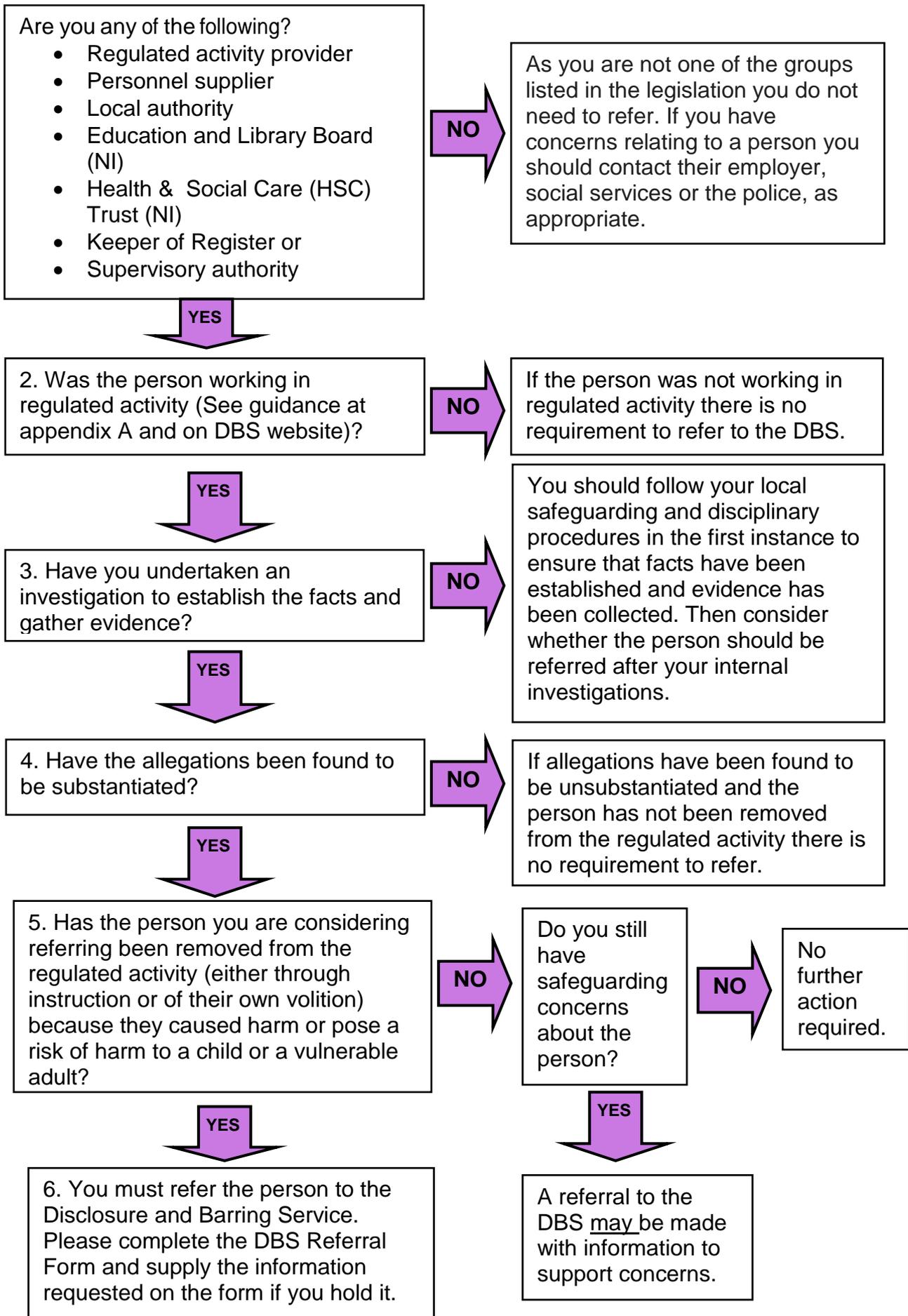
In all cases Macmillan will make a referral as soon as the four criteria are met.

All referrals will be made by the Safeguarding Manager.

Details of how to make a referral are contained on the DBS and Disclosure Scotland websites.

The following flowchart is produced by the Disclosure and Barring Service for England, Wales and Northern Ireland but the principles also apply to Scotland.

FLOWCHART- REFERRALS



Appendix G: Recruiting Manager's Guidance on Criminal Background Checks (England and Wales)

Understanding which roles require a criminal backgrounds check can be complex and it is essential that we get the decision on whether to check right.

It is unlawful to ask for a Criminal Background check unless the relevant national law allows us to – we cannot “err on the side of caution” – every check must be justified under the relevant law.

Eligibility for a check must be agreed with the Safeguarding Team / Human Resources in advance of any post being advertised as the advert will include details of the check required.

In reaching a decision on whether a check is required, recruiting managers should refer to the relevant national guidance below and use the appropriate flowchart(s).

Checks on criminal background in England and Wales are carried out by the Disclosure and Barring Service (DBS)

There are three types of disclosure that Macmillan uses

- Enhanced DBS Check with Adult Barring Information
- Enhanced DBS Check with Child Barring Information
- Enhanced DBS Check

All three of these checks will provide details of all relevant offences that are held on the Police National Computer Database (such as convictions and cautions) as well as any information that police where the applicant has lived thinks is relevant (for example serious allegations made where no charges were brought).

