



Safeguarding Adults Policy & Procedures

Status	Live
Policy Owner	CEO
Date last updated	March 2021
Date for review	March 2022
Approved by	Trustees
How will policy be disseminated	Stored on SharePoint – Staff to be updated at Development Days by Deputy Designated Safeguarding Lead
Does policy require training for implementation – if so describe training plan	Yes - training at dedicated training sessions and development day.
Linked policies/procedures	<ul style="list-style-type: none"> • Dignity at Work Policy • Managing Allegations Policy • Information Sharing Policy • Case Recording and Records Retention Policy • Conduct Code • Recruitment Policy • Feedback and Complaints Policy • Whistleblowing Policy • Health and Safety Policy • Safeguarding & Child Protection Policy • Preventing Abuse for Extremist Purposes Policy • Lone Working Policy • Death of a Service User Policy • Serious Case and Domestic Homicide Reviews Policy • Acceptable Use of Social Media Policy • Film, Photography & Audio Policy • Illegal Items & Criminal Behaviour Policy • Need to Know Protocol • Statement on Confidentiality
Document control	A controlled version of this document is available in the Policies and Procedures folder in the Governance Library on Sharepoint. Any printed versions are classified as uncontrolled.

Contents

Policy Statement.....	3
1. Overview and Introduction	4
2. Why this policy exists.....	5
4. Roles and responsibilities	6
5. Legal framework	7
6. Related policies and procedures	7
7. Review.....	8
Adult Safeguarding Procedures.....	9
Appendix 1 – Definitions, Types of abuse & Neglect and How to spot scams	16
Scams are a form of financial abuse and can be sophisticated, drawn out and based on real or feigned relationships.	18
Appendix 2 – Key people and contacts	20
Appendix 3 - Need to Know Protocol summary	21
Appendix 4 - Additional Guidance	22
Appendix 5 – Logging a safeguarding concern on Apricot	24
Appendix 6 – Safeguarding Procedure Summary Flowchart	30

If a safeguarding concern arises outside of normal working hours – i.e. Mondays – Fridays between 9.00 and 5.00 – contact the On-Call Service via the Out of Hours Emergency number: 0207 129 7851

COVID 19 Statement

Since March 2020 the world has been impacted by a coronavirus pandemic which can lead to infection with COVID-19.

The global response to this virus, and more specifically the response of the UK government and the London Councils, has impacted the way Safer London works, its policies and procedures.

The principles underlying the Safeguarding Adults policy and procedures remain unchanged although meetings and conversations are likely to take place virtually rather than face to face because of restrictions around face to face contact that may be in place at any time.

The limits on face to face contact with service users, their families and other stakeholders may mean that critical non-verbal information and cues are missed as these are often less obvious on remote and virtual platforms, and easier for people to disguise or minimize. Staff therefore need to be especially vigilant to ensure that they are not overlooking signals during virtual conversations and sessions, whether by videoconferencing or telephone, which they might pick up in a face to face meeting.

Staff should also be conscious that the responses to the pandemic – including the restrictions on movement and contact with others, things like wearing masks and holding conversations by phone or videoconference - may impact on service users and, indeed, on themselves, in ways that may affect how they relate to each other, and work on their awareness of whether and how this might be the case. These measures may also impact on, and exacerbate or indeed disguise, the issues that service users are dealing with.

Policy Statement

- (i) Safer London is committed to keeping adults safe from harm and exploitation and to upholding their rights and expects all staff and volunteers to share this commitment. This includes those who may be additionally vulnerable because of factors such as social isolation, poverty, illness, poor housing and social circumstances, or exposure to violence or exploitation.
- (ii) As part of this commitment Safer London supports and works to the six principles of adult safeguarding as set out in the Care Act 2014, namely:
- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent: *“I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”*
 - **Prevention** – It is better to act before harm occurs: *“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”*
 - **Proportionality** – The least intrusive response appropriate to the risk presented: *“I am sure that the professionals will work in my interest, as I see them, and they will only get involved as much as needed.”*
 - **Protection** – Support and representation for those in greatest need: *“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”*
 - **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse: *“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”*
 - **Accountability** – Accountability and transparency in delivering safeguarding: *“I understand the role of everyone involved in my life and so do they.”*
- (iii) Staff are expected to work in partnership with the adults who access Safer London’s services so that they are:
- safe and able to protect themselves from abuse and neglect;
 - treated fairly and with dignity and respect;
 - protected when they need to be;
 - able to easily get the support, protection and services that they need.

1. Overview and introduction

- 1.1. This policy draws on the [London multiagency adult safeguarding policy & procedures](#) which is built on strong multi-agency partnerships working together with adults to prevent abuse and neglect where possible, and to provide a consistent approach when responding to safeguarding concerns. This entails joint accountability for the management of risk, timely information sharing, co-operation and an interconnected approach that respects boundaries and confidentiality within legal frameworks.

- 1.2. Definition of adult safeguarding: Safeguarding is defined as ‘protecting an adult’s right to live in safety, free from abuse and neglect.’ (Care and Support statutory guidance, chapter 14ii). Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of adults.

2. Why this policy exists

- 2.1. There are fundamental differences between the legislative framework for safeguarding children and that for adults, which primarily revolve around who can make decisions.
- 2.2. Adults have a legal right to make their own decisions, even if those decisions are unwise, if they have the capacity to make that decision, which must be free from coercion or undue influence.
- 2.3. However, if an adult repeatedly makes unwise decisions that put them at significant risk of harm or exploitation or makes a particular unwise decision that is obviously irrational or out of character, there might be need for further investigation.
- 2.4. Moreover, the wishes of victims of crime can be overridden in the public interest, which includes responding to suspected offences against them or the suspected abuse or neglect of others.
- 2.5. This policy sets out how Safer London will ensure that the adults accessing its services are appropriately safeguarded whilst protecting their right to self-determination.

