



## ADULT AT RISK PROTECTION POLICY

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## 1.0 POLICY

This policy deals with the protection of Adults at Risk previously known as 'Vulnerable Adults' (as defined in section 3.a below). Children are those under 18 years of age and a separate policy covers Child Protection.

Safeline is a specialised charity working to prevent sexual abuse and rape and support those who have been affected. Safeline acknowledges it has a responsibility for the safety of Adults at Risk. Safeline recognises that good Adults at Risk Protection policies are of benefit to everyone involved in Safeline's work.

Safeline holds as one of its highest priorities the health, safety and welfare of all adults at risk involved in courses or activities which come under the responsibility of Safeline.

Safeline has a duty to ensure that its staff/volunteers fulfill their responsibilities to prevent abuse of adults at risk and to report any abuse discovered or suspected. Safeline's Adults at Risk Protection policy applies to all staff, including senior managers and board of trustees, paid staff, volunteers and sessional workers, agency staff, students and anyone working on behalf of Safeline.

The purpose of this policy:

- to protect adults at risk who receive Safeline's services
- to provide staff, students and anyone working on behalf of Safeline with the overarching principles that guide our approach to Adults at Risk Protection.

Safeline believes that an adult at risk should never experience abuse of any kind. We have a responsibility to promote the welfare of all adults at risk and to keep them safe. We are committed to practice in a way that protects them.

Safeline will advise all relevant parties of the existence of Safeline's 'Adults at Risk Protection Policy.

- 1.a Safeline will work with appropriate local agencies to ensure that adults at risk are safeguarded through the effective operation of Safeline's safeguarding procedures.
- 1.b Safeline recognises that any adult at risk can be subject to abuse and all allegations of abuse will be taken seriously and treated in accordance with the organisation's procedures.
- 1.c Safeline recognises that it is the responsibility of all staff/volunteers to act upon any concern no matter how small or trivial it may seem.
- 1.d Safeline recognises its responsibility to implement, maintain and regularly review the procedures that are designed to prevent or notify suspected abuse.

- 1.e Safeline is committed to supporting, resourcing and training those who work with, or who come into contact with, adults at risk and to providing appropriate supervision.

## **2.0 Legal Framework**

In accordance with the Home Office Revised Code of Practice for Disclosure and Barring Service – Registered Person dated November 2015, Safeline will carry out an enhanced Disclosure & Barring check on all members of staff, volunteers, sessional workers and trustees who will be working with service users on a one to one basis. The check will be renewed every three years.

## **3.0 Definitions**

- 3.a An adult at risk, as defined by the Care Act 2014 is:

An adult who:

- Has needs for care and support and
- Is experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

A person aged 18 or over who needs extra help to manage their lives and be independent. This may include:

Many adults, because of illness or disability, may be unable to protect themselves from abuse. Adults with care and support needs may be certain older people, people with learning disabilities, physically disabled people, people with mental ill-health, a person with special sensory needs, a person with cognitive needs i.e. acquired brain injury or those with a short or long-term illness.

The Care Act guidance 2014 describes “care & support” as-

“The mixture of practical, financial and emotional support for adults who need extra help to manage their lives and be independent – including older people, people with a disability or long-term illness, people with mental health problems, and carers. Care and support includes assessment of people’s needs, provision of services and the allocation of funds to enable a person to purchase their own care and support. It could include care home, home care, personal assistants, day services, or the provision of aids and adaptations.”

### **3.b Abuse**

Abuse is ‘the violation of an individual’s human and civil rights by any other person or persons’ (No Secrets 2000). It may consist of a single act or repeated acts and can be listed under the following categories:

*Physical* – which includes any sort of physical assault, restraint, giving wrong or no medication.

*Domestic* – which includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called ‘honour based violence’

### 3.c Types of Abuse

This is not an exhaustive list, but will include:

#### **Physical Abuse**

Physical abuse is physical force or mistreatment of one person by another which might or might not cause physical injury. This type of abuse includes: hitting, pushing, rough handling, exposure to heat or cold, force feeding, improper administration of medication, denial of treatment, misuse or illegal use of restraint, not being allowed to go where you wish, when you wish.

