

# **Gloucestershire Safeguarding Adults Board**

## **Strategic Plan 2018-2021**

### **Introduction**

The Care Act 2014 placed adult safeguarding within a clear legal framework setting out the responsibilities of local authorities and their partners. One of the main requirements was to establish a safeguarding adults board.

The Act and the accompanying statutory guidance, requires the board to work together to help make sure that some of the most vulnerable in our communities are protected from abuse and neglect. It is underpinned by the principle that individuals have the right to make choices and exercise control when engaging with agencies who seek to protect and minimise the risk of their harm and/or abuse.

This document sets out the vision and the three year strategic plan for the Gloucestershire Safeguarding Adults Board (GSAB). The GSAB is a multi-agency partnership that is committed to promoting the health and well-being of the most vulnerable members of our community and in order to do so, is committed to continually striving to deliver the most effective services.

### **Our vision is:-**

***“To provide assurance that adults at risk are safeguarded from abuse and neglect. All partner agencies of the GSAB will work together to assure that people who have care and support needs are empowered to be kept safe from harm, abuse and neglect and that when abuse occurs, partner organisations respond effectively and proportionately”.***

***The strategy has been developed following a period of consultation which has taken place over several months and is also driven by the many requirements of the Care Act 2014. Our core strategic objectives are to: -***

- ***Improve the effectiveness of the Board,***
- ***Improve safeguarding practice,***
- ***Focus on preventative strategies,***
- ***Focus on Making Safeguarding Personal***

As a Board we are mindful that we need to respond to new threats and therefore the strategy will develop in response to new operational demands, however, the core strategic objectives will be retained for a period of at least three years.

During 2018 and beyond, we will seek assurance that safeguarding arrangements in Gloucestershire are effective in protecting adults who, as a result of their care and support needs, experience, or are at risk of, abuse or neglect.

We have had a Safeguarding Adults Board in Gloucestershire since 2009, which became a statutory requirement following implementation of the Care Act 2014. The main objective of the Board is to protect all adults in Gloucestershire who have

needs for care and support and who are experiencing, or at risk of, abuse or neglect against which they are unable to protect themselves because of their needs.

The GSAB aims to fulfil its purpose by:

- Co-ordinating the work of its member agencies to determine shared policy,
- Facilitate joint training,
- Raise public awareness and
- Monitor and review the quality of services relating to safeguarding adults in Gloucestershire ensuring that all agencies work together to minimise the risk of abuse to adults at risk of harm and to protect and empower those people effectively when abuse has occurred or may have occurred.

The GSAB supports the rights of all adults to equality of opportunity, to retain their independence, wellbeing and choice and to be able to live their lives free from abuse, neglect and discrimination. It values diversity and will seek to promote equal access and equal opportunities irrespective of race, culture, sex, sexual orientation, disability, age, religion or belief, marriage/civil partnership and pregnancy /maternity.

## **The Care Act 2014**

The Care Act 2014 provides the legal framework for adult safeguarding, setting out the responsibilities of local authorities and their partners. It places a duty on Local Authorities to establish Safeguarding Adults Boards and also stipulates local authorities' responsibilities and those with whom they work, to protect adults at risk of abuse or neglect.

The role of a Safeguarding Adults Board is detailed in Schedule 1 of the Care Act 2014, which states the objective of Safeguarding Adults Boards as being to help and protect adults in its area by co-ordinating and ensuring the effectiveness of what each of its members does and each Board may do anything which appears to it, to be necessary or desirable for the purpose of achieving its objective.

The Act details the Boards three primary functions:

1. It must publish a strategic plan for each financial year that sets how it will meet its main objective, and what the members will do to achieve these objectives. The plan must be developed with local community involvement and the SAB must consult the Local Healthwatch organisation.
2. It must publish an annual report detailing what the SAB has done during the year to achieve its main objective and implement its strategic plan and what each member has done to implement the strategy, as well as detailing the findings of any Safeguarding Adults Reviews or any on-going reviews.
3. It must conduct Safeguarding Adults Review when necessary.

## What is Safeguarding?

The Care Act Statutory Guidance describes adult safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time, making sure that the adult’s wellbeing is promoted including where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances”.

**Categories of Abuse** Section 14.17 of The Care Act Statutory Guidance describes the various categories of abuse:

**Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

**Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; so called ‘honour’ based violence.

**Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

**Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

**Financial or material abuse** - including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Modern slavery** - encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Discriminatory abuse** - including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

**Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home for example, or in relation to care provided in one’s 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.

**Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating

**Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

### **Principles underpinning Safeguarding**

As in our last strategic plan 2015-2018, we will again recognise the 6 key principles which were first set out by the Government in May 2011 and reissued in 2013, which apply in equal measures and underpin good safeguarding:

**Empowerment:** Presumption of person led decisions and informed consent

**Prevention:** It is better to take action before harm occurs

**Proportionality:** The least intrusive response appropriate to the risk presented

**Protection:** Support and representation for those in greatest need

**Partnership:** Local Solutions through services working with communities

**Accountability:** Accountability and transparency in delivering safeguarding

## **Our Strategy**

This strategy is intended to help focus the work of the GSAB during the next 3 years, but is not embedded in stone but will be shaped by issues and themes which occur during the period of the plan, which become emerging threats.

A number of the priorities found in this strategy were initially commenced in our previous strategic document and remain a priority for the Board.

This strategy aims to place greater focus on a small number of themes which are there to:-

- **Improve the effectiveness of the Board,**
- **Improve safeguarding practice,**
- **Focus on preventative strategies,**
- **Focus on Making Safeguarding Personal**

As well as our four focused themes, there are a number of objectives which are 'business as usual' that will continue across our three year strategy:

- Seek to ensure that the learning from Safeguarding Adult Reviews, Domestic Homicide Reviews, Serious Case Reviews and other learning events is shared and put into practice
- Continue to review and develop our Board policies, guidance, procedures and practice to reflect new legislation and Care Act guidance
- Continue to develop our website as a source of relevant information for the general public, professionals and Board members
- Continue to develop and implement an audit process which is effective and which supports the achievement of the objectives within this strategy
- Continue to review national published Safeguarding Adult Reviews to identify lessons learned and implications for practice
- Continue to work together to raise knowledge and understanding among professionals and the community of the Mental Capacity Act 2005 and Deprivation of Liberty Safeguards
- Continue to work with and develop a good working relationship with other key partnerships in Gloucestershire, including the Districts, Gloucestershire Safeguarding Children's Board (GSCB), Health and Wellbeing Board (HWBB), Safer Gloucestershire, Gloucestershire Anti Slavery Partnership Board (GASPB), Prevent Board, Mental Health Partnership Board (MHPB), Domestic Abuse and Sexual Violence (DASV) and the Learning Disability Partnership Board (LDPB).