3. Scope

- 3.1. This policy applies to anyone working for or on behalf of Safer London including senior managers, paid staff, volunteers – including trustees, sessional workers, agency staff and students. Wherever this policy refers to staff or employees it should be taken to refer to all the above unless indicated otherwise.
- 3.2. This policy applies to anyone aged 18 and over. For those aged under 18 please refer to Safer London’s Safeguarding & Child Protection Policy.
- 3.3. In the context of the legislation, specific adult safeguarding duties apply to any adult who:
 - has care and support needs, and
 - is experiencing, or is at risk of, abuse or neglect, and
 - is unable to protect themselves from either the risk or the experience of abuse or neglect because of those needs.

Within the scope of this definition are:

- all adults who meet the above criteria regardless of their mental capacity to make decisions about their own safety or other decisions relating to safeguarding processes and activities;
- adults who manage their own care and support through personal or health budgets;
- adults whose needs for care and support have not been assessed as

eligible or which have been assessed as below the level of eligibility for support;

- adults who fund their own care and support;
- children and young people in specific circumstances as detailed in 3.5 and 3.6 below.

- 3.4. Adults in custodial settings, i.e. prisons and approved premises, are outside the scope of this policy.
- 3.5. *Transitions*: the Children and Families Act 2014 and the Care Act 2014 together create a new comprehensive legislative framework for transition, i.e. when a child turns 18 (the Mental Capacity Act applies once a person turns 16). The duties in both Acts are on the Local Authority, but this does not exclude the need for all organisations to work together to ensure that the safeguarding adult's policy and procedures work in conjunction with those for children and young people. Where there are on-going safeguarding issues for a young person and it is anticipated that on reaching 18 years of age they are likely to require adult safeguarding, and that they will continue to access Safer London services, safeguarding arrangements should be discussed as part of transition support planning and protection.
- 3.6. *Children who abuse*: If a child or children is/ are causing harm to an adult covered by these Adult Safeguarding procedures, action should be taken under these procedures, and a referral to and close liaison with children's services should take place. Abuse towards parents and other relatives (for example, grandparents, aunts, uncles), some of whom may be adults at risk, can be carried out by young people and children as well as by other adults; this can include physical, sexual and financial abuse. See guidance section on 'adolescents who abuse parents' for more information.
- 3.7 This policy does not form part of Safer London's contract of employment. Consequently, Safer London reserves the right to change the policy at any time when considered necessary. However, failure to comply with this policy may lead in action being taken against the non-compliant staff member or volunteer and may lead to dismissal.

4. Roles and responsibilities

- 4.1. **Safer London** is fully committed to safeguarding adults, and all those who work for Safer London in any capacity have a duty to safeguard and promote the welfare of the adults with whom we work, regardless of whether their role involves direct contact with service users.
- 4.2. **All staff** are responsible for ensuring that they read and understand this policy, and act in line with it in all their interactions with vulnerable adults. Employees are responsible for ensuring that they keep their safeguarding training up to date, including completing mandatory on-line face to face training and refresher courses
- 4.3. **The Senior Leadership Team (SLT)** is responsible for ensuring that this policy is adhered to, and for taking appropriate action where a staff member is found to have acted in a way that is contrary to this policy.

- 4.4. **The Chief Executive Officer** has overall accountability for all matters concerning safeguarding, although the day-to-day management of this area is delegated to the Director of Safeguarding and Quality Practice.
- 4.5. **The Lead for Safeguarding and Quality Practice** is the Designated Safeguarding Lead (DSL), responsible for safeguarding and promoting the welfare of adult service users. This role oversees safeguarding arrangements, delivers training on how to identify concerns, advises on responses that meet the Need to Know criteria and, in consultation with the CEO, is also responsible for reporting relevant incidents to the Trustees and to statutory bodies where applicable. The DSL is supported in this role by the **Deputy Designated Safeguarding Lead** and by the **Lead Trustee for Safeguarding**.
- 4.6. **All managers** are responsible for supporting staff to follow this policy and helping them to report safeguarding concerns and address challenges where appropriate. Managers are responsible for notifying the DSL of any Need to Know incidents, for keeping their own training up to date and for ensuring that the staff members they line-manage complete appropriate training and regular refreshers.

5. Legal framework

- 5.1. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect adults in England.
- 5.2. Key legislation includes:
- The Care Act 2014
 - The Protection of Freedoms Act 2012
 - Domestic Violence, Crime and Victims (Amendment) Act 2012
 - The Equality Act 2010
 - The Safeguarding Vulnerable Groups Act 2006
 - Mental Capacity Act 2005
 - Sexual Offences Act 2003
 - The Human Rights Act 1998
 - The Data Protection Act 1998
 - Care and Support Statutory Guidance (re-issued July 2018)
 - Domestic Abuse Bill 2019
 - The Modern Slavery Act 2015

6. Related policies and procedures

- 6.1. This policy should be read alongside the following relevant Safer London policies and procedures which can be found [here](#) on SharePoint:
- Dignity at Work
 - Managing Allegations
 - Information Sharing
 - Case Recording and Records Retention Policy
 - Conduct Code
 - Recruitment Policy
 - Feedback and Complaints Policy

- Whistleblowing Policy
- Health and Safety Policy
- Safeguarding and Child Protection Policy and Procedures
- Preventing Abuse for Extremist Purposes
- Lone Working Policy
- Death of a Service User Policy
- Serious Case and Domestic Homicide Reviews Policy
- Acceptable Use of Social Media Policy
- Film, Photography & Audio Policy
- Illegal Items & Criminal Behaviour Policy
- Statement on Confidentiality
- Need to Know Protocol

7. Review

- 7.1. Safer London is committed to reviewing its Safeguarding policy and practice annually or earlier if:
- there are significant changes in legislation or government guidance that affect this policy;
 - it is invoked and use suggests that amendments are needed; or
 - organisational restructures lead to changes in reporting lines or other processes.
- 7.2. The designated policy owner is responsible for ensuring that the policy and procedures are reviewed and updated as needed, including when there are changes to any of the individuals or roles mentioned in the policy or procedures. Appendix 2 provides a link to the SharePoint location for the key individuals/ roles mentioned in the policy and procedures.

