



# ADULT CARE & SUPPORT

Practice Guidance:  
Large Scale Enquiry

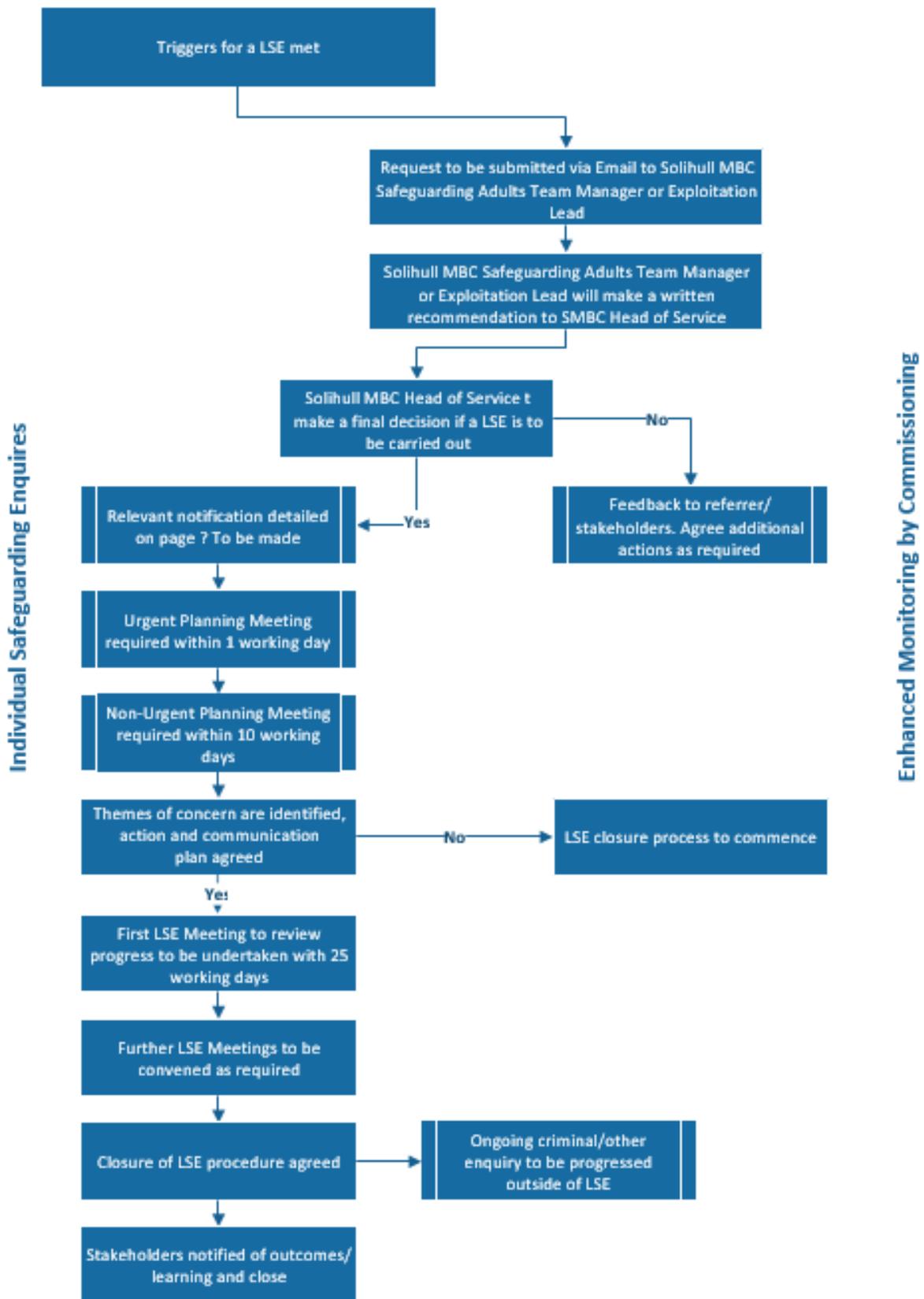
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## Version Control Log

<b>Version:</b>	<b>Date:</b>	<b>Author Name:</b>	<b>Rationale:</b>
V1	23/03/21	David Mullane	First draft
V2	26/03/21	David Mullane	To incorporate Operational SLT feedback
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# 1. LSE Flowchart



## **2. What is a Large Scale Enquiry?**

A Large Scale Enquiry (LSE) is a coordinated multi-agency response to protect Adults with Care and Support Needs from abuse. An LSE may be triggered where the statutory safeguarding duty is met relating to more than one adult, a location or network that facilitates abuse, or a provider that fails to protect adults from abuse.