Checks with barring also include a check against the relevant list (for adults or children or both) to see whether the applicant is legally barred from working with that client group due to previous behaviour. For example, most people who are convicted to offences against children are barred from working in positions of trust with children.

Checks with barring are only available for roles that involve what the law calls regulated activity. The regulated activity has to be a feature of the role – i.e. be expected, rather than happening incidentally.

For example, one of the activities that is classified as regulated is handling money. We would expect volunteers providing a practical support service of light housework, shopping and gardening to handle money so they are carrying out regulated activity. However, if at an event, a Macmillan employee collected some money from participants to go and buy some drinks, this would not be regulated activity as we would not reasonably expect their role to involve them handling other people's money.

Recruiting managers should use the following flowchart to assess the level of DBS check (if any) that they believe is eligible and then discuss with the Safeguarding Team and their Business Partner in Human Resources or their Volunteering Adviser.

Appendix H: Recruiting Manager's Guidance on Criminal Background Checks (Northern Ireland)

Understanding which roles require a criminal backgrounds check can be complex and it is essential that we get the decision on whether to check right.

It is unlawful to ask for a Criminal Background check unless the relevant national law allows us to – we cannot “err on the side of caution” – every check must be justified under the relevant law.

Eligibility for a check must be agreed with the Safeguarding Team / Human Resources in advance of any post being advertised as the advert will include details of the check required.

Checks on criminal background in Northern Ireland are carried out by the Access Northern Ireland (AccessNI)

There are three types of disclosure that Macmillan uses

- Enhanced AccessNI Check with Adult Barring Information
- Enhanced AccessNI Check with Child Barring Information
- Enhanced AccessNI Check without Barring Information

All three of these checks will provide details of all relevant offences that are held on the Police National Computer Database (such as convictions and cautions) as well as any information that police where the applicant has lived thinks is relevant (for example serious allegations made where no charges were brought).

Checks with barring also include a check against the relevant list (for adults or children or both) to see whether the applicant is legally barred from working with that client group due to previous behaviour. For example, most people who are convicted to offences against children are barred from working in positions of trust with children.

Checks with barring are only available for roles that involve what the law calls regulated activity. The regulated activity has to be a feature of the role – i.e. be expected, rather than happening incidentally.

For example, one of the activities that is classified as regulated is handling money. We would expect volunteers providing a practical support service of light housework, shopping and gardening to handle money so they are carrying out regulated activity. However, if at an event, a Macmillan employee collected some money from participants to go and buy some drinks, this would not be regulated activity as we would not reasonably expect their role to involve them handling other people's money.

Recruiting managers should use the following flowchart to assess the level of DBS check (if any) that they believe is eligible and then discuss with a Safeguarding Officer and their Business Partner in Human Resources or their Volunteering Adviser.

Appendix I: Recruiting Manager's Guidance on Criminal Background Checks (Scotland)

Understanding which roles require a criminal backgrounds check can be complex and it is essential that we get the decision on whether to check right.

It is unlawful to ask for a Criminal Background check unless the relevant national law allows us to – we cannot “err on the side of caution” – every check must be justified under the relevant law.

Eligibility for a check must be agreed with HR in advance of any post being advertised as the advert will include details of the check required.

Checks on criminal background in Scotland are carried out by the Disclosure Scotland:

There is only one type of check that Macmillan uses in Scotland:

- Protecting Vulnerable Groups (PVG) Scheme Registration

PVG Scheme Registration is undertaken by individuals who want to work in positions of trust with Protected adults and / or children.

A PVG Scheme record shows details of all relevant offences that are held on the Police National Computer Database (such as convictions and cautions) as well as any information that police where the applicant has lived thinks is relevant (for example serious allegations made where no charges were brought).

Additionally a Scheme record includes a check against the relevant list (for adults or children or both) to see whether the applicant is legally barred from working with that client group due to previous behaviour. For example, most people who are convicted to offences against children are barred from working in positions of trust with children.

PVG Scheme registration is only available for roles that involve what the law calls regulated work. The regulated work has to be a feature of the role – i.e. be expected, rather than happening incidentally.

Recruiting managers should use the following flowchart to assess whether a post is eligible for PVG Scheme registration and then discuss with a Safeguarding Officer and their Business Partner in Human Resources or their Volunteering Adviser.