#### **Sexual Abuse**

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, revenge porn, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult did not consent to or was pressured into consenting to, denial of a sexual life to consenting adults. Any sexual relationship that develops between adult where one is in a position of trust, power or authority in relation to the other and the trust, power or authority is abused for sexual gratification.

#### **Psychological**

Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming controlling, intimidating, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. There is now a coercive or controlling behavior offence in force since December 2015 which can carry a prison sentence in cases of extreme psychological and emotional abuse.

#### **Financial or Material**

This includes 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.

#### **Neglect and Acts of Omission**

Includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, withholding of the necessities of life, such as medication, adequate nutrition and hearing.

**Discriminatory**

Includes forms of harassment, slurs or similar treatment because of race, gender and gender identity, age disability, sexual orientation or religion.

**Organisational**

Includes neglect and poor care practice within an institution or care setting ranging from one off incidents to on-going ill treatment.

**Mate crime**

This happens when someone 'makes friends' with a person and goes on to abuse or exploit that relationship. The founding intention of the relationship, from the point of view of the perpetrator, is likely to be criminal. The relationship is likely to be of some duration and, if unchecked, may lead to a pattern of repeat and worsening abuse.

**Self-neglect**

Includes neglecting to care for one's personal hygiene, health or surroundings and includes behavior such as hoarding.

**Trafficking**

People trafficking means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation includes the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.

**Forced Marriage**

In which one or both parties are married against their will or without their consent or where they cannot give consent. Forced Marriage is now recognised as domestic/child abuse.

**Female Genital Mutilation (FGM)**

Involving procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act came into effect in 2004 making it illegal to practice FGM in the UK or to take British Nationals or permanent residents of the UK abroad for FGM or to aid, abet counsel or procure this.

**Modern Slavery**

Modern slavery is a serious crime. It encompasses slavery, servitude, and forced or compulsory labour and human trafficking. Modern slavery victims can often face more than one type of abuse and slavery, for example if they are sold to another trafficker and then forced into another form of exploitation.

**Criminal exploitation**

Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or an

adult into any criminal activity: (a) In exchange for something the victim needs or wants, and/or (b) For the financial or other advantage of the perpetrator or facilitator (such as to support serious organised crime and/or terrorism), and/or (c) Through violence or the threat of violence to ensure compliance. The victim may have been criminally exploited even if the activity appears consensual. Criminal Exploitation does not always involve physical contact; it can also occur using technology and/or social media. Because they are more likely to be easily detected, individuals who are exploited are more likely to be arrested and criminalised for criminal behaviour, than those individuals or groups who are exploiting them. Individuals who are being criminally exploited can be involved, linked to or considered to be (by themselves or others) as part of a “gang”. It is important when children or adults identify or are identified as being affected or involved with gang-related activity that involves the use of actual or threatened violence and/or drug dealing that professionals also consider that they may be victims of criminal exploitation. Criminal exploitation is broader than but often part of organised crime and county lines.

### **Organised Crime & County lines**

Organised Crime is “serious crime planned, coordinated and conducted by people working together on a continuing basis. Their motivation is often, but not always, financial gain.” Organised crime groups are “organised criminals working together for a particular criminal activity or activities.” County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and adults to move, [locally supply] and store the drugs and money. They will often use coercion, intimidation, violence (including sexual violence) and weapons.

### **Cuckooing**

This term is “named after the nest stealing practices of wild cuckoos. It describes the situation where a county lines dealer ‘takes over’ accommodation located in the provincial drugs market, using it as a local dealing base.” (Coomber and Moyle: 2017) An individual or group can do this by taking over the homes of local adults and families through an abuse of power or vulnerability by coercion, control and/or force so that they can provide a base for the supply of drugs into the local community. This places the adult and/or families at an increased risk of eviction (if they are in social or privately rented housing) and isolation from their communities due to the anti-social activity it can create. Cuckooing often forms part of wider ‘county lines’ activity and is also a form of criminal exploitation.

### **Hate Crime**

The term 'hate crime' can be used to describe a range of criminal behaviour where the perpetrator is motivated by hostility or demonstrates hostility towards the victim's disability, race, religion, sexual orientation or transgender identity.

These aspects of a person's identity are known as 'protected characteristics'. A hate crime can include verbal abuse, intimidation, threats, harassment, assault and bullying, as well as damage to property. The perpetrator can also be a friend, carer or acquaintance who exploits their relationship with the victim for financial gain or some other criminal purpose.