The purpose of this document is to provide a framework to effectively manage multiple safeguarding enquiries in one process.

Historically LSE processes have only focused on institutions and organisations, but can be used to manage other complex situations such as the large scale enquiry into sexual exploitation in Newcastle, Operation Sanctuary [\[Operation Sanctuary JSCR\]](#)

## **3. Guiding Principles**

Safeguarding is everyone's business, we all have our part to play in protecting adults from abuse.

All practitioners investigating safeguarding concerns need to consider the possibility that more than one adult may potentially be at risk.

It is essential that collaborative working is open, honest, and transparent.

Sharing of information across agencies takes place within GDPR guidelines.

All investigative enquiries and actions taken by agencies contributing to the LSE must uphold the Care Act (2014) principles of Empowerment, Prevention, Proportionality, Protection, Partnership and Accountability.

Making Safeguarding Personal remains at the centre of the safeguarding enquiry process. The adult's individual safeguarding concerns must be addressed via the individual safeguarding processes with actions guided by their defined outcomes.

## **4. The Legal Framework for Large Scale Enquiry**

There are no legislative powers referenced within the Care Act 2014 specific to LSE. The Act does however require the Local Authority to make, or cause to be made whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case.

The Care Act also sets out a duty to co-operate with each of its relevant partners (S6) in order to protect the adult. In their turn each relevant partner must also co-operate with the Local Authority.

The Local Authority's duty under the Care Act only apply within their own boundaries. If the abuse has occurred outside the Solihull Local Authority boundaries, it is the duty of the Local Authority where the abuse occurred to decide on the most appropriate course of action.

Where there is no duty under the Care Act for the Local Authority to enquire or cause enquiries, the Structured Partnership Approach can provide any lead agency with a framework for a multi-agency approach [\[SPA guidance\]](#)

## 5. What is the Purpose of LSE?

The LSE framework enables the Local Authority to effectively coordinate a multi-agency response that.

- Focuses the enquiry on the alleged abuse and the outcomes of those at the centre of the process.
- Ensures that all agencies act in a timely manner to protect adults in their care.
- Ensures a fair, consistent and proportionate response across all agencies.
- Ensures the safety and well-being for all adults at risk both individually and collectively.
- Supports the development of a safeguarding plan that mitigates risk of harm and protects adults at risk.
- Identifies learning from the experience and share learning as appropriate.

## 6. Is an LSE the Most Appropriate Process?

The LSE framework is only to be used where there is a duty to enquire under S42 of the Care Act. Allegations of unsafe practice by regulated providers or non-compliance with minimum care standards that do not constitute a S42 enquiry should be addressed by other processes e.g. contract quality monitoring or Commissioning Provider Failure Protocol

[\[Provider Failure Protocol\]](#) **unless serious or multiple failings by a provider lead to a concern that the care is of such poor quality that it is likely to result in a number of adults being abused.**

Where an agency is regulated or licenced to operate by another statutory authority it may be more appropriate for those with regulatory powers to lead any investigation. For example, Trading Standards for Taxi Drivers or premises licenced to sell alcohol. Adults who are eligible and may have experienced abuse should continue to be supported through the safeguarding process as appropriate.

Where it is suspected that a crime may have been committed, the Police must be alerted at the earliest opportunity and their enquiries may take precedence.

Where adults are thought to remain at risk, an LSE may still proceed where the Police agree that the LSE will not impede their enquiries.

