

Responding to Position of

Trust Concerns

September 2020

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Policy Version History

Date	Version	Amendments	Lead
21 January 2019	1	Draft new policy	SAB Working Party
18 February 2019	1.1	Revised draft	SAB Working Party
7 March 2019	1.2	Revised draft	SAB Working Party
26 March 2019	1.3	Revised draft	SAB Working Party
31 July 2019	1.4	Revised draft	SAB Working Party
14 February 2020	1.5	Revised draft	Partnership Working Party
24 July 2020	1.6	Final draft	Suffolk Safeguarding Partnership

1. Introduction

The Care Act 2014 introduced a single new statute to replace most existing adult social care law. The Care and Support Statutory Guidance formalised the expectations on local Safeguarding Adults Boards to establish and agree a framework and process for how allegations against people working (paid or unpaid) with adults with care and support needs (i.e. those in a position of trust) should be notified and responded to. The outcome of a concern is that those in power satisfy themselves that a position of trust is justified for the individual subject to concerns or allegations.

1.1 Definition of abuse in a Position of Trust

Position of Trust (PoT), in legal terms, refers to a situation where one person holds a position of authority over another person and uses that position to their advantage to commit a crime or to injure the victim in some way. The adult at risk may be deterred from making a complaint or taking action out of a sense of loyalty, fear of abandonment or other repercussions.

Where concerns are raised, it will be necessary for the employer of the individual concerned (or student body or voluntary organisation) to assess any potential risk to adults with care and support needs who use their services, and, if necessary, to take action to safeguard those adults.

Examples of such concerns could include allegations that the individual in question has:

- behaved in a way that has harmed, or may have harmed an adult or child
- · possibly committed a criminal offence against, or related to, an adult or child
- behaved towards an adult or child in a way that indicates they may pose a more general risk of harm to adults with care and support needs

When an individual's conduct may impact on their suitability to work with or continue to work with children, this must be referred to the Local Authority's Designated Officer (LADO). For further detail, please see the LADO procedures for children and young people.

If a local authority or other statutory agency is given information about such concerns, they should give careful consideration to what information should be shared with the employer (or student body or voluntary organisation) to enable a proportionate risk assessment to be undertaken. For this purpose, the responsibility for self-employed individuals sits with the agency who commissions or contracts with the individual in question.

This document is designed to inform and support the decision-making processes of agencies and their commissioned services once they become aware of a position of trust concern. It applies whether the allegation relates to a current or a historical concern.

This document should be read in conjunction with the Suffolk Adult Safeguarding Multi-Agency Policy and Procedures, and the <u>Suffolk Safeguarding Adults Framework</u>.

1.2 What is a breach in a Position of Trust?

- The Person in a Position of Trust has been accused of the abuse or neglect of an adult with care and support needs.
- The Person in a Position of Trust's life outside work is a cause of great concern, affecting their ability to fulfil their work responsibility for an adult with care and support needs.
- The Person in a Position of Trust has been accused of the abuse or neglect of a child, (whether the individual's own children or other children).
- The Person in a Position of Trust is accused of committing a criminal offence against or related to an adult with care and support needs either at work or in their private life.

- The Person in a Position of Trust acts in a way that exploits an adult with care and support needs.
- The Person in a Position of Trust acts in a way which questions their ability to provide a service to an adult with care and support needs e.g. conviction for grievous bodily harm against someone who is not an adult with care and support needs.

2. Responsibilities

2.1 Key partners (Local Authority, Police and Health)

2.1.1 Local Authority

As the lead agency for Adult Safeguarding, Suffolk County Council (SCC) is often in receipt of sensitive information about people in positions of trust. Each Local Authority must have a lead officer who can be contacted by internal and external colleagues regarding concerns about people in a Position of Trust. In Suffolk this is the Adult MASH Operational Manager and the Adult Safeguarding Operational Manager (who may delegate to others in the organisation).

Suffolk County Council's PoT process is responsible for allegations made against individual's employed by SCC. When a concern about an SCC employee who works with adults with care and support needs is received, the Operational Managers will consider the information and take appropriate steps to liaise with the person's manager and Human Resources.