Adult Safeguarding Procedures

1. Different ways to raise a concern

- 1.1. If you suspect that abuse or neglect is happening, or that an adult you are working with is unsafe:
- It is not your role to investigate;
 - Speak to your line manager, and follow their advice about what to do next;
 - Contact the adult safeguarding access point in the relevant Borough for guidance.
 - Where the concern meets the Need to Know criteria contact the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead;
 - Outside working hours contact the outside hours on call service – 0207 129 7851.

- 1.2. Recording information: Records must be clear, accurate and factual, and provide evidence for the points you make. Keep in mind that your records protect both the service user and the person making the record. The **Case Recording and Records Management Policy** sets out what is required of case records.

Log your concerns in the service user's record on Apricot using the Safeguarding Concerns form - see Appendix 4 for instructions on how to do this. There is also guidance on Apricot.

- 1.3. Referrals to Adult Social Care: If, based on the information available, it appears that the following three conditions are met¹, a referral **must** be made to the Local Authority:
- i. A person has care and support needs
 - ii. They may be experiencing or at risk of abuse and neglect
 - iii. They are unable to protect themselves from that abuse and neglect because of their care and support needs

Where a crime has been, or may have been committed, you must report this to Police.

- 1.4. *What to do if you have concerns about a colleague:* Refer to Safer London's **Managing Allegations policy** and consult your manager; they may decide to contact the relevant Local Authority's Designated Officer and/or make a referral to social care. Do not alert the colleague about your concerns.
- 1.5. *What to do if you have concerns about Safer London's practice:* If you are concerned that certain practices or behaviours on the part of Safer London or its senior management could lead to or have led to its practice being unsafe for the people Safer London works with, you should refer to **the Whistleblowing Policy & Procedures**.

2. How to respond to concerns or allegations of harm

- 2.1. As a general principle you must assume that it is your responsibility to raise a

¹ If you are not sure whether these conditions have been met speak to your line manager, the DSL or the DDSL

safeguarding concern if you believe an adult at risk is suffering or likely to suffer abuse or neglect and/ or are a risk to themselves or another, rather than assume someone else will do so. You should share the information with the local authority Adult Safeguarding Team and/or the police if you believe or suspect that a crime has been committed or that the individual is immediately at risk (see also section 5, Information Sharing, below).

- Never ignore anything that might indicate abuse is taking place.
- Always record everything clearly and accurately.
- Work collaboratively with other professionals.
- Always seek the adult's views directly, and preferably away from any other adults including carers.
- Look for the patterns in small concerns – you may build up a full picture over time.
- Consider every adult as an individual.

2.2. In all adult safeguarding work, anyone working with the adult at risk must establish whether there are any children in the family, and whether checks should be made on children who are part of the same household, irrespective of whether they are dependent on care either from the adult at risk or from the person alleged to have caused harm to that adult.

2.3. If an adult discloses abuse to you:

Do:

- listen and accept;
- try not to interrupt;
- tell them they've done the right thing by telling you and ask them what they would like to happen next;
- inform them of what you are going to do;
- make accurate notes using their own words as soon as possible and in any case within 24 hours;
- inform your line manager
- inform the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead in Need to Know cases

Don't:

- promise confidentiality – you may need to share information with others to ensure that appropriate action is taken and the concern dealt with;
- investigate;
- ask leading questions;
- ask them to repeat the disclosure several times.

Where a crime has been, or may have been, committed you must report this to Police.

2.4. *Mental capacity and consent:* The Mental Capacity Act 2005 provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves and establishes a framework for making decisions on their behalf. This applies whether the decisions are about life-changing events or about everyday matters. All decisions taken in the adult safeguarding process must comply with the Act.

- 2.5. The Mental Capacity Act outlines five statutory principles that underpin work with adults who may lack mental capacity:
- i. A person must be assumed to have capacity unless it is established that they lack capacity.
 - ii. A person is not to be treated as unable to make a decision, unless all practicable steps to help them to do so have been taken without success.
 - iii. A person is not to be treated as unable to make a decision merely because they make an unwise decision.
 - iv. An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in that person's best interests.
 - v. Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be achieved as effectively in a way that is less restrictive of the person's rights and freedom of action.
- 2.6. The majority of adults that require additional safeguards are people who are likely to lack mental capacity to make decisions about their care and support needs.
- 2.7. Mental Capacity refers to the ability to make a decision **about a particular matter at the time the decision is needed**. In other words, it is not a fixed state but dependent on the specific context and circumstance: someone may have mental capacity in regard to one area of their life or at some periods, but not at other times or in regard to other issues. You must satisfy yourself that the adult has the mental ability to make the decision themselves; if you are not satisfied that this is the case it is best to err on the side of caution, identify the risks and consider support or services that will mitigate the risk.
- 2.8. It is always important to establish the mental capacity of an adult who is at risk of abuse or neglect, should there be concerns over their ability to give informed consent to:
- planned interventions and decisions about their safety;
 - their safeguarding plan and how risks are to be managed to prevent future harm.
- 2.9. Useful guidance can be found on the Social Care Institute for Excellence [Mental Capacity Act](#) pages, but always talk to the Designated Safeguarding Lead or their Deputy about mental capacity as this is a complex area and it is important that a suitably trained person makes the assessment of a person's mental capacity if there is any doubt.
- 2.10. *Disclosure of illegal activities*: If an adult discloses - or you suspect that - they are in possession of an illegal item or possibly engaged in criminal activity, you must in first instance ensure the safety of that adult and of yourself. The Dos and Don't set out above still apply, but you should consult the **Illegal Items & Criminal Behaviours Policy** for further guidance at the earliest opportunity.