Where the adult has been subject to abuse and has experienced significant harm or died, explicit consideration should be given as to whether the criteria has been met for a Safeguarding Adults Review [\[SAR guidance\]](#)

## 7. Triggers for Large Scale Enquiry

The decision to undertake LSE processes will be considered where the statutory duty under S42 of the Care Act is met and there is evidence that:

- A number of adults have allegedly been abused by the same source of risk resulting in significant harm or there is potential for significant harm.
- Themes of abuse emerge across a number of S42 safeguarding enquiries.
- Trends and patterns are identified through the Exploitation Vulnerability Tracker relating to individual victims, sources of risk or locations.
- High volumes of S42 enquiry are received for the same provider/organisation and/or for the same type of exploitation, or
- Where a service has made no safeguarding referrals and adults are found to be at risk of abuse.
- A provider has failed to engage with other safeguarding actions to date resulting in continued harm or continued risk of harm to one or more individuals.
- A combination of concerns are received from a provider/organisation that are potentially higher risk and appear systemic e.g. poor moving and handling with inappropriate techniques or equipment, nutritional needs not being met, skin integrity needs not being met etc.

ShEP or the Exploitation Vulnerability Tracker identifies concerns about Organised Networked exploitation or Organised Crime Groups and Gangs.

## 8. Timescales

If immediate investigation and/or protection is needed, the Safeguarding Team Manager or Exploitation Lead should convene an urgent planning discussion by video/telephone conferencing with key agencies. This should be undertaken within **1 working day**.

In all other situations LSE Planning meeting should be undertaken within **10 working days** of the decision to initiate LSE procedures.

If the planning meeting is likely to be delayed by the unavailability of agencies, the Chair of the LSE should review the need for that agency to attend and/or ask for a deputy if their attendance is crucial to the purposes of the meeting.

It is suggested that the first LSE meeting reviews the progress within **25 working days** of the planning meeting.

The LSE meetings will continue until it is clear that adults with lived experience are safe from abuse or neglect. This process can be as short or long as is necessary, LSE should however always be closed at the earliest opportunity.

## **9. Requesting a Large Scale Enquiry**

Prevention of abuse is always the priority within safeguarding processes, sharing intelligence earlier allows decisions to be taken quicker to protect people from abuse. Low-level concerns that may indicate exploitation should be reported to Police using FIB form. Commissioning and CQC need to be aware of failures to provide quality care. If the concerns meet, the triggers for a LSE contact should be made with the SMBC Safeguarding Team Manager, who will consider the request and make a written recommendation to an Operational Head of Service.

If the concerns relate to the exploitation of adults, contact should be made with SMBC Exploitation Reduction Lead, who will consider the request and make a written recommendation to an Operational Head of Service.

The decision on whether to commence a LSE lies with SMBC Head of Service.

The decision to initiate the LSE procedure should be communicated, by the Head of Service responsible for the decision or delegated as appropriate to:

- Director of Adult Care and Support
- Assistant Director for Adult Care and Support
- Strategic Commissioner
- Solihull Safeguarding Adults Board
- Safeguarding Adults Lead for the CCG (if relevant)
- Police
- Care Quality Commission (CQC) (if relevant)
- Operational Heads of Service

## **10. Decision not to proceed to Large Scale Enquiry**

If a decision is taken that there is insufficient evidence to proceed to a LSE, the Head of Service must record the reasons not to proceed and document any further actions to be taken to address the concern(s) raised and who will take responsibility for ensuring the agreed actions are completed. The written record may be an email or more formal response. A copy of the decision should be kept on shared drive T:/Safeguarding.

## **11. Information sharing**

Information sharing is key to prevent abuse, promote wellbeing and for wider public protection. Information sharing is a vital element in improving an adult's individual outcomes and for all. Nevertheless, it is important to understand that most people want to be confident that their personal information is kept safe and secure and that practitioners maintain their privacy, while sharing appropriate information to deliver better services.

The SSAB has produced Information Sharing Agreement that sets out the principles and guidance for using and sharing personal information. This is available on [\[SSAB ISA\]](#) .

## **12. Recording of Minutes and Collation of Reports and Documentation**

Throughout the process, minutes of each LSE meeting will be taken by a member of the SMBC Safeguarding Adults Administrative Office.

