



## **Safeguarding Adults Policy**

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Approved by Chair on behalf of Trustees:

Name: Kelvin Blake

Approved operationally by Chief Executive Officer:

Name: Dominic Ellison

*You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the shared drive. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for complying with the policy requirements at all times.*

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## **1. Safeguarding Adults Policy Statement**

### **1.1. Statement**

WECIL seeks to enable people to live in safety without fear of abuse, and is committed to the protection of all children, young people and adults who use its services. This policy relates specifically to adults at risk, but should be considered alongside WECIL's Child Protection Policy. Safeguarding is far wider than just protecting adults and children who are at risk. It is about promoting the well-being and positive health of staff, volunteers and people who use our services, and empowering them to make the choices they need to keep safe. It is about individuals and organisations working together to prevent abuse and neglect, and also to create a safe space where the views, wishes, beliefs and concerns of those at risk are taken into account.

### **1.2 Purpose**

This policy is aimed at ensuring all employees and volunteers understand their responsibilities under the Care Act 2014, other safeguarding legislation and local policy with regard to protecting adults at risk. This includes the procedures to take if abuse of an adult with care and support needs is suspected, occurring or about to occur.

Government legislation on the safeguarding of adults is mainly designed to protect those already known to the social care or health sector, and who are considered to be 'at risk'. Under the Care Act 2014, specific safeguarding duties apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of these needs) 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.

Previously this group was called 'vulnerable adults', but they are now usually referred to as 'adults at risk' as it is recognised they are not inherently 'vulnerable'.

In line with the principles of Safeguarding Adults under the Care Act guidance, WECIL aims to raise awareness and promote an environment where abuse is less likely to occur as a result of increased understanding, effective preventative measures and appropriate action when abuse is suspected or alleged.

We will also work to promote the well-being of everyone who uses a WECIL service, and this might include protection from abuse and neglect, but also wider issues of:

- personal dignity (including treatment of the individual with respect);
- physical and mental health and emotional well-being;
- control by the individual over day-to-day life (including over care and support or support, provided to the individual and the way in which it is provided);
- participation in work, education, training or recreation;
- social and economic well-being;
- domestic, family and personal relationships;
- suitability of living accommodation;
- the individual's contribution to society.

To develop good practice, WECIL will introduce lower level wellbeing plans for those who Social Services will not pick up as technically 'at risk' according to their thresholds, but who we feel need to be monitored and supported to ensure their situation does not deteriorate. WECIL would use Wellbeing Plans to encourage members and those supporting them to consider what the organisation can do in terms of advocacy, advice, referrals and signposting to:

- Reduce isolation/improve social networks
- Reduce poverty/hunger
- Improve physical & mental health
- Ensure safe place to sleep/live
- Find meaningful activity, i.e. volunteering/work/ classes etc
- Other specialist advice services required e.g. debt/housing/careers

### **1.3 Scope and Implementation**

The policy applies to all employees, volunteers, people who use services, visitors and anyone else in the WECIL community who may come into contact with adults with care and support needs.

This policy is the responsibility of everyone who works at, manages, volunteers for, or visits WECIL. The Designated Safeguarding Lead for Adults (DSL/A) will bring this policy to the notice of everyone throughout their time at our organisation, in a way that is most accessible to them, so that they fulfil their duties to co-operate with this policy. We deliver services at various venues, and this policy will apply in all these contexts.

We will also ensure that the partner organisations we work with have safeguarding procedures in place. We will ensure that adults engaged in WECIL services are informed of this policy on our website, and through leaflets and briefings and other means if appropriate.

All staff will receive this policy and a briefing in safeguarding during their induction within the first three months of their employment, along with the Staff Handbook, and the Bullying and Harassment, Data Protection, Equalities, Health and Safety and Whistleblowing policies. No staff or volunteers will work unsupervised with children or adults who use services before they are trained.

All staff that come into contact with adults at risk as part of their job shall be provided with up to date safeguarding training at least annually, as well as updates as necessary (for example, via email, e-bulletins and staff meetings) to provide them with relevant skills and knowledge to safeguard adults at risk effectively including:

- Safeguarding Adults (which includes FGM and Prevent) policy and process;
- Diversity awareness;
- First Aid (where appropriate); and
- Procedures on working with adults at risk.

All staff will receive regular supervision and appraisals to ensure they understand, and are supported individually, with their

safeguarding responsibilities. A record of staff training will be kept on each member of staff's individual continuing professional development record (utilising CitrusHR software) and on the Single Central Record. WECIL will provide at least an annual update on safeguarding issues, which may include on-line training should significant changes to legislation or best practice be identified.

Any breach of policy or procedures will be treated seriously and could result in disciplinary action; this includes failure to report and maintain records, as well as inappropriate conduct.

Trustees will also be expected to undertake safeguarding training and offered updates. Some members of staff and trustees involved in recruitment will receive Safer Recruitment training from an accredited trainer. Every recruitment panel will include at least one person who has received Safer Recruitment training.

The DSLA and the Deputy DSLA will undertake advanced training for DSLs at least every 2 years.

#### **1.4 Other Associated WECIL Policies**

- Health and Safety;
- Whistleblowing;
- Bullying and Harassment;
- Staff Handbook;
- Communications and IT;
- Complaints Policy and Procedure;
- Safeguarding Children and Young People; and
- Data Security

#### **1.5 Background**

In 2009, increased safeguards called the Vetting and Barring Scheme (VBS) were introduced to help protect children and vulnerable adults from harm by preventing those deemed to be 'unsuitable' from working with them. We will be vigilant to prevent known abusers gaining opportunities (as staff, volunteers, visitors or members) with us in order to access those whom we regard as vulnerable- whether or not they come under the formal definition.

Safeguarding regulations state that:

- A person who is barred from working with children or adults at risk will be breaking the law if they work or volunteer, or try to work or volunteer with those groups
- An organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law

The VBS is just one part of a much bigger framework covering the use of information to support public protection.

## **1.6 Principles**

WECIL believes that:

1. Every person has a right to live a life free from abuse, neglect and fear;
2. Safeguarding adults at risk is everyone's business and responsibility;
3. All reports or suspicions of abuse will be treated seriously;
4. We have duties to protect users of WECIL services from all forms of abuse and to protect staff and volunteers from situations that may lead to the allegation of abuse;
5. WECIL believes that the empowerment of adults at risk should underpin all adult safeguarding work and helps to prevent abuse;
6. The focus of adult safeguarding should always be to identify and endeavour to meet the desired outcomes of the adult at risk;
7. Every member, volunteer and staff member should be able to access appropriate and accessible information about how to gain safety from abuse and violence;
8. Accepts adult abuse is far from being a localised or isolated problem;
9. Will aid workers in the recognition and reporting of abuse;
10. Will work together with other agencies including Social Services and the Police in the prevention, identification,

investigation and treatment of alleged, suspected or confirmed abuse;

11. Will carry out Disclosure and Barring Service (DBS) checks as part of its recruitment process;

WECIL is committed to complying with the requirements of the law and good practice in this area. As such, this procedure has been produced in accordance with:

- The Care Act 2014
- Independent Safeguarding Authority Guidance
- Health & Social Care Act 2008
- Safeguarding Vulnerable Groups Act 2006
- Public Interest Disclosure Act 1998
- Mental Capacity Act 2005
- Deprivation of Liberty Safeguards 2009
- Human Rights Act 1998
- Equality Act 2010
- GDPR 2018
- Care Standards Act 2000

## **1.7 Monitoring**

WECIL recognises our responsibility for monitoring safeguarding, and requires the CEO, informed by the DSLA, to present an annual report on safeguarding to be submitted to Trustees. We will carry out safeguarding audits as deemed necessary. Safeguarding will also be a standing agenda item for the Trustees and for all staff supervision sessions.

## **1.8 Review**

WECIL will regularly review the Safeguarding Adults Policy, practice and procedures in light of experience and changes to legislation and regulations. This policy and procedure will be reviewed at least every two years.

## **2. Responsibilities**

### **2.1. General Responsibilities**

Safeguarding Adults is everyone's responsibility. All staff, representatives and volunteers etc. must have an understanding of their role with regard to preventing, recognising and reporting abuse where an adult with care and support needs is either the person on the receiving end of the abuse or the person undertaking the abuse.

All staff have a key role in recognising any welfare concern they have about the adults they work with, including suspected abuse. Effective safeguarding means that all welfare concerns need to be taken seriously. If staff have any concerns about an adult's welfare, they should act on them immediately by recording and reporting to the DSLA. If the DSLA and other key managers cannot be contacted, the staff member should contact Adult Social Care directly (see Section 12) or the Police if there is an immediate risk to someone's safety. All employees and volunteers are accountable for adhering to this policy and have a responsibility to:

- a. Be aware of the indicators of abuse and to be alert to the possibility abuse may occur
- b. Understand the correct response to abuse and be able to take appropriate action to safeguard the person, preserve evidence where necessary and report any concerns, disclosures or allegations appropriately
- c. Co-operate with any enquiry
- d. Never prevent or persuade another person from expressing their concerns about abuse
- e. Respect the rights and wishes of adults with care and support needs whilst also considering their capacity to understand any particular risks that they may face

Statutory guidance enshrines six principles of safeguarding to help guide all professionals working with safeguarding issues. The six principles are:

- **Empowerment** – presumption of person led decisions and informed consent
- **Prevention** – it is better to take action before harm occurs
- **Proportionality** – proportionate and least intrusive response appropriate to the risk presented
- **Protection** – support and representation for those in greatest need
- **Partnership** – local solutions through services working in their communities
- **Accountability** – accountability and transparency in delivering safeguarding

## 2.2. Leadership

The Designated Safeguarding Lead for Adults (DSL) is the Community Development Manager (Lucie Martin-Jones). The Designated Safeguarding Deputy (DSD) is the Operations Manager (Alex Johnston). In the absence of the DSL and DSD, decisions will be made by the Chief Executive Officer (Dominic Ellison) or in his/her absence, the most senior member of staff on duty. The Designated Trustee for Safeguarding (DST) is Ruth Pickersgill.