It is timely now that we review our joint duties and responsibilities as a Board and look to evidence and improve our effectiveness. We will therefore, look to undertake

a review of the Board during 2018, in order to ensure we are fit for purpose going forward.

We must also continually strive to improve safeguarding practice through our policies and procedure, workforce development and learning from reviews, both locally and nationally.

What has emerged during our last strategic plan is the importance of, not only our response to abuse and neglect, but also the importance of focusing on preventative strategies, in order to reduce the necessity of safeguarding in the future. This will involve listening to and identifying individuals and communities within the County, who are vulnerable owing to any number of reasons, and raising greater awareness of safeguarding, in order to keep them safe from harm and make our communities more resilient.

We have to embed the ethos of making safeguarding personal cross the partnership, which focuses on the desired outcomes of people with care and support needs, who may have been abused or neglected, and who are subject of safeguarding enquiries. We must also get better at capturing the voices of the service users in order to develop and improve practice.

Through our quality assurance and performance dashboard which is developing and evolving we will seek to gain a greater understanding of our communities and their needs and also identify and respond to emerging threats.

## Outcome 1 – Improve GSAB Effectiveness

### **Key Objective**

**To ensure that the GSAB is fit for purpose, in that it has the right membership, has the right support and is resourced and run in an efficient and effective manner, so that it can fulfil all of its statutory functions to a high standard. The outcome of its work must meet the requirements of the Care Act 2014, and the Board must lead on and make a positive contribution to adult safeguarding in Gloucestershire.**

### **Actions Required**

<b>Objective</b>		<b>Action</b>	<b>By Who</b>	<b>When</b>
<b>Improve GSAB Effectiveness</b>	1.1	<b>Review structure, governance and membership of Gloucestershire Safeguarding Adults Board and its sub groups in order to ensure maximum efficiency and effectiveness</b>	GSAB Business Manager	Y1 (Complete)
	1.2	<p>Develop an approach for engaging with service users, their carers or advocates and the wider community on the work of the Board and on its future priorities</p> <p>The GSAB Co-Production and Service User Engagement Group is chaired by Vicci Livingstone-Thompson from Inclusion Gloucestershire.</p> <p>The GSAB Co-Production and Service User Engagement Group had a timetable of themed talks on specific safeguarding topics; this ran from September 2018 to September 2019. In future the Learning Disability Partnership Board will have adult safeguarding as a standing item on its agenda. Expanding this to other Partnership Boards is also being considered.</p> <p>Vicci Livingstone-Thompson has produced a report outlining the activity of the Co-Production Group for 2018/19.</p> <p>A film, 'Was Not Brought' has been produced by the CCG and Inclusion Gloucestershire to highlight the issue of not being taken to health appointments. This was shown to the GSAB Comms and Engagement sub group in June 2019 and sent out as a GSAB Alert. It will also be shown at the 2020 GSAB Roadshows.</p> <p>The VCS Alliance has taken over chairing the GSAB Comms and Engagement sub group. The group</p>	Comms and Engagement Sub Group	Y2, Y3

	<p>includes approximately ten VCS organisations. It regularly sends out communication messages via its members and through GSAB Alerts.</p> <p>The theme of the 2020 GSAB Roadshows is 'Back to Basics' and is aimed at the VCS. VCS Alliance members have been contacted to seek their views on safeguarding and the subjects they would like covered at the roadshows.</p>		
<b>1.3</b>	<p>Work with the South West network on embedding the learning from the Thematic Review of Safeguarding Adult Reviews</p> <p>The Head of Safeguarding Adults attends the South West Regional Quarterly Meetings. The recommendations from the thematic review have been transferred onto the South West Safeguarding Network's Workplan for 2018/19.</p> <p>The priorities are:</p> <ul style="list-style-type: none"> <li>• Implementation of the SAR Quality Markers in the South West</li> <li>• Continuing to develop ways of disseminating learning from SARs</li> <li>• Formal review of SAR work plan progress</li> <li>• Guidance on risk assessment, self neglect, with MCA 2005 compliant practice integral to all templates</li> <li>• Develop best practice guidance to clarify the statutory guidance on the Care Act 2014; including People in a position of trust; approaches to organisational abuse</li> </ul> <p>Timescales have been allocated to each priority to monitor progress.</p> <p>South West Chairs are taking forward the SAR Quality Markers work and once finalised will disseminate them nationally.</p> <p>The South West Chairs Conference on SARs will be held in 2020.</p> <p>Best practice risk guidance is currently being considered.</p>	SAR Sub Group	Y1, Y2, Y3
<b>1.4</b>	<p>Deliver our Workforce development strategy which reflects the requirements of the Board and Care Act 2014</p> <p>The Workforce Development sub group holds quarterly meetings to progress this.</p>	Workforce Development Sub Group	Y1, Y2, Y3