In some case SCC receives information regarding people in a position of trust who work for other organisations, for example care providers, health and police professionals. In these cases the Operational Managers will consider the information shared and advise the responsible organisation of the need to make a decision about disclosure. In a smaller number of cases the organisation may not be willing or able to decide on whether disclosure is appropriate and in this situation a multi-agency Persons in Position of Trust (PIPoT) meeting may need to be convened to take a view on this.

Contact for PoT concerns: positionoftrust@suffolk.gov.uk

2.1.2 Suffolk Constabulary

When undertaking criminal investigations, Police have a common law power to disclose sensitive personal information to relevant parties where there is an urgent 'pressing social need'. A pressing social need might be the safeguarding or protection from harm of an individual, a group of individuals, or society at large. This could include informing a relevant employer/student body about criminal investigations relating to their employee/volunteer/student working in a position of trust, where police have assessed this action to be proportionate necessary and appropriate in order to allow the person in a position of trust's employer to manage identified risks. Any such notifications are referred to as Common Law Police Disclosures.

Where a concern has been raised about a 'person in a PoT who may pose a risk of harm to his/her own children, or other children/young people in the course of their private life, information will be shared with children services without delay.

Contact for PoT concerns: MASH@suffolk.pnn.police.uk

2.1.3 Health

It is a requirement of the Care Act 2014 that Safeguarding Adult Boards should establish and agree a framework and process for any organisation to respond to allegations against anyone who works (in either a paid or an unpaid capacity) with adults with care and support needs. These individuals are known as People in a Position of Trust (PiPoT). That Positions of Trust Framework and process applies to all SABs partner agencies, including health, so that the SAB responds appropriately to allegations.

Where there is an allegation that a member of staff in a CCG or Primary Care services has abused or neglected an adult in their personal life or is a potential risk to vulnerable adult groups and working in a position of trust, the designated professional for safeguarding adults in the CCG should be informed.

NHS Providers must assure themselves, the regulators, and their commissioners that safeguarding arrangements, including internal management of allegations against staff in a position of trust, are robust and working. They must have a Managing Allegations Against Staff Policy in place that is reflective of the SAB POT Framework processes. CCGs are responsible in law for this safeguarding element of services they commission.

Where allegations cannot be fully managed and addressed internally, NHS Providers must refer allegations for multi-agency review. As statutory partner, the CCG will fully engage in POT multi agency reviews and will take the lead for those investigations where the individual is currently employed by a NHS provider organisation and/or is a registered health professional.

NHS Provider Services will store POT information pertinent to their employee in the individual's HR file. Multi Agency Meetings relevant to these individuals can also be stored in their HR personal file by the individual's employer.

Where the individual is a registered health professional and not currently employed within the NHS, as required, documentation will be shared with the individual's Professional Body (NMC/GMC/RCSLT/RPS....), and/or DBS.

Multi Agency agreement will be reached where information should be stored should multi agency review not deem any of these bodies require sharing of the information discussed and the individual is not currently employed within an NHS Organisation.

Contact for PoT concerns: Health.MASH@suffolk.gov.uk

2.1.4 All organisations

Each organisation is responsible for the management and handling of its own information and is also responsible for issues of disclosure. Each agency should have a designated lead officer for managing issues relating to positions of trust. Disclosure of confidential information without consent must be considered on the basis of proportionality and information can be disclosed only if there is a 'pressing need' for that disclosure. This means:

- the legitimate aim in question must be sufficiently important to justify the interference; and
- the measures taken to achieve the legitimate aim must be rationally connected to it.

Individual organisations in Suffolk are responsible for responding to allegations regarding any person working for them in a position of trust with adults with care and support needs and for undertaking all necessary action in line with their internal process and agreed timescales.