## 2.3 Designated Safeguarding Lead for Adults

Trustees are required to ensure that there is an appropriate, experienced member of staff is designated to take lead responsibility for safeguarding, (the DSL). This person should have the status and authority to carry out the duties of the post, including access to needed resources and, where appropriate, the ability to support and direct staff. Actions, but not overall responsibility can be delegated to the deputies.

The trustees of WECIL have designated two Safeguarding Leads – the Designated Safeguarding Lead for Children and Young People (DSL/CYP) and the Designated Safeguarding Lead for Adults (DSL/A).

The areas of responsibility for the DSL include:

- Referring cases where a crime may have been committed to the Police;
- Referring, and supporting staff to refer, cases of suspected abuse to the relevant local authority:
  - Bath & North East Somerset <https://www.safeguarding-bathnes.org.uk/adults/i-work-adults/5-report-concern-about-adult>, 01225 396000
  - Bristol [https://www.bristol.gov.uk/en\\_US/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk](https://www.bristol.gov.uk/en_US/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk)
  - North Somerset <http://www.n-somerset.gov.uk/my-services/socialcare/adults/safeguarding-adults/safeguardingadults/>, 01275 888 801
  - South Gloucestershire <http://sites.southglos.gov.uk/safeguarding/#report>, 01454 868007
- Referring, and supporting staff to refer cases to the Channel programme where there is a radicalisation concern;
- Overseeing the management by relevant staff of Risk Assessments, including those undertaken for outings, First Aid, meeting medical needs, fire, lockdown and radicalisation;
- Liaising with staff on matters of safety and safeguarding, acting as a source of support, advice and expertise for all staff;
- Undergoing training to provide them with the knowledge and skills required to carry out the role, updated at least every two years
- Ensuring their knowledge and skills are refreshed (via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments) at regular intervals as required, and at least annually;
- Understanding the assessment process for providing statutory intervention, including local criteria for action and referral arrangements;
- Being alert to the specific needs of adults at risk

- Keeping detailed, accurate, secure written records of safeguarding concerns and referrals and if appropriate, share any information with other settings;
- Ensuring all related safeguarding adults policies and procedures are known, understood and used appropriately, and that the Safeguarding Adults Policy is reviewed every two years (as a minimum);
- Ensuring the Safeguarding Adults policy is available publicly (e.g. through the website);
- Linking with the local safeguarding partners;
- Being available for staff to discuss any safeguarding concerns (in person, phone, Skype or other such media) and arranging adequate and appropriate cover arrangements for any out of hours activities;
- Overseeing the budgetary allocations for safeguarding;
- Undertaking any safeguarding audits as necessary, including audits of the Single Central Record; and
- Ensuring that these duties can be carried out by the Deputy DSLs in their absence.

## **2.4 Chief Executive Officer**

The CEO responsibilities include:

- Taking overall responsibility for the implementation of this Policy, and co-ordinating the Child Protection and Adult at Risk procedures, including implementation, regular review and updating, working with the Designated Leads as necessary;
- Keeping up to date with developments in safeguarding children and young people and adults at risk, and attending training as required;
- Ensuring that all staff, trustees and volunteers in WECIL receive regular training and briefings, and are kept up to date with safeguarding issues within WECIL, but also locally and nationally, and keeping records of this training;

- Managing initial allegations and complaints about staff and liaising with the Authority Designated Officer (LADO), Local Authority Safeguarding Adults Boards, and other external agencies as and when appropriate, including the Police and the Disclosure and Barring Service; as necessary;
- Referring cases where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service as required;
- Ensuring that all staff are aware of their legal duty to report safeguarding concerns to Children's or Adults' Social Care or the Police;
- Reviewing safeguarding in WECIL on an annual basis and producing an annual report to Trustees highlighting any trends, serious cases and recommending changes to policies and practice;
- Linking with the relevant Safeguarding Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- Ensuring that all key stakeholders (people who use services, staff, volunteers, visitors, partner agencies) are aware of this Policy and relevant procedures, and that they are available on WECIL's website and in accessible formats as appropriate;
- Managing the safer recruitment of staff, including risk assessments of any staff or volunteers who are not re DBS checked.

## **2.5 Trustees**

The WECIL Board of Trustees has overall responsibility for ensuring that there are sufficient measures in place to safeguard adults at risk within WECIL and having regard to their statutory duties. Trustees should:

- Take reasonable steps to protect those connected with WECIL from harm;

- Ensure that there are a range of measures in place at WECIL to protect adults at risk from abuse and maltreatment of any kind;
- Be alert to the possibility that people may use WECIL to deliberately gain access to adults at risk to abuse them;
- Be aware that they may be held responsible for any possible breaches of trust or duties;
- Ensure that all incidents or allegations of abuse and reports of safeguarding risks or procedural failures are handled appropriately;
- Ensure there are effective and up to date systems in place to safeguard and promote adults at risk's welfare;
- Make sure that people working in the charity know how to deal with safeguarding issues;
- Set an organisational culture that prioritises safeguarding, so that it's safe for those affected to report incidents and concerns with the assurance that these will be handled properly;
- Ensure that reports of incidents, allegations and risks, are recorded and stored securely;
- Identify and manage risk (through the Risk Register);
- Ensure that reports are made where necessary to the police, Local Authorities and other agencies, and where the criteria are met, that a serious incident report is sent to the Charity Commission;
- Make changes to reduce the risk of any further incidents;
- Agree the safeguarding policy, make sure it is updated, in line with statutory national guidance and local practice and that it is available on the website (knowing that WECIL works with adults at risk and the risk of harm is higher);
- Prevent the charity from being abused for extremist purposes, including ensuring there are appropriate risk assessments in place;
- Appoint a Lead Trustee for Safeguarding (DST);
- Discuss, appraise and agree the annual safeguarding report for Trustees; and
- Be DBS certificated every 3 years.

## **2.6 Chair of Trustees**

The Chair of Trustees has the responsibility of contacting the Local Authority Designated Officer (LADO) or Local Authority Safeguarding Adults Boards directly if there is an allegation of abuse made against the DSLCYP or DSLA.

## **2.7 Designated Lead Trustee (DST) for Safeguarding**

The DST has the responsibility on behalf of the trustees for

- Ensuring that WECIL has up to date policies and procedures and a staff code of conduct in place for protecting adults and children at risk that are reviewed annually;
- Ensuring that WECIL has safer recruitment policies and that these are implemented in all recruitment activity;
- Ensuring WECIL has Designated Safeguarding Leads in place, and that they have had the required training that is appropriate for their role;
- Identifying possible risks to people who use services or anyone else connected with WECIL, taking into account local and national intelligence;
- Continually reviewing the safeguarding culture in WECIL;
- Ensuring that everyone involved in WECIL (staff and volunteers) knows how to recognise and report a safeguarding concern and has safeguarding training relevant to their role at least annually;
- Continually reviewing and evaluating any safeguarding training to ensure it is current and relevant;
- Ensuring that there is a process in place to ensure that all posts that need to be DBS checked are dealt with appropriately and that a risk assessment process is in place for staff who do not require a DBS check;
- Ensuring that, as a Board, all trustees are aware of WECIL policies and procedures and receive at least annual briefings on safeguarding;
- Receiving an annual safeguarding report;

- Being aware of Serious Case reviews or other major incidents and ensuring that reviews are taken place to address any issues raised by Safeguarding Boards;
- Checking the Single Central Record;
- Ensuring that relevant incidents are reported to the Charity Commission.

## **2.8 All Staff**

All staff at WECIL, regardless of their seniority or role, have a responsibility to safeguard the welfare of adults at risk. All staff should:

- Be aware of and understand this policy;
- Receive appropriate safeguarding training which is regularly updated;
- Receive and read safeguarding updates;
- Be aware of indicators of abuse and neglect so that they are able to identify cases of adults at risk who may be in need of help or protection;
- know what to do if a person tells them he/she is being abused or neglected and how to manage the requirement to maintain an appropriate level of confidentiality;
- Promote so called 'British Values', challenge extremism, and identify people who may be vulnerable to radicalisation;
- Be aware of the process for making referrals to local authorities and Channel;
- Ensure that if, at any point, there is a risk of immediate serious harm to an adult at risk that they make a referral to the emergency services immediately;
- Be able to record their safeguarding concerns clearly and appropriately;
- Not assume a colleague or another professional will take action and share information that might be critical in keeping adults at risk safe;
- Be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision and share information while maintaining an appropriate level of confidentiality;

- Raise concerns about poor or unsafe practice and potential failures in the safeguarding regime using appropriate allegation and Whistleblowing procedures;
- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Act in the best interests of adults at risk; and
- Always speak to the DSLA if they are unsure.