The definition of a Welfare Service is that it must meet all of the following criteria:

- A) Is provided in the course of work to one or more persons over the age of 16;
- B) Is delivered on behalf of an organisation;
- C) Requires training to be undertaken by the person delivering the service;
- D) Has a frequency and formality attached to the service;

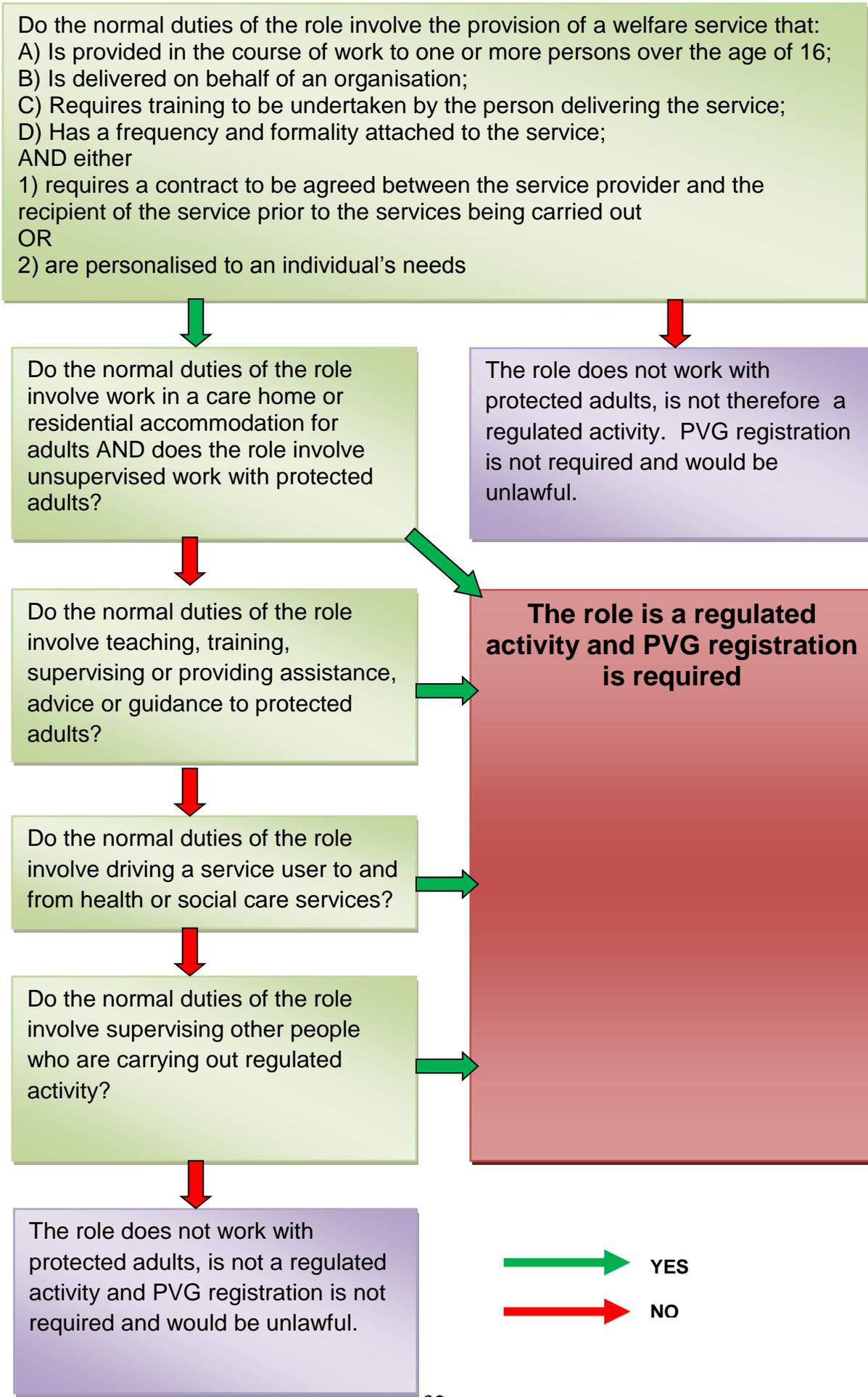
AND either

1) requires a contract to be agreed between the service provider and the recipient of the service prior to the services being carries out