## Prevent/Extremism

'Extremism' is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

'Violent Extremism' is defined by the Crown Prosecution Service (CPS) as:

*"The demonstration of unacceptable behaviour by using any means or medium to express views, which:*

- *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;*
- *Seek to provoke others to terrorist acts;*
- *Encourage other serious criminal activity or seek to provoke others to serious criminal acts;*
- *Foster hatred which might lead to inter-community violence in the UK."*

There are a number of offences that can be considered when dealing with violent extremism. They include offences arising through spoken words, creation of tapes and videos of speeches, internet entries, chanting, banners and written notes and publications. The main offences employed to date have been soliciting murder and inciting racial hatred.

'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Radicalisation is usually a process not an event.

Safeline will keep its policy and procedures on Adults at Risk Protection under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff/volunteers are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of adults at risk.

### 3.d Adults at Risk

In agreeing the procedures for dealing with suspected abuse of an adult at risk, Safeline acknowledges the individual's right to a life which maintains their independence and involves a degree of risk. Where the individual chooses to accept this risk, their wishes should be respected within the context of their capacity to understand the nature of the decision and its implications. The Mental Capacity Act 2005 says that *"... a person lacks capacity in relation to a matter if at the material time he/she is unable to make a decision for himself/herself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain"*.



Staff and volunteers working for Safeline are placed in a position of trust regarding the Service users taking part in Safeline activities. Anyone who abuses that trust will be subject to disciplinary action. It is the responsibility of the staff and volunteers of Safeline to report maltreatment of an adult at risk. The procedure for this is detailed below.

#### **4.0 Safer Recruitment**

Appropriate recruitment and selection procedures for staff and volunteers in the context of adults at risk protection have been adopted by Safeline and include the following.

- A clear definition of any role so that the most suitable appointee can be identified.
- Identification of key selection criteria.
- A wide circulation of vacancies to ensure equal opportunities.
- Confirmation of the identity of the applicant including personal details obtained either through using an application form where appropriate, or through other means.
- Requirement of a declaration of previous convictions and submission to formal check, together with the issue of the Adults at Risk Protection Policy for those candidates whose work will bring them into contact with adults at risk or who will have a management responsibility in relation to those whose work does bring them into such contact.
- A clear guarantee that disclosed information will be treated in confidence and not used against applicants unfairly, including adherence to the DBS Code of Practice.
- Documentary evidence of qualifications.
- Use of several selection techniques to maximise the chance of safe recruitment, e.g. interview, references, checks.
- At least one representative from the Charity conducting the interview will have received safer recruitment training, meet personally with every applicant and conduct an exploration of their attitudes towards working with children.
- **Interview-** where the post involves direct work with adults at risk, two Safeline representatives will be involved and the Adults at Risk protection policy will be discussed with the candidate.
- **References-** request two written references from at least two people who are not family members.

**DBS-** a post offer will only be made subject to a satisfactory DBS check being obtained.

#### **5.0 Code of Practice**

Safeline expects that all staff, which for these purposes includes anybody in paid or unpaid work on its behalf, will be aware of this Code of Practice and adhere to its principles in their approach to all adults at risk.

- The counselling process should be as open as possible, and it is important that no more time should be spent alone with vulnerable adults than is necessary to conduct the session.

- It is important not to have physical contact with adults at risk and this should be avoided.
- It is not good practice to take adults at risk alone in a car on journeys, however short.
- Do not make suggestive or inappropriate remarks to or about an adult at risk, even in fun, as this could be misinterpreted.
- It is important not to deter adults at risk from making a 'disclosure' of abuse through fear of not being believed, and to listen to what they have to say. If this gives rise to an adult at risk protection concern it is important to follow Safeline's procedure for reporting such concerns, and not to attempt to investigate the concern yourself.
- Remember that those who abuse adults at risk can be of any age, gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.

Good practice includes valuing and respecting adults at risk as individuals and the adult modelling of appropriate conduct - which will always exclude bullying, shouting, racism, sectarianism or sexism.