### **3. Safeguarding Code of Conduct for Staff**

#### **3.1. Introduction**

WECIL recognises that the vast majority of adults who work with adults at risk act professionally and aim to provide a safe and supportive environment for people they are supporting. However, as a result of their knowledge, position and the authority invested in their role, the worker often has a position of power over the adult at risk. All staff and volunteers working with adults at risk have a responsibility to ensure that this unequal balance of power is not used for personal advantage or gratification.

A Safeguarding Code of Conduct ensures that adults at risk are safeguarded in our setting and that staff are protected against allegations of abuse. Below are the behaviours and rules WECIL expects all its staff to follow when coming into contact with adults at risk in any capacity on behalf of WECIL:

1. The safety and welfare of the adult at risk is paramount and must be prioritised at all times.
2. Only staff with valid enhanced DBS checks can have sole responsibility for or be left alone with adults at risk.
3. Listen to and respect people at all times; don't patronise them.
4. Never give out your personal contact details and don't link up with people you work with on social networking sites.
5. Avoid favouritism and treat all users of WECIL services fairly without prejudice or discrimination.
6. Always act within professional boundaries.
7. If you feel anyone is behaving inappropriately around adults at risk, it is your duty to report your concern to the DSLA or CEO immediately.

The Code makes clear the behaviour that is expected when coming into contact with adults at risk, and therefore makes any conduct not in accordance with the Code easily identifiable. It is not meant to inhibit natural interactions with people, but to support respectful relationships between WECIL staff and the users of WECIL services they come into contact with.

WECIL aims to give a clear message to staff that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action is likely to follow. Accordingly, this document may be referred to in disciplinary proceedings.

All those working with adults at risk at WECIL should:

- Follow WECIL's policies at all times;
- Be responsible for their own actions and behaviour;
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Work, and be seen to work, in an open and transparent way;
- Discuss and/or take advice promptly from the DSLA about any incident which may give rise to concern;
- Contribute positively to our ongoing culture of vigilance, challenging unacceptable behaviour, and promptly reporting all allegations/suspensions of abuse in other staff; and
- Continually monitor and review their practice.

WECIL understands that any Safeguarding Code of Conduct cannot cover all situations that may arise and that sometimes staff may feel that they must make decisions which directly contravene this guidance in the best interests of the adults at risk in their charge. Individuals are therefore expected to make professional judgements when necessary which are warranted, proportionate, safe and applied equitably. Staff should always record and report these matters with the DSLA.

The WECIL management team is responsible for overseeing the production of Risk Assessments for all the work delivered by staff. If staff have a concern about a particular area of work, for example, a certain event, they should contact the WECIL office and if necessary, a member of the management team will complete a Risk Assessment, which will be retained securely in the office.

### **3.2 Admissions and Exclusions**

WECIL acknowledges that there are occasions when behaviour can disrupt others and cause problems. Staff should seek to ensure that, in regard to access to services and exclusions, our decisions are transparent, justifiable, fair and communicated promptly and efficiently by appropriate representatives. We aim to provide prospective service users with good factual information about our services and regularly check all publicity and website materials to ensure they are accurate and up to date. When there is a serious behaviour problem, a person may be excluded from our activities. In cases where there is a dispute between two users of WECIL services, we reserve the right to take whatever actions we deem necessary to protect the interests of adults at risk and this may include excluding them from particular activities.

### **3.3 Behaviour Management**

Managing any difficult behaviour of adults at risk should depend largely on the context and activity and broadly speaking, if people display difficult or challenging behaviour, staff should use strategies appropriate to the circumstance and situation. Where a person has specific needs in respect of particularly challenging behavior that is on-going, an assessment of risk should be drawn up by a DSLA and agreed by all parties.

### **3.4 Communication, including online safety**

All communications within WECIL with adults at risk should be transparent and open to scrutiny. Staff should not request or respond to any personal information other than which may be necessary in their professional role.

Staff should not give their personal contact details to users of WECIL services for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If users of WECIL services attempt to contact or correspond with staff directly or indirectly for personal reasons using social media or any other technology, staff should not respond and must report the matter to the DSLA.

WECIL staff are only permitted access to parts of the computer system. Staff should not use WECIL computers for personal use. Staff should not forward any work, files, information etc. stored on WECIL computers to their home computer, unless this has been agreed by the relevant manager as necessary. Caution should be taken if personal e-mail addresses are used on WECIL computers within settings. Illegal or inappropriate materials must not be uploaded, downloaded or accessed.

Staff may have access to confidential information about any adults using services which must be kept confidential at all times, and only shared when legally permissible to do so and in the interest of the adult. Online records should only be shared with those who have a legitimate professional need to see them. Staff are expected to comply with laws on Data Protection, including GDPR, and any breaches of this may result in disciplinary action. WECIL may at times have access to confidential and sensitive information and have a duty of confidentiality to our organisation and to the person concerned.

Information a staff member receives in the course of their job must not be used for their own benefit or the benefit of others, and must not be disclosed to anyone outside WECIL, except in the public interest, which includes safeguarding. Users of WECIL services' full name will not be used anywhere on WECIL literature.

Email and the internet are available for communicating WECIL business. Staff attention is drawn to the fact that external email is not secure and that this must be taken into account in choosing how personal and confidential information is communicated. Staff must ensure that they do not make inappropriate comments in any emails. It is recognised that from time to time, email may be used for personal reasons unrelated to business. Such use should be brief, outside of working hours (except in a case of emergency) and must exclude activities prohibited by the WECIL.

WECIL will ensure that internet access used within our organisation by users of WECIL services will have appropriate content filtering. The use of internet derived materials should comply with copyright law. If staff or users of WECIL services discover unsuitable sites, the

URL (address), time and content shall be reported to the session leader who will then report to the DSLA.

Most mobile phones now have access to the internet and picture and video messaging and may present opportunities for unrestricted access to the internet and sharing of images. Other mobile devices with this facility include laptops, tablets, watches and gaming hardware. Personal mobile phones and other devices may be used in some situations, as long as it is for business and emergency purposes only and staff are not to be distracted from the care of adults at risk.

Staff are responsible for keeping their own mobile devices up to date through software, security and app updates. Any device should be virus protected and should not be capable of passing on infections to the network. Staff are responsible for charging their devices and for protecting and looking after their devices and will be held responsible for the upkeep, content and security of their own devices, e.g. access to web pages. If this is deemed to be a safeguarding issue this will be dealt in accordance with our safeguarding policies.

Pictures, videos and sounds are easily transferred and pose a real safeguarding issue to adults at risk. WECIL will ensure that the publishing of images, video and sound will be strictly monitored for the appropriate permissions. Staff are not to use any mobile phone cameras to photograph users of WECIL services, unless there is a specific purpose which may entail a risk assessment. Images taken of users of WECIL services should be downloaded onto WECIL computers only and not be downloaded onto any personal device. If photographs or videos are required, this must be arranged with consent from the users of WECIL services and all partner organisations. Users of WECIL services may withdraw permission at any time. Digital images will be stored in a separate password protected files, which is accessed by designated staff only. After a photograph is taken down it will either be securely archived or deleted if unnecessary.

WECIL is committed to ensuring that all its IT systems are as secure as possible. All reasonable precautions will be taken to prevent access to inappropriate material. However, due to the international scale and linked internet content, it is not possible to guarantee

that unsuitable material will never appear on a WECIL computer. The organisation does not accept liability for the material accessed, or any consequences of Internet access. WECIL will audit IT use to establish if its strategies are adequate.

WECIL respects a staff member's private life. However, it must also ensure that confidentiality and its reputation are protected. Staff using social networking websites in their private life must refrain from promoting themselves as working for the organisation, in a way which has, or may have, the effect of bringing the WECIL into disrepute. They must not identify other staff, children and young people or users of WECIL services without their consent and must not make any defamatory remarks about WECIL, children and young people, users of WECIL services or staff, or conduct themselves in a way that is detrimental to the organisation. Staff must not disclose personal data or information about WECIL, children and young people and families, users of WECIL services or staff that could breach legislation (e.g. photographs, images). Staff should not engage in any activity or communication with users of WECIL services in social media sites. They should be aware of possible wider implications when entering any personal details on any online sites.

The WECIL website is a valuable source of information for users of WECIL services, but it must be managed to reduce any potential risks. The DSLA will take overall safeguarding editorial responsibility and ensure that website content is accurate and appropriate to anyone who uses services. WECIL must ensure that staff and all personal information will not be published on the website, particularly names in association with photographs. Photographs and videos that include users of WECIL services will be selected carefully and will not enable individual users of WECIL services to be clearly identified and consent from users of WECIL services will be obtained before photographs are published on the WECIL website.

### **3.5 Conduct**

All staff have a responsibility to maintain public confidence in their ability to safeguard adults. They should adopt high standards of personal conduct in order to maintain confidence and respect of

the general public and those with whom they work. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of adults at risk, loss of trust and confidence, or bringing WECIL into disrepute.

### **3.6 Day Trips**

All day trips organised by WECIL, or requiring participation by staff, require a Risk Assessment carried out by the event's coordinator. For annual or infrequent activities, a review of an existing assessment may be all that is needed. For new or higher-risk activities or trips, a specific assessment of the significant risks should be carried out.

In all circumstances, those organising trips and outings should pay careful attention to ensuring there is a safe staff/ users of WECIL services ratio and suitable gender mix of staff. All volunteers should have an enhanced DBS check. As far as possible, venues should be accessible but secure. Access to the venue should be through a formal signing-in system.

