

Safeguarding Vulnerable Adults Policy and Procedure

Reviewed: October 2021

Key:

Team Members = Staff, volunteers, trustees and students on placement

DSL = Designated Safeguarding Lead

SSL = Strategic Safeguarding Lead

Overview

SATEDA is committed to safeguarding and protecting the welfare of all who use its service. SATEDA recognises that it has a responsibility, along with others, to protect the welfare of vulnerable adults through its support.

SATEDA aims to ensure a consistent approach and commitment to high standards of practice in safeguarding the welfare of vulnerable adults. SATEDA has no statutory remit or role to investigate abuse of vulnerable adults but acknowledges its responsibility to pass on to the appropriate statutory agency concerns in relation to the safety or welfare of a vulnerable adult so that these concerns can be assessed.

The action we take to promote the welfare of vulnerable adults and protect them from harm is everyone's responsibility. Everyone who comes into contact with vulnerable adults has a role to play.

This Policy applies to all working for SATEDA who have contact with vulnerable adults, or who have responsibility for contractors and organisations providing services on behalf SATEDA.

This policy seeks to ensure that team members working with vulnerable adults have a good understanding of safeguarding guidelines and good practice.

Definitions and responsibilities

Vulnerable Adults

A vulnerable adult is a person aged 18 years of over who is receiving or could need community care services and is or may be unable to protect themselves from significant harm or serious exploitation. This may be because they have a mental health or other disability or because they are old, frail or ill.

In this context community care services includes all care services provided in any setting by any agency whether statutory, voluntary or independent in health or social care including hospitals, housing agencies and advice services.

In response to the "No Secrets" DOH guidance a Kent and Medway Multi-Agency Adult Protection Policy Protocols and Guidance document was issued by Kent County Council Social Services Directorate.

Definition of abuse

The definition of abuse set out below is taken from the Department of Health document "No Secrets: guidance on protecting vulnerable adults in care" (2000).

Abuse is “a violation of an individual’s human and civil rights by any other person or persons’ and can be perpetrated by, and to, anyone, regardless of age, gender, class or ethnicity”. Abuse may be a single act or repeated over a period of time. Somebody may abuse or neglect a vulnerable adult by inflicting harm, or by failing to act to prevent harm. Vulnerable adults may be abused in a family, in an institutional or community setting, by those known to them or, more rarely, by a stranger.

It is important to understand that a vulnerable adult may be abused by another vulnerable adult.

Fulfilling SATEDA’s Safeguarding Obligations

All team members must complete Level 1 Induction to Safeguarding during their induction. Staff who have unsupervised contact with vulnerable adults are required to undertake Level 2 Safeguarding Adults and Children during their probationary period. Line Managers should undertake Level 3 DSL Adults and Children.

Team Members should follow the escalation process below.

Safe recruitment practices

SATEDA ensures safe recruitment practices are in place to reduce the likelihood of recruiting staff who may present a risk. This includes ensuring that a statement about the organisation’s commitment to safeguarding is included in all recruitment and selection materials including reference to regular DBS checks and ongoing training.

Satisfactory explanations for any gaps in employment will be sought. References will always be obtained direct from the referee, never through the applicant.

Appropriate levels of Disclosure and Barring Service checks will be obtained.

Disclosure and Barring Service (DBS) Check Policy

SATEDA requires team members to have an enhanced DBS check if they have unsupervised contact with vulnerable adults. The CEO, in consultation with The Board of Trustees, is responsible for deciding which roles require an enhanced DBS check, and Line Managers ensure that DBS checks are revised every two years.

Appropriate training for employees (see training policy). Team members will have regular training on safeguarding matters. This includes an annual awareness refresher session.

Team members must accept and be able to recognise their responsibilities with regard to their own good practice and the reporting of signs of suspected abuse or neglect to either the Police or Kent County Council’s Central Duty Team, and understand SATEDA’s obligation to ensure confirmation is received from the County Council that any referrals made are being actively dealt with.

Training needs and opportunities relating to vulnerable adult safeguarding and protection issues will be identified and addressed through SATEDA’s Induction Procedure and in response to any changes in legislation.

Training may include internal courses/workshops, externally accredited courses/seminars or workshops organised by relevant agencies.