### **5.a Working within Limitations**

If a client's main presenting issues continue to be self-harm with a high ongoing suicide risk then providing a continued service should be reviewed. This should be discussed by the Clinical and Safeguarding staff to determine the most appropriate course of action in the best interests of the client. Consideration should be given to referral to mental health services. Safeline services cannot necessarily maintain support even if other relevant services are considered inadequate by staff or rejected by the client.

## **6.0 Procedures for Reporting Concerns**

If any member of staff has concerns about an adult at risk abuse they should act without delay and share their concerns immediately with the Designated Safeguarding Lead (DSL) at Safeline. If an adult at risk is deemed to be at immediate risk Safeline will act without delay and share their concerns with Warwickshire County Council Adult Social Care Team. See appendix 2 for full contact details.

Designated Safeguarding Leads (DSLs) for Safeline are:-

Liz Welsh (Head of Clinical Services)

Colin Walker (Head of Education & Prevention Services)

Liz Harrison (Helpline and Online Support Manager)

In their absence refer to Neil Henderson, Chief Executive Officer or the designated safeguarding Trustee in his absence.

Lydia Ward (Designated Safeguarding Trustee)

Sue Thurlow (Designated Safeguarding Trustee)

Queries can also be made directly with the Adult Social Care Team if the case is urgent. In case of emergencies, call Warwickshire Police on 999.

Role and responsibilities of Designated Safeguarding Leads:

1. The Designated Safeguarding Lead is the first point of contact for all staff and volunteers to go to for advice if they are concerned about an adult at risk. (This may also need to be out of hours so staff and volunteers should always know how to contact them).
2. The Designated Safeguarding Lead has a higher level of training and knowledge than the other staff and will have completed Working Together to Safeguard Children and Young People training.
3. They are responsible for ensuring that the organisation's Safeguarding Policy is kept up to date.
4. They will ensure that the organisation complies with safer recruitment procedures for new staff members and their induction.
5. The Designated Safeguarding Lead will assess information from staff regarding concerns about adults at risk and make decisions about whether staff concerns are sufficient to notify the MASH/Adult Safeguarding Team or whether other courses of action are appropriate for example instigation of Common Assessment Framework (CAF).
6. The Designated Safeguarding Lead or member of staff will make formal referrals to the duty and advice team at the MASH/Adult Safeguarding Team.
7. They will ensure that all concerns are logged and stored securely and review ongoing safeguarding concerns at regular DSL meetings.
8. They have a joint responsibility with the CEO or the Trustees to ensure that the organisation's Safeguarding Policy and related policies and procedures are followed and regularly updated.
9. They are responsible for promoting a safe environment for children and young people /adults at risk involved with Safeline.
10. They will know the contact details of the relevant statutory agencies. e.g. The Adult Safeguarding Team, Police,

It is not the responsibility of the Designated Safeguarding Officer to decide whether a child / adult at risk has been abused or not, that is the responsibility of the investigative statutory agencies such as the Police. Keeping children / adults at risk safe is

everybody's business and all staff and volunteers should know who to go to and how to report any concerns they may have about a child/ adult at risk being harmed or at risk of being harmed.

## **7.0 Procedure for dealing with allegations of abuse or inappropriate conduct by a member of staff**

Allegations of abuse or inappropriate behaviour by any member of staff, other worker or volunteer must be reported to Neil Henderson, Chief Executive without delay or in his absence Liz Welsh, Head of Clinical Services or Colin Walker Head of Education and Prevention Services who will notify the Safeline Chair of Trustees as soon as possible in order to follow the complaints procedure.

There are clear written procedures for dealing with situations where allegations of abuse are made against an adult or a child/young person within Safeline.

## **8.0 Whistle-Blowing Policy**

Safeline is committed to achieving high standards of integrity and accountability and expects the same commitment from staff, volunteers and all persons working on behalf of Safeline.

Safeline aims to provide an open environment so that employees and those working for Safeline can raise issues they believe to be in the public interest, with the confidence that they will be acted upon appropriately.

Employees and all staff will be protected from detrimental treatment, victimisation or dismissal if they raise concerns.

The procedure complies with the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013.

Whistle-blowing is a formal raising of concerns that are in the public interest (referred to as public interest disclosure). Please refer to the staff handbook for further information about Whistle Blowing.