OR

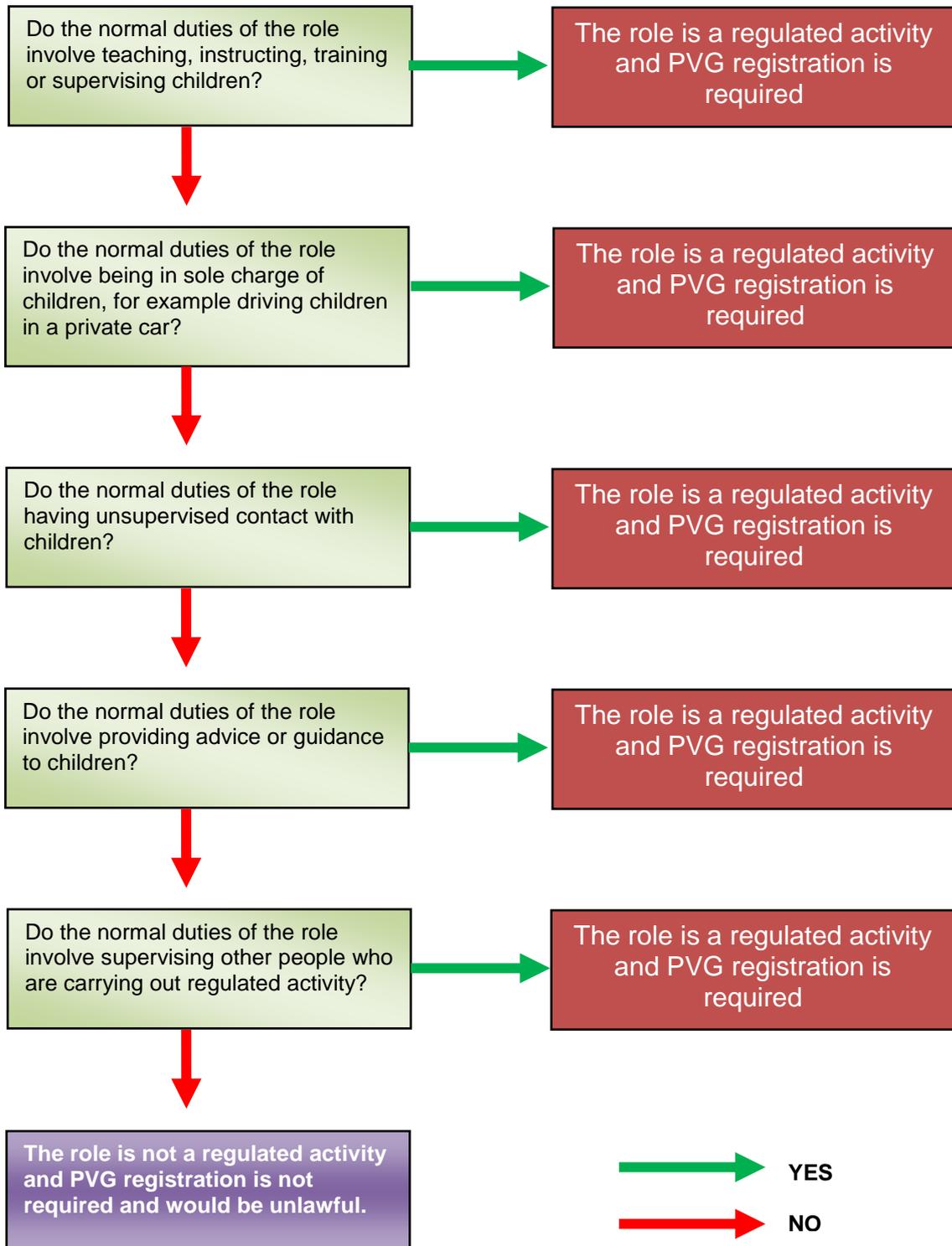
2) are personalised to an individual's needs

Scotland
PVG Eligibility (Scotland) - Protected Adults



Scotland

PVG Eligibility (Scotland) – Children (under 18 years old)



Appendix J: Suicidal People Guidance

1) Purpose and Background

- 1.1 Some people may express feelings of depression or an inability to go on. Some may express thoughts of self harm, self injury or even suicide. Some people also have mental health issues or a history of depression.
- 1.2 This guidance covers the expected actions to be taken by staff or volunteers when they are approached by someone expressing suicidal thoughts or someone with a clear plan to attempt suicide- or in the act of a suicide attempt.

2) Scope of the Guidance

- 2.1 This guidance applies to all employees and volunteers.
- 2.2 All managers have a responsibility to be familiar with this guidance and to comply with it and to ensure that their employees are aware of the policy and understand their own and the organisation's responsibilities in respect of it.

3) Staff Responsibilities in Relation to this Guidance

- 3.1 All staff and volunteers must have an awareness of the possibility that they may encounter suicidal people. Staff and volunteers will:
 - Understand that they have a duty to act on any concerns about a suicidal person
 - Know what to do if they have concerns
 - Be aware of the guidance and procedure relevant to their work
 - Be trained to a standard that equips them to carry out their responsibilities.

4) Relevant Definitions and Law

- 4.1 Definition of suicide:
Suicide is the act of killing yourself intentionally. Attempted suicide or non-fatal suicidal behaviour is self-injury with the desire to end one's life that does not result in death
- 4.2 Suicide and the law:
Suicide is not against the law. However it is an offence for any person to "encourage or assist" in a suicide or attempted suicide. That is, you are guilty of a criminal offence if you are seen to be an accomplice to the suicide of another.
- 4.3 It is not against the law to speak with someone who is committing suicide or who is talking about suicidal feelings, providing the discussion cannot be seen to influence the death of that person.
- 4.4 We have a separate approach that governs management of situations where people that contact our services discuss thoughts of serious harm to themselves including those wanting information about euthanasia.

5) Suicidal People and Confidentiality

- 5.1 Confidentiality means that personal information disclosed by the vulnerable person will not be shared with a third party without the express permission of the caller.
- 5.2 There are some exceptional circumstances where staff may need to break confidentiality without permission of the individual concerned in order to meet the law of the land or their professional codes of conduct.

6) Boundaries of the Guidance

- 6.1 Staff and volunteers are not expected to make assessments of a person's mental health or capacity. Macmillan Cancer Support does not have a specific remit to directly support people experiencing suicidal feelings. There are a number of other UK based services and health professionals that directly help people experiencing suicidal thoughts and feelings and we encourage our staff to signpost visitors with suicidal feelings to those services.