		<p>The Board is updated via GSAB Update Reports from the Workforce Development sub group, which are sent out to members in advance of Board meetings</p> <p>A Workforce Development Plan is produced at the start of each year, focusing on the priorities for the coming year. This is then reviewed at each sub group meeting.</p> <p>Progress for 2019/20 includes:</p> <p>Safeguarding Induction e-learning has been produced and rolled out</p> <p>Level 2 Safeguarding Training has been reviewed and updated</p> <p>MCA Training has been reviewed and updated</p> <p>Level 3 Safeguarding Simulation Training (by GHCHSFT) has been delivered and is being evaluated</p>	
1.5		<p>Develop our quarterly partnership quality assurance and performance dashboard so we gain a greater understanding of our communities to ensure it fulfils our expectations</p> <p>Performance Reports from other areas were scrutinised to benchmark against.</p> <p>Gloucestershire Constabulary, POhWER and CGL now provide data for the quarterly report.</p> <p>The GSAB Independent Chair is now attending CCG Strategic Health Group meetings.</p> <p>Discussion has taken place regarding health data and agreement has been reached on what information will be provided by the CCG.</p> <p>Safeguarding Adults Collection (SAC) comparison data will be produced and taken to the Board annually.</p>	<p>GSAB Business Board Planning Group</p> <p>Y1, Y2, Y3</p>
1.6		<p>In order to benchmark our continued development and ensure we are meeting our statutory requirements, engage with the peer review programme open to Safeguarding Adult Boards</p> <p>A GSAB peer review with other Safeguarding Adults Boards is planned for 2020/21.</p> <p>Safeguarding Adults Boards across the South West are considering a regional peer review.</p> <p>The Head of Safeguarding Adults is undertaking an LGA Safeguarding Adults Peer Challenge Case Audit</p>	<p>Independent Chair</p> <p>Y2, Y3</p>

		with Devon County Council.
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## **Outcome 2 – Improve Safeguarding Practice**

### **Key Objective**

**To assure that the Board and its partners deliver efficient and effective outcomes which are person centred, and that evolve to meet new challenges and take into account best practice and learning from across the safeguarding landscape.**

### **Actions Required**

<b>Objective</b>		<b>Action</b>	<b>By Who</b>	<b>When</b>
<b>Improve Safeguarding Practice</b>	<b>2.1</b>	<p>Seek to ensure that our workforce and organisations within the voluntary and community sector have the appropriate knowledge, skills and confidence to protect those most at risk in our community</p> <p>The safeguarding Train the Trainer model provides trainers for the voluntary and community sector. An annual Train the Trainer CPD event is held each autumn.</p> <p>Induction training covering both children's and adults safeguarding is now available via LearnPro.</p> <p>Gloucestershire VCS Alliance, Healthwatch and POhWER sit on the Board.</p> <p>The GSAB Comms and Engagement Group regularly have speakers at their quarterly meetings, this increases attendees knowledge and confidence in the area of adult safeguarding.</p> <p>Since January 2019 a new GSAB quarterly Newsletter is being produced and sent out to approximately 2,500 people.</p> <p>The first edition of the GSAB Newsletter (Jan 2019) provided step by step information on how to report a safeguarding concern.</p>	Comms and Engagement & Workforce Development Sub Groups	Y1, Y2, Y3

		<p>The GSAB Comms and Engagement Group have this objective as a standing item on their agenda.</p> <p>The GSAB Workforce Development sub group have this objective as a priority for 2019/20.</p> <p>The VCS Alliance is chairing the GSAB Comms and Engagement sub group.</p> <p>The theme of the 2020 GSAB Roadshows is 'Back to Basics' and is aimed at the VCS. VCS Alliance members have been contacted to seek their views on safeguarding and the subjects they would like covered at the roadshows.</p>		
<b>2.2</b>		<p>Raise awareness among professionals and the community of the continuous and developing threat from neglect and self-neglect, and the developing threat of financial abuse, especially among the elderly</p>	Comms and Engagement & Workforce Development Sub Groups	Y1, Y2, Y3
		<p>Level 2 safeguarding training includes information on neglect, self neglect and financial abuse.</p> <p>Eight Safeguarding Adults Reviews have been conducted on the theme of self neglect. The reports are published on the GSAB website, which are accessible to both professionals and the public. The 2018 GSAB Roadshows covered the topic of self neglect.</p> <p>The GSAB Comms and Engagement sub group disseminates learning and information through its members, to both professionals and the community. Trading Standards sit on this group.</p> <p>Age UK provides the out of hospital service used for taking patients home when they are discharged from hospital; they are able to see the conditions that patients are returning home too.</p> <p>Trading Standards presented at the GSAB Comms and Engagement Group in March 2019 on the theme of scams and financial abuse. Following this, information from the presentation was sent out as a GSAB Alert.</p> <p>The annual CPD event was held for Gloucestershire's foundation train the trainers on 23<sup>rd</sup> October 2019.</p> <p>Trading Standards will have a stall at the 2020 GSAB Roadshows.</p>		
<b>2.3</b>		<p>Raise awareness and understanding among professionals and the community of the risk posed by social isolation and frailty, including rural communities</p>	Comms and Engagement & Workforce	Y1, Y2, Y3

			Development Sub Groups	
		The Safeguarding Train the Trainer CPD Event in October 2018 covered the topic of frailty.  The Complex Care Team presented at the November 2019 Board meeting.  This is also a priority for the Health and Wellbeing Board and Safer Gloucestershire.  The February 2020 Board includes a presentation on Social Isolation.		
2.4	Undertake annual safeguarding roadshows to raise awareness among relevant professionals of current challenges and safeguarding issues	Workforce Development Sub Group	Y1, Y2, Y3	
	The first GSAB Roadshow took place in 2017, holding four sessions in two locations. These were a success and they are now an annual event. The Roadshows were expanded to six locations in 2018 and the same in 2019. The topic of the 2019 Roadshow was Domestic Abuse.  The 2020 GSAB Roadshows are currently being planned, with a theme of 'Back to Basics', this is aimed at the VCS, although places are still available for statutory partners.			
2.5	Raise knowledge and awareness of the issue of domestic abuse with both professionals and the public, as an issue for people with care and support needs  Level 2 safeguarding training includes information on domestic abuse.  The Head of Safeguarding Adults sits on the Domestic Abuse and Sexual Violence (DASV) Group.  Information, including 16 Days of Action, is regularly sent out via GSAB Alerts.  The theme of the 2019 Roadshows was Domestic Abuse; these were attended by around 300 professionals.  The second edition of the GSAB Newsletter contained domestic abuse information and statistics.  Information received from the DASV Co-ordinator is sent out via GSAB Alert.	Comms and Engagement & Workforce Development Sub Group	Y1, Y2, Y3	