The specific responsibilities of individual organisations include:

- Establishing a clear internal allegations management procedure setting out the process (including timescales) for investigation, and what support and advice will be available to individuals against whom allegations have been made
- Ensuring their staff and managers have access to expert advice and guidance to enable them to fulfil
 their responsibilities when responding to allegations
- Responding promptly to allegations regarding their staff and for undertaking all necessary action in line with their internal process and agreed timescales

- Monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process
- Ensuring appropriate systems are in place to support and provide regular updates to the employee in respect of the investigation
- Making prompt referrals to Professional Registration Bodies and the non-departmental public body of the Home Office as relevant (DBS)
- Ensuring appropriate recording systems are in place and that these provide a clear audit trail about the allegation(s), decision making process and any recommendations arising from the investigation and subsequent actions
- Ensuring the control of information in respect of individual cases is in accordance with accepted data protection and confidentiality requirements
- Maintain records of the number and nature of allegations made and using this data to inform service improvement and development
- When necessary, working jointly with partners to ensure risks have been assessed and appropriately managed.
- Ensuring all safeguarding concerns that result from a concern about a person in a position of trust are reported

Multi-Agency Concerns Management: Positions of Trust

Concern raised about any person working with an adult at risk

Report concerns to your senior manager, record and seek advice from your agency Position of Trust lead

(if you do not have a PiPoT Lead or Safeguarding Lead contact Adult Social Care (Safeguarding)

The decision to disclose /or not to be made to employing agency/ and or relevant others in line with Caldicott and data protection guidelines

Yes - Duty to raise safeguarding adults concern to Adult Social Care/Adult Safeguarding Team Yes – The employee should be informed of any decision made to inform the employer following assessment

No – record decision making rationale

The information owner (data controller) shares the information with the employer/ volunteer manager/organisational head

The employer assesses the risk and may undertake investigations through internal management employment processes where appropriate

The employer implements risk management plan as appropriate to the individual case

(e.g. Increased supervision, disciplinary or dismissal. Referral to DBS, professional body such as HCPC, NMC, GMC etc.

3. Managing concerns

Concerns about people in positions of trust can be raised through many routes, including complaints, regulatory inspections, audits and quality systems, staff grievances, 'whistleblowing', social media, and disciplinary and performance procedures. It is important that safeguarding concerns where they may also be issues relating to position of trust are shared using the multi-agency safeguarding procedures in Suffolk and that key partners are able to contribute to initial enquiries and any subsequent strategy discussion / meeting.

Quarterly meetings will be held between lead agencies (Health, Police and Social Care) to assess incoming referrals and enable better multi agency oversight of concerns.

4. Information sharing

4.1 Record keeping

Record-keeping is an integral part of all safeguarding processes to ensure that adults with care and support needs are safeguarded, and that organisations and individuals are accountable for their actions when responding to concerns about a person in position of trust.

Individuals with responsibility for the investigation and management of people in positions of trust concerns must, as far as is practicable, contemporaneously document a complete account of the events, actions and any decisions taken, together with their rationale. The purpose of record keeping is to:

- Enable accurate information to be given in response to any future request for a reference.
- Provide clarification in cases where a future DBS Disclosure reveals information from the police that an allegation was made but did not result in a prosecution or conviction.
- Prevent unnecessary re-investigation if an allegation resurfaces after a period of time.
- Enable patterns of behaviour, which may pose a risk to adults with care and support needs, to be identified.
- To assure the Safeguarding Adults Board that adults with care and support needs are protected from harm

Data Protection guidelines should be followed in the processing, handling, sorting and destruction of all information.

4.2 Sharing of information

The default position should be that the data controller (owner) of the information should not share it without the person in positions of trust's knowledge and permission. However, if they decline the request to share their information for whatever reason, this does not mean the information cannot be shared by the data controller. In deciding whether to share, the below principles should be taken in to account:

- The legitimate aim in question must be sufficiently important to justify the interference
- The measures taken to achieve the legitimate aim must be rationally connected to it
- The means used to impair the right must be no more than is necessary to accomplish the objective
- A fair balance must be struck between the rights of the individual and the interests of the community; this requires a careful assessment of the severity and consequences of the interference.