7) Actions where there are concerns about a person causing serious self harm

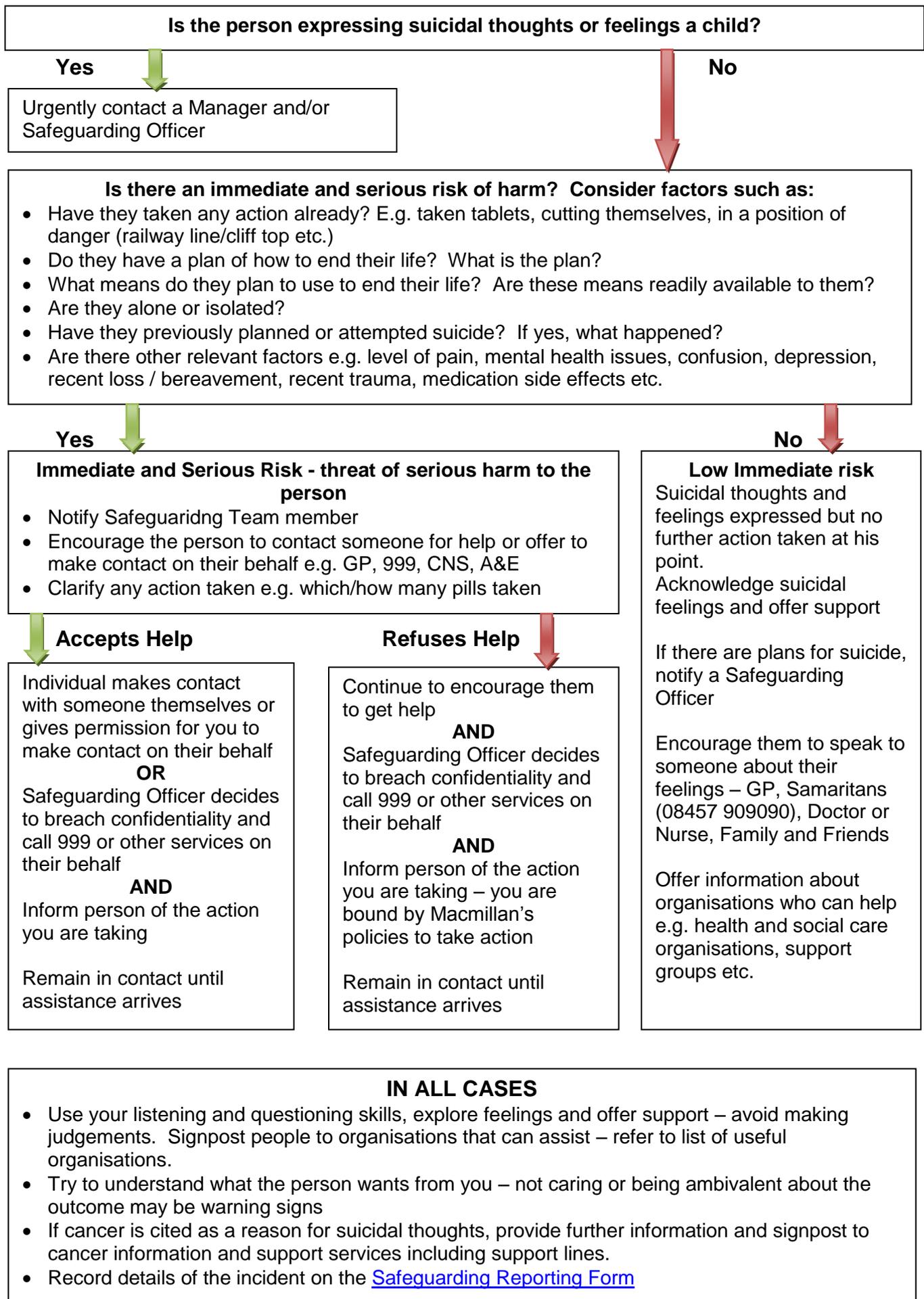
- 7.1 If the person expressing suicidal thoughts or feelings is a child, a manager and the Safeguarding Team must be notified as a matter of urgency.
- 7.2 Where a child is at risk or threatens to cause serious self harm or commit suicide, the Safeguarding Team will notify the emergency services unless there are compelling reasons not to.
- 7.3 If there are concerns about an adult causing serious harm to themselves, staff should do the following:
- The staff member or volunteer seeks support from any staff members or volunteers working alongside them, their line manager or a Safeguarding Officer as soon as they have concerns about a service user. If the concern arises outside of normal working hours, the staff member or volunteer should contact the on-call Safeguarding Officer
 - If the staff member or volunteer is working in isolation, their line manager or a Safeguarding Officer should be contacted for support. If the concern arises outside of normal working hours, the staff member or volunteer should contact the on-call Safeguarding Officer
 - A staff member should document what is said and attempt to ascertain any action the person has taken or might be about to take.
 - The staff member or volunteer should encourage anyone that states they have taken action to harm themselves to contact the emergency services themselves. If the person is reluctant or unable to do so, the staff member should explain we will contact the emergency services on their behalf.
 - Where someone expresses suicidal feelings, but have not taken any self harming actions, staff members should firmly encourage the visitor to seek appropriate support from GP, other health professional or relevant organisation (see list)
 - You may have to decide, with the support of your line manager or Safeguarding Officer, to make the decision as to whether the situation warrants breaking confidentiality to contact the emergency services or an identified health professional involved in the visitors care e.g. GP.
 - You should report the incident using the Safeguarding Reporting Form. Consent should be gained to record the person's personal details. If consent is not given, an account of the interaction should be recorded anonymously.