3. Recruitment of Staff and Volunteers

- 3.1. Safer London has a **Safer Recruitment Policy** which sets out the use of safe recruitment practices, and our selection and vetting procedures include checks into the eligibility and suitability of all staff who have direct or indirect (e.g. helpline, e-mail) contact with service users or access to their personal information. Because of their position within the charity, Safer London will always obtain DBS clearance for anyone serving as or seeking to become a Trustee.

- 3.2. Safer London has **Feedback & Complaints policies and procedures** and a **Managing Allegations policy** which set out how service users and others can voice concerns about unacceptable and/or abusive behaviour on the part of a Safer London staff member.

4. Supervision, Support and Training for staff and volunteers

- 4.1. Safer London ensures that anyone working with adults at risk is appropriately monitored and supervised in accordance with their roles and responsibilities.
- 4.2. Safer London ensures that all its employees are equipped to embed safeguarding within their professional practice. They are supported in this through training which is tailored to their roles and duties and in accordance with their levels of contact with and responsibility for those who access our services. This ranges from those who have limited or no contact with service users as part of their work to those who have the highest levels of responsibilities for them, including at strategic level.
- 4.3. Training is designed to achieve the required levels of competency in regard to safeguarding adults and is constantly updated to reflect emerging issues and new learning e.g. from Safeguarding Adult Reviews. Details of what training should be completed, when it should be completed and by whom is set out in the annual workforce development plan.
- 4.4. Training is not limited to formal events and can include a wide range of learning and development activities such as sharing expertise, e-learning, shadowing and presentations. Safer London has systems to evaluate the quality and effectiveness of training provided and its impact on the delivery of its services.
- 4.5. Safer London uses the [Training Evaluation and Impact Analysis Framework](#) developed by The London Safeguarding Training Sub-Group. The evaluation focuses on the extent to which training is contributing to improving the knowledge and skills of the workforce with regard to working together to safeguard and promote the welfare of children and adults at risk. Evaluation includes the following: Relevance, currency and accuracy of course content; Quality of training delivery; Short and longer term outcomes; and Impact of working together and inter-professional relationships.

Quality Assurance of Training: All external trainers are required to go through a formal tender process - as set out in the 'Procurement Policy' - for selection against set quality standards. Single Agency Training is also subject to a review against quality standards.

- 4.6. Management support contributes to the effectiveness of learning and development: Safer London managers support their staff to attend training and transfer their learning into practice by ensuring they have enough time, resources and opportunities to use their new skills. Learning and development is a standing item on our supervision template and one-to-one sessions always include a discussion on learning from any recent courses/events.

5. Information sharing

- 5.1. Learning from recommendations of Safeguarding Adult Reviews shows that the importance of effective multi-agency working is a common feature, and all relevant

organisations and partners owe legal duties in relation to the safeguarding of adults.

- 5.2. Organisations contributing to effective inter-agency working can achieve this through creative joint working partnerships that focus on positive outcomes for the individual(s).
- 5.3. Local authorities and partner organisations – including Safer London - should co-operate in order to deliver effective safeguarding, both at a strategic level and in individual cases, where they may need to ask one another to take specific action in that case.
- 5.4. Section 6 of the Care Act 2014 describes a general duty to co-operate between Local Authorities and other organisations providing care and support. This includes a duty on the Local Authority itself to ensure co-operation between its adult care and support, housing, public health and children's services.
- 5.5. Section 7 of the Care Act 2014 provides a new ability to request co-operation from a relevant partner or another local authority, in relation to an individual case. The local authority or relevant partner must co-operate as requested, unless doing so would be incompatible with their own duties or have an adverse effect on the exercise of their functions.
- 5.6. Sharing the right information, at the right time with the right people, is fundamental to good safeguarding practice.
- 5.7. The Care Act 2014, Section 45 - Supply of Information Duty - covers the responsibilities of others to comply with requests for information as detailed above. Sharing information between organisations as part of day-to-day safeguarding practice is already covered in the common law duty of confidentiality, the General Data Protection Regulations 2018, the Human Rights Act 1998 and the Crime and Disorder Act 1998.
- 5.8. Partner organisations may be asked to share information through agreed information sharing protocols. SCIE has produced helpful practice guidance and the Metropolitan Police Service Information Sharing protocol is a useful example. See Appendix 4, Additional Guidance for further details.
- 5.9. *Consent in relation to safeguarding*: The Care Act 2014 advises that the first priority in safeguarding should always be to ensure the safety and well-being of the adult. See the SCIE guidance and talk to your line manager, the DSL or DDSL if you are unsure about how best to do this.
- 5.10. Adults may refuse to give their consent to the sharing of safeguarding information for several reasons. For example: they may be unduly influenced, coerced, or intimidated by another person; they may be frightened of reprisals; they may fear losing control; they may not trust social services or other partners; or they may fear that their relationship with the abuser will be damaged. Reassurance and appropriate support may help to change their view on whether it is best to share information. When faced with a refusal to share information you should consider the following:
 - Explore the reasons for the adult's objections – what are they worried about?
 - Explain the concern and why you think it is important to share the information.
 - Tell the adult with whom you may be sharing the information and why.

- Explain the benefits, to them or others, of sharing information – could they access better help and support?
- Discuss the consequences of not sharing the information – could someone come to harm?
- Reassure them that the information will not be shared with anyone who does not need to know.
- Reassure them that they are not alone, and that support is available to them.

5.11. *Making Safeguarding Personal* is a person-centred approach which means that adults are encouraged to make their own decisions and are provided with support and information to empower them to do so. This approach recognises that adults have a general right to independence, choice and self-determination including control over information about themselves. You should strive to deliver effective safeguarding consistent with both principles mentioned above, which should ensure that the adult has accessible information so that they can make informed choices about safeguarding: what it means, risks and benefits and possible consequences. You will need to clearly define the various options to help support them to decide about their safety.