### Outcome 3 – Focus on Preventative Practice

#### **Key Objective**

**The Board recognises the importance of preventative practices in order to protect individuals from being abused and/or neglected and also early intervention which minimises and mitigates harm. In doing so we should embrace a person centred approach, which takes into account the needs and wishes of persons who are subject of safeguarding.**

#### **Actions Required**

<b>Objective</b>		<b>Action</b>	<b>By Who</b>	<b>When</b>
<b>Focus on Preventative Practice</b>	3.1	<p>Develop a person centred policy for the management of individuals who are considered high risk to themselves or others</p> <p>A new High Risk Policy has been produced and is live on the GSAB website. It is for use when all other options have been unsuccessfully tried by the professionals involved.</p> <p>‘Finding Creative Solutions for Complex Needs’ was the theme of the GSAB CPD event held in July 2019.</p> <p>The GSAB Independent Chair and Head of Safeguarding Adults have created stronger links with the Sex Workers Outreach Project (SWOP), Blue Light Project and the Homeless Healthcare Team.</p> <p>Two new Safeguarding Adult Reviews will take place in 2020; one a Sex Workers Outreach Project (SWOP) Thematic Review and the other (PH) in relation to a homeless man who died in Cheltenham. These are expected to provide new and valuable learning.</p>	Policy & procedure Sub Group	Y1, Y2, Y3
	3.2	<p>Support and empower staff to recognise and take appropriate action in relation to victims of the current and developing threat posed by Modern Slavery and Dangerous Drugs Networks (County Lines)</p> <p>The GSAB Independent Chair sits on the Anti-Slavery Partnership Board. A member of the Anti-Slavery Partnership Board provided an update to the Board at the February 2019 meeting.</p> <p>Level 2 safeguarding training includes information on modern slavery.</p>	Comms & Engagement & Workforce Development Sub Group	Y1, Y2, Y3

		<p>An update on County Lines (Dangerous Drugs Network) was provided to the November 2019 Board.</p> <p>The Workforce Development sub group will focus on training and prevention in relation to Modern Slavery and the Dangerous Drugs Network in 2020/21.</p> <p>District Councils are raising awareness of the Dangerous Drugs Network amongst their staff.</p> <p>Free Modern Slavery e-learning has been rolled out.</p>		
3.3		<p>Raise understanding among professionals of the risks associated with the placing of adults with care and support needs into the County of Gloucestershire (Out of County)</p> <p>ADASS and the LGA have produced an Advice Note for Directors of Adult Social Services regarding the Commissioning of Out of Area Care and Support Services.</p> <p>The recommendations from the LM SAR Review cover out of county placements. The Board will work with the South West and National SAB Chairs Networks to lobby government regarding out of county placements. The LM recommendations have been published and disseminated to professionals.</p> <p>The Transforming Care agenda is seeking to move service users back into their community, close to family and friends.</p> <p>The Commissioning Disabilities Hub is investigating the 'Impact of into county placements on commissioned health services'.</p>	Head of Safeguarding Adults, GCC	Y1, Y2, Y3
3.4		Work with Commissioners to gain a greater understanding of and the decision making process and risk management in relation to the placing of adults with care and support needs, outside of Gloucestershire	Head of Safeguarding Adults, GCC	Y1, Y2 (Complete)
3.5		<p>Work with partners to ensure adults with care and support needs have access to a range of advocacy services to support them and ensure their voice is heard</p> <p>Advocacy was a topic at the 2018 GSAB Roadshow; POhWER (GCC contracted advocacy service) also had a stall at each of the 2019 GSAB Roadshows.</p> <p>The first edition of the GSAB Newsletter (Jan 2019) included an article on POhWER and the advocacy services they provide.</p>	Comms & Engagement Sub Group	Y1, Y2, Y3

		<p>A member of POhWER sits on the GSAB Comms and Engagement Group.</p> <p>POhWER presented advocacy information to the GSAB Comms and Engagement Group in March 2019. Following this, information from the presentation was sent out as a GSAB Alert.</p> <p>Advocacy is one of the topics at the 2020 GSAB Roadshow and POhWER are presenting an item and have a stall at each of the events.</p>		
<b>3.6</b>		<p>Work with partners within Gloucestershire to ensure that the needs of carers, for help and support, is being met</p>	Comms & Engagement Sub Group	Y1, Y2, Y3
		<p>GSAB had an information stand at the Carers Rights Day event on 23<sup>rd</sup> November 2018 run by Carers Gloucestershire.</p> <p>Carers Gloucestershire provided feedback on the new draft GSAB Strategic Plan consultation.</p> <p>A member of Carers Gloucestershire sits on the GSAB Co-Production and Service User Engagement Group.</p> <p>The second edition of the GSAB Newsletter contained information on the Gloucestershire Carers' Hub, the new carers service.</p> <p>People Plus, the new carers service provider presented at the September 2019 Board meeting.</p>		
<b>3.7</b>		<p>Work with other Boards and partnerships within Gloucestershire in order to ensure that our preventative approach is in line and that we are all working together to protect the people most at risk in our communities</p>	Independent Chair	Y1, Y2, Y3
		<p>The GSAB Independent Chair sits on a wide range of boards including the Health and Wellbeing Board, Anti-Slavery Partnership Board, Mental Health Partnership Board and the Learning Disabilities Partnership Board.</p> <p>Sarah Jasper, Head of Safeguarding Adults, is a member of Safer Gloucestershire, which acts as an umbrella for all other boards in the county.</p>		
<b>3.8</b>		<p>Work with the GSCB in respect of those individuals who are transitioning from children to adult services to ensure that those with care and support needs undergo a seamless transition</p>	Policy and Procedure Sub Group	Y1, Y2, Y3
		<p>The joint GSAB/GSCB Transition Policy is being updated in partnership with the Children's Executive.</p>		