All decisions to share or not share information, and their rationale should be clearly recorded. For each case involving an allegation against a person in positions of trust, a balance has to be struck between the duty to protect people with care and support needs from harm or abuse and the effect upon individuals of information about them being shared (for example, upon the person's Article 8 Human Rights (the right to private and family life).

Before disclosing information to a third party there is sometimes a need to consult with the person whose information is to be disclosed and to give them an opportunity of making representations before the information is disclosed. The imposition of such a duty is a necessary ingredient of the process if it is to be fair and proportionate. However, if after following the above principles, and weighing up the information available, a decision is made not to tell the person in position of trust about the concern about them and ask their permission to share it with their employer, (because doing this would place any adults or children at increased risk of harm), then this decision and the reasons for it should be recorded. The planning process must identify the earliest opportunity for them to be informed.

When asking information of another agency, the grounds for concern about a particular individual must be set out. The level of detail should be proportionate to the information sought but must be enough for the agency being asked to satisfy themselves they have obligations under their safeguarding duty to respond.

The rationale must be specific to each agency asked. Specific questions should be asked, to avoid any sense of a fishing expedition and responses to such questions by agencies should be made in accordance with each agency's own rules regarding disclosures for safeguarding purposes.

As well as sharing information with employers and relevant organisations, records may also be used to prepare anonymous reports to the Suffolk Safeguarding Partnership Boards (for example to identify trends and patterns or give assurance that adults with care and support needs have been protected).

Example of how Position of Trust sits alongside Safeguarding

A medication error was made by a person in a position of trust. The patient had care and support needs and subsequently dies. A safeguarding referral is made. As the enquiry progresses it is revealed that the person who made the error was drunk on duty. The safeguarding enquiry will address the risk to the person (and any others) with care and support needs, any criminal enquiry and any system-wide safeguarding issues. The position of trust enquiry will run alongside the safeguarding enquiry and address the fact that the staff member was drunk on duty and unable to fulfil their caring responsibilities.

4.3 Information sharing prompts

To help organisations determine if a disclosure should be made to an individuals' employer or a multiagency "Position of Trust" meeting needs to be convened by the relevant partner. Consider the following prompts when requesting information to be shared:

- Is there a transferable risk to people with care and support needs -consider the situation you have been made aware of and if the there is potential for the risk to be transferred to people with care and support needs due to the individuals occupation paid or voluntary.
- High risk domestic abuse situation
- Investigation that has resulted in Child protection proceedings
- Accumulation of multiple incidents that may suggest risk could be transferred to people with care and support needs via the individual employment

Appendix 1: Factors to consider in relation to People in a Position of trust notification

Questions	No cause for concern	Some cause for concern	Cause for concern
The person has behaved in a way that has harmed or may have harmed an Adult with care & support needs?	POTENTIAL HARM	SOME HARM OF POTENTIAL HARM	
2. Possibly committed criminal offence against or related to adults at risk?		NOT AN ADULT WITH CARE AND SUPPORT NEEDS BUT THE OFFENCE IS SERIOUS S	YES O
3. Otherwise behaved towards an adult(s) at risk or in a way that indicates s/he is unsuitable to work with adults.		YES	
4. Has the person behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to adults must be reviewed?		YES	
5. May be subject to abuse themselves which means their ability to provide a service to adults must be reviewed.		YES	
6. Behaved in a way which questions their ability to provide a service to adults which must be reviewed – e.g. criminal conviction for violent offence.		YES	
		AMBER FOLLOW	ONCE OR MORE RED FOLLOW SAFEGUARDING PROCEEDURE

Appendix 2: Suggested forms for recording people in positions of trust cases

Partner Organisations of Suffolk Safeguarding Adults Board and Providers they commission may choose to use these forms their own design or other recording systems. However, each is required to meet the recording requirements set out in Section 8 of this Protocol.

ALLEGATIONS AGAINST PEOPLE WHO WORK IN POSITIONS OF TRUST WITH ADULTS WITH CARE AND SUPPORTNEEDS REFERRAL FORM

This referral applies to allegations or concerns raised about a person, whether an employee, volunteer or student, paid or unpaid who works with or cares for adults with care and support needs. These individuals are known as People in Position of Trust and the process is the Position of Trust process.

