

## Safeguarding Adults Policy

Henderson Trust is committed to safeguarding adults by protecting their health, wellbeing and human rights so they can live free from harm, abuse and neglect.

CONTENTS 1. Aim 2. Introduction 3. Overview 4. Recruitment 5. General procedures 6. Training 7. Roles and responsibilities 8. Dealing with allegations against staff 9. Raising a safeguarding adults concern 10. Records and confidentiality 11. Good working practice 12. Useful contacts

Appendix 1. Handling a Disclosure of Abuse Appendix 2. Recruitment Appendix 3. What is Abuse & Neglect? Appendix 4. Types of Abuse & Neglect Appendix 5. Extremism & Hate Crime Appendix 6. Safeguarding Flowchart

**1. Aim** The purpose of our safeguarding policy and procedures is to prevent harm and reduce the risk of adults with care and support needs experiencing abuse or neglect. This policy is based on the fundamental principle that all adults regardless of age, disability, gender, gender identity, ethnic, cultural, racial, national origins, religious belief/non-belief or sexual orientation have the right to live safely, free from abuse and neglect.

This policy will give clear guidance to staff, trustees, volunteers and visitors about the behaviour we expect and our legal responsibilities to safeguard and promote the welfare of adults at risk of abuse or neglect that we come into contact with at our organisation.

**2. Introduction** Our organisation fully recognises the things we can all do to protect adults from abuse and neglect. Our policy applies to all adults at risk of abuse or neglect, staff, trustees, volunteers and visitors. Under the Care Act 2014, legal safeguarding adult duties apply where an adult (someone 18 or older):

- has needs for care and support (regardless of the level of need and whether the council is meeting any of those needs)
- is experiencing, or is at risk of abuse or neglect, and
- as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Note: to be considered as a safeguarding concern the adult must meet this threshold criteria. For domestic abuse the age limit is 16 years of age.

**3. Overview** Our organisation will ensure that our activities are carried out in a way which keeps all adults safe. Adults will be able to talk freely to any staff member in our organisation if they are worried or concerned about something and be listened to. We will support anyone who, in good faith, reports a concern that an adult is being abused or neglected, or is at risk of abuse or neglect even if those concerns prove to be unfounded. Through training – both induction and on-going refresher training - we will ensure that all our staff and volunteers:

- understand the importance of safeguarding and their role in safeguarding adults
- recognise an adult potentially in need of safeguarding and know what action to take
- are able to recognise a disclosure from an adult and react appropriately
- are aware of the different forms of abuse and neglect
- understand dignity and respect when working with individuals
- know how to report an adult safeguarding concern in line with this policy

We will provide information and advice so that all the adults we work with understand their rights and how they can obtain help and support. At all times we will work together with carers, spouses/partners, relatives and colleagues from other agencies and organisations.

**4. Recruitment** All staff, volunteers and regular visitors who come into contact with the adults we work with have a duty of care to prevent harm and reduce the risk of them suffering from abuse or neglect. There is a legal duty placed upon us to ensure that everyone who works with, or on behalf of, all the adults who we come into contact with, is competent and

suitable to do so. Our recruitment practices help prevent unsuitable people from working with adults at risk of abuse or neglect (see more in Appendix 2).

**5. General procedures** When joining the organisation all new staff and volunteers will be:

- informed of how we safeguard
- given access to our safeguarding policy, told who the safeguarding lead is and how to contact them
- advised of our reporting process, guidance on what to do, and who to pass concerns to.

As part of their induction they will undertake safeguarding awareness training at the right level for their role. All staff and volunteers will be asked to read this policy annually or after it has been reviewed and updated if necessary. Best practice: they will sign to say they have read and understood the policy

All regular visitors will be:

- told where our policy is kept
- told who our safeguarding lead is and how to contact them or an alternative staff member
- told how the recording and reporting system works

All service users, partners, spouses, relatives and carers will be:

- told about our safeguarding policy and offered a copy if they would like
- informed of our legal duty to assist our colleagues in other agencies with adult safeguarding enquiries and
- told what happens should we have cause to raise a safeguarding concern to Adult Social Services

**6. Training** Every staff member/volunteer will undertake basic awareness safeguarding training appropriate to their role every three years. Training is available from several organisations as well as through the Norfolk Safeguarding Adults Board's safeguarding training programme. We actively encourage all our staff/volunteers to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via [norfolksafeguardingadultsboard.info](http://norfolksafeguardingadultsboard.info). The safeguarding lead should be used as the first point of contact for any safeguarding queries or concerns in our organisation. However, anyone can report a concern to Norfolk County Council Adult Social Services, or to the police in an emergency – be sure to let your safeguarding lead know if you have done this.