- The completed report should be sent to the Safeguarding Manager at the earliest possible time.
- All staff who have dealt with a suicidal person should be provided with adequate time to debrief immediately after the interaction, this may result in temporarily closing the service if necessary.
- Learning from interactions with people expressing suicidal thoughts, feelings of actions will be anonymised shared.

8) Guidance

- 8.1 Written guidance in the form of a [suicidal people support framework](#) has been developed. This is a practical tool to assist employees and volunteers in managing situations where suicide is discussed and covers where a service user:
- hints or implies suicidal feelings or thoughts
 - states that they have been thinking seriously of committing suicide, or have been planning suicide
 - states they have already taken some action to end their lives e.g. taken pills, or seriously self harmed.

Appendix K: Suicidal People Support Framework



Appendix L: Safeguarding Training in Macmillan

Basic Guidance	<p>Written guidance covering:</p> <ul style="list-style-type: none"> • Who to notify if you are concerned about the wellbeing of someone 	<p>Suitable for:</p> <ul style="list-style-type: none"> • volunteers and supporters carrying out ad-hoc or one-off activities
Level 1 Training	<p>On-line course covering:</p> <ul style="list-style-type: none"> • basic information about safeguarding children and adults • understanding the need to report concerns 	<p>Suitable for:</p> <ul style="list-style-type: none"> • all employees and volunteers carrying out regular work for Macmillan
Level 2 Training	<p>Face to face course covering</p> <ul style="list-style-type: none"> • understanding what safeguarding is and your role in safeguarding adults and children • understanding dignity and respect when working with individuals • be able to recognise an adult or child potentially in need of safeguarding and take action • have knowledge of Macmillan's policy, procedures and legislation that supports safeguarding adults and children 	<p>Suitable for:</p> <ul style="list-style-type: none"> • all staff who have regular contact with the people affected by cancer, • managers of staff and volunteers who work with the public (for example regional fundraising managers)
Level 3 Training	<p>Face to face course covering:</p> <ul style="list-style-type: none"> • being able to take early action because you recognise that abuse may be insidious/hidden rather than a one off event • being able to respond to a safeguarding concern/alert effectively • taking and making appropriate referrals and referring to other sources of investigation if required • asking the right questions and gathering initial information to promote the safety and well being of the person • Undertaking an initial risk assessment either by telephone or face to face and taking any required protective action • recognising when other agencies may need to be involved, including the Police • reflective Practice in Safeguarding 	<p>Suitable for:</p> <ul style="list-style-type: none"> • Safeguarding Team

Appendix M: Emergencies and Out of Hours Process

What is an emergency?

It is impossible to list everything that could be an emergency, but as a guide, the types of incident that must be reported immediately via the out of hours' emergency service are:

- an accident or illness requiring hospital treatment
- an incident involving the police, ambulance service or fire brigade
- the death of a service user
- the threat of suicide or serious self-harm by a service user
- the threat of or evidence of harm to others
- concerns regarding abuse of a service user or another person associated with them
- a missing employee or volunteer, who uses Guardian 24 and cannot be located
- information that a crime has been or is about to be committed

If you need to call the emergency services for help then do not delay – dial 999 before calling the out of hours' emergency service

Please note, the Macmillan Safeguarding emergency out of hours' service is only for emergencies for staff and volunteers– for non-urgent enquiries please email Safeguarding@Macmillan.org.uk

Appendix N: Team Guidance

Safeguarding Guidance – Digital Team

Guidance is relevant for all employees/workers and volunteers moderating, managing the accounts of, or responding to pabc via:

- The Online community
- Facebook
- Twitter
- Skype buddy / Macmillan Connect
- Team up
- Those managing email inboxes: my.macmillan inbox, webmanager inbox

Context

The increase in digital platforms and their usage as ways of communicating with and supporting people affected by cancer means that employees and volunteers who work on these platforms are likely to come across posts and messages that raise safeguarding concerns.

These may take the form of general statements such as “I can’t cope with this anymore, I’ve had enough, I think it would be easier to be dead” or specific threats “Anyone know how many paracetamol you need to take to be sure of killing yourself, I’ve decided that I’m going to stop the pain now”.

It is essential that people are able to express their views and thoughts freely online and that they are able to share frustrations, fears, worries and doubts in order to receive (peer) support. However it is also essential that Macmillan takes action to prevent or minimise risk where harm or illegal activity is reported or threatened.

Many Community members will be in a distressed and vulnerable state, and we have a duty to ensure they are never exposed to content that could put them in any danger or wrongly influence their choices. This includes any disclosure of actual intent or attempt to harm themselves, commit suicide, or be involved in assisted suicide.