Confidential and Restricted Form	Reference Number
Date referral sent	Date of alleged incident

REFERRERS DETAILS			
Family Name		First Name/s	
Position		Email Address	
Agency		Tel. No/Mobile	
Address			

Criteria for Referral – tick those that apply					
	The People in Positions of Trust's own work/voluntary activity (with Adults and/or Children) (for example where a worker or volunteer has been accused of the abuse or neglect of an adult with care and support needs or child)				
	The People in Positions of Trust's life outside work i.e. concerning adults with care and support needs in the family, social circle (for example where a son is accused of abusing his older mother and he also works as a domiciliary care worker with adults with care and support needs. Or where a woman is convicted of grievous bodily harm and also works in a residential home for people with learning disabilities)				

	The Person in Position of Trust's life outside work i.e. concerning risks to children, the individual's own children or other children (for example where a woman who works in a host authority with women who suffer domestic abuse and lives in the neighbouring authority is subject to child protection procedures involving her own children due to domestic abuse by her husband)
And the p	person has:
	Behaved in a way that has harmed or may have harmed an adult with care and
	support needs.
	Behaved in a way that has harmed or may have harmed an adult with care and
	support needs.
	Behaved in a way that has harmed children or may have harmed children which
	means their ability to provide a service to adults with care and support needs must be reviewed.
	May be subject to abuse themselves, which means their ability to provide a
	service to adults with care and support needs must be reviewed.
	Behaved in a way, which questions their ability to provide a service to an adult
	with care and support needs, which must be reviewed e.g. conviction for grievous bodily harm against someone who is not an adult with care and
	support needs.

PERSON IN A POSITION OF TRUST DETAILS (Personal details of the Employee/Volunteer being referred)							
Family Name				First Name	Э		
DOB				Gender			
Home Address	}					_	
ID Number	ID Number			Tel./Mobile	e No		
Current Addres	SS						
(If different above)	from						
Other Household Members (including non-family members)							
Name	M/F	DOB	Relation	•	First		ental
			Ad	ult	Language	Respo	nsibility

				Yes	No
Owner is ation 2 Address	Daves				
Organisation & Addressin Position of Works/Volunteers for					
Is the organisation above CQC Registere		Yes or No			
Job Title & Role					
Does the Person in F Trust have a Pro Registration? (e.g NM GMC)	ofessional	Yes / No State: NMC / HCPC /	CMC / (apocify)		
,		State. NIVIC / FICE C/	Givic / (specily)		
Manager Contact E Employing Organisation		Name:			
Employing Organisand) i i	Address:			
Current employment status					
Has this person been referred into the Person in a Position of Trust Referral Process before?					
When?					
What were the concerns and the outcome? e.g. managed as an advice issue or went to a POT meeting?					
Does the Person in Position of Trust know you are making this referral?		Yes/No			
If not why not? (ple there may be situation					

the adult may be placed at	
greater risk if the Person in a	
Position of Trust is informed	
immediately)	

INCIDENT / CONCERNS DETAILS			
Brief Description of Concerns			
Was the Victim a child or adult	Child / Adult with care and support needs / Other		
with care and support needs?	(please state)		
Are there adult or children's	Adult Safeguarding Procedures: Yes / No		
safeguarding Adult Safeguarding Procedures	Children's Safeguarding Procedures: Yes / No		
currently in process?			
Police Crime Reference Number			
(if applicable)			

ALEDGED VICTIM'S	DETAILS
No of Alleged Victims	
4.441.14.01.11.17	Daniel Latin Control
1st Adult / Child / You	ung Person / other individual
Full Name	
DOB	
Gender	
Current/Past LA	
Involvement	
Child in Need/Child Protection	
If a Child Parents Names and DOB (if different)	