		<p>Links have been made with the GHC initiative 'Ready, Steady, Go'.</p> <p>A joint GSAB/GSCB Transition Event was held on 27<sup>th</sup> March 2019; further work is being undertaken as a result.</p> <p>A Thematic Review is being undertaken, beginning in March 2020, one of the themes of the review will be transitions.</p>	
<b>3.9</b>	<p>Work with relevant partners across Gloucestershire in order to raise awareness of the impact of Adverse Childhood Experiences (ACEs) on young people and the implications on adult services</p> <p>The Head of Safeguarding Adults attended the 'More than ACEs' Gloucestershire Conference on 8<sup>th</sup> November 2018.</p> <p>Paul Stephenson, from Cheltenham Borough Homes, provided an update on ACEs to the Board on 28<sup>th</sup> November 2018.</p> <p>Paul Stephenson, from Cheltenham Borough Homes, presented the findings of his housing audit at the GSAB CPD event on 10<sup>th</sup> July 2019.</p> <p>A Thematic Review is being undertaken, beginning in March 2020, one of the themes of the review will be ACEs.</p>	GSAB Board Members	Y1, Y2, Y3
<b>3.10</b>	<p>Work with and support the Mental Health Partnership Board on its Crisis Concordat to seek assurance that it delivers and meets its requirements</p> <p>Jan Marriott provided an update on the Mental Health Partnership Board to the GSAB on 21<sup>st</sup> February 2019.</p> <p>The Mental Health Partnership Board (MHPB) meets quarterly. The MH Crisis Concordat and corresponding Action Plan is a standing agenda item and an update is provided on progress at each meeting. The Crisis Care Declaration has recently been updated along with the Action Plan. The Independent Chair of the GSAB attends the MHPB meetings and periodically the chair of the MHPB will be invited to the GSAB to provide a fuller update on progress.</p>	GSAB Board Members	Y1, Y2, Y3

#### Outcome 4 – Embed the Ethos of Making Safeguarding Personal

## Key Objective

**To ensure that the ethos of Making Safeguarding Personal is totally embedded within the practice of all Board member organisations.**

## Actions Required

Objective		Action	By Who	When
<b>Embed the Ethos of Making Safeguarding Personal</b>	<b>4.1</b>	Individual Board members to take an active role in developing the Making Safeguarding Personal Agenda within their own organisation by considering how the principles and culture of Making Safeguarding Personal can be developed and embedded	GSAB Business Planning Group	Y1, Y2, Y3
		<p>The GSAB Self Assessment Audit was conducted at the beginning of 2018 with statutory partner agencies; it included two questions on MSP. Those partners with amber scores were asked to provide an update on their progress.</p> <p>MSP benchmarking has been undertaken by the police, advocacy and housing and a one page summary of the results has been produced.</p> <p>A revised GSAB Self Assessment Audit is currently being undertaken (Jan 2020) and the findings will be reported at a future Board meeting.</p>		
	<b>4.2</b>	The Board to establish a clear picture of how well MSP principles are embedded in partner organisations by undertaking an audit in spring 2019.	GSAB Board Members	Y1, Y2, Y3
<p>The GSAB Self Assessment Audit was conducted at the beginning of 2018 with statutory partner agencies; it included two questions on MSP. Those partners with amber scores were asked to provide an update on their progress.</p> <p>MSP benchmarking has been undertaken by the police, advocacy and housing and a one page summary of the results has been produced.</p> <p>A revised GSAB Self Assessment Audit is currently being undertaken (Jan 2020) and the findings will be reported at a future Board meeting.</p>				
<b>4.3</b>	Seek evidence to provide assurance that staff across all partnership organisations are empowered and supported to take a Making Safeguarding	GSAB Board Members/Audit	Y2, Y3	

		Personal approach	Sub Group	
		<p>The GSAB Self Assessment Audit was conducted at the beginning of 2018 with statutory partner agencies; it included two questions on MSP. Those partners with amber scores were asked to provide an update on their progress.</p> <p>MSP benchmarking has been undertaken by the police, advocacy and housing and a one page summary of the results has been produced.</p> <p>Level 2 safeguarding training includes information on MSP.</p> <p>A revised GSAB Self Assessment Audit is currently being undertaken (Jan 2020) and the findings will be reported at a future Board meeting.</p>		
	4.4	<p>Seek evidence to provide assurance that the views and wishes of service users are at the heart of the safeguarding process and the outcomes achieved are built into the Board's quality assurance and performance dashboard</p> <p>The Safeguarding Adults team are currently looking at other local authorities to see if changes are needed to the model and process in Gloucestershire.</p> <p>The team has undergone a review by the GCC Performance and Improvement Team and the findings will be used to review the processes and structure of the team.</p> <p>Service user data is included in the GSAB Quarterly Report.</p> <p>When undertaking either single agency or multi-agency audits, MSP outcomes are always checked.</p>	Head of Safeguarding Adults, GCC	Y1, Y2, Y3
	4.5	<p>Seek evidence to provide assurance from practitioners by collecting their experience of the safeguarding process and using it to inform the safeguarding process</p> <p>The SAFE1 has been updated, following feedback from practitioners; this will make it more user friendly and easier to complete.</p>	GSAB Audit Sub Group	Y2, Y3
	4.6	<p>Workforce development to consider evolving approaches to Making Safeguarding Personal in order to support and empower staff across the partnership</p> <p>Being taken forward by the GSAB Workforce Development sub group.</p>	Workforce Development Sub Group	Y2, Y3

		Level 2 safeguarding training includes information on MSP.			
	<b>4.7</b>	Workforce development to include a focus on working with risk, working with the principles of both the Mental Capacity Act and of safeguarding adults	Workforce Development Sub Group	Y2, Y3	
		<p>Being taken forward by the GSAB Workforce Development sub group</p> <p>A new High Risk Policy has been produced and is live on the GSAB website. It is for use when all other options have been unsuccessfully tried by the professionals involved.</p> <p>A Thematic Review is being undertaken, beginning in March 2020, and the learning will be taken forward by the GSAB Workforce Development sub group.</p>			
	<b>4.8</b>	Seek evidence, to provide assurance, that partners ask individuals about their desired outcomes, in line with Making Safeguarding Personal principles	GSAB Audit Group	Y1, Y2, Y3	
		Being taken forward by the GSAB Audit sub group			

Safeguarding Adults Boards have a unique set of risks to monitor and manage which would likely include, but go well beyond, gaining assurance that partner agencies are managing their own risk in relation to Safeguarding Adults.