The Risk Assessment should be distributed widely and reviewed by the team responsible for the event. Staff should take particular care when supervising adults at risk in the less formal atmosphere of a day trip where a more relaxed discipline or informal dress and language code may be acceptable. Staff remain in a position of trust and need to ensure that their behavior cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

### **3.7 Dress and Appearance**

WECIL believes that dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

### **3.8 Environment**

Environments for people who use services should always be planned in ways which minimise the risks to them e.g. physical layout and surroundings. Opportunities to casually observe staff and users of WECIL services' interaction should always be maintained. We will display our Safeguarding Statement and other posters that display our commitment to challenging and reporting abuse in all our venues wherever possible.

### **3.9 Gifts and Rewards**

Staff need to be aware of the safeguarding implications of gift giving. Gifts can be a sign of infatuations and favouritism. There are occasions when users of WECIL services wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you, and this is usually acceptable. It is, however, unacceptable for staff to receive gifts on a regular basis or of any significant value. If in doubt, the staff member should consult their manager.

Staff should never give gifts or rewards to users of WECIL services, unless it is part of an agreed scheme (e.g. certification of a course). This could be interpreted as a gesture to bribe. Any reward given to users of WECIL services should be in accordance with agreed practice, recorded and not based on preferential treatment. Staff should exercise care when selecting users of WECIL services for specific activities, jobs or privileges in order to avoid perceptions of injustice. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria and there should be a clear audit trail indicating how decisions were made.

### **3.10 Home Visits**

Some staff may carry out work that requires home visits. This work should necessitate a full Risk Assessment carried out by the staff member conducting the home visit. The assessment should include an evaluation of any known factors regarding the person using the services and any others living in the household. Consideration should be given to any circumstances which might render the staff member becoming more vulnerable to an allegation being made e.g. hostility, existing safeguarding concerns, complaints or

grievances. Specific thought should be given to visits outside of 'office hours' or in remote or secluded locations. In the unlikely event that little or no information is available, visits should not be made alone.

### **3.11 Infatuations**

All staff need to recognise that a user of WECIL services may become attracted to a member of staff and/or develop a 'crush' or infatuation. They should behave in a professional manner at all times, making every effort to ensure that their own behaviour cannot be brought into question, does not appear to cultivate this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted. WECIL acknowledge that legitimate intimate relationships between staff and adults using WECIL services may from time to time occur. In any such case the staff member must report this to their line manager. Staff members must never form intimate or sexual relationships with adults identified as at risk who they are supporting through WECIL services. Any member of staff who believes that an adult at risk has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the DSLA. In this way appropriate early intervention can be taken which can avoid hurt, embarrassment or distress for those concerned.

### **3.12 Intimate and Personal care**

WECIL seeks to ensure that all of our activities are accessible. We aim to promote the health, safety, independence and welfare of adults and respect their dignity and privacy.

Users of WECIL services in need of intimate and personal care should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practicable.

When practical assistance is required, this should normally be undertaken by the users of WECIL services' support workers /personal assistants; however, staff should be prepared to assist people in emergencies to ensure our support for everyone is holistic and that we are working effectively in partnership with other professionals. A signed record should be kept of all intimate and personal care tasks undertaken and reported to the DSLA.

### **3.13 One-to-One Situations**

To safeguard both adults at risk and all staff, a Risk Assessment in relation to the specific nature and implications of one-to-one work should always be undertaken by the member of staff conducting the one-to-one. Each assessment should consider the individual needs of each adult and should be reviewed regularly. If possible, staff should try to work in a room with windows, or leave the door open so the session is able to be casually observed. If this is not possible, staff should ask another adult to look in on the session part way through. Staff should avoid closing doors and displaying 'engaged' signs during one-to-one sessions. Arranging to meet with adults at risk away from the work premises should not be permitted unless as part of a service that is routinely delivered in the community and with the knowledge of the staff member's line manager.

### **3.14 Partnership Working**

WECIL must always ensure that our delivery partners have effective safeguarding policies in place and display good practice in regard to safeguarding, including having a named safeguarding lead and offering staff safeguarding training and support.

Charities must adhere to the Charity Commission Safeguarding Standards. Any concerns that staff have of poor safeguarding practice in partner organisations should be reported to the DSLA at the time they are noted. Partner organisations must inform WECIL of the occurrence of any breaches or suspected breaches of their safeguarding policy.

WECIL will offer safeguarding support and advice where appropriate to affiliates. Valid, enhanced DBS checks, including a check against the adults' barred list or the children's barred list, as appropriate, must be carried out by partner organisations in relation to anyone who is employed or volunteers by them. Partner organisations should inform WECIL and the DBS about any person carrying out the activities where permission has been removed for people to carry out work with children or adults at risk because, in their opinion, such person has harmed or poses a risk of harm to the children and young people or adults at risk.

### **3.15 Physical Contact**

There are occasions when it is entirely appropriate and proper for staff to have physical contact with users of WECIL services however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the users of WECIL services individual needs. Motivation is absolutely crucial and the reason for contact must be absolutely clear. The contact should take place in a safe and open environment easily observed by others and should last for the minimum time necessary. The extent of the contact should be made clear and undertaken with the permission of the user of WECIL services. Staff must tell the user of WECIL services that they are about to make contact, and check that the user of WECIL services is happy for this to happen. Contact should be relevant to their age and understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by an adult at risk. Staff should therefore use their professional judgement at all times.

Physical contact should never be secretive, or for the gratification of the worker, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the DSLA. Extra caution may be required where it is known that an adult has suffered previous abuse or neglect. Staff need to be aware that the adult may associate physical contact with such experiences. They also should recognise that due to their history, some people seek out inappropriate physical contact. In such circumstances staff should deter the adult sensitively and help them to understand the importance of personal boundaries.

Some disabled adults may require more physical contact to assist their everyday activity. The arrangements should be understood and agreed by all concerned, justified in terms of the disabled person's needs, consistently applied and open to scrutiny.

### **3.16 Physical Intervention**

Users of WECIL services should not be physically restrained. If a member of staff feels that a participant is a danger to them or other participants, they and the other participants should leave the

situation as soon as possible. The incident should be reported as soon as possible. Under no circumstances should physical force be used as a form of punishment; the use of unwarranted or disproportionate physical force is likely to constitute a criminal offence. Where WECIL judges that a user of WECIL services behaviour presents a serious risk to themselves or others, a member of the management team must always put in place a robust Risk Assessment which is reviewed regularly and, where relevant, a physical intervention plan.

### **3.17 Visits to Staff Members' Homes**

Staff should not invite any user of WECIL services into their living accommodation unless the reason to do so has been firmly established and agreed with their manager. It is not appropriate for staff to be expected or requested to use their private living space for any activity involving users of WECIL services. Managers should ensure that appropriate accommodation for such activities is found elsewhere in a setting. Under no circumstances should users of WECIL services be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.

### **3.18 Settings**

WECIL session leaders work in a variety of different settings within the community. On visiting a setting, all staff should find out the safeguarding and behaviour policies (if relevant) and the fire evacuation and lockdown procedure of the setting.

All significant incidents that occur during work by staff in external settings must be recorded. This includes accidents resulting in any kind of medical attention, incidents (such as violent or threatening behaviour of participants), disclosures of any welfare issue, or near misses. Staff required to complete an Incident form at a setting must ask for a copy of the report, and any subsequent investigation documents. These should be sent to WECIL. This allows us to monitor issues that our staff are having, and helps to identify reoccurring problems.

Staff have a right to expect users of WECIL services to behave in a reasonable and considerate manner. Staff based at different settings should make WECIL staff aware of any potential problems

with specific users of WECIL services, in individual needs or requirements that may affect the ability of WECIL staff to do their jobs.

### **3.19 Sexual Activity**

Sexual activity involves physical contact including penetrative and non-penetrative acts and also includes non-contact activities, such as people to engage in or watch sexual activity or the production of pornographic material. Any sexual activity by a member of staff with or towards an adult identified as at risk who is using WECIL's services is unacceptable and will lead to dismissal.

### **3.20 Social Contact Outside of the Workplace**

Staff should never deliberately seek out any social contact with users of WECIL's services outside of the workplace. They should actively discourage users of WECIL's services who seek to establish social contact. Staff should be aware that professionals who sexually harm adults at risk often seek to establish relationships and contact outside of the workplace with the adult at risk and create opportunities for sexual abuse. Other informal social contact can lead to sexual exploitation, radicalization and/or staff exerting inappropriate influence on adults at risk and possibly bringing the setting into disrepute (e.g. attending a political protest, circulating propaganda).

Outside of sessions, it is likely that staff may meet users of WECIL services coincidentally. In all cases, staff must ensure that they maintain professional boundaries at all times and be aware of their use of alcohol. Staff may also have genuine friendships and social contact with users of WECIL services or their families, independent of any professional relationships. Contact of this nature must necessitate that the member of staff should exercise their professional judgement.

### **3.21 Transportation**

Staff should never offer to transport users of WECIL services outside of their normal working duties, other than in an emergency or where not doing so would put that person at risk. In these

circumstances the matter should be recorded and reported to the DSLA.