5.12. If, after this, the adult refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, their wishes should generally be respected. However, there are several circumstances where you can reasonably override such a decision, including:

- The adult lacks the mental capacity to make that decision – this must be properly explored with guidance from the DSL or DDSL and recorded in line with the Mental Capacity Act 2005.
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent.
- Other people are, or may be, at risk, including children.
- Sharing the information could prevent a serious crime.
- A serious crime has been committed and sharing the information will help the investigation of that crime.
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral.
- Staff are implicated.
- There is a court order or other legal authority for acting without consent.

5.13. In such circumstances it is important to keep a careful record of the decision-making process. You should seek advice from managers in line with Safer London's 'Information Sharing Policy' before overriding the adult's decision, except in emergency situations. Managers should make decisions based on whether there is an overriding reason which makes it necessary to act without consent and whether doing so is proportionate because there is no less intrusive way of ensuring safety. Legal advice should be sought where appropriate. If the decision is to act without the adult's consent, then unless it is unsafe to do so, the adult should be informed that this is being done and of the reasons why.

5.14. If none of the above apply and the decision is made not to share safeguarding information with other safeguarding partners, or not to intervene to safeguard the adult you should:

- Support the adult to weigh up the risks and benefits of alternative options.
 - Ensure they are aware of the level of risk and possible outcomes.
 - Offer to arrange for them to have an advocate or peer supporter.
 - Offer support for them to build confidence and self-esteem if necessary.
 - Agree on **and record** the level of risk the adult is taking.
 - Record the reasons for not intervening or sharing information.
 - Regularly review the situation.
 - Try to build trust to enable the adult to better protect themselves.
- 5.15. It is important that the risk of sharing information is also considered. In some cases, such as domestic violence or hate crime, it is possible that sharing information could increase the risk to the adult. Safeguarding partners need to work jointly to provide advice, support, and protection to the adult in order to minimise the possibility of worsening the relationship or triggering retribution from the abuser.
- 5.16. *Need to Know Protocol:* All staff must ensure that the Designated Safeguarding Lead or their Deputy is informed as soon as possible of the occurrence of any of the situations set out in Appendix 3 of this policy.
- 5.17. In cases of “need to know”, Safer London may need to prepare a brief summary that includes the service user’s details, the nature of the incident and the plan of action (where relevant) for the relevant contact in the Authority where the service user resides. Managers must familiarise themselves with any requirements to do this that may be set out in contracts within their services. Some serious incidents may need to be reported to organisations such as the Charities Commission, and the DSL will manage this where applicable.

Appendix 1 – Definitions, Types of abuse & Neglect and How to spot scams

Definitions:

An **Adult** is anyone aged 18 or over.

An **Adult at Risk** is a person aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); and
- Is experiencing, or is 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.

An **Adult in need of care and support** is determined by a range of factors including personal characteristics, factors associated with their situation or environment and social factors.

NB: a person's disability or frailty does not mean that they will inevitably experience harm or abuse. In the context of safeguarding adults, the likelihood of an adult in need of care and support experiencing harm or abuse should be determined based on a range of social, environmental and clinical factors, not merely because they may be defined by one or more of the above descriptors.

In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse.

Abuse is a violation of an individual's human and civil rights by another person or persons.

Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (Mental Capacity Act 2005).

Types of Abuse and Neglect

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. The Care Act 2014 identifies the following list as an illustrative guide and is not intended to be exhaustive as to the sort of behaviour which could give rise to a safeguarding concern.

- Self-neglect – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- Modern Slavery – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

- Domestic Abuse and coercive control – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.
- Discriminatory Abuse – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.
- Organisational Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- Physical Abuse – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- Sexual Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Financial or Material Abuse – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. See Appendix 3 for signs that someone is the victim of a financial scam.
- Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Emotional or Psychological Abuse – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Additionally, the following forms of abuse, although not included in the Care Act 2014, may also be relevant:

- Cyber Bullying
- Forced Marriage – the forced marriage of adults with learning disabilities occurs when the adult does not have the capacity to consent to the marriage.
- Mate Crime – a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.'
- Radicalisation
- County Lines
- Criminal Exploitation - the victim may have been criminally exploited even if the activity appears consensual.

Indicators of abuse

Any of the following signs might be indicators of abuse or neglect in an adult:

- Unexplained bruises or injuries or lack of medical attention when an injury occurs.
- Belongings or money going missing.
- Someone stops engaging with Safer London services.

- Someone losing or gaining weight, an unkempt appearance or marked deterioration in personal hygiene.
- A change in the behaviour or confidence of a person, particularly if this appears to be in relation to the presence of one or more specific individuals.
- Signs of self-harm.
- Person shows a fear of a particular group or individual.
- They may tell you / another person they are being abused (a disclosure).
- Person is being harassed in relation to protected characteristics under the Equality Act.
- Person's needs are not being met.
- Anybody intentionally striking another individual or subjecting them to unwanted physical contact.
- Person is receiving unwanted sexually explicit text messages.
- Person is receiving threats of harm or abuse.
- Others are persistently blaming an individual or undermining their self-esteem and confidence.

How to spot the signs that a vulnerable adult is being scammed

Scams are a form of financial abuse and can be sophisticated, drawn out and based on real or feigned relationships.

The following information comprises excerpts taken from a new guide on protecting adults from scams. The full guide covers the different types of scams, risk factors and approaching victims, and subscribers can [read the guide](#) on Inform Adults.