All employees and volunteers must remove any content that condones illegal activity, such as assisted suicide and euthanasia. This is illegal. However, discussing feelings and views, rather than condoning, is acceptable.

Responsibilities of employees and volunteers

All employees and volunteers who are responsible for managing or moderating online platforms must be familiar with the [Safeguarding: Suicidal Child and Vulnerable Adult Guidance and Framework](#) in Appendix J of the Safeguarding Policy.

Where there is a specific threat of harm made, urgent assistance must be requested from an appropriate manager or Safeguarding Officer. **Urgent assistance and action must always be taken where** one or more of the following conditions are met:

someone states that they have already harmed themselves or others (including involvement in assisted suicide)

someone posts plans for harming themselves or others – method, place, time

someone asks for advice on how to end their life

someone starts a conversation about suicide

someone threatens action which could put a child at risk

Additional actions

- **Contact your manager immediately if you think you need a second opinion** on a comment or to read over any messages that you plan to send.
- **Use the email template suicide/self harm support copy to contact the member**, adapting the content carefully to their needs.
- **If the member explicitly states that they want to commit suicide or harm themselves then ban/suspend them immediately** (following the how to guidelines), move the content to the 'admin delete forum' and send them an email, which will signpost to alternative support. There is a template but always read through and amend as needed for that member, as each case will be different, and content may need consideration.

Other circumstances may require urgent action – where employees or volunteers are unsure whether there is a specific threat they should seek a second opinion from their manager – if a manager is not available they should err on the side of caution and take urgent action.

General (non-specific) threats should be closely monitored and [the Safeguarding: Suicidal Child and Vulnerable Adult Guidance and Framework](#) should be used to provide support.

All threats of harm or self harm (whether specific or general) must be

1. reported to an appropriate manager or Safeguarding Officer and then
2. recorded using the [safeguarding reporting form](#) and
3. logged this on the end of shift notes and watch list where necessary.

Employees and Volunteers

All employees and volunteers who moderate or manage the online presence of Macmillan frequently (at least once a week or four times a month) must have an enhanced DBS/AccessNI check in England, Wales and Northern Ireland and PVG registration in Scotland.

All employees and volunteers who moderate or manage the online presence of Macmillan as part of their role must be trained to [Level 2 in Safeguarding Vulnerable Adults and Children](#).

External Moderation

Some digital services are moderated externally (by an agency) when staff are not available (e.g. weekends). All external moderation should be consistent with this policy and the contract and schedules for such services should reflect requirements to act, report and carry out background checks as required.

Appendix O: What Is Abuse?

Abuse and neglect are forms of maltreatment. Both adults and children may abuse or neglect another person by inflicting harm, or by failing to act to prevent harm. People are most commonly abused by someone they know, or more rarely, by a stranger.

The following are the broad categories of abuse that vulnerable people may encounter:

Neglect and acts of omission is the persistent failure to meet a vulnerable person's basic needs – such as food, warmth and shelter, safety, emotional wellbeing and access to medical attention. We should also be aware of self neglect.

Sexual abuse is when a vulnerable person is used sexually by an adult or young person. Making a vulnerable person look at pornographic magazines or films is also sexual abuse.

Physical abuse includes hitting, kicking, punching and other ways of inflicting pain or injury such as poisoning (perhaps with harmful drugs or alcohol), drowning or smothering. Physical harm may also be caused when a parent or carer / enabler fabricates the symptoms of, or deliberately induces illness in, a vulnerable person.

Emotional abuse undermines a vulnerable person's confidence and sense of self-worth – for example, by ignoring them, giving degrading punishments, bullying or constantly threatening or humiliating them.

Financial abuse may include theft, fraud, exploitation or pressure in connection with wills, property, enduring power of attorney, inheritance or financial transactions. It also includes the inappropriate use, misuse or appropriation of property, possessions or benefits.

Discriminatory Abuse includes abuse, bullying or harassment based on the individual's age, sex, disability, religion, race or ethnicity and sexual orientation.

Responding to Allegations of Abuse

If you are in the situation where a vulnerable person is disclosing abuse, you should stay calm and use the strategies below to help you to allow them to speak:

- Use open-ended statements, such as "Tell me more" and "Would you like to explain that further?"
- Avoid "leading" questions, such as "It sounds like you've been abused?"
- Listen carefully to what the vulnerable person is saying
- React calmly, even if a vulnerable person is telling you something upsetting
- Reassure the vulnerable person that they are not to blame
- There are 'no secrets', so reassure the vulnerable person that they were right to tell you
- Explain to the vulnerable person what is going to happen next - that you have to pass on the information to those who need to know for their protection
- Reassure the vulnerable person about 'confidentiality' so they understand that information will only be passed on to those who need to know and can help them
- Keep the best interests of the vulnerable person as your prime concern and focus

Remember: You are not conducting an investigation. This will be the responsibility of the Local Authority or Health and Social Care Trust. You are simply listening to the vulnerable person and responding in a responsible way.

Possible Signs of Abuse

The following are possible signs that abuse may be occurring although there may be other explanations for them. Employees and volunteers who work closely with vulnerable people should be aware of the possible signs of abuse, but more importantly, what they should do if they are concerned.