Line Managers will keep a record of all staff and volunteer co-ordinators will keep a record of volunteers who have received training.

SATEDA will ensure that photographs taken of clients participating in events will not be used for publicity purposes unless express written permission has been agreed with the client. An exception will be at community events which are open to all, and where it is therefore not possible to get prior consent. In such instances highly-visible signs will be put up advising the public the photographs are being taken that could be used for publicity purposes.

It is the responsibility of all Team Members to report all concerns about abuse to their line manager/project lead.

All incidents of alleged poor practice misconduct or abuse will be taken seriously and responded to swiftly and appropriately.

All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.

Types of abuse - definitions:

- »» Discriminatory – Unequal treatment, verbal abuse, inappropriate use of language, slurs, harassment, deliberate exclusion, lack of respect for beliefs and cultural background.
- »» Physical – The non-accidental infliction of physical force that results in bodily injury, pain or impairment.
- »» Sexual – Such as rape, sexual assault, or sexual acts, such as unwanted touching, to which the vulnerable adult has not or could not have consented, or they were pressurised into consenting to
- »» Emotional/Psychological – The use of threats, humiliation, bullying, swearing and other verbal conduct or any other form of mental cruelty that results in the mental or physical distress. It includes the denial of basic human and civil rights such as choice, self-expression, privacy, dignity and emotional contact.
- »» Financial – The unauthorised and improper use of funds, property or any resources belonging to an individual or withholding individual's funds for own use.
- »» Neglect – such as ignoring medical or physical care needs and preventing access to health, social care or educational services or withholding the necessities of life such as food, drink or heating.

Where there are concerns about the safety or welfare of a vulnerable adult this policy and procedures herein will be followed and information will be shared with the relevant agencies to protect the vulnerable adult.

SATEDA will take all possible steps to ensure that vulnerable adults are kept safe through: -

- »» Clear procedure for raising concerns and information sharing processes
- »» Safe recruitment processes including the obtaining of DBS checks for all team members
- »» Induction includes clear guidance and advice on safeguarding procedures and the action to take in the event of concerns with Level 1 training to be undertaken within 6 weeks
- »» Procedures to manage any allegations of abuse against team members.
- »» Training and support for team members to ensure they are aware of and understand the importance of this policy and the related procedures.
- »» Named designated safeguarding leads (DSL)



Disclosure of Information

General Data Protection Regulations, Data Protection Act 2018 and human rights laws are not barriers to justified information sharing of information but provide a framework to ensure that personal information is shared appropriately;

- »» Team members must be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so;
- »» Team members must seek advice from other practitioners, and more specifically DSL if they are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible;
- »» Where possible, team members must share with consent and respect the wishes of those who do not consent to having their information shared. Under GDPR and Data Protection Act 2018 information can be shared without consent if, it is judged, a lawful reason to do so, such as where safety may be at risk. Team Members will need to base their judgment on the facts of the case.
- »» Team members must consider safety and well-being of individuals concerned: They must base their information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions;
- »» Information sharing must be necessary, proportionate, relevant, accurate, timely and secure. Team members must ensure that that the information they share is necessary for the purpose for which it is shared. Is shared only with those people who need to have it, is accurate and up-to-date, securely, in a timely fashion (Practitioners must follow their organisation's policy on security for handling personal information). When sharing or requesting personal information, team members must be clear why this is necessary.
- »» Where there is no consent, team members must be mindful that an individual might not expect information to be shared.
- »» Staff must make a record of their decision and the reasons for it - whether it is to share information or not and record on Modus. If a decision is made to share, then a record what has been shared, with whom and for what purpose will be recorded in Modus.
- »» If the concern is about a team member the DSL will record in a secure database.



Procedure where there are concerns

Team members with concerns about a vulnerable adult must raise those concerns and inform the DSL within 48 hours.

If a vulnerable adult discloses that they are being, or have been abused this information must be taken seriously and the information must be passed to the DSL within 48 hours of the information coming to light.

The first priority should always be the safety of vulnerable adults and it is the responsibility of all to act on suspicion or evidence of abuse or neglect.

A record of the concerns and the action taken will be passed to the relevant agencies by the team member within 7 working days.