In certain situations, staff may be required or offer to transport adults at risk as part of their work. In such cases, the management team has a duty to carry out a Risk Assessment to manage any known risks. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

### **3.22 Visitors, including Personal Assistants**

Staff need to ask visitors to sign in/out and request identification with photographs. Visitors must not be permitted to take photographs of WECIL activities without the express permission of the DSLA. Other professionals who come in to see service users unsupervised must show their DBS check and a record of this kept with the Single Central Record. Staff need to show them where to go if they are not familiar with the building.

Posters with information of how to report a concern and pictures of the DSLCYP and DSLA will be displayed in reception

## **4. Definitions**

### **4.1. What is Abuse?**

Abuse is a violation of a person's human and civil rights by any other person(s). Abuse now also includes self-neglect (see categories below). Abuse is varied and it is open to interpretation, but could:

- Consist of a single act or repeated acts
- Be an act of neglect or an omission to act
- Be intentional or unintentional and can result from lack of knowledge

- Occur when an adult with care and support needs is persuaded to enter into a financial arrangement or sexual relationship to which they have not, or could not have, consented
- Some forms of abuse may also be a crime
- Exploitation may be a common theme in the experience of abuse.
- Abuse can take place anywhere, and WECIL will work to prevent abuse of adults at risk both within and outside its own services and premises.
- It is important to look beyond single incidents to identify patterns of harm. Repeated incidents of poor care may indicate institutional abuse
- All abuse must be reported; it is not up to a staff member to decide if something is abusive.

#### **4.2. Recognising signs of Abuse**

All staff have a key role in recognising any welfare concern they have about anyone who uses a service they work with, including suspected abuse. The quality of relationships staff develop with service users is vital in helping to understand unexplained changes in behaviour and/or personality. Small as well as more obvious unexplained changes may indicate a cause for concern. Effective safeguarding means that all welfare concerns need to be taken seriously. If staff have any concerns about a service users' welfare, they should act on them immediately by recording and reporting to the DSLA. Suspected abuse is extremely serious and should always be reported to the DSLA on the same day that it is noted.

Staff are not responsible for diagnosing or investigating abuse. However, they do have a clear responsibility to be aware that all is not well with someone who uses a service and to be able to recognise the signs of abuse (concerns arising from the appearance and the behaviour of the adult at risk and/or the abuser). Not all concerns about service users relate to abuse; there may well be other explanations or other welfare concerns that do not meet safeguarding thresholds. It is important that staff keep an open

mind and treat every concern with the utmost seriousness. They should never assume that someone else will take action.

Although some signs do not necessarily indicate that abuse is actually taking place, they may help staff and volunteers recognise that something is wrong. The possibility of abuse should be reported if there are a number of these signs or any of them to a marked degree.

#### **4.3. Categories and Indicators of Abuse**

**Physical Abuse** – including assault, hitting, slapping, pushing, misuse of medication, force feeding, poor manual handling, deprivation of liberty, restraint or inappropriate physical sanctions. Possible indicators of physical abuse include:

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

**Domestic Violence and Abuse (DVA)** – DVA is the abuse of one person over another who is, or has been, in a relationship. The abuse may be verbal, sexual, physical, emotional or financial, and is usually, but not exclusively, perpetrated by men against women. It occurs in all groups and sections of society and may be experienced differently to, and compounded by racism, sexuality, disability, age, religion, culture or class. The current government definition describes DVA as:

*'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members*

*regardless of gender or sexuality.’ Source: Home Office, Domestic Violence: A National Report (2012).*

This includes so called ‘honour based violence’, forced marriage; 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, sexual abuse through social media (e.g. sexting, inappropriate images) indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

If there are concerns that an adult at risk (male or female) is in danger of being forced into a marriage they do not or cannot consent to, staff should report to the DSLA on the same day the concern is noted. The DSLA must always notify the Police in such cases where it is agreed there is a substantive risk as urgent action must always be taken. All those involved should bear in mind that mediation as a response to forced marriage can be extremely dangerous. Refusal to go through with a forced marriage has, in the past, been linked to so-called ‘honour based violence’ including murder, rape and serious physical and emotional abuse

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- Acts of assault, threats, humiliation and intimidation
- Harming, punishing, or frightening the person
- Isolating the person from sources of support
- Exploitation of resources or money
- Preventing the person from escaping abuse
- Regulating everyday behaviour.

Possible indicators of domestic violence or abuse include:

- Low self-esteem
- Feeling that the abuse is their fault

- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money
- Victim tries to hide injuries, or minimises their extent or cause, appears frightened, overly anxious or depressed and/or is submissive or afraid to speak in front of the partner;
- Partner always attends unnecessarily and may refuse to leave, and/or may be aggressive or dominant

If WECIL has serious concerns about a victim's situation, they should refer the case to the local Independent Domestic Violence Advisor (IDVA) who can refer to the Multi-Agency Risk Assessment Conference (MARAC), or to the Police.

**Sexual:** this includes exploitative situations, contexts and relationships where the adult receives affection, inclusion or some sort of reward (often food, drugs, alcohol, gifts or money) as a result of performing sexual activities.

Types of sexual abuse include:

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Possible indicators of sexual abuse include:

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

**Psychological**—is defined as the persistent emotional maltreatment of a person such as to cause severe and adverse effects on their emotional development. It may involve conveying to a person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include threats of harm or abandonment, rejection, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. Some level of emotional abuse is involved in all types of maltreatment of adults at risk, although it may occur alone.

Types of emotional abuse include:

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Possible indicators of psychological or emotional abuse include

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

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

- Types of financial or material abuse include
- Theft of money or possessions
- Fraud, scamming

- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Possible indicators of financial or material abuse include

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative

- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

**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. A person is trafficked if they are brought to (or moved around) a country by others who threaten, frighten, hurt and force them to do work or other things they don't want to do. The Universal Declaration of Human Rights 1958, states that: "No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms." There is a national framework to assist in the identification of victims and referral to services known as the National Referral Mechanism (NRM) and any staff suspecting slavery or trafficking should report to this.

Types of modern slavery include

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography

- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

Signs of trafficking include people who :

- Are not in possession of a passport, identification or travel documents;
- Act as if instructed or coached by someone else or allow others to speak for them when spoken to directly;
- Recruited for one purpose and forced to engage in some other job;
- Have transport paid for by facilitators, whom they must pay back through providing services;
- Receiving little or no payment for their work - someone else was in control of their earnings;
- Forced to perform sexual acts;
- Do not have freedom of movement;
- Threatened with harm if escapes;
- Under the impression they are bonded by debt, or in a situation of dependence;
- Harmed or deprived of food, water, sleep, medical care or other life necessities;
- Cannot freely contact friends or family; and
- Limited social interaction or contact with people outside their immediate environment.

Possible indicators of modern slavery include

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

There is no typical victim of slavery. Victims can be men, women and children of all ages and cut across the population, but it is normally more prevalent amongst the most vulnerable, minority or socially excluded groups. The Home Office predicts that there may be as many as 13,000 victims in the UK alone. Further Home Office information on identifying and reporting modern slavery can be found at

[https://modernslavery.co.uk/?gclid=CL\\_f1LqO0sECFeFZ2wodNUUAUg](https://modernslavery.co.uk/?gclid=CL_f1LqO0sECFeFZ2wodNUUAUg)

**Discriminatory Abuse** - this occurs when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. It can feature in an abuse of an adult at risk where the abuse is motivated by the perpetrator's prejudice towards that adult's gender, ethnicity, disability, gender identity, age, sexuality, religion, culture, class etc.

Types of discriminatory abuse include

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010 - see <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

Possible indicators of discriminatory abuse include

- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

**Organisational or Institutional 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. It may also include policies and procedures This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice that deny human rights e.g. lack of privacy, dignity, hygiene facilities, misuse of medication, denial of medical care as a result of the structure, policies, processes and practices within an organisation.

- Types of organisational or institutional abuse include
- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately

- Interference with personal correspondence or communication
- Failure to respond to complaints

Possible indicators of organisational or institutional abuse include

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

**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.

Types of neglect and acts of omission include

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person

- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

Possible indicators of neglect and acts of omission include

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

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

Types of self-neglect include:

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Possible indicators of self-neglect include:

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions

- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

**Female Genital Mutilation (FGM)** is a form of physical abuse against girls and young women. FGM is also known as female circumcision or female genital cutting. FGM has no health benefits. It involves removing and damaging healthy and normal female genital tissue, and interferes with the natural functions of girls' and women's bodies. The procedure may be carried out when the girl is newborn, during childhood, adolescence, at marriage or during the first pregnancy. However, in the majority of cases FGM takes place between the ages of 5-8 and therefore girls within that age bracket are at a higher risk. It can cause severe bleeding and problems urinating, and later cysts, infections, infertility as well as complications in childbirth. They can also often suffer severe psychological trauma, including flashbacks and depression.

The Female Genital Mutilation Act 2003 made it illegal to: practice FGM in the UK; take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in that country; and aid, abet, counsel or procure the carrying out of FGM abroad. In 2015 the Serious Crime Act came into force and with it new legal powers to deal with FGM. Anyone who fears that someone is at risk of FGM can apply to a family court for a FGM Protection Order. This includes people who think they could be victims themselves or are already victims, local authorities, teachers, doctors, social workers or other third parties. FGMPOs will help to safeguard girls who are at risk of FGM at home or abroad. If the court makes a FGMPO, the specific conditions could include confiscating passports or travel documents to prevent girls from being taken abroad, or stopping someone from bringing a 'cutter' to the UK for the purposes of committing FGM on a girl.