Child/Adults	
Relationship to the	
Alleged Person in a	
Position of Trust	
2nd Adult / Child / Yo	oung Person / other individual
Full Name	
DOD	
DOB	
Gender	
Current/Doot I A	
Current/Past LA Involvement	
invoivement	
Child in Need/Child	
Protection	
If a Child Dayanta	
If a Child Parents	
Names and DOB (if	
different)	
Child/Adults	
Relationship to the	
Alleged Person in a	
Position of Trust	
3rd Adult / Child / You	ung Person / other individual
Full Name	
DOB	
Gender	
Current/Past LA	
Involvement	
Child in Need/Child	
Protection	

If a Child Parents Names and DOB (if different)	
Child/Adults Relationship to the Alleged Person in a Position of Trust	
Copy and paste here v	ictims information if more than 3 victims

Please provide names of key individuals connected to the alleged Person in a Position of Trust as the Safeguarding Lead / Managing Officer will need to consider who to invite to the People in Positions of Trust meeting

Job Role/ Title	Name and Job Role	Organisation	Telephone Number	Email Address
Supervisor/				
Line Manager				
HR				
Provider				
Manager				
Police Contact				
Contract &				
Commissioning				
Leads				
CQC				
Health				
Professionals				
Others				

Please provide names of key individuals connected to the alleged Victim(s) Safeguarding Lead / Managing Officer will need to consider who to invite to the People in Positions of Trust meeting

Job Role/ Title	Name and Job Role	Organis	ation	Telephone Number	Email Address
Social Worker					
Health Professional					
Advocate					
Provider					
Voluntary Agency					
Contract & Commissioning Leads					
Others					
positionoftrust@su	be sent without to the sent without the				rding Manager at
Ac	lvice Given			Actions Tal	ken
Date referral rec	eived				
Local Authority	Lead for Position	of Trust	Decisio	n	
Not PoT - referre procedure: Speci	d to another proce fy	ess/	Initiate Proced	Person in Position	on of Trust

Request further i referrer (Referrer to a	nformation from	•	formation from other
Refer to other Local a	Authority Manager for	Refer to LADO	
Decision Date			
For Completion by Pe	eople in Positions of Tr	ust Lead - People in F	Positions of Trust Case
Recording (record na	me after each entry or	group of entries)	
Date/Time	Recording	Outcome/Actions	Contact Details

Appendix 3: Example position of trust planning meeting agenda template

Chair	Date	
Start Time	Finish Time	
Venue	Minute Taker	
Person in Position of Trust	Employer and Role	

Confidentiality Statement

Those present are reminded that this meeting is strictly confidential. Discussions should not be shared outside of the meeting. All agencies should develop procedures to ensure that the minutes are retained in a confidential and appropriately restricted manner. The minutes will aim to reflect that all individuals who are discussed at the meeting should be treated fairly, with respect and without discrimination. All decisions undertaken at the meeting will be informed by a commitment to equal opportunities and effective practice issues in relation to race, gender, sexuality and disability.

Minutes of this meeting could be shared as part of a criminal, civil or disciplinary proceedings, or as part of investigations concerning whether an individual should be barred from working with children or adults with care and support needs.

If further disclosure is considered to be appropriate, permission must be sought form the Chair.

The minutes should not be photocopied or shared without agreement of the Chair.

Purpose of Meeting

This meeting is held under the Suffolk Safgeuarding Adults Board Person in a Position of Trust Protocol 2019 to:

- 1. Share information
- 2. Agree actions to be taken, by whom and by when
- 3. Risk assess

Agenda		Agenda
Nº	Time	Focus
1		Introductions and confidentiality statement

2	Detail of the allegations(to include current and previous allegations, details to whom the allegation relates)
3	How this is relevant to their employment with adults with care and support needs
4	Relevant information from attendees
5	Risk assessment:
	To consider the safety of adult/s concerned
	To consider the safety of other adults or children
6	Agree support to person in position of trust
7	Agree feedback mechanism to the referrer (who, what, when)
8	Planning the management of the allegation
9	Consider strategy for media enquiries (if relevant)
10	Next steps including details of further meetings
11	AOB

Appendix 4: Example position of trust case closure agenda template

Chair	Date	
Start Time	Finish Time	
Venue	Minute Taker	
Person in Position of Trust	Employer and Role	

Confidentiality Statement

Those present are reminded that this meeting is strictly confidential. Discussions should not be shared outside of the meeting. All agencies should develop procedures to ensure that the minutes are retained in a confidential and appropriately restricted manner. The minutes will aim to reflect that all individuals who are discussed at the meeting should be treated fairly, with respect and without discrimination. All decisions undertaken at the meeting will be informed by a commitment to equal opportunities and effective practice issues in relation to race, gender, sexuality and disability.