### **Examples of concerns include:**

- Criminal offences
- Failure to comply with legal obligations
- Actions which endanger the health and safety of an individual
- Actions which cause damage to the environment
- Actions intended to conceal the above

Safeline encourages staff to raise concerns with their line managers or the CEO.

A written record will be created detailing: -

- what is alleged by the employee
- the action to be taken
- a whistle-blowing investigation log commenced
- incident reported to CEO/Trustees as appropriate
- referral to the Police or other independent body

If the employee believes that they are unable to raise the matter with Safeline management or that the organisation has failed to take appropriate actions they may refer the matter to the Board of Trustees.

### **Concerns raised in confidence:**

Where a concern is raised in confidence Safeline will protect the identity of the whistle-blower. However, there will be circumstances where this is not possible for example where the whistle-blower is an essential witness and Safeline would be unable to investigate the situation further without revealing the whistle-blower's identity. Anonymous concerns will be considered but may prove difficult or impossible to investigate.

## **9.0 Responding Appropriately to an adult at risk Making an Allegation of Abuse**

### **Do's and Don'ts**

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Tell the adult at risk that the matter will only be disclosed to those who need to know about it.
- Allow the adult at risk to continue at her/his own pace.
- Ask questions for clarification only, and always avoid asking questions that suggest a particular answer.
- Reassure the adult at risk that they have done the right thing in telling you.
- Tell them what you will do next, and with whom the information will be shared.
- Record in writing what was said, using the adult at risk's own words as soon as possible – note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.
- It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. That is a task for the Warwickshire County Council Adult Safeguarding Team, following a referral from the DSL in the organisation.

Safeline believes and seeks to adhere to the principle that children/ adults at risk should be given every opportunity to learn that no one has the right to do anything to them that makes them feel uncomfortable. They have the right to not accept any behaviour from adults and children within the organisation that makes them feel threatened.

- Always put the care needs welfare and safety of a child/ adult at risk first.
- Respect a child's/ adult at risk's right to be involved in making choices and decisions which directly affect them.
- Respect a person's right to personal privacy
- Ensure that when you are working with children/ adults at risk you are not in sight or hearing distance of another adult.
- Never engage in sexually provocative games or discussion with an adult at risk
- Never allow yourself or others to touch an adult at risk in a sexually provocative manner
- Never make sexually suggestive comments to a child/ adult at risk even in jest.
- Do not engage in rough or physical contact with a child/ adult at risk
- Never form inappropriate emotional or physical relationships with a child/ adult at risk.
- Never harass or intimidate an adult at risk because of their age, race, gender, sexual orientation, religious belief, socio economic class or disability.
- Never invite a child/ adult at risk to your home or offer a lift in a car
- Never let allegations, made by anyone, go unacknowledged, unresolved or be failed to be acted upon.

Staff/workers should be aware of the potential for misunderstandings when touching children/ adults at risk. If it is an accepted part of an activity touching should be appropriate to the situation and follow accepted guidelines where they exist. Consoling a child / adult at risk who is distressed, administering first aid or supporting an individual in an activity is acceptable and necessary behaviour.

**Staff/volunteers should endeavour to minimise any possible misunderstandings of their actions.**

## **10.0 How information should be recorded**

All responses to allegation or suspicions of abuse involving children/ adults at risk will be recorded in the Safeguarding Register. The register will be reviewed on a weekly basis by at least two of the Designated Safeguarding Leads and action taken as appropriate to ensure all adults at risk are protected from harm.

## **11.0 e-Safety Policy**

This policy and the procedures that it underpins apply to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, agency staff, students and anyone working on behalf of Safeline.

- to protect adults at risk who receive Safeline's services and who make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with us
- to provide staff and volunteers with the overarching principles that guide our approach to e-safety
- to ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use information technology

**We recognise that:**

- the welfare of the adults at risk who come into contact with our services is paramount and should govern our approach to the use and management of electronic communications technologies
- All people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- the use of information technology is an essential part of all our lives; it is involved in how we as an organisation gather and store information, as well as how we communicate with each other. It is also an intrinsic part of the experience of our children and young people, and is greatly beneficial to all. However, it can present challenges in terms of how we use it responsibly and, if misused either by an adult or a young person, can be actually or potentially harmful to them