If a woman over 18 discloses that they have had FGM, there is no mandatory reporting requirement.

If staff are concerned that a child or young person is at risk of FGM, they must tell the Designated Safeguarding Lead for Children and Young People (DSL/CYP).

**Hate crime:** This is a form of discriminatory abuse although it often also includes other abuse such as physical or psychological. It is a criminal offence committed against a person or their property that is motivated by hostility to their protected characteristics (listed below). Hate crime includes lack of respect, exclusion from services, swearing and name-calling, treating someone less favourably due to their ethnicity or other characteristics

The **characteristics** that are protected by the Equality Act 2010 are:

- age
- disability
- gender reassignment
- marriage or civil partnership (in employment only)
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

**Violence Against Women and Girls (VAWG)** covers a range of unacceptable and deeply distressing crimes, many of which are listed above such as domestic violence and abuse, sexual violence and child sexual abuse, stalking, so called 'honour-based' violence - including forced marriage and female genital mutilation (FGM), gang related violence, and human trafficking. We recognise that these crimes are disproportionately gendered. Violence can affect women and girls regardless of their age, race or religion, their socioeconomic background, sexual orientation or marital status.

Violence takes place in every locality across the UK and can happen in relationships, in families, and in communities. We will work to ensure that awareness of VAWG is raised within our organisation and work with multi-agency approaches effectively to understand and meet the support needs of victims, survivors and family members, through recovery and on to sustainable, positive life outcomes.

**Mate crime:** There is an increasing awareness that adults at risk may be targeted by people who they consider to be friends. This may be a particular issue if someone is disabled and has difficulty in understanding the nature of the relationship or recognising abuse, or if there are cultural differences and misunderstandings. Adults at risk may be targeted by people who befriend them in order to abuse them financially or in other ways.

Possible indicators of mate crime include

- An adult at risk suddenly appears to have a new friend or a much larger friendship group and a more active social life. These new people seem to have an undue influence. They may be visiting the adult at risk at home for social gatherings
- The adult at risk comments that his or her friends will be disappointed if a certain activity doesn't take place. They may express worry that they'll lose their friends. They may appear uneasy about the friendship
- The adult at risk may be spending their own money to pay for concert tickets for others or taxi fares or rounds of drinks. They may be buying gifts for other people or giving away precious possessions. They may suddenly change their will
- The adult at risk may unexpectedly change their routine, behaviour or appearance. They may have unexplained injuries, look scruffy or dirty or show signs of mental ill health.

*NB: Historical abuse does not come under the Care Act 2014. However, action may still need to be taken via liaison with the*

*appropriate agencies such as Children and Young Peoples Services and the police.*

Further detailed information about possible indicators of abuse is available at <https://bristolsafeguarding.org/media/1123/guidance-for-adults-at-risk.pdf>

## **5. Drugs**

‘Drugs’ are taken here to mean substances that are legal, such as alcohol, tobacco and solvents, over the counter and prescribed drugs and illegal drugs such as cannabis, ecstasy, amphetamines, heroin, crack/cocaine, LSD etc. We will forge links with adults services, health services and voluntary sector organisations to ensure support is available to adults at risk affected by drugs, alcohol misuse and smoking. Possession and or use of illegal drugs and alcohol in a session, including during a WECIL activity or while travelling to/from a WECIL activity, is inappropriate. Drugs, alcohol and cigarettes are not to be bought, sold or otherwise exchanged wherever we are delivering a WECIL activity. Individual exceptions may be made for those who require prescription medicines where appropriate.

Any medical emergencies will be dealt with accordingly by our first aiders.

## **6. Mental Well-Being and Resilience**

In order to help anyone who uses our services to thrive, WECIL has a role to play in supporting them to be resilient and mentally healthy. There are a variety of things that we can do, for all users of WECIL services and for those with particular problems, to offer that support in an effective way. Where severe problems occur, we should expect the user of WECIL services to get support elsewhere as well, including from medical professionals, voluntary organisations and local GPs.

There are resources available to help staff support good mental health and emotional wellbeing. We should consider if any service

user would benefit from the offer of counselling and work with other organisations to look at what provision is available locally to help them promote mental health and intervene early to support anyone who is experiencing difficulties.

## 7. Radicalisation

WECIL understands and will comply with the Counter Terrorism and Security Act 2015, having “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. It is part of an overall counter-terrorism strategy, CONTEST. The aim of the strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent Duties include:

1. Identifying users of WECIL services who may be vulnerable to radicalization.
2. Being aware of what to do when adults at risk are identified as vulnerable to radicalisation.
3. Promoting so called ‘British Values’ and challenging extremist views.
4. Offering appropriate training and development.

Extremism is defined in the 2015 Prevent Duty Guidance 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.’*

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Research shows that a disproportionate number of those targeted for radicalisation are adults at risk.

WECIL has a clear approach to implementing the Prevent duty and keeping children, young people, families, adults at risk and staff safe from the dangers of radicalisation and extremism. We tackle any instances of discrimination, and aim to be alert to potential risks from radicalisation and extremism. The promotion of equality, diversity and inclusion is at the heart of our work and they

are demonstrated through all our practice. Fostering so called 'British Values' i.e. actively promoting democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs is central to how we work. At WECIL we believe that it is possible to live together peacefully, each person being a valuable part of our multicultural world.

We will aim to build users of WECIL services' resilience by providing a safe environment for debating controversial issues and helping them to understand how they can influence and take part in decision-making. We will challenge extremism in all our work. We undertake due diligence to ensure that visiting speakers are appropriate, supervised at all times and not allowed to speak to adults at risk without a member of staff being present. Staff must not invite speakers into sessions without first obtaining permission from the DSLA.

We are aware of the increased risk of online radicalisation, to radicalise children, young people and adults at risk through the use of social media and the internet. As with managing other safeguarding risks, staff are alert to changes in behaviour which could indicate that colleagues, children, young people and adults at risk are in need of help or protection. Adults at risk of radicalisation may display different signs or seek to hide their views. Staff will use their professional judgement in identifying children, young people and adults who might be at risk of radicalisation and act proportionately. We are committed to identifying families who may be vulnerable to radicalization.

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes;
- Glorifying violence, especially to other faiths or cultures;
- Making remarks or comments about being at extremist events or rallies;
- Evidence of possessing illegal or extremist literature;
- Advocating messages similar to illegal organisations or other extremist groups;
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come

across online so involvement with particular groups may not be apparent.);

- Secretive behaviour;
- Online searches or sharing extremist messages or social profiles;
- Intolerance of difference, including faith, culture, gender, race or sexuality;
- Graffiti, art work or writing that displays extremist themes;
- Attempts to impose extremist views or practices on others;
- Verbalising racist, anti-Western or anti-British views; and
- Advocating violence towards others.

At WECIL we will assess each situation on an individual basis using the following guidelines that help measure risk:

- **Engagement:** Identifying patterns in behaviour that indicate a person at is engaged in an ideology linked to terrorism e.g. accessing social networking sites;
- **Intent:** Identifying whether the engagement of a person indicates radicalised behaviour or the intention to cause terrorist acts e.g. meeting with an extremist group; and
- **Capability:** Capability to cause harm e.g. setting fire to a place of worship.

Online training is available for staff, managers and trustees to help them understand the issues of radicalisation, the signs of vulnerability or radicalisation and how to refer their concerns. The DSLA will undertake Prevent awareness training and can provide advice and support to staff on protecting adults the risk of radicalisation.

Staff with concerns that anyone is becoming radicalised should contact the DSLA the same day the concern is noted. As well as contacting the relevant local authority, the DSLA should also contact the Police to find out whether a Channel referral may be appropriate. The Channel programme is part of Prevent - early intervention to protect and divert people away from the risk of being drawn into terrorist related activity. Referrals can be made at [channelsw@avonandsomerset.police.uk](mailto:channelsw@avonandsomerset.police.uk), however it should be discussed with the individual before a referral is made and clearly explained to them that it is a multi-agency initiative involving the

police. Referrals may only be made with the consent of the individual.

If there is a terrorist related emergency, staff should contact the Police immediately.

Further information for people with concerns is available on

<http://www.preventtragedies.co.uk/> and

<http://www.avonandsomerset.police.uk/newsroom/features/preventingterrorism-and-extremism/>

## 8. Homelessness

Being homeless, or being at risk of becoming homeless, presents a real risk to a person's welfare. The DSLA should be aware of referral routes into Local Authority Housing so they can raise/progress concerns at the earliest opportunity:

- Bristol <https://www.bristol.gov.uk/housing/homeless-or-at-risk-of-being-homeless>
- B&NES  
<http://www.bathnes.gov.uk/services/housing/housing-advice/homelessness-partnership>
- North Somerset <https://www.n-somerset.gov.uk/my-services/housing/help-if-you-are-homeless-or-need-support/preventing-homelessness/>
- South Gloucestershire  
<http://www.southglos.gov.uk/housing/homelessness/advice-about-homelessness/>

Indicators that a family may be at risk of homelessness include:

- Household debt;
- Rent arrears;
- DVA and anti-social behaviour;
- The family being asked to leave a property.