Safeguarding adults at risk from abuse and neglect is a core activity, but workers may not realise that protecting them from scams falls into this category. However, the law and policy in both England and Wales is clear that it does. Section 42 of the Care Act 2014 and section 126 of the Social Services and Well-being (Wales) Act 2014 (the Well-being Act) place duties on local authorities to make enquiries when they have reasonable cause to suspect that a person with care and support needs is experiencing, or at risk, of abuse and neglect and is unable to protect themselves because of their needs. Section 42 of the Care Act and section 197 of the Well-being Act define abuse as including financial abuse, which itself includes having money or other property stolen or misused, being defrauded and being under pressure in relation to money or property. And a scam is a fraud. It's an attempt to steal money or goods, usually through some scheme or ploy.

The statutory guidance to the Care Act is explicit in stating that scams, whether internet, postal or doorstep, are a form of financial abuse (paragraph 14.28).

Financial and material abuse can be limited to a person with care and support needs stating that their cash has gone missing, or a pair of earrings has been stolen. Such cases still come in as safeguarding referrals and should be taken seriously. However, the more devastating aspects of financial abuse are not opportunistic in nature or petty theft; rather, they are sophisticated and often drawn out. They are based in relationships with the scammers that are often nearly impossible for professionals to break down. The relationships that scammers form with victims could be described as adult grooming as the criminal will often spend months befriending a victim and making them increasingly dependent on them.

As such, by the time professional intervention takes place, the first hurdle is often getting the victim to see that their “friend” is in fact a criminal who is defrauding them or intends to. Such enmeshment between victim and criminal is not limited to physical contact (the kind one may see with a rogue trader) but can also be achieved via post or phone or a combination of both.

Types of scams

There are a variety of different scams, ranging from the romance scam, to the pension scam, to the clairvoyant scam. Then there is the lottery scam and the doorstep scam. The list is constantly growing. The Action Fraud site lists over 100 different types of fraud and scams and it's an ever-evolving crime.

Spotting the signs

Scams are not easy to spot at first until you start to identify the signs. These are some of the signs to look out for:

- A ‘typical’ victim may receive an inordinate amount of post, often ordered as described above. Psychic or clairvoyant mass marketing mail tends to address the recipient by their first name or by the generic term ‘friend’.
- They may have received ‘holding’ prizes – small items of little value delivered to their home as an enticement to maintain their interest.
- The landline may ring consistently or at odd hours of the day and night – these callers are often phoning from overseas, their ‘call centre’ is open 24/7 and they think nothing of getting a victim out of bed to instill the mantra of the win.
- Your client may be very secretive about this aspect of their life if you start asking questions. They have often been groomed into believing that to divulge their imminent win/cure/prophesy will result in all contact being terminated.
- Some victims may confess to being penniless. It may transpire that all of their money has gone towards constant release fees, paid out in small but increasingly regular amounts.

Many victims will refuse to believe that they are a victim or a target of crime. The fraudster has warned the victim against professional involvement from “authorities”.

Appendix 2 – Key people and contacts

- Designated Safeguarding Lead / CEO: Sherry Peck - sherrylynpeck@saferlondon.org.uk; mob: 07734 955 899
- Deputy Designated Safeguarding Lead: Jason Bascoe – jasonbascoe@saferlondon.org.uk; mob. 07793 241 268
- Lead Trustee Safeguarding: Sally Hamwee - HAMWEES@parliament.uk **[NB: should only be contacted via the DSL]**
- Data Systems Lead: Lisa Carrigan - lisacarrigan@saferlondon.org.uk; mob: 07887 638 488

The Senior Leadership Team (SLT) consists of the following roles:

- CEO – Sherry Peck
- Director of Internal Resources – Katie Mitchell
- Organisational Lead – Desmond Edward
- Organisational Lead – Carly Adams Elias
- Organisational Lead – Alison Campbell
- Organisational Lead – George Perry
- Head of Corporate Services – Racheal Raji
- Head of Business Development – John Moore
- Senior Practitioner – Jason Bascoe
- Senior Practitioner – Anna Reilly

If a safeguarding concern arises outside of normal working hours i.e. Mondays – Fridays between 9.00am and 5.00pm please contact the Out of Hours On-Call Service via the Out of Hours Emergency number: 0207 129 7851

Appendix 3 - Need to Know Protocol summary

All staff and volunteers must ensure that the Designated Safeguarding Lead is informed as soon as possible of the occurrence of any of the situations set out below. The Designated Safeguarding Lead will then keep the Chief Executive informed with regular updates. The Designated Safeguarding Lead will also include details in reports to the Trustee Board.

If you are not certain whether an incident or situation falls within this protocol let the DSL know and they will make that assessment. NB: this is a summarized version of the **Need to Know Protocol**.

1	The death of a person who uses or has used our services
2	The attempted suicide of a person who uses or has used our services
3	Any known incident of child abduction
4	Any incidents of alleged serious abuse of a child or perpetrated by a child
5	Serious incidents in the community, including where a person who is using our services or who has done so in the past: <ul style="list-style-type: none"> • is charged with murder, attempted murder, manslaughter, rape, torture, kidnapping, false imprisonment or firearms offences • is the victim of any of these offences
6	Death in service of members of staff or volunteers
7	When any member of staff or a volunteer is the subject of criminal proceedings
8	Fire or other occurrence which causes major damage or closure to a building occupied by Safer London staff
9	Serious injury to any person while on our premises or engaged in an activity organised by Safer London
10	Accidents on trips / activities organised for people who use our services
11	Serious incidents involving people who use our services, including serious wounding
12	Any matter or incident arising that may bring Safer London into the public eye or attract adverse media attention
13	Serious data breach that may result in sensitive or confidential data becoming available to unauthorised persons
14	Visits by OFSTED, Department for Education or other government agencies to a workplace where Safer London staff are located/ co-located
15	Proposed visit to a workplace where Safer London staff are located/ co-located by a Government Minister, MP or local Councillor

Appendix 4 - Additional Guidance

General safeguarding guidance:

- [Association of Directors of Adult Social Services \(ADASS\)](#) – safeguarding resources
- [London Multiagency Adult Safeguarding Policy & Procedures](#)
- Information sharing and consent – [advice for practitioners](#)
- The Social Care Institute for Excellence (SCIE)'s [Safeguarding charities resources](#)

Specific safeguarding issues:

Adolescent to parent violence and abuse (APVA)	Information guide : adolescent to parent violence and abuse (APVA)
Children at points of transition to adult services	See guidance from the National Institute for Health & Care Excellence: https://www.nice.org.uk/guidance/NG43/resources
Contextual safeguarding:	see guidance provided by the Contextual Safeguarding Network
Criminal exploitation/ County Lines	See the government's guidance , updated in February 2020, on this issue.
Domestic abuse	<ul style="list-style-type: none"> • https://www.gov.uk/guidance/domestic-violence-and-abuse • Information on the 2019 Domestic Abuse Bill
Female Genital Mutilation (FGM)	<ul style="list-style-type: none"> • See the Government's Multi-Agency Statutory Guidance on FGM issued 8 October 2018 • In February 2020 the Home Office released an on-line Resource Pack around FGM which can be found here: • A mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police. The FGM duty came into force on 31 October 2015. This document gives staff from these professions information on the mandatory reporting duty.
Forced marriage	<ul style="list-style-type: none"> • https://www.gov.uk/guidance/forced-marriage#legislation-on-forced-marriage • The Forced Marriage Unit – offer advice and support, will not contact the victim's family • Tel: 020 7008 0151; Email: fmufco.gov.uk • In an emergency dial 999
Learning Disability:	<ul style="list-style-type: none"> • SEND guidance for social care practitioners • SEND code of practice
Suicide/self-harm:	<ul style="list-style-type: none"> • If someone gives an indication that they are feeling hopeless or can't see the point of going on ask them clearly "Are you

	<p>thinking about killing yourself?” or “Are you thinking about taking your own life?”. Give reassurance that these feelings won't last forever, they are valued and that help is available. If someone tells you they are feeling suicidal ensure they aren't left alone. Remove anything they could use to take their own life. Inform the person you would like to seek medical help immediately. Call their GP, dial 999 or take them to A&E and stay with them until they are seen by a mental health practitioner. Share your concerns with your own colleagues, the person's family/friends. Signpost the person to the helplines listed here:</p> <ul style="list-style-type: none">• https://www.thecalmzone.net/help/worried-about-someone/
--	---

Appendix 5 – Logging a safeguarding concern on Apricot

Safeguarding Concern Guide – Age 18 and Over

When a Safeguarding Concern has been identified a Safeguarding Concern Form will need to be created. There are two options, one for Service Users 17 and under and one for Service Users 18 plus. Once the age of the Service User has been determined, the Safeguarding information requirements for that age range will be shown. There are mandatory sections that will need to be completed and the system will provide you with prompts regarding missing data. Some data response will create additional data fields which will need to be completed. You will not be able to save your Safeguarding form unless all the Mandatory data fields have been completed. It is advised that you save the form as you work through the sections.

1. Create a New Safeguarding Concern Form

When a Safeguarding Concern has been identified locate the Service User, and from the Service User Document Folder create the Safeguarding Form, and work through the 10 different sections in sequence.

Select “**Actions**” dropdown on Safeguarding concern and then click “**Create New**”

Additional Documents

Current work details Actions ▶

Case notes Actions ▶

Onward (external) referral form Actions ▶

Safeguarding Concern Actions ▼

1:1 Workflow (1 records) ▶ Create New

2. Internal Monitoring

Internal monitoring ▼

Current work this referral relates to if applicable

Violence ▼ Go To Record

Select the Work area the Service User is associated with

3. Views

Views ▼

Is the Service User:

18 or over ▼

--Please Select--

17 or under

18 or over

Views ▼

Is the Service User: 18 or over ▼

Has Service User consented to the referral?

Yes

No

Service User views

Notes

Click and Select 18 or over

On selection an additional data field will appear in the Views section.

1. Select Yes or No to the Question Has Service User consented to the referral?
2. If Yes is selected update the Service Users Views section
3. If No is selected to the Question Has Service User consented to the referral? No further information is required.

4. Detail of Concern and Consultation

Update all the sections

1. Add the date that the Safeguarding concern was identified
2. Provide details of the concern.
3. Complete the Report to Section
4. Select if Safeguarding lead was consulted
5. Provide the name of the lead
6. Provide the date the lead was consulted
7. Provide the name of the Manager who will be signing off the Safeguarding form
8. Select the Safeguarding Category that best reflects the type of safeguarding Concern.
(11 options to choose from)

Details of concern and consultation ▾

*Date safeguarding concern identified <input type="text" value="11/03/2021"/>	*Details of safeguarding concern ? <input type="text" value="Safeguarding concern"/>
*Reported to: <input checked="" type="checkbox"/> Social Care <input type="checkbox"/> Police <input type="checkbox"/> Threshold not met - recording concern for information	*Safeguarding lead consulted? ? <input checked="" type="radio"/> Yes <input type="radio"/> No
*Name of safeguarding lead <input type="text" value="Other"/> <input type="text" value="Lisa Carrigan"/> <small>This field is required.</small>	*Date safeguarding lead consulted <input type="text" value="11/03/2021"/>
*Manager's name for sign off <input type="text" value="Not *Applicable"/>	Safeguarding category <input type="text" value="-- Please Select --"/>

5. Previous Concerns and Others at Risk

1. Select Yes / No to the Question "Are Siblings/other Service Users at risk?"
2. If Yes is selected either
 - a. Add a link to the Service User on Apricot
 - b. Add the name of the sibling
3. Select Yes / No to the Question "Have there been any previous safeguarding concerns reported?"
4. If Yes is selected then provide the date and details of the previous concerns.