**We will seek to promote e-safety by:**

- appointing e-safety coordinators
- developing a range of procedures that provide clear and specific directions to staff and volunteers on the appropriate use of ICT;
- supporting and encouraging the adults at risk using our service to use the opportunities offered by mobile phone technology and the internet in a way that keeps themselves safe and shows respect for others;
- use our procedures to deal firmly, fairly and decisively with any examples of inappropriate ICT use, complaints or allegations, whether by an adult or a child/young person (these may include breaches of filtering, illegal use, cyberbullying, or use of ICT to groom a child or to perpetrate abuse);
- reviewing and updating the security of our information systems regularly;
- providing adequate physical security for ICT equipment; ensuring that user names, logins and passwords are used effectively;

- using only official email accounts provided via the organisation, and monitoring these as necessary;
- ensuring that the personal information of staff, volunteers and service users (including service users' names) are not published on our website;
- ensuring that images service users are used only after their written permission has been obtained, and only for the purpose for which consent has been given;
- any social media tools used in the course of our work with adults at risk must be risk assessed in advance by the member of staff wishing to use them;
- providing effective management for staff and volunteers on ICT issues, through supervision, support and training;
- examining and risk assessing any emerging new technologies before they are used within the organisation.

The name of our e-safety coordinators are Colin Walker, Liz Harrison and Liz Welsh. They can be contacted on 01926 402498.

## **12.0 Confidentiality Policy**

The sharing of ANY information with additional agencies should only be undertaken following consultation with the Designated Safeguarding Leads and in conjunction with the CEO if necessary and wherever possible with the person's consent.

Regarding allegations against members of staff the Designated Safeguarding Lead in conjunction with the Chief Executive Officer will decide on which agencies will be notified following a detailed risk assessment.

## **13.0 Links with other Safeline policies/ procedures**

This policy should be read in conjunction with the following Safeline documents.

- Safeguarding - Child Protection Policy
- Confidentiality Policy
- Suicide Risk Policy
- Managing Behaviour in Schools policy
- Staff Handbook
- Complaints Policy
- Data Protection Policy

General Data Protection Regulations



This policy should be read in conjunction with Safeline's Data Protection Policy and complies with the new General Data Protection Regulations (GDPR dated May 2018)

It is the responsibility of all staff members/volunteers working within Safeline to record and report vulnerable adult protection concerns, i.e. where they believe a vulnerable adult is at risk of abuse, or significant harm. This responsibility extends to all staff and volunteers and not just those specifically working with vulnerable adults.

#### **14.0 Guidelines for Staff/Volunteers on When to Take Action & How**

- 14.a Any rumour, suspicion or knowledge of any abuse of any vulnerable adult, must be reported **immediately** in person or by telephone to Safeline's DSL, who will refer to the social worker where available or the Adult Safeguarding Team with details of facts only and without any personal opinions or interpretations. The parent/carer/representative of the adult at risk will be informed provided they are not involved in the abuse allegation. Safeline staff/volunteers should not attempt to investigate any allegations on their own.

If the abuse allegation is made against a member of Safeline staff/volunteer, the matter should be reported immediately to the CEO and or the Trustee representative for Safeguarding:

Lydia Ward (Designated Safeguarding Trustee)

Sue Thurlow (Designated Safeguarding Trustee)

Queries can also be made directly with the Warwickshire County Council Safeguarding Adults Team (App.2) if the case is urgent.

If the allegation does not concern sexual or physical abuse and is of a minor nature, the concern should be logged as a Safeguarding concern and discussed at the DSL meeting to decide on the best way to support the adult at risk.

- 14.b When an adult at risk makes a disclosure of abuse to you ensure you respond correctly by following the guidelines below.
- allow them to speak without interruption
  - never trivialize or exaggerate the issue
  - never make suggestions
  - never coach or lead them in any way
  - reassure them, let them know you are glad they have spoken up and that they are right to do so
  - always ask enough questions to clarify your understanding, do not probe or interrogate, no matter how well you know them.
  - spare them having to repeat themselves over and over

- ❑ be honest. Let them know that you cannot keep this a secret, you will need to tell someone else.
- ❑ try to remain calm and exercise patience. Remember this is not an easy thing for them to do.
- ❑ do not show your emotions. If you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your 'negative' feelings are directed towards them
- ❑ let them know that you are taking the matter very seriously
- ❑ make them feel secure and safe without causing them any further anxiety.
- ❑ Check out how they are really feeling and do not avoid the subjects of self-harm and/or suicidal thoughts. Explore any feelings to ensure there is no serious and immediate intent.