A specific Safeguarding Adult Minute Taker will be designated to the LSE process and will (where possible) remain with the case for continuity until the enquiry closes.

Minutes approved by the LSE Chair will be circulated to representatives within 10 working days with a request that any amendments are requested within 5 working days of that date.

## **13. Storage of LSE Documentation**

Good record-keeping is an essential part of the accountability of all organisations involved in the LSE. Maintaining proper records is vital to individuals' care and safety. Information Access Requests may also be made by affected agencies, personnel and adults at risk/their families and may be requested at any time.

The LSE Chair is responsible for securely storing the LSE documentation and maintaining a record of all LSEs for future profiling, background information and monitoring. Records of all LSE's will be stored on a shared drive T:/Safeguarding.

Sharing of LSE Documentation is only with the permission of The LSE Chair. Any breaches of confidentiality must be reported to SMBC Information Governance.

## **14. Dispute Resolution**

All agencies have a statutory responsibility under the Care Act to cooperate with its partners to protect adults from abuse. There will however be occasions where staff from one partner agency may have concerns about the way in which staff from another partner agency is/are delivering their part of the safeguarding process.

SMBC expects that practitioners will challenge each other and raise concerns directly and immediately when they disagree with each other and that they retain a focus on the wellbeing of the adult. SSAB have produced a guide to multi agency dispute resolution that can be accessed on the [SSAB Website](#)

## **15. LSE Planning Meeting**

For planning meeting Aide memoire please [\[Click here\]](#)

A Large Scale Enquiry may require a series of individual Safeguarding Adults enquiries or investigations and reports from other agencies to address allegations of abuse specific to each individual adult at risk.

## **Coordination and Administration**

The Safeguarding Team Manager or Exploitation Reduction Lead will be assigned the responsibility of leading the coordination and monitoring of the LSE. Where an institution or organisation is part of the concern, they should be formally notified of the decision by letter. A communication plan for informing those using the service and their families at the start and end of the process is also required.

The allocated Safeguarding Admin Officer will support with letters, minute taking, and co-ordination of meetings, reports, monitoring and dissemination of information.

Where other agencies are requested to undertake part of the investigation, the agency should be provided with a clear remit by the Chair of the LSE meeting detailing their specific roles and responsibilities. Agreement should be reached on the desired outcomes of the enquiry, how progress will be monitored, who will report to the meeting and within what timescales.

Written reports from agencies contributing to the LSE should be returned to the Safeguarding Admin Office [sao.workload@solihull.gov.uk](mailto:sao.workload@solihull.gov.uk) within agreed timescales and will be shared at the Planning Meeting or any subsequent LSE meetings so that the findings can be discussed and outcomes agreed.

## **Attendees**

Invites to the LSE Planning meeting will depend on the type of investigation required. The process should however be proportionate and only involve agencies whose roles and responsibilities will support the objectives of the LSE. The Chair should consider how each agency's expertise could contribute to the enquiry.

It would not be appropriate for individuals with lived experience or their representatives to attend an LSE meeting. This is because of the practicalities of managing attendance of multiple interested parties and the need to maintain confidentiality.

However, it is vital that any LSE meeting includes consideration of how Advocacy may support the views and outcomes of any individuals and or their family representatives either in relation to individual safeguarding enquiries or in response to the LSE process itself.

## **SMBC Operational Representatives**

While the Safeguarding Team Manager or Exploitation Lead will Coordinate the LSE process, it is still dependent on individual safeguarding S42 enquiries which are likely be on-going during the LSE process. The Team Manager in the relevant social work team will continue to oversee the individual safeguarding enquiries and must be invited to report the findings and themes to the planning meeting. Social Workers or key investigators may be invited at the Chairs discretion.