**7. Roles and responsibilities** Any person in our organisation may see or hear something which causes concern that abuse, or harm may be involved. Safeguarding is everybody's business, so the first responsibility is to respond to and then report any concerns.

Responding:

- If the person needs immediate medical attention, call an ambulance using 999
- If they are in immediate danger or a serious crime is being committed, call the police on 999
- If it will not cause you or them extra harm or risk, discuss your concerns with the person and ask what they would like to happen next
- Do not confront the person thought to be the cause of the harm

All staff and volunteers must record any concern for an adult's safety or welfare in writing and give it to the safeguarding lead as soon as possible.

The Safeguarding lead is responsible for:

- linking with Adult Social Services and other agencies where necessary, and raising any concerns through the safeguarding adults process within 24 hours where possible, depending on the level of risk
- making sure that all staff and volunteers are aware of our policy and the procedure they need to follow
- ensuring that all staff/volunteers have received appropriate safeguarding information and

training during induction as appropriate and this training is refreshed every three years

- ensuring that our safeguarding policy is in place, is reviewed annually and follows the guidance provided by the NSAB

- ensuring that at all times safer recruitment practices are followed

Remember, anyone can report a concern to the local authorities – be sure to let your safeguarding lead know if you have done this. Norfolk County Council Adult Social Services has the lead role in safeguarding adult investigations, so no member of our organisation is expected to investigate, though where safe and appropriate we may ask for more information before raising the concern.

**8. Dealing with allegations of abuse/neglect against our staff.** Allegations of abuse or neglect against our colleagues can sometimes arise from a different view of the same event but, when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some people who harm or abuse adults. All the people who work and volunteer with us will be made aware of the procedures that will be followed if an allegation of abuse or neglect is made against them. We will support anyone who, in good faith, reports concerns that an adult is being abused or neglected, or is at risk of abuse or neglect, even if those concerns prove to be unfounded.

Any allegation raised directly with us must be reported on to Norfolk County Council Adult Social services within one working day wherever possible. If a concern involves immediate or serious risk or injury, we will report first to emergency services using 999. Where any allegations are made to the police or Adult Social Services about an employee, those authorities will link with us about what to do next. If an individual (paid worker or unpaid volunteer) is dismissed or stopped from working in our organisation because the person poses a risk of harm to adults (even if they have left e.g. resigned), we must make a referral to the Disclosure and Barring Service. We recognise that it is a criminal offence to FAIL to make a referral without good reason.

**9. Raising a safeguarding adults concern (making a safeguarding referral)** We are clear that the local authority (Norfolk County Council), and the police where a concern relates to a potentially criminal matter, must lead all investigations into any allegation regarding safeguarding. Remember: the safeguarding lead will usually raise the concern, but anyone can make that call if necessary. The process is: Telephone Norfolk County Council: **0344 800 8020** (operates 24 hours a day, 365 days a year) and follow the prompts to take you to the safeguarding adults' option. State that it is a safeguarding adults matter and explain your concerns. Check with them what action should be taken and by who. Make a note of the person you spoke to including what they told you, their name and contact details. Guidance on the information required when making a referral is available on the NSAB website – see “Checklist for Raising A Concern” in [norfolksafeguardingadultsboard.info/professionals/guidance-and-documents](http://norfolksafeguardingadultsboard.info/professionals/guidance-and-documents)

If we are unsure if a referral should be made, we will contact Norfolk County Council Adult Social Services and ask for advice. This can be anonymous on the part of the adult to help establish the level of concern and any action advised.

**10. Records and confidentiality** If we are concerned about the safety or wellbeing of any adult in our organisation, we will record our concerns immediately using our agreed reporting form (found in the Adults at Risk section of the Safer folder in the main office) and give this to the safeguarding lead. All information is confidential and will be managed and stored within our organisation in line with the Data Protection Act 2018 and General Data Protection Regulation (GDPR). However, we understand that where there are concerns that an adult may be at risk of harm or abuse, information can be shared with other agencies, for example, Adult Social Services or the police.