Physical abuse
A history of unexplained falls or minor injuries
Bruising in well protected areas, or clustered from repeated striking
Finger marks
Burns of unusual location or type
Injuries found at different states of healing
Injury shape similar to an object
Injuries to head/face/scalp
History of GP or agency hopping, or reluctance to seek help
Accounts which vary with time or are inconsistent with physical evidence
Weight loss due to malnutrition, or rapid weight gain
Ulcers, bed sores and being left in wet clothing
Drowsiness due to too much medication, or lack of medication causing recurring crises/hospital admissions
Sexual abuse
Disclosure or partial disclosure (use of phrases such as 'It's a secret')
Medical problems, e.g. Genital infections, pregnancy, difficulty walking or sitting
Disturbed behaviour e.g. depression, sudden withdrawal from activities, loss of previous skills, sleeplessness or nightmares, self-injury, showing fear or aggression to one particular person, repeated or excessive masturbation, inappropriately seductive behaviour, loss of appetite or difficulty in keeping food down.
Behaviour of others towards the vulnerable adult
Circumstances – e.g. two service users found in a toilet area, one in a distressed state
Emotional abuse
Isolation
Over meticulous
Inappropriately dressed
Withdrawn, agitated, anxious not wanting to be touched
Change in appetite
Insomnia, or need for excessive sleep
Tearfulness
Unexplained paranoia, or excessive fears
Low self esteem
Confusion
Neglect
Physical condition poor
Clothing in poor condition
Inadequate diet
Untreated injuries or medical problems
Failure to be given prescribed medication
Poor personal hygiene

Financial abuse
Unexplained or sudden inability to pay bills
Unexplained or sudden withdrawal of money from accounts
Disparity between assets and satisfactory living conditions
Extraordinary interest by family members and other people in the vulnerable person's assets
Discriminatory abuse
Lack of respect shown to an individual
Signs of substandard service offered to an individual
Exclusion from rights afforded to others, such as health, education, criminal justice
Other possible signs of abuse
Inappropriate use of restraints
Sensory deprivation e.g. spectacles or hearing aid
Denial of visitors or phone calls
Failure to ensure privacy or personal dignity
Lack of flexibility of choice e.g. bedtimes, choice of food
Restricted access to toilet or bathing facilities
Lack of personal clothing or possessions
Controlling relationships between care staff and service users

Appendix P: Useful Services and Organisations

The following are a list of services that you can consider referring service users to:

For urgent medical attention or urgent referral to psychological support:

- Emergency services – 999
- GP or Accident & Emergency department at nearest hospital
- [NHS 111 \(England and Wales\)](#)
- [NHS24 \(Scotland\)](#)

For Counseling and Psychotherapy

- British Association for Behavioural and Cognitive Psychotherapies (BABCP)
www.babcp.com
Directory of accredited behavioural and cognitive psychotherapists available online
- British Association for Counselling and Psychotherapy
www.bacp.co.uk
See website for details of local practitioners
- The British Psychological Society
www.bps.org.uk
For a directory of chartered psychologists
- United Kingdom Council for Psychotherapy (UKCP)
www.psychotherapy.org.uk
Regional lists of psychotherapists available free
- WPF Network
www.wpfnetwork.org.uk
The largest provider of general counselling in B

Support Service and Helplines

- Samaritans: <http://www.samaritans.org>
24-hour telephone helpline offering emotional support
- Breathing Space: www.breathingspacescotland.co.uk
Provide support over a helpline for any individual experiencing low mood or depression, or who is unusually worried. The Breathing Space phone line is available 24 hours at weekends (6pm Friday - 6am Monday) and 6pm - 2am on weekdays (Monday – Thursday)
- MIND: http://www.mind.org.uk/help/advice_lines
Provide information on types of mental distress, where to get help, drug and alternative treatments and advocacy. Provide details of help and support for people in their own area. Helpline is called MindinfoLine
- Papyrus: <http://www.papyrus-uk.org>
Advice for young people at risk of suicide – have a helpline called HOPELineUK

- SANE: <http://www.sane.org.uk>
Provides advice for those in crisis, as well as practical information. Have a helpline called SANELine
- C.A.L.L. (Community Advice & Listening Line)
www.callhelpline.org.uk
Emotional support and information on mental health to the people of Wales
- CALM (Campaign Against Living Miserably)
www.thecalmzone.net
Advice and support for men
- Depression Alliance
www.depressionalliance.org
Depression Alliance Cymru
t: 029 2069 2891
Provides information, support and self-help groups
- Lifeline – Northern Ireland
www.lifelinehelpline.info/page/contacting-lifeline
- London Lesbian and Gay Switchboard
www.llgs.org.uk
Staffed by lesbian and gay volunteers for anyone in the UK
- MDF The Bipolar Organisation
www.mdf.org.uk
Support for people affected by bipolar disorder (manic depression)
- MDF The Bipolar Organisation Cymru
www.mdfwales.org.uk
- National Self-harm Network
www.nshn.co.uk
Survivor-led organisation supporting those who self-harm
- Rethink
www.rethink.org Call helpline for those with severe mental health problems in crisis