Minutes of this meeting could be shared as part of a criminal, civil or disciplinary proceedings, or as part of investigations concerning whether an individual should be barred from working with children or adults with care and support needs.

If further disclosure is considered to be appropriate, permission must be sought form the Chair.

The minutes should not be photocopied or shared without agreement of the Chair.

Purpose of Meeting

This meeting is held under the Suffolk Safeguarding Adults Board Person in a Position of Trust Protocol 2019 to:

- 1. Gain feedback from agreed actions from the Person in Position of Trust planning meeting or discussions
- 2. Reach a formal determination of the case.

Agenda		Agenda
Nº	Time	Focus
1		Introductions and confidentiality statement
2		Summary of original allegations
3		Feedback of agreed actions from planning meeting or discussion
4		Risk assessment:
5		Agree formal determination of the case
6		Agree actions (includes disciplinary action. Referral to regulator and professional bodies (e.g.HCPC, NMC), Disclosure & Barring Service, criminal prosecution etc.)
7		Consider strategy for media enquiries (if relevant)
8		Agree feedback to person in position of trust
9		Agree feedback mechanism to the referrer (who , what, when) and relevant others
10		AOB

Appendix 5: Example position of trust planning meeting minutes template

Chair	Date
Start Time	Finish Time
Venue	Minute Taker
Person in Position of Trust	Employer and Role
Present	
Apologies	
Non- Attendees	
Confidentiality statement read out	
Details of allegation/s	
How is this relevant to their employment	
Agree feedback mechanism to the referrer (who what when)	
Risk assessment	
Agree support to person in a position of trust	

Planning	the
managem	ent
of	the
allegation	

	Actions	By Whom	By When
1			
2			
3			
4			
5			
6			
7			

Strategy for media enquiries	
Next steps/ further meetings	
AOB	

This record is issued in the belief that it accurately reflects the meeting. Please contact the chair within 7 days of receipt to record any inaccuracies or omissions. This record is confidential and is not to be reproduced or copied to others without the chair's approval.

Appendix 6: Example position of trust case closure minutes template

Chair	Da	ate
Start Time	Fi	nish Time
Venue		inute aker
Person in Position of Trust		mployer nd Role
Present		
Apologies		
Non- Attendees		
Confidentiality statement read out		
Summary of the allegation/s	f	
Feedback of agreed actions from planning meeting or discussion	1	
Risk assessment		
Formal determination of the case		

	Actions	By Whom	By When
1			

2		
3		
4		
5		
6		
7		

Strategy for media enquiries	
Agree feedback to person in position of trust	
Agree feedback mechanisms to the referrer and other relevant others	
AOB	

This record is issued in the belief that it accurately reflects the meeting. Please contact the chair within 7 days of receipt to record any inaccuracies or omissions. This record is confidential and is not to be reproduced or copied to others without the chair's approval.

Appendix 7: Suggested database (for data collection and checking for previous concerns)

Date People in a Position of Trust concern received
Referral From
Referrers Details including:
1. Name
2. Organisation3. Contact details
Person in a Position of Trust Details including:
1. Name
2. Address 3. DOB
4. Organisation
5. Contact details
6. Job role 7. Employer
Concern relates to
Include:
Details of allegations
What, when
Safeguarding Adults
Safeguarding Children
Person in a Position of Trust
Date passed to employer
Include lead contact
Include employers' actions Outcome
Outcome
Include:
Details of agreed outcome
Date closed
Learning for organisation and system

Referrals to regulatory bodies