RISK	IMPACT/CONSEQUENCE				
LIKELIHOOD	1	2	3	4	5
	Insignificant	Minor	Moderate	Major	Critical
Almost certain (5)	5	10	15	20	25
Highly likely (4)	4	8	12	16	20
Probable (3)	3	6	9	12	15
Possible (2)	2	4	6	8	10
Rare (1)	1	2	3	4	5

Brief Overview (LxC)	
Risk 1.1	Links with other partnerships such as Safer Gloucestershire, Health and Wellbeing Board, Learning Disability Partnership Board, Mental Health Partnership Board, Overview and Scrutiny Committee and Community Safety Partnerships are not effectively identified and managed. <b>Rating 3 x 2 = 6</b>
Risk 1.2	Agencies prioritise safeguarding children and young people at the expense of adults with care and support needs (strategically and operationally) <b>Rating 3 x 2 = 6</b>
Risk 2.1	There is a failure to disseminate learning from Safeguarding Adults Reviews (SARs) or national and or local enquiries, and measure its impact <b>Rating 2 x 3 = 6</b>
Risk 2.2	Individual and collective information sharing protocols are understood and applied <b>Rating 2 x 5 = 10</b>
Risk 2.3	The profile of safeguarding adults at risk is poor with the general public, people who use services, carers and professionals and practitioners <b>Rating 2 x 4 = 8</b>
Risk 2.4	Reliance of some agencies/partners upon e-learning as the sole method of training for front line staff <b>Rating 3 x 2 = 6</b>
Risk 3.1	Partnership and partner agencies internal safeguarding arrangements and management of risk are not robust <b>Rating 2 x 3 = 6</b>
Risk 3.2	There are currently concerns about the accuracy of the data being provided on safeguarding activity <b>Rating 2 x 3 = 6</b>
Risk 4.1	Evidencing how partners meet statutory guidance (Care Act 2014 and Making Safeguarding Personal) in relation to facilitating person-centred outcomes <b>Rating 3 x 3 = 9</b>
Risk 4.2	Wider partnership information and data is not available to the Board to provide assurance that appropriate steps are taken to protect and safeguard adults at risk e.g. training and recruitment <b>Rating 2 x 4 = 8</b>
Risk 5.1	Failure to meet statutory requirements in relation to compliance with the MCA and ensure the principles of the MCA are embedded in practice <b>Rating 3 x 4 = 12</b>
Risk 5.2	Failure to meet statutory requirements in relation to compliance with Deprivation of Liberty Safeguards (DoLS) & Supreme Court Judgement March 2014 <b>Rating 3 x 4 = 12</b>
Risk 5.3	Failure to implement Liberty Protection Safeguards (LPS) and embed it across agencies <b>Rating 3 x 4 = 12</b>

## 1. STRATEGIC LEADERSHIP

SAB Priority	The Risk	Consequence/impact	Current RAG LxC	Mitigating actions	Risk owner	Timeframe	Target RAG
1.1	The links with other partnerships such as the Health and Wellbeing Board, Adult Social Care and Communities Scrutiny Committee and Safer Gloucestershire are not effectively identified and managed	With so many boards there is a risk that things will be missed, leaving individuals at risk of harm or neglect.  Duplication, different requirements or messages increase the burden on partners.	<b>3 x 2 = 6</b> Green	A joint protocol has been produced by Safer Gloucestershire detailing how boards will work together  SJ provided an update to the Health and Care Scrutiny Committee on 13/11/18  Presentations at Board meetings from other local boards, including the Health and Wellbeing Board, Safer Gloucestershire, the Mental Health Partnership Board and the Learning Disabilities Partnership Board  SJ has become a member of Safer Gloucestershire	GSAB Independent Chair		<b>1 x 2 = 2</b> Green
1.2	Agencies prioritise safeguarding children and young people at the expense of adults with care and support needs (strategically and operationally)	Significant harm to adults at risk.  Risks are not identified, monitored or mitigated and therefore adults are put at risk of harm and mistreatment due to this inaction.  Reputational damage to the Board and the County of Gloucestershire.	<b>3 x 2 = 6</b> Green	Close monitoring  Partners to raise concerns  Changes have been made to the format of Board meetings to increase the board's assurance role and to allow greater scrutiny.	GSAB Partner Agencies		<b>1 x 4 = 4</b> Green

## 2. REPUTATION

SAB Priority	The Risk	Consequence/impact	Current RAG LxC	Mitigating actions	Risk owner	Timeframe	Target score
2.1	There is a failure to disseminate learning from Safeguarding Adults Reviews (SARs) or national and or local enquiries, and measure its impact.	<p>Learning is not implemented and will therefore not inform practice, adults at risk will not be protected from harm or abuse.</p> <p>Reputational damage to the Board and the County of Gloucestershire for failing to meet the needs of adults at risk and their families as identified through SARs.</p>	<b>2 x 3 = 6</b> Green	<p>Learning events are held for individual SARs to share learning.</p> <p>All SAR Reports are published on the GSAB website.</p> <p>Learning from SARs is shared with the Safeguarding Lead from statutory partners; this is then disseminated throughout their organisation as appropriate.</p> <p>A GSAB Alert is sent out when a SAR Report is published.</p> <p>GSAB has worked with the University of Sussex on a dissemination of learning from SARs project. Focus groups were held to gain the views of partner agencies. The report has been received and the findings will inform next steps.</p>	GSAB SAR Sub Group, GSAB Workforce Development Sub Group, GSAB Comms & Engagement Sub Group		<b>1 x 4 = 4</b> Green
2.2	Individual and collective information sharing protocols are not understood and applied	<p>Information is not shared appropriately and individuals are not protected or are placed in danger. (<i>There is evidence to suggest through SARs and Safeguarding Information</i></p>	<b>2 x 5 = 10</b> Amber	<p>GSAB can request as necessary, information that a wide number of partners may hold (Care Act 2014 – Section 45)</p> <p>Information sharing is covered in the Safeguarding Adults training.</p> <p>Information Sharing Guidance has been produced in line with GDPR and is regularly</p>	GSAB Partner Agencies		<b>1 x 4 = 4</b> Green