## 9. Situations of Increased Risk

The profile and the circumstances of the alleged perpetrator can often be more significant in assessing the risk, than the profile or degree of dependence of the adult. This is likely to be the same in

domestic and other settings. The following factors can act as a flag for further assessment if the alleged perpetrator has:

- A history of substance misuse
- Mental health issues
- A history of violence or abuse including domestic violence or sexual offences
- A dependency on the adult at risk for money, accommodation
- Financial problems, low income, debt problems
- History of family conflict
- Carer stress.

## **10. Mental Capacity**

People must be assumed to have capacity to make their own decisions and be given all practicable help before anyone treats them as not being able to make their own decisions. Where an adult is found to lack capacity to make a decision then any action taken, or any decision made for, or on their behalf, must be made in their best interests.

All professionals and other staff are required to work in accordance with the Mental Capacity Act 2005 ('MCA') and have regard to the relevant Code of Practice. The provisions of the Act are binding upon anyone seeking to make decisions for a person who may lack capacity.

When safeguarding concerns arise the mental capacity of the individuals involved - victims as well as those alleged to be responsible - is central to the assessment and decision-making processes. It is essential that in any level of safeguarding enquiry the mental capacity of those involved is clarified at the outset.

However it is important to ensure that safeguarding decision-making and mental capacity best interests decision-making do not become confused. In essence this is because safeguarding procedures do not convey any authority to act on behalf of a person who may lack mental capacity. Where there are disputes about a person's mental capacity or the best interests of an adult deemed to be at risk and these cannot be resolved locally, legal advice

should be sought about whether an application to the Court of Protection is required.

## **11. Safeguarding Procedures**

### **11.1. Disclosure**

Staff necessarily work towards forming positive and trusting relationships with users of WECIL services in their care. At times this may mean that people who use services feel that they can confide in them about aspects of their life that may cause concern for their general welfare. All staff should be alert to possible disclosure. The disclosure may be that they are feeling unsafe or are being abused – or it may be that they feel vulnerable in other ways. Effective safeguarding means that any welfare concern needs to be taken seriously and all staff have a role to play in this. Any concern that staff are made aware of should be recorded and reported to the DSLA on the same day it is noted.

If the disclosure involves abuse, or the person is at risk of significant harm, the matter is extremely serious. A disclosure may involve a criminal offence and if poorly handled could increase the risk for the adult at risk and could undermine a potential prosecution. Staff must take the following action:

- Stay calm.
- Listen to what the person who is disclosing is actually saying.
- Reassure them that they have done the right thing by telling.
- Indicate that they are taking the matter extremely seriously (without saying they believe them).
- Not promise the person who is disclosing that this can be kept secret, as subsequent disclosure could then lead to them feeling betrayed. Explain that they must tell other people to keep them safe. Absolute confidentiality should never be promised. Inform the person who is using WECIL's service (or whoever has disclosed the information) that the information cannot be kept confidential and will have to be passed on to appropriate agencies.

- Not interrogate the person who is disclosing, or push for more information. Ensure that any questions asked are open, not leading closed questions. It is not the role of staff to investigate but to report concerns.
- Not ask them to repeat what they have said to another member of staff.
- Make a note of any conversations with the person who is disclosing, trying to make these as detailed as possible, including when and where the conversations took place.
- Report the disclosure to the DSLA. The person to whom the disclosure was made should ensure that the person who disclosed is informed about what will happen next, so they can be reassured about what to expect.

### **11.2 Recording**

Effective record keeping is essential to help us identify needs at an early stage. Often it is only when a number of seemingly minor issues are taken as a whole that any general welfare or safeguarding concern becomes clear. Record keeping helps us monitor and manage our safeguarding practices and in any inspection it is vital evidence of robust and effective safeguarding practice. Any member of staff who has any kind of concern relating to the abuse of adults at risk must make an accurate record as soon as possible. Record keeping and reporting forms are found on SharePoint and must be used to record all incidents, concerns and referrals. Records are stored and kept in compliance with Data Protection legislation including GDPR. They are kept securely until the adult at risk leaves the service or 6 years from the date of report.

All adult at risk welfare records should be:

- clear, straightforward and avoid jargon;
- concise;
- accurate;
- contemporaneous;
- contextualised;
- correctly dated;

- written as to differentiate between facts, opinion, judgments and hypothesis;
- signed with the name of the signatory clearly printed; and
- written with a mind that the subject of a record does have the right in law to request access to them at any stage.

The record should explain:

- what was seen in appearance and behaviour of the adult at risk: when and where (include if relevant a site map indicating the position of any bruises or marks, trying to indicate size, colour and shape);
- what was said by the person who has disclosed using the exact words used;
- a note of any other people involved e.g. as witnesses;
- what the staff member thought and why they thought it;
- what the staff member did; and
- any other relevant information.

If abuse is suspected, the staff member must record this on the same day that the concern is noted.

The DSLA is responsible for keeping all adult at risk welfare records secure at WECIL. These records should be kept separately from general information kept about the users of WECIL services All records about allegations about staff should be kept by the DSLA in a central and secure location and separate from personnel records.

Information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the adult at risk or to enable them to carry out their own duties, but it should not be shared wider than that.

### **11.3 Reporting and Referring**

Staff spotting the signs of abuse and/or receiving disclosure of abuse or any other welfare concern, must report their concerns to the DSLA. If the DSLA is not available, the member of staff must inform the Deputy DSL, Chief Executive Officer or another manager of the disclosure immediately. During evenings and weekends staff are to inform Social Services and advise the Manager or another

Manager immediately on the next working day.

If in exceptional circumstances, the DSLA or deputies are not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the SLT and/or take advice from the relevant local authority directly. If anyone is immediately unsafe and at risk or there is criminal activity involved, this must be reported to the police. In these circumstances, any action taken should be shared with the DSLA as soon as is practically possible. If the abuse implicates the DSLA, the concerns should be discussed with the DST or the Chair of Trustees. If staff are working within another organisation, they should also report to the DSL of that organisation. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping adults at risk safe.

When reporting, staff should supply the DSLA with a verbal account of what happened which can allow the DSLA to ask specific questions as necessary. Staff should then record the incident using SharePoint. After reporting, possible options for action could then be:

- i. Carry on recording incidents and take no further action at the present time.**

If it is decided that a referral should not be made at the current time, it may be important to monitor the adult at risk's behaviour closely and carefully record any concerns. Concerns may also be discussed with other agencies as appropriate. The relevant local authority's safeguarding team may be a useful source of support at this stage, and may be able to offer insight and advice.

- ii. Refer**

Referral means sharing information about concerns with outside agencies. If staff are concerned about the safety of an adult at risk, information must be passed on to the DSLA. A referral is normally carried out by a DSLA, but any member of staff can refer. Contact details for adult safeguarding referrals to the local authorities in which WECIL currently operate are:

- **Bath & North East Somerset** <https://www.safeguarding-bathnes.org.uk/adults/i-work-adults/5-report-concern-about-adult> 01225 396000
- **Bristol** [https://www.bristol.gov.uk/en\\_US/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk](https://www.bristol.gov.uk/en_US/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk)  
Care Direct 0117 922 2700
- **North Somerset** <http://www.n-somerset.gov.uk/my-services/socialcare/adults/safeguarding-adults/safeguardingadults/> 01275 888 801
- **South Gloucestershire**  
<http://sites.southglos.gov.uk/safeguarding/#report> 01454 868007

### iii. Contact the Emergency Services

Staff and the DSLA may feel, after discussion, at this stage it is appropriate to contact the emergency services at once.

If the staff member and the DSLA disagree about whether to refer, the staff member can also FastTrack the referral without the agreement of the DSLA. The fast track procedure is **immediate** escalation to the relevant authority.

Whatever the course of action decided upon on after reporting a concern, the details of the meeting and any action agreed must be recorded.

*Note: there are specific referral pathways for adult victims of Domestic Violence and Abuse, Female Genital Mutilation and Radicalisation and these are described in this document under the relevant headings in this policy.*

## 11.4 Escalation and Professional Challenge

Occasionally situations arise when professionals feel that a safeguarding decision made by someone else is not safe. Disagreements could arise in a number of areas, but are most likely to arise around:

- Levels of need;
- Roles and responsibilities;

- The need for action; and
- Communication.

Staff at WECIL should feel able to challenge decision-making in regard to safeguarding and to see this as their right and responsibility in order to promote best practice. An escalation and professional challenge policy aims to provide workers with the means to raise concerns they have about decisions made by other professionals or agencies by:

- Avoiding professional disputes that put users of WECIL services at risk or obscure the focus on the adult at risk;
- Resolving the difficulties within and between agencies quickly and openly; and
- Identifying problem areas in working together where there is a lack of clarity and to promote the resolution via amendment to protocols and procedures.

Effective working depends on an open approach and honest relationships between professionals. Problem resolution is an integral part of professional co-operation and joint working to safeguard adults at risk. The safety of individual adults at risk is the paramount consideration in any professional disagreement and any unresolved issues should be addressed with due consideration to the risks that might exist for the adult at risk. Resolution should therefore be sought within the shortest timescale possible to ensure the adult at risk is protected. Disagreements should be resolved at the lowest possible stage, however if a person is thought to be at risk of immediate harm discretion should be used as to which stage is initiated.

If the disagreement is between a staff member and their manager then the staff member should consider our grievance procedure.

If staff remain concerned about the Safeguarding Issue after the WECIL grievance procedure has been exhausted, they are able to ask Social Services to escalate the matter within their department to the Head of Safeguarding or an appropriate Director.