#### 14.c **Confidentiality**

Confidentiality and trust should be maintained as far as possible, but staff and volunteers must act on the basis that the safety of the adult at risk is the overriding concern. The degree of confidentiality will be governed by the need to protect the adult at risk- should be informed at the earliest the disclosure, that the information will be passed on. All conversations regarding an adult at risk should always be held in private.

Safeline complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of an adult at risk.

Whatever happens, always be open and honest with the adult at risk of your intention to take the case further.

You must not discuss the case with anyone other than those involved in the case. If you have any concerns about the progress of the case or have any other concerns these must be discussed with the DSL/CEO/Trustee acting.

#### 14.d **Allegations Against Staff/Volunteers**

The primary concern of Safeline is to ensure the safety of the vulnerable adult. It is essential in all cases of suspected abuse by a member staff that action is taken quickly and professionally whatever the validity.

There could be occasions where a vulnerable adult will accuse a member of staff/volunteer of physically or sexually abusing them. In some cases, this may be false or unfounded. However, in some cases the allegations may be true.

Any instance of a vulnerable adult being abused by a member of staff is particularly serious. On the other hand, for an innocent person to be accused of

such an act, is a serious ordeal which can result in long term damage to their health and career.

If any member of staff/volunteer suspects any other member of staff/volunteer of abusing a Safeline user, it is their responsibility to bring these concerns to the CEO who should inform the designated safeguarding Trustee.

If the allegation concerns the CEO or a trustee, the matter should be discussed directly with the Chair of Trustees. Vulnerable Adult Protection Procedure.

- 14.e The member of staff will be advised to:
- ❑ contact their union representative if they have one or a legal adviser
  - ❑ keep records of all conversations, meetings attended, letters received and telephone calls relating to the allegation.
- 14.f If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under Safeline's disciplinary procedures related to adult at risk abuse allegations.

14.g **CODE OF BEHAVIOUR ON ADULT AT RISK PROTECTION FOR SAFELINE'S STAFF/VOLUNTEERS**

Safeline recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff and volunteers come into contact with adults at risk and to guarantee the protection of adults at risk and Safeline's staff and volunteers.

However, below are the standards of behaviour required of staff or volunteers who work in an unpaid capacity on behalf of Safeline in order to fulfill their roles. This code should assist in the protection of both adults at risk and members of staff and volunteers

**Staff/volunteers must** implement the Adult at Risk Protection Policy and Procedures at all times.

- 14.h **Staff must never:**
- ❑ engage in rough, physical games including horseplay with service users
  - ❑ allow or engage in inappropriate touching of any kind
  - ❑ do things of a personal nature for service users that they can do for themselves
  - ❑ physically restrain a service user unless the restraint is to prevent physical injury of the person or anybody else. **In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault**
  - ❑ make sexually suggestive comments to or within earshot of a service user.

- ❑ Invite a service user on their own and into their own vehicle, unless this is as a part of the ISVA role. Also, it is essential that there is adequate insurance for the vehicle to cover transporting service users as part of the business of your work. In extreme emergencies (for medical purposes) where it is required to transport a service user on their own, it is essential that a line manager is notified immediately
- ❑ spend time alone with a service user on his/her own, outside of the normal working relationship, i.e. a counselling sessions or private meeting
- ❑ engage in a personal relationship with a service user, beyond that appropriate for your professional role/relationship.

#### 14.i **Implications for staff and volunteers**

Staff who breach any of the above may be subject to the disciplinary procedure or, if volunteers, the complaints procedure. If an allegation against a member of staff has occurred then an investigation will be carried out in accordance with the Complaints Procedure

#### 14.j **Action to be taken if you receive an allegation about yourself.**

Keep calm. Do not get involved in an argument which is likely to make the situation worse.

Immediately inform your line manager. The quicker that action is taken to investigate the allegations, the sooner the situation will be resolved.

Record the facts as you understand them.

Ensure that no-one is placed in a position which could cause further compromise. Do not contact another agency involved with the service user or the person concerned.