**11. Good working practices** Good practice guidance will help staff and volunteers avoid

putting themselves in a situation which could put them at risk of having an allegation of abuse made against them. This includes:

- always trying to ensure, where practical to do so, that a third party is present
- avoiding unobserved one-to-one situations with adults, where practical to do so – keep a door open and/or ensure that you are within the hearing of others
- not offering to transport an adult in your own vehicle (unless that is the service you are providing)
- never allowing yourself to be drawn into inappropriate attention seeking behaviour
- never entering a room where an adult may not be fully dressed without first clearly obtaining their consent
- never undertaking activities of a ‘personal’ nature for an adult unless that is clearly defined as part of your role – this is likely to be considered a regulated activity
- never engaging in, or allowing, any sexually provocative games, whether based on talking or touching
- never making suggestive remarks or discriminatory comments
- never engaging in, or tolerating, bullying or harassment
- never engaging in, or tolerating, inappropriate physical activity e.g. horseplay
- never trivialising allegations of abuse or neglect
- doing your part in developing a culture in which everyone feels able to point out inappropriate attitudes and behaviours to each other
- ensuring that all allegations of abuse are reported, including any made against you
- remembering that someone else might misinterpret your actions, no matter how well intentioned.

## **12. Useful contacts**

Norfolk County Council (for concerns about adults and children) 0344 800 8020

Norfolk police: • Non-emergency 101 • Emergency 999

Norfolk Safeguarding Adults Board [norfolksafeguardingadultsboard.info](http://norfolksafeguardingadultsboard.info)

Care Quality Commission (CQC) 0300 061 6161

NHS and Social Care Whistleblowing Helpline 0800 072 4725

### **Named safeguarding lead**

The following designated members of staff are in post:

Safeguarding lead: Sally Fox

Telephone number: 07932 589068

Email: [sally.fox@henderson-norwich.org](mailto:sally.fox@henderson-norwich.org)

Safeguarding deputy lead: Matt Packer

Telephone number: 01603 251691

Email: [matt.packer@henderson-norwich.org](mailto:matt.packer@henderson-norwich.org)

### **Policy Review**

We will always make any changes immediately to our procedures in line with Norfolk Safeguarding Adults Board’s guidance [norfolksafeguardingadultsboard.info](http://norfolksafeguardingadultsboard.info).

## **Appendix 1 – HANDLING A DISCLOSURE OF ABUSE**

An adult may tell someone they trust that they are being abused or neglected. They will often not be aware of the help and support available. It takes courage to confide in someone – the way in which staff/volunteers respond can be crucial.

Do:

- remain calm and be sensitive
- listen without interrupting
- make it clear that you are taking them seriously
- acknowledge their courage in telling you
- let them know you will do what you can to help
- explain what you would like to do next
- try to get their permission for you to share the information, on a need to know basis, to get them the help and support they need
- record, using ink, what was said as soon as possible – signing and dating it
- contact your safeguarding lead immediately
- seek support

Do not:

- dismiss or ignore the concern
- allow your shock or panic to show
- ask leading questions
- probe for more information than is offered
- make assumptions or speculate
- make negative comments about the abuser
- make promises you cannot keep
- promise to keep the information secret – particularly in those situations where other adults may be at risk

What to do if the adult asks you to keep the information secret:

- If the adult has mental capacity, then the public interest test applies (this means if someone else could be a victim of the alleged perpetrator it is in the public interest to report it with or without the victim's consent)
- If they do not have mental capacity, you have a duty to report it without their consent

If in doubt, always speak to your safeguarding lead

## Appendix 2 – RECRUITMENT

All staff, volunteers and regular visitors who come into contact with the adults we work with have a duty of care to prevent harm and reduce the risk of them suffering from abuse or neglect. There is a legal duty placed upon us to ensure that everyone who works with, or on behalf of, all the adults who we come in contact with, is competent and suitable to do so. Our recruitment practices are designed to help prevent unsuitable people from working with adults at risk of abuse or neglect.