		<p><i>Sharing Meetings that information is not being shared between agencies)</i></p> <p>Agencies are not able to undertake their work effectively or safely.</p> <p>Reputational damage to the Board and the County of Gloucestershire.</p>		<p>reviewed and updated.</p> <p>GSAB Escalation Protocol has been produced and is regularly reviewed.</p> <p>A joint piece of work is taking place with Safer Gloucestershire, the Childrens Partnership and GSAB to produce a 'Multi Agency Principles of Information Sharing' document.</p>			
2.3	The profile of safeguarding adults at risk is poor with the general public, people who use services, carers and professionals and practitioners. The strategic profile of safeguarding is not a priority with some organisations.	<p>People do not know what adult abuse is.</p> <p>People do not know how to report abuse.</p> <p>People do not know how to prevent abuse.</p> <p>People do not know what to expect once abuse has been identified and reported.</p> <p>People do not know their rights.</p> <p>Significant harm to adults at risk due to lack of awareness and knowledge.</p> <p>Reputational damage to the Board and the</p>	<b>2 x 4 = 8 Amber</b>	<p>Council Members are aware of their roles and responsibilities in relation to Safeguarding Adults.</p> <p>Partner agencies provide an appropriate level of training for those staff who have substantial and unsupervised contact with adults at risk.</p> <p>Greater consultation, communication and engagement with the public and people who use services.</p> <p>Evidence through data collection and MSP</p> <p>First Communication &amp; Engagement sub group held on 26<sup>th</sup> September 2017 with 17 partner agencies attending. Meetings are held quarterly.</p> <p>A Co-Production and Service User Engagement group has been established with its first meeting in April 2018.</p> <p>A programme of themed Co-Production and</p>	GSAB Partner Agencies		<b>1 x 2 = 2 Green</b>

		County of Gloucestershire.		<p>Service User Engagement meetings took place during 2018/9, with guest speakers, to increase attendance.</p> <p>Updated Safeguarding Guidance Notes and Procedures for Elected Members have been produced and circulated to all members.</p> <p>The GSAB quarterly newsletter has been re-launched and is sent to around 2,500 people.</p> <p>Annual GSAB Roadshows are held to increase awareness of safeguarding and to highlight topical themes.</p>			
2.4	Agencies/Partners reliance upon e-learning as the sole method of training for front line staff	Failure to recognise and act upon signs of abuse and neglect	<b>3 x 2 = 6 Green</b>	<p>CCG hold regular GP Safeguarding Forums (started Dec 2016)</p> <p>A new NHS intercollegiate document, requiring 50% face to face training, is being considered by each agency; it is open to interpretation.</p> <p>Due to COVID-19, e-learning and virtual training has been reviewed and is being well received by participants.</p>	GSAB Partner Agencies		<b>1 x 3 = 3 Green</b>

### 3. INFORMATION GOVERNANCE

SAB Priority	The Risk	Consequence/impact	Current RAG LxC	Mitigating actions	Risk owner	Timeframe	Target score
3.1	Partnership and partner agencies internal safeguarding arrangements and management of risk are not robust	<p>Risk are not identified, monitored or mitigated and therefore adults are put at risk of harm and mistreatment due to this inaction.</p> <p>Reputational damage to the Board and the County of Gloucestershire.</p>	2 x 3 = 6 Green	<p>Partner agencies implement a 'Duty of Candour' by proactively bringing high risks to the attention of the Board at the earliest opportunity.</p> <p>Partner agencies have an adequate risk management process.</p> <p>GSAB members complete a Self Assessment Audit every two years.</p> <p>GSAB CPD Events are held annually.</p> <p>A Quality Assurance Framework has been produced.</p> <p>The focus of the Strategic Plan (2018-21) is prevention and the wider risk.</p> <p>The 2018 Self Assessment Audit was completed and buddy sessions held to provide scrutiny and challenge. Scores were amended as a result of this process.</p> <p>Statutory partners shared details of their governance arrangements at the September 2018 board meeting.</p> <p>A new template for the 2021/22 GSAB</p>	GSAB Partner Agencies		1 x 3 = 3 Green

				<p>Self Assessment Audit is currently being considered, for both statutory and VCS partners. The audit will begin at the end of 2021 and the findings will be shared with the Board.</p> <p>The new structure of Board meetings is to provide scrutiny and assurance.</p>			
3.2	There are currently concerns about the accuracy of the data being provided on safeguarding activity.	Data cannot be relied upon to provide assurance to the Board that appropriate steps are being taken to safeguard adults with care and support needs.	<b>2 x 3 = 6</b> Green	<p>Meeting were held with Data &amp; Performance Team Manager to address concerns.</p> <p>SAFE1 data recording issues being progressed with ICT.</p> <p>At a meeting on 11/09/2017 concerns had been addressed and progress with reporting made.</p> <p>The quality of data has improved following support from additional Data and Performance staff.</p> <p>Liquid Logic has been announced as the replacement for ERIC, it is used by 60 other Local Authorities.</p>	GCC		<b>1 x 2 = 2</b> Green

#### 4. OPERATIONAL DELIVERY

SAB Priority	The Risk	Consequence/impact	Current RAG LxC	Mitigating actions	Risk owner	Timeframe	Target score
4.1	Evidencing how partners meet statutory guidance (Care Act 2014 and Making Safeguarding Personal) in relation to facilitating person-centred outcomes	<p>Safeguarding is 'done to people' rather than with people due to procedures and practices in Gloucestershire being not fit for purpose because they are not informed by people's experiences.</p> <p>Relationships with the community are impaired.</p> <p>Lack of community understanding to inform the work of the Board.</p>	<b>3 x 3 = 9</b> Amber	<p>Case File Audits regularly highlight good MSP by Adult Social Care locality teams.</p> <p>MSP data is now captured on the monthly performance data report and the GSAB Quarterly Report.</p> <p>The SAFE1 has been updated and MSP boxes are now mandatory</p> <p>The 2018 Self Assessment Audit included an MSP section.</p> <p>Partner agencies (police, housing and advocacy) have benchmarked themselves against the new ADASS/LGA MSP Guidance.</p> <p>A new template for the 2021/22 GSAB Self Assessment Audit is currently being considered, for both statutory and VCS partners.</p>	GSAB Partner Agencies		<b>1 x 4 = 4 Green</b>
4.2	Wider partnership information and data is not available to the Board to provide assurance that appropriate steps are taken to protect and safeguard adults at risk	Data is not available to provide assurance to the Board that appropriate steps are being taken to safeguard adults with care and support needs.	<b>2 x 4 = 8</b> Amber	Multi-agency data has been provided by Gloucestershire Constabulary, CGL and POhWER, which has been incorporated into the GSAB Quarterly Report. Health data is being sought.	GSAB Partner Agencies		<b>1 x 3 = 3 Green</b>