Await further contact from your line manager.

#### 14.k **Action to be taken if you suspect an abuse of trust has occurred**

Discuss your suspicions with your line manager.

Record the facts which support your suspicions

Once your suspicions have been passed on to the appropriate person, you should have no further involvement.

#### 14.l **Whatever the nature of the complaint, it must be kept confidential. You must not discuss the disclosure with any individual or party other than those identified in the above procedure.**

We are committed to reviewing our policy, procedures and good practice annually.



## Protection of Adults at Risk: Concern Form

### Strictly Confidential

Use this form to record any concern you have about the potential abuse of a client or the disclosure of abuse made to you by a client by a member of staff or volunteer. The report should be factual and should not include opinions or personal interpretations of the facts presented. It should be used in conjunction with the policies and procedures laid out in the Adults at Risk Protection Policy.

If the report is made directly after the disclosure, it should be signed, dated and passed as soon as possible, or at the latest within 24 hours, to a Safeline DSL, the CEO or the Designated Safeguarding Trustee and followed with a discussion of the incident.

DSLs: Liz Welsh, Colin Walker, Liz Harrison  
CEO; Neil Henderson. Trustees; Lydia Ward (Designated Safeguarding Trustee, Sue Thurlow (Designated Safeguarding Trustee)

Your Name:	
Centre:	
Any other people present at the disclosure:	

Client Name:	
Name of carer/institution	

Date:		Time:		Location:	
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**Details of the Concern/Disclosure: please use the space on the other side of this form to record the information. Please include:**

- Reason for the concern
- Any apparent physical signs of abuse
- A factual account given to you of abuse by the adult concerned without personal opinion or interpretation, as accurately as you can record it.

- Dates and times of incidents and when notes are made
- Do not send Strictly Confidential forms through the internal or external post

**Protection of Vulnerable Adults: Concern Form**

**Strictly Confidential**

Form completed by: ..... Signed: .....

Date: .....

Time:.....

Discussed with: DSL, CEO or Trustee. Name: .....

Signature: ..... Date: .....

## APPENDIX 2 – Guidance for Reporting Concerns to Warwickshire or Coventry Safeguarding Adults Team

### How do I make a safeguarding referral?

Contact Warwickshire County Council or Coventry City Council to make an alert on the details below:

#### Safeguarding Adults Warwickshire

Email: [Adult abuse concerns – Warwickshire County Council](#) Tel: **01926 412080**

Address: Warwickshire County Council, Shire Hall, Warwick, CV34 4RR

#### Safeguarding Adults Coventry

Address: Room 48, Civic Centre 1, Little Park Street, Coventry, CV1 5RS

Tel: **024 76833800**

E-mail: [ascdirect@coventry.gov.uk](mailto:ascdirect@coventry.gov.uk)

#### Adult Safeguarding in Coventry

where to refer:-

**Adult Social Care Direct:** For Older People (65 and over) & Adults with Learning or Physical Disabilities

Tel: **024 7683 3003** (you will be transferred out of hours to emergency duty team)

Email: [ASCDirect@coventry.gov.uk](mailto:ASCDirect@coventry.gov.uk)

Secure: [ASCDirect@coventry.gov.uk](mailto:ASCDirect@coventry.gov.uk)

[rygcsx.gov.uk](mailto:rygcsx.gov.uk)

**Mental Health:** For Adults (18 and over) with Mental Health issues 24 hours.

Tel: **0300 200 0011** Email: [cwp-tr.speccoventryadult@nhs.net](mailto:cwp-tr.speccoventryadult@nhs.net)

#### Safeguarding Adults Reviews (SARs)

Safeguarding Adults Reviews (SARs) provide a process for all partner agencies to identify the lessons that can be learned from particularly complex or serious safeguarding adults cases, **where an adult in vulnerable circumstances has died or been seriously injured and abuse or neglect has been suspected.**

For a word-version of the SAR referral form please contact the Warwickshire Safeguarding Adults Board directly via [WSAB@warwickshire.gcsx.gov.uk](mailto:WSAB@warwickshire.gcsx.gov.uk). Please ensure all details are completed and submissions are **ONLY** made via the WSAB ema



### Appendix 3 - Flowchart regarding Child Protection and Vulnerable Adults Procedure