If an adult is at risk of immediate harm, the team member will inform the appropriate agency immediately. All action and reason for action is to be recorded within the clients record and the DSL advised.

Failure to report concerns may lead to suspension pending investigation, and for staff, disciplinary action.

If a team member is alleged to have put the welfare or safety of a vulnerable adult at risk, the DSL will inform the appropriate agency and cooperate fully.

Allegations against team members

Concerns for the welfare of a vulnerable adult arising from abuse or harassment by a team member should be reported immediately to the DSL and an incident form completed – see Appendix I. Concerns about poor practice should also be reported to the DSL (if the concerns are relating to the DSL it must be reported to the CEO or board of trustees).

Where there are allegations of abuse or concerns about poor practice of team members there are three strands of investigation as follows:

- »» Vulnerable adult protection investigation (externally led)
- »» Criminal investigation (externally led by the Police Authority)
- »» A disciplinary investigation (internally led)

Employees may be suspended with pay or a volunteer asked to cease volunteering pending the outcome of the investigation.

Strategic Safeguarding Lead (SSL)

It is the responsibility of the Strategic Lead for Safeguarding to:

- »» Ensure this policy and procedure is available to all team members and it is integrated into practice
- »» Take the lead for dealing with safeguarding, providing information, advice and support to the DSLs at Managers Meetings/Safeguarding Sub Group
- »» Liaise with trustees around allegations of abuse against team members



- »» Identify and liaise with a local specialist safeguarding advisor

Designated Safeguarding Leads (DSL)

SATEDA has appointed Project/Programme Leads as our DSLs who:

- »» Take the designated responsibility for safeguarding issues raised by team members and enable them to refer on
- »» Inform SATEDA's SSL of concerns at Managers Meetings/Safeguarding Sub-Group
- »» Follow up concerns and safeguarding issues to the relevant agencies
- »» Liaise with the relevant agencies, in accordance with SATEDA's confidentiality procedure
- »» Liaise with the SSL where there are allegations against team members (Log document: [Safeguarding Log - Non clients](#))

Retention of Records

A factual, dated record of concerns about a vulnerable adult will be kept in line with SATEDA's record keeping and procedures.

Records kept by team members about vulnerable adults should only include contacts made, referrals made including date, time and reason, and referral agency.

This policy will be reviewed annually and more regularly if appropriate.

Date policy adopted: November 2021

Date policy to be reviewed: November 2022



Appendix I Incident Report

SAFEGUARDING INCIDENT REPORT FORM

This form is to be used to record basic information in the light of an allegation, suspicion or disclosure of a potential safeguarding concern.

Completing this record should not delay contacting Police or Social Services in the event of an emergency or urgent safeguarding incident.

Date and time of completing this form:	
Reporters Name	
Reporters contact details	Phone Email
Your position or relationship to who your safeguarding concern is about	
Details of who report refers to	
Name	
Client Number	
Contact details	Address Phone Email
DOB	
Details of parent/carer/appropriate adult	
Details of the allegations/suspensions	
Are you recording: <ul style="list-style-type: none"> • Disclosure made directly to you by the child? • Disclosure or suspicions from a third party? • Your suspicions or concerns? 	
Date and time of any incident/disclosure:	
Details of the allegation/suspensions: <i>State exactly what you were told/observed and what was said. Use the persons own words as much as possible.</i>	
Actions taken so far	
Onward referral	
Police - 999 yes/no	Name and contact number: Details of advice received:
	If yes – which:

Social services yes/ no	Name and contact number: Details of advice received:
Local Authority yes/no	If yes – which: Name and contact number: Details of advice received:
Other (e.g. NSPCC, NGB, OFSTED?)	Which: Name and contact number: Details of advice received:

Signature of reporting team member	
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A copy of this form should be sent to the relevant DSL and added to Modus. Do not discuss this incident with anyone other than those who need to know.

Follow up actions	
Further actions completed after submitting initial Cause for Concern form: <i>Use this space to record discussions with DSL, family/carers, schools, social worker, EH, police etc. Remember to date each action, and record whether there is a Modus note.</i>	
Action	Date

Appendix II Other Safeguarding concerns to be aware of:

[Link to information on safeguarding concerns to be mindful of](#)