## 5. STATUTORY/REGULATORY/LEGAL

SAB Priority	The Risk	Consequence/impact	Current RAG LxC	Mitigating actions	Risk owner	Timeframe	Target score
5.1	Failure to meet statutory requirements in relation to compliance with the MCA and ensure the principles of the MCA are embedded in practice.	Errors in completing MCA assessments (legal/reputational challenge) Failure to protect Article 5 & 8 rights of individuals (legal/reputational challenge) Failure to ensure the right of choice for individuals as set out in the MCA (legal/reputational challenge) Delay in the adult at risk receiving an appropriate and timely service (Government intervention/challenge) Assessments not completed within expected timescales	3 x 4 = 12 Amber	The MCA Policy has been reviewed and updated and is on the GCC, GSAB and CCG website.  Fully funded MCA training is available and runs on a monthly basis, ad hoc team specific training can also be provided.  The Mental Capacity Act Governance Group (MCAGG) meets on a quarterly basis.  An audit of the MCA is being undertaken with the results due in 2020/21.	GCC		1 x 1 = 1 Green
5.2	Failure to meet statutory requirements in relation to compliance with Deprivation of Liberty Safeguards (DoLS) & Supreme Court Judgement March 2014	Delays in providing the adult with the protections of the safeguards, including the right of challenge and the right to advocacy	3 x 4 = 12 Amber	DoLS Supervisory Body oversight.  ADASS Guidance followed regarding the prioritisation and identification of 'technical' breaches as opposed to a 'substantive' breach. A risk based approach is used.  Law Commission consultation & recommendations, interim statement disseminated.  All applications and reviews are			

				prioritised in line with the ADASS screening tool.  DoLS Policy & Procedures has been reviewed and updated and a working draft is on the GSAB website.  Following a Law Commission update, a change to DoLS is unlikely before 2020.21. A robust system is in place to minimise the risk of substantive breaches.  The risk position for the local authority in relation to the backlog has been reviewed.		
5.3	Failure to implement Liberty Protection Safeguards (LPS) and embed it across agencies	Delays in providing the adult with the protections of the safeguards, including the right of challenge and the right to advocacy	3 x 4 = 12 Amber	An LPS Project Group has been established, with regular meetings scheduled.  LPS is a regular item on the GSAB agenda, with updates from the Head of Safeguarding Adults.  An LPS Multi-Agency Workforce Development Group has been established and will meet regularly.		

Department	Modern Slavery E-Learning	Safeguarding Leadership	Domestic Abuse Elearning	Introduction to Safeguarding Adults and Children Elearning			Deprivation of Liberty Safeguards Elearning	Mental Capacity Act Level 1 Elearning	Mental Capacity Act Level 2 - GSAB Trainers	Mental Capacity Act Level 3 - GCC Adult Social Care Practitioners	Mental Capacity Act Level 3 - Multi-Agency Managers	Safeguarding Adults Level 1 Elearning	Safeguarding Adults Level 2 - GSAB Trainers	Safeguarding Adults Level 3	Safeguarding Adults Level 4 -GCC & 2GNHSFT	Domestic Abuse - GCC & 2GNHSFT Staff only	Self-Neglect - GCC & 2GNHSFT Staff Only	Grand Total
2gether NHS Foundation Trust	3	1	1	2	1	324				1	2	438	221	6	1	1	1002	
Dental Practices			3	12	1	12				8			1				37	
Department for Work and Pensions						1											1	
District Councils	5	6	3	13		2				1		2					32	
Domiciliary & Community Based Care Providers (Independent)	146	45	100	195	236	372	44		28	366	96	68					1696	
Education, Learning & Training Providers	45	9	8	140	22	9			1	74		4					312	
Gloucester City Council	24	3	5	34	9	9				19							103	
Gloucestershire Care Services NHS Trust	5	1	1	2	2	2	144		3	1	400	9					570	
Gloucestershire Clinical Commissioning Group		4		3	1	1				1							11	
Gloucestershire Constabulary			1	2	4					3		5					15	
Gloucestershire County Council Employees	319	19	85	139	153	166	57	102	1	140	35	97	59	73	76		1521	
Gloucestershire Fire and Rescue Service	2				1	1	1										5	
Gloucestershire Health and Care NHS Foundation Trust		4		1	1		1	144		1	499	1	3				655	
Gloucestershire Hospitals NHS Trust					2						1	2310					2313	
GP Practices	4		1	6	1	2			3	4	23	29					73	
Housing Providers	25	3	10	24	9	6				14	129	2					222	
Learning Disabilities Providers (Independent)	103	40	34	90	126	135	246		15	126	301	51	1				1268	
Mental Health Providers (Independent)	8	1		74	2	1				6		1					93	
Neighbourhood services					1												1	
Older People Residential & Nursing Providers (Independent)	81	26	11	55	198	198	53		22	200	229	38					1111	
Other	14	11	28	78	24	27	47			61	43	4					337	
Probation and Prison Services	1		1	1	3	2				2		1					11	
Service Users/Patients											1	1					2	
Shared Lives & Foster Carers	2	1		1	2	2	38			18	27						91	
South West Ambulance Service Trust	5	1	5	3	2	3				1							20	
Unpaid Carers for family members / friends		2	3	6	16	14			1	9		2					59	
Voluntary Community Sector Organisations	37	19	13	163	15	85	15		201	181	16						745	
Grand Total	839	190	321	1048	824	1375	788	102	75	1260	4711	553	69	74	77		12306	