An integral part of this is the correct use of Disclosure and Barring Service (DBS) checks: There are three types: 1. Standard – which includes checks for spent and unspent convictions, cautions, reprimands and final warnings 2. Enhanced - which includes the same checks as the standard, plus any additional information held by local police that is reasonably considered relevant to the post being applied for. 3. Enhanced with barred list – this includes the same checks as the enhanced check and also checks against the appropriate barred list to ensure that the individual has not been barred from working with adults at risk of abuse or neglect. Only members of staff involved in regulated activities are required to undergo a mandatory enhanced DBS with barred list. It is a criminal offence to allow anyone on the adult barred list to undertake regulated activities with adults at risk of abuse or neglect.

Regulated activities relating to adults comprise the provision of:

- health care
- personal care
- social work
- assistance with cash, bills and/or shopping
- assistance in the conduct of a person's own affairs

- transport to and from a place where an individual receives health, personal or social care (excludes family, friends and taxi drivers)

Further information on DBS Checks is available on [gov.uk/government/organisations/disclosure-and-barring-service](http://gov.uk/government/organisations/disclosure-and-barring-service)

### Appendix 3 – WHAT IS ABUSE & NEGLECT?

The Care Act 2014 does not set out a specific definition of abuse.

Abuse and neglect can take many forms:

- It may be a one-off incident, a series of incidents or a long-term pattern of behaviour
- It could affect one person or many more
- It may be in someone's home, in public or in an institutional setting
- It may be deliberate, or the result of negligence or ignorance
- Exploitation in particular is a common pattern in abuse and neglect

Can happen anywhere - including:

- in a person's own home and/or other people's homes
- public places or in the community
- clubs
- the workplace
- schools and colleges of further education
- hospitals, surgeries or other health centres
- care homes
- places of worship
  - via electronic media, including the intranet
- day centres

Patterns of abuse vary - and include:

- serial abusing in which the perpetrator seeks out and 'grooms' individuals – sexual abuse sometimes falls into this pattern as do some forms of financial abuse and radicalisation
- long-term abuse in the context of an ongoing family relationship such as domestic violence between partners/spouses or generations or persistent psychological abuse
- opportunistic abuse such as theft occurring because money or jewellery has been left lying around
- situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour
- neglecting a person's needs because the carer has difficulties. These could be debt, alcohol, or mental health related or the specific demands resulting from caring for someone

Anyone can be an abuser or neglect someone – including:

- spouses/partners - other family members
- carers - paid staff or professionals - volunteers
- neighbours/friends or acquaintances
- local residents or strangers
- people who deliberately exploit adults they think are vulnerable to abuse

### Appendix 4 – TYPES OF ABUSE AND NEGLECT

The guidance in the Care Act 2014 lists ten types of abuse. However, this is not intended to be an exhaustive list but rather a guide to the sort of behaviours which could give rise to a safeguarding concern. It is important that we do not limit our view of what constitutes abuse or neglect to those types or the different circumstances in which they can take place.

Physical abuse – includes:

- hitting, pushing, pinching, shaking, grabbing, biting, hair-pulling, scalding
- misusing medication
- withholding food or drink, force-feeding

- restraint or inappropriate physical sanctions
- failing to provide physical care or aids to living – for example glasses or a walking stick

Psychological & emotional abuse – includes:

- threats of harm or abandonment
- deprivation of contact
- radicalisation (being exploited by those who would want them to embrace terrorism)
- humiliation, blaming, controlling
- intimidation, coercion
- harassment, verbal abuse and cyber bullying
- isolation or unreasonable and unjustified withdrawal of services or support

Financial or material abuse – While it can happen in isolation, it is often present with other forms of abuse and includes:

- theft and fraud
- internet scamming
- some forms can involve the perpetrator seeking out and grooming individuals
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- misuse or misappropriation of property, possessions or benefits

Sexual abuse – includes:

- rape, sexual assault or sexual acts to which the adult has not consented to, was unable to consent to, or was pressured into consenting to
- indecent exposure; sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography, subjection to pornography or witnessing sexual acts

Sexual exploitation is a subset of sexual abuse. It involves:

- exploitative situations and relationships where people receive 'something' (e.g. accommodation, alcohol, affection, money) as a result of them performing, or others performing on them, sexual activities
- can also involve serial abusing in which the perpetrator seeks out and 'grooms' individuals. Grooming is defined as developing the trust of an individual at risk of abuse and/or his or her family in order to engage in illegal sexual conduct

Organisational abuse – includes:

- 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 ongoing 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 – include:

- 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, food and heating

Discriminatory abuse – includes:

- forms of harassment, slurs or maltreatment because of someone's actual or perceived age, disability, gender, gender identify, ethnic, racial, cultural or national origin, religious belief/non-belief or sexual orientation
- hate incidents are a form of discriminatory abuse

Domestic abuse – The Home Office (2013) defines this as an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It is important

to remember domestic abuse may be more hidden in older people, BAME or LGBTQ+ communities. For this type of abuse the age range is extended down to 16. It includes:

- psychological, physical, sexual, financial, emotional abuse
- ‘so called honour’ based violence
- female genital mutilation
- forced marriage
- it also includes being a witness to domestic abuse of another person

Modern slavery and human trafficking encompass:

- Sexual exploitation including prostitution and ‘adult entertainment’
- Forced labour – commonly in agricultural, construction, food processing, hospitality industries, factories, car washers and nail bars
- Domestic servitude
- Organ harvesting
- Forced criminality – includes cannabis cultivation, street crime, forced begging, burglary, metal theft and benefit fraud

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. They may use concerns about an individual’s immigration status or concerns that their families may be at risk if they resist exploitation.

Self-neglect covers a wide range of behaviour, including:

- neglecting to care for one’s own personal hygiene, health, safety or surroundings;
- behaviour such as hoarding.

The definition of self-neglect excludes a situation in which a mentally competent person, who understands the consequences of their decisions, makes a conscious and voluntary decision to engage in acts that threaten their health or safety as a matter of personal choice. However, there is a need to assess your concerns - balancing the individual’s right to choose their lifestyle, considering their mental health or capacity to understand the consequences of their actions. It can often be a care or risk management issue rather than a safeguarding concern and may require a social care assessment in the first instance.

Signs and indicators of abuse/harm

The signs of abuse are not always clear. The following may, however, suggest the possibility of abuse:

- disclosures by the victim
- concern expressed by a third party
- admissions by the perpetrator
- someone expressing fears that abuse might happen
- evidence of unreported injuries
- signs of fear or distress
- injuries suggesting a possible non-accidental cause
- explanations that are incompatible with injuries presented or where conflicting explanations are given
- a history of persistent illness, infection or injury
- inappropriate use of medication
- possessions or money going missing or bills not being paid
- property being sold without the owner’s consent or understanding
- sudden or unexpected removal of an individual from a care setting
- a person is uncharacteristically withdrawn without apparent reason
- a person is found alone and at risk without adequate explanation
- a long time lapse between injury or illness and obtaining medical or other care
- abrupt or frequent changes of doctor or caring agency



- unexplained weight loss
- uncharacteristically unkempt appearance or surroundings
- agencies have repeated difficulty in gaining access to see someone
- it is made difficult to speak to a person alone without their carer/another person present
- evidence of avoidance, including regularly missed appointments, refusal of help, etc
- evidence of alcohol or other substance misuse
- signs of stress
- history of previous abuse or violence in the family
- unexplained pain, itching, infection or injury in the anal, genital or abdominal areas
- torn, stained or bloody underclothing
- multiple unrelated people living at one address living in overcrowded private rental accommodation

#### Appendix 5 – EXTREMISM & HATE CRIME

The following signs may indicate that an individual is at risk of being radicalised or is being exposed to extremist views:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Accessing extremist material online, including through social networking sites
- Possessing or accessing materials or symbols associated with an extremist cause
- Justifying violence to address social issues
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause
- Changing their style of dress or personal appearance to accord with the group
- Attempts to recruit others to the group/cause
- Using insulting or derogatory names for another group

#### Hate Incidents

A hate incident is any incident which is perceived by the person, or any other person as being motivated by prejudice or hatred. Hate incidents/crime can be anything from name calling, physical attack, vandalism or stealing a person's property, motivated by prejudice, hostility or hatred towards that individual because they are different. It may or may not be a crime and it may or may not be linked to a safeguarding concern. There are a number of ways to report a hate incident:

- in an emergency always phone 999
- contact the police via email: [enquiries@norfolk.pnn.police.uk](mailto:enquiries@norfolk.pnn.police.uk) or visit their website: [norfolk.police.uk](http://norfolk.police.uk)
- go to any Norfolk County Council public building such as libraries and report it. The staff will be able to assist if needed
- go to your district council, local police station or anywhere you see the 'Hate Incident Reporting Place' logo