Previous concerns and others at risk ▾

Are siblings / other Service Users at risk? ?
 Yes
 No

Have there been any previous safeguarding concerns reported? ?
 Yes
 No

Link to at risk Service Users if on Apricot
 Hide Deactivated Links

Date/s of previous safeguarding concerns and brief details

Siblings / others at risk - list if not on Apricot

6. Social Care and Police Referral Details

Complete the details regarding any Social Care Referrals.

1. Add the date the concern was reported to Social Care
2. Add the Local Authority Borough
3. Provide the name and job title of the person contacted.
4. Identify if the service user is known to Social care
5. Update the Date of the Social Care Assessment (Check when this is completed)
6. Select the Outcome of the Referral

Social Care referral details ▾

Date report to Social Care made

11/03/2021 

Date concern acknowledged by Social Care

DD/MM/YYYY 

Local Authority Area

Bexley

Name of person taking referral and job title

Minnie Mouse

Is Service User open to Social Care already?

- Yes
 No

Date of Social Care assessment

DD/MM/YYYY 

Outcome of referral

-- Please Select --

-- Please Select --

Referral progressing to a social work assessment

No further action

Signposting to another service

Recommendation of early help assessment (or that referral remains within early help services)

Outcome of referral

Complete the details regarding any Police Referrals.

1. Add the date the concern was reported to the police
2. Add the Team spoken to
3. Provide the name of the PC/ staff member and their ID
4. Identify if a crime has been committed
5. Add details of the crime
6. Add a crime number

Police referral details ▾

Date of report to police

DD/MM/YYYY 

Date concern acknowledged by police

DD/MM/YYYY 

Team spoken to

Name of PC / staff taking the report

Name & number of PC

Force Identification Number (FIN)

Has a crime been committed Team spoken to

- Yes
 No

Details of crime

Any crime - remove (serious)

Crime number

7. Immediate Actions

If an immediate action is required / made then

1. Click on the new button

A section appears called Safeguarding action

2. Add the date of the Action
3. The details of the action
4. Provide a date you expect the action to be completed by
5. Update the status of the Action.

By selecting the “New” button a link has been created to this action. You will be able to update the action via the Link

Immediate Actions ▾

Immediate actions made Hide Deactivated Links [+ New](#)

Safeguarding action ▾

<p>*Date action made</p> <input type="text" value="DD/MM/YYYY"/>	<p>Date action to be completed by</p> <input type="text" value="DD/MM/YYYY"/>
<p>*Details of action </p> <input type="text" value="Enter New Text"/>	<p>*Action status</p> <p><input type="radio"/> In Progress</p> <p><input type="radio"/> Completed</p> <p><input type="radio"/> Delayed</p> <p><input type="radio"/> Abandoned / Canceled</p>

8. Follow Up Actions

If you have any follow up actions

1. Click on the new button

A section appears called Safeguarding action

2. Add the date of the Action
3. The details of the action
4. Provide a date you expect the action to be completed by
5. Update the status of the Action.

By selecting the “New” button a link has been created to this action. You will be able to update the action via the Link

Follow Up Actions ▾

Follow up actions made

Hide Deactivated Links

 New

Safeguarding action ▾

***Date action made**

DD/MM/YYYY 

***Details of action** 

Enter New Text

Date action to be completed by

DD/MM/YYYY 

***Action status**

- In Progress
- Completed
- Delayed
- Abandoned / Canceled

9. Upload for social care Referral documents

Upload the Social Care Referral documents to the Safeguarding form.

1. Click on the Choose File button
2. Search for the document you want to upload from your computer.
3. Upload the document.

If the form has been completed online

4. Link any forms completed online by adding the hyperlink.

Upload for social care referral documents ▾

Referral documents 

No file selected.

Up to 25 MB

Link to completed form if done online

Upload for social care referral documents ▾

Referral documents 

No file chosen

Up to 25 MB

Link to completed form if done online

10. Summary Links to Case Notes

Any activities that have taken place to support the Safeguarding Concern will be recorded in the Case Notes. These case notes should be linked to the Safeguarding form to show all the work undertaken in one place.

1. Click on the search field section
2. Select a search option (type of work)
3. Locate the work category
4. Click on the case note
5. Save Record

The case note will now be linked to the Safeguarding Form.
You can also add a case note in this section by selecting Create New

Summary - links to case notes ▾

Link to case notes relating to safeguarding

Hide Deactivated Links

 Add

Case notes Search

 Create New

-- Add Search Field -- ▾ Browse All

Type of work / topic (Case notes)

Safeguarding ▾

The following records matched your search criteria (0.05 Seconds)

Case notes (1 record)

Type of work / topic ▾	Date activity / communicati... ▾	Short case note summary (th... ▾	C
Safeguarding	01/03/2021	test	

11. Managers Sign Off

Manager Sign Off ▾

Is the information in this record satisfactory?

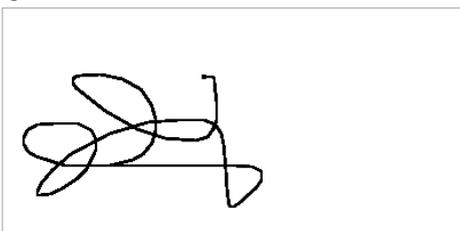
Yes ▾

Manager's signature

Name

dfdfsd

Signature



Witnessed By

Deborah Kabahinda on 17/04/2020 04:32 PM

Date of Manager sign off

DD/MM/YYYY 

Manager Sign Off is completed by the Manager. They will review the Safeguarding form, and make sure that the actions identified in the Safeguarding Form have been completed and that all the required information has been added.

1. Click on the arrow alongside the Managers Sign Off bar.
2. Update if the Information is satisfactory Yes / No
3. If Yes Enter your Name
4. Sign the Form
5. Date the form
6. If No is selected
7. Provide details of the activities that need to be completed, and advise Support worker.
8. Complete Managers Sign Off when the updates have been made.

Appendix 6 – Safeguarding Procedure Summary Flowchart