### **11.5 Emergencies**

In some instances, staff may be the first people to recognise that an adult at risk may need immediate attention resulting from

abuse or may be unsafe e.g. suicide threats . The emergency procedure can also be applied if the member of staff feels that an adult at risk is in immediate danger, or is not satisfied with the action taken by the Manager or any other referral agencies to whom the report was made. The DSLA or member of staff concerned will ensure that the service user is informed about what will happen next so that they can be reassured about what to expect. Depending on the circumstances staff may need to:

- Telephone for an ambulance or the police (dial 999);
- Ask a doctor to call;
- Ask the personal assistant of an adult at risk to take them to the doctor or the hospital at once;
- Offer to take the adult at risk for immediate medical attention as appropriate; and/or
- Take the adult at risk to the hospital/surgery/clinic.

### **11.6 Allegations**

The following signs and symptoms may mean that staff are involved in abuse:

- Paying an excessive amount of attention to a particular adult at risk or group of adults at risk;
- Providing presents, money or having favourites;
- Seeking out particularly vulnerable adults
- Trying to spend time alone with a particular adult at risk or group of adults at risk on a regular basis;
- Making inappropriate sexual comments;
- Sharing inappropriate images;
- Being vague about where they have worked or when they have been employed; and/or
- Encouraging secretiveness.

Concerns and allegations about staff should be directed to the CEO on the same day that it is noted, or directly to the Local Authority Designated Officer (LADO) in Social Services if appropriate. Concerns about the DSLCYP, DSLA and/or the DST should be directed to the Chair of Trustees, or if necessary, directly to the Local Authority Designated Officer (LADO) in Social Services. Staff should take steps to ensure that during the remainder of the working session that the person they have concerns about is not left in sole charge of any adult at risk. Staff who have concerns or

has been informed of inappropriate behaviour must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

Where there is a complaint or allegation against a member of staff there may be three types of investigation:

- a criminal investigation;
- a safeguarding investigation; and/or
- a disciplinary or misconduct investigation.

The results of the police and safeguarding investigation may well influence the disciplinary investigation, but not necessarily.

The CEO must seek to clarify the nature of the concerns by asking the following of reporting member of staff if the staff member has:

- Behaved in a way that has harmed an adult at risk, or may have harmed an adult at risk?
- Possibly committed a criminal offence against or related to an adult at risk?
- Behaved in an inappropriate way towards an adult at risk which may have indicated the he or she is unsuitable to work with adults at risk?

If, following consideration, the allegation is clearly about poor practice, this will be dealt with as a misconduct issue. If it appears that there is a case of suspected abuse, the CEO should contact the DST and the Local Authority Designated Officer (LADO) in Social Services at the earliest opportunity. WECIL will ensure that s/he is given all the assistance they require in pursuing any investigation on these situations where appropriate. The Local Authority Designated Officer (LADO) in Social Services should be given a signed and dated written record of the concerns. Staff should maintain confidentiality and guard against publicity while an allegation is being considered or investigated and follow local information sharing protocols. The CEO should then follow the Local Authority Designated Officer (LADO) in Social Services' advice on how to deal with the allegation. Relevant evidence and information will be given to us if required by the Local Authority Designated Officer (LADO) in Social Services.

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations

must be investigated as a priority so as to avoid any delay. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months and all but the most exceptional cases should be completed within 12 months. For those cases where it is clear immediately that the allegation is unfounded or malicious then it is expected that they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence, appropriate action should be taken by WECIL within 3 working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

If the allegation is substantiated and the person is dismissed or we cease to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Local Authority Designated Officer (LADO) in Social Services should discuss with us whether a referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists is required. There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) an adult at risk or if a person otherwise poses a risk of harm to an adult at risk.

At the conclusion of a case in which an allegation is substantiated, the Local Authority Designated Officer (LADO) in Social Services should review the circumstances of the case to determine whether there are any improvements to be made to our procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Details of allegations against staff that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the

record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on employment retention.

### **11.7 Support to Staff**

As a result of reporting any concerns, staff members may feel angry and upset. The DSLA will provide support to the member of staff concerned through the supervision process. If necessary the member of staff can request additional external supervision or counselling during this period which can be authorised by the DSLA. If Local Authority Designated Officer (LADO) in Social Care need further information or involvement from the member of staff, the DSLA will talk with them and the member of staff about how this will happen.

Staff may also be subject to allegations of abusing adults at risk. Any allegation of abuse will be dealt with under the gross misconduct procedures within WECIL and will result in suspension on full pay while an investigation takes place. During suspension, the member of staff will be offered support in the form of a person within WECIL who will be named to act as a contact point (this will be another manager other than the person who currently line manages them).

### **11.8 Confidentiality**

Confidentiality is crucial to all our relationships - but the welfare of an adult at risk is paramount. WECIL does not allow anyone to keep concerns relating to an adult at risk to themselves. Confidentiality may not be maintained if the withholding of the information will prejudice the welfare of an adult at risk. Staff have a responsibility to share relevant safeguarding information with other professionals, particularly the investigative agencies. Any information sharing will be done in line with statutory guidance. It is important to remember there can be significant consequences to not sharing information as there can be to sharing. Staff must use their professional judgement to decide whether to share or not, and what information is appropriate. A record of what information has been shared, with whom, the date and why should be kept.

### **11.9 Recruitment of Staff**

WECIL recognises that some people who seek to abuse adults at risk will also seek employment which brings them into contact with them. We adhere to safer recruitment procedures to minimise this risk.

WECIL uses the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust. The DBS helps employers make safer recruitment decisions and prevents unsuitable people from working with vulnerable groups.

All WECIL staff, unsupervised volunteers and trustees working directly with children and young people or adults at risk, or with access to information about children and young people or adults at risk, will undertake pre-selection checks which include the following:

- Completion of an application form including self-disclosure about criminal records;
- An enhanced DBS with a barred list check;
- Receipt of two references in accordance with WECIL recruitment and selection procedures in advance of the interview;

- Verification of the candidate's mental and physical fitness to carry out their work responsibilities;
- Verification of qualifications;
- Verification of right to work in the UK;
- Verification of identity; and
- Any overseas checks if necessary.

All checks will be recorded on the Single Central Record (SCR).

A statement about commitment to safeguarding should be incorporated in any job advert. Prospective applicants will be supplied Section 1 of this Safeguarding Adults Policy as well as the Safeguarding and Child Protection Policy. At least one Safer Recruitment trained staff member or Trustee will be appointed to every recruitment panel.

WECIL will ensure that, when requesting references for a paid member of staff, sessional workers or unpaid volunteers, the following paragraph will be included:

*"In commenting on the applicant, please bear in mind that it is the organisation's duty to protect children, young people and adults at risk from harm, of a physical, emotional and sexual nature, and any information relating to their suitability for this work should be disclosed".*

At interview, candidates will always be required to:

- Explain satisfactorily any gaps in employment;
- Explain satisfactorily any anomalies or discrepancies in the information available to recruiters including information supplied by their referees;
- Answers questions about criminal history;
- Declare any information that is likely to appear on a DBS disclosure; and
- Demonstrate their capacity to safeguard and protect the welfare of children and young people and adults at risk of harm.

WECIL will treat DBS applicants that have a criminal record fairly, taking into account the date and nature of the offence and will not

discriminate against them based on criminal activity that is not relevant to their job role.

### **11.10 Complaints**

If staff believe that WECIL has failed to implement its Safeguarding Adults Policy properly, or believe they have been the subject of any form of discrimination, they should notify WECIL using the grievance procedure. Staff are reminded that any member raising a grievance in good faith, with reasonable grounds, has a right to be protected against victimisation for making such a grievance, even if the grievance is not upheld. Users of WECIL services or members of the public should use our Complaints Procedure to raise concerns. We take all complaints seriously and we undertake to investigate complaints promptly and respond in accordance with the appropriate procedure.

### **12. Local Authority details and other useful numbers**

- Bristol - 0117 922 2700 Do we need to say what this is- assume it is Care Direct??  
<https://www.bristol.gov.uk/>
- South Gloucestershire - 01454 868007  
<http://www.southglos.gov.uk/>
- B&NES - 01225 396000  
<http://www.bathnes.gov.uk/>
- North Somerset - 01275 888 801  
<http://www.n-somerset.gov.uk/>
- Avon and Somerset Police- for non-emergencies dial101
- Police Emergencies- dial 999
- Care Quality Commission- 03000 616161(to report concerns about the quality of care in other providers)  
<http://www.cqc.org.uk/organisations-we-regulate/registered-services/notifications/notifications-non-nhs-trust-providers>
- Total Advocacy- 01823 339494 *what do they do?*
- Age UK- 0800 169 6565

WECIL Safeguarding Adults Policy. Approved on 20/12/2018

- Disclosure and Barring Service Website:  
<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

All staff should be aware that the main sources of information on Safeguarding Adults can be obtained from the relevant Adult Safeguarding Boards e.g.

Bristol Safeguarding Adults Team

<https://bristolsafeguarding.org/adults/>

This will include more detailed guidance on all key areas and updates when legislation changes e.g. self-neglect, mate crime, Prevent.

The Safeguarding Adults Team in BANES, Bristol, North Somerset, South Gloucestershire and Somerset have produced a joint Safeguarding Adults Policy:

<https://bristolsafeguarding.org/media/19829/joint-safeguarding-adults-policy-final-22-dec-2017.pdf>