



# Policy for managing concerns around people in position of trust (PiPoT)

October 2022

North Lincolnshire Safeguarding Adults Board

# People in a position of trust (PiPoT)

- The local authority and its partners, and those providing universal care and support services, should have clear policies in line with those from the Safeguarding Adults Board (SAB) for dealing with allegations against people who work, either in a paid or unpaid capacity.
- Such policies should make a clear distinction between an allegation, a concern about the quality of care or practice, or a complaint.

*(The Care Act 2014)*

# Safeguarding Adults Board PiPoT policy

- The policy provides a framework for managing cases where allegations have been made against a person in a position of trust (PiPoT), and is focussed on the management of risk.
- It provides guidance to ensure appropriate actions are taken to manage allegations against people who work, either in a paid or unpaid capacity, with adults with care and support needs.
- This policy applies whether the allegation or incident is current or historical.
- This policy is based on the **Care Act (2014)** and the **Care and Support Statutory Guidance (2015)**, which requires that partner agencies and their commissioners of services have clear recording and information sharing guidance, set explicit timescales for action, and are clear on the need to preserve evidence.

# Safeguarding Adults Board PiPoT policy

The policy states that action may need to be taken in respect of a PiPoT in the following circumstances, where there are concerns or evidence that:

- The person has harmed an adult or a child whilst in a professional role.
- The person has harmed an adult or a child in a personal relationship.
- The person has harmed an adult or a child in some other role or capacity.

**And:**

- It is believed that the above poses a current or continuing risk in the person's current role of responsibility (whether paid or unpaid).

# Safeguarding Adults Board PiPoT policy

- Concerns may be raised through a variety of processes including:
  - ✓ Criminal investigations,
  - ✓ Section 42 enquires under the Care Act 2014,
  - ✓ Children's safeguarding enquiries,
  - ✓ Disciplinary investigations,
  - ✓ Regulatory action,
  - ✓ Reports from the public.
- The policy also relates to those instances where a relevant agency is alerted to information that may affect the suitability of an employee, volunteer or student to work with an adult(s) at risk, where such information has originated from activity outside their professional or volunteer role, and place of work.
- The alleged victim, in such circumstances, does not have to be an adult at risk, for example, it could be their partner or a child.

# Responsibilities

- All agencies, employers, student bodies and voluntary organisations should have their own clear and accessible policy and procedures in place, setting out the PiPoT process.
- These should determine who should undertake an investigation, including timescales for investigation and how support and advice will be made available to individuals against whom allegations have been made.
- Any allegations against people who work with adults should be reported immediately to a senior manager within the organisation. Employers, student bodies and voluntary organisations should have their own source of advice (including legal advice) in place for dealing with such concerns.
- Where such concerns are raised about someone who works with adults with care and support needs, it will be necessary for the employer (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.

# Responsibilities - information sharing

- Decisions for sharing information must be justifiable and proportionate, based on the potential or actual harm to adults or children at risk, and the rationale for decision making should always be recorded.
- **When sharing information about adults, children and young people at risk between agencies, it should only be shared:**
  - ✓ Where there is a legal justification for doing so.
  - ✓ Where relevant and necessary, not simply all the information held.
  - ✓ With the relevant people who need all, or some of the information.
  - ✓ When there is a specific need for the information to be shared at that time.
- Remember that the **General Data Protection Regulation (GDPR)** and **Caldicott guidance** is not a barrier to sharing information, but provides a framework to ensure that the personal information about living persons is shared appropriately.

# Responsibilities (cont'd)

- Each SAB partner agency is required to provide assurance to the SAB that arrangements to deal with allegations against a person in a position of trust within their organisation are adequate, and are functioning effectively.
- Partner agencies are required to provide quarterly updates to the SAB in relation to referrals received and outcomes. The SAB will maintain oversight of whether these arrangements are considered to be working effectively between and across partner agencies in the local authority area.
- Appropriate cross organisational challenge should be possible as it is an important part of this process.
- The local authority Safeguarding Adults Team are required to provide updates to the SAB about PiPoT concerns relating to providers, colleges and voluntary organisations not represented on the SAB.



# Concerns in relation to children

- When a person's conduct towards an adult may impact on their suitability to work with, or continue to work with children, this must be referred to the **North Lincolnshire Local Authority Designated Officer (LADO)**.
- Where concerns have been identified about their practice and they are a parent / carer for children, then consideration by the data controller should be given to whether a referral to **Children's Services** is required.

<https://www.northlincscmars.co.uk/>

# PiPoT quarterly reporting tool

Appendix 5: PiPoT reporting tool.



People in a Position of Trust (PiPoT) quarterly reporting tool

Organisation

Name of person completing

Reporting Period

Please submit completed tools to [safeguardingadultsboard@northlincs.gov.uk](mailto:safeguardingadultsboard@northlincs.gov.uk)

Date referral received	Organisation	Reference / identifying number	Current status of referral	Outcome	Actions required and status	Identified future learning

# Further information and guidance

- North Lincolnshire SAB multi - agency PiPoT procedures:

[PiPoT-Policy-FINAL.pdf \(northlincssab.co.uk\)](#)

- North Lincolnshire SAB multi - agency safeguarding policy and procedure:

[North-Lincolnshire-MA-PP-FINAL.pdf \(northlincssab.co.uk\)](#)

- North Lincolnshire SAB website:

[www.northlincssab.co.uk](http://www.northlincssab.co.uk)

- PiPoT lead (service manager for safeguarding adults or nominated deputy):

Email - [safeguardingadmin@northlincs.gov.uk](mailto:safeguardingadmin@northlincs.gov.uk)

Questions...