## Partner Agencies

Invites to partner agencies may include safeguarding leads from:

- West Midlands Police
- University Hospitals Birmingham
- Birmingham and Solihull Clinical Commissioning Group
- Birmingham and Solihull Mental Health Foundation Trust
- Support to Care Homes Team (if related to a care or nursing home)
- Solihull Community Housing
- Barnardos
- Care Quality Commission (for regulated services)
- Solihull Action Through Advocacy
- Solihull Commissioning.
- Other Authorities who work with or fund the care of individual Adults

Childrens Services where there is potential for under 18's

The **institution or organisation** - A planning meeting can be held without the provider being present if appropriate, but decisions must be made at the meeting (or before) as to how the provider will be communicated with. The nature of the concerns will determine whether the provider is contacted from the start of the process or at a later point.

It is important to consider that the provider will need to play a part in the enquiry in order to address the issues raised.

The LSE Planning meeting will need to consider and/or agree:

- The immediate safety of all adults at risk and whether immediate action is required.
- The Action plan for the enquiry; to consider the level of the enquiry required the proportionality of the response and identify the lead agency.
- Timescales and framework for ensuring all actions are completed.
- How the LSE will interface with any individual safeguarding enquiries that are ongoing
- What other enquiries, investigation or inspection are required or are in process.
- Whether individual reviews or assessments of any other adults are needed and who should undertake these.
- LSE in relation to institutions or organisations - Review and confirm the commissioning status and inform Care Quality Commission and neighbouring local authorities as appropriate.
- A communication strategy including:
  - How the provider will be informed (if not invited to the planning meeting)
  - How other adults or families potentially affected by the LSE are informed
- How any media enquiries will be dealt with?

## 16. LSE Meeting

For LSE Meeting progress/review Aide Memoire [\[click here\]](#)

The LSE Chair should convene a first LSE meeting to review progress from the planning meeting within 25 working days. Further LSE Progress/Review meetings will be arranged by agreement.

The purpose of LSE meetings is to:

Review information gathered since the last meeting and the outcomes of any S42 enquiries

- Provide feedback on the different strands of investigation
- Plan further actions
- Evaluate progress of previously agreed actions
- Evaluate ongoing risk.
- Obtain an update from the Police as to the status of any criminal prosecutions.
- Consider any variations to the Action Plan.

All those who attend the LSE meeting are required to ensure that they have completed the actions agreed at the LSE Planning meeting and have provided the Chair with a report prior to the meeting, or as a minimum requirement have the information available to share at the meeting.

LSE meeting in relation to institutions or organisations

If not involved at the LSE Planning Meeting, the relevant provider manager should be invited to attend the LSE review as it is vitally important that they are fully engaged and take an active role in the progression of any improvement/action plan.

## 17. Closure of LSE Process.

When dealing with care providers it has to be acknowledged that initiating Large Scale Enquiries causes uncertainty and concern to families who have loved ones in their care and may well cause a negative financial impact on the providers themselves, LSE processes should not be allowed to drift and closed as soon as possible to ensure the impact is minimised.

The LSE can be closed if the meeting agrees:

- A consensus that the LSE has achieved its agreed outcomes and actions
- Appropriate mechanisms are in place if required to manage individual agency actions which do not require the oversight of the LSE
- An agreed threshold for escalation should the risks or issues reoccur
- An evaluation of whether the criteria has been met for a Safeguarding Adults Review in line with the SSAB Policies and Procedures
- A plan to provide a final communication to the adults, representatives and relevant partners

Process can also be closed providing that the adult is safeguarded.

**18. When the LSE is closed the following will be agreed:**

- How and by whom the closure of the LSE will be communicated to adults affected and their families (where appropriate) key stakeholders and partner agencies,.
- The ongoing monitoring of any improvement or disruption plan outside of the safeguarding process.
- How learning from this LSE will be taken forward.
- Whether practitioners and professionals involved in this LSE need an opportunity to de-brief.
- Chair of the LSE will ensure that the Head of Service or Assistant Director is informed of the final outcome of the enquiry process and advise them of any continued risks identified regarding the service.
- Closure of the LSE in relation to institutions and organisations - A copy of the Enquiry minutes should also be sent to the Assistant Director of Commissioning of ACS and where relevant the CCG. This is to ensure that relevant actions are built into contract monitoring arrangements with the Service Provider
- Closure of LSE in relation to Exploitation - A copy of the Enquiry minutes should also be sent to the Chairs of the Solihull Exploitation Reduction Board and Solihull Exploitation Reduction Delivery Group. This is to ensure that relevant actions are built into future Exploitation strategies, policies and procedures.
- Closure of the LSE in relation to institutions and organisations - a concluding letter will be sent by the Chair to the Service Provider outlining the outcome of the LSE.
- Closure of LSE in relation to institutions and organisations - Any ongoing restrictions on admissions may be monitored by Commissioning and reviewed with the Provider.

**19. Closing Enquiries Down When Other Processes Continue**

Where an Institution or Organisation is the subject of LSE, the longer it takes to resolve the concerns, the greater the impact on the families and provider and could potentially trigger provider failure. The LSE should always be focused on protecting individuals and closed at the earliest opportunity.

It is possible that the LSE may be closed but other processes may continue, for example, a disciplinary or professional body investigation or Police enquiry into a person no longer involved or in contact with those at placed at risk. Consideration may need to be given to how this will be monitored if the LSE is closed.

## 20. Glossary

<b>Organisational Abuse</b>	<p>Organisational abuse includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or where care is provided within their own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.</p> <p>It is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights.</p> <p>Organisational abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfilment of adults with care and support needs.</p>
<b>Exploitation</b>	<p>The West Midlands regional definition of exploitation is: An individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or adult and exploits them:</p> <ul style="list-style-type: none"><li>a) through violence or the threat of violence, and/or</li><li>b) for financial or other advantage of the perpetrator or facilitator and/or</li><li>c) in exchange for something the victim needs or wants.</li></ul> <p>The victim may have been exploited even if the activity appears consensual due to his /her specific situation. Exploitation does not always involve physical contact, it can also occur through the use of technology, e.g. as the result of a grooming process which takes place during conversations in chat rooms, or through the use of social media.</p> <p>Solihull recognises that exploitation is deliberate maltreatment and manipulation irrespective of their age, gender, ethnicity, background or ability and sexuality and comes in many forms, including:</p> <ul style="list-style-type: none"><li>• modern slavery</li><li>• human trafficking</li><li>• sexual exploitation</li><li>• criminal exploitation</li></ul>

<p><b>ShEP</b></p>	<p>Solihull Exploitation Panel (ShEP) is a multi-agency forum that brings together the key agencies and organisations with a responsibility for stopping the exploitation of Children and Adults in Solihull.</p>
<p><b>Vulnerability Tracker</b></p>	<p>The Vulnerability Tracker has been developed to provide a single, multi-agency informed data set of exploitation vulnerability within the borough of Solihull.</p> <p>It is designed to capture vulnerability data and define the profile of exploitation within Solihull which will enable a focus on the operational and strategic delivery across the four priorities of: prevent, protect, partnership and pursue.</p>
<p><b>Organised/Networked exploitation or trafficking</b></p>	<p>Individuals (often connected) are passed through networks, possibly (but not always) over geographical distances, between towns and cities where they may be forced/coerced into criminal or sexual activity. Some of this activity is described as serious organised crime and can involve the organised ‘buying and selling’ of victims by offenders. Organised exploitation varies from spontaneous networking between groups of offenders, to more serious organised crime where victims are effectively ‘sold’.</p> <p>Individuals are known to be trafficked for exploitation and this can occur anywhere within the UK, within and across local authority boundaries and across international borders.</p>
<p><b>Organised Crime Groups and Gangs</b></p>	<p>Organised crime group is a legal term and means a group that-</p> <ol style="list-style-type: none"> <li>a) Has as its purpose, or as one of its purposes, the carrying on of criminal activities, and</li> <li>b) Consists of three or more persons who act, or agree to act, together to further that purpose</li> <li>c) Gang related violence and drug dealing activity is defined as gang related if it occurs in the course of, or is otherwise related to, the activities of a group that- <ul style="list-style-type: none"> <li>- consists of at least three people, and</li> <li>has one or more characteristics that enable its members to be identified by others as a group.</li> </ul> </li> </ol> <p>(Serious Crime Act 2015)</p>