



# Safeguarding Adults Policy

**NB: This policy should be read alongside the Safeguarding Adults Procedures**

Status	Live
Policy Owner	Head of Safeguarding & Quality Practice
Date last updated	February 2022
Date for review	February 2023
Approved by	Trustees
How will policy be disseminated	Stored on SharePoint and staff updated at Development Days
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"><li>• Safeguarding Adults Procedures</li><li>• Managing Allegations Policy</li><li>• Information Sharing Policy</li><li>• Case Recording and Records Retention Policy</li><li>• Conduct Code</li><li>• Feedback and Complaints Policy</li><li>• Whistleblowing Policy</li><li>• Health &amp; Safety Policy</li><li>• Safeguarding &amp; Child Protection Policy</li><li>• Preventing Abuse for Extremist Purposes Policy</li><li>• Lone Working Policy</li><li>• Death of a Service User Policy</li><li>• Child Protection &amp; Domestic Homicide Reviews Policy</li><li>• Acceptable Use of Social Media Policy</li><li>• Need to Know Protocol</li><li>• Confidentiality Policy</li></ul>
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 or versions saved elsewhere are classified as uncontrolled.

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## 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.
- (iv) 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.

## **1. Overview and introduction**

- 1.1. This policy draws on the [London multi-agency 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.
- 1.3. There are fundamental differences between the legislative framework for safeguarding children and that for adults, which primarily revolve around who can make decisions.
- 1.4. 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.
- 1.5. 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.
- 1.6. 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. Scope**

- 2.1. This policy applies to anyone working for or on behalf of Safer London including paid employees, 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.
- 2.2. This policy applies to anyone aged 18 and over. For those aged under 18 please refer to Safer London’s Safeguarding & Child Protection Policy.
- 2.3. 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.
- 2.4. 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.
- 2.5. Adults in custodial settings, i.e. prisons and approved premises, are outside the scope of this policy.
- 2.6. *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.
- 2.7. *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.
- 2.8. 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 to action being taken against the non-compliant staff member or volunteer and may lead to dismissal.

### 3. Roles and responsibilities

- 3.1. **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.
- 3.2. **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
- 3.3. **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.
- 3.4. **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 Head of Safeguarding & Quality Practice.
- 3.5. **The Head of Safeguarding & 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**.
- 3.6. **All managers** are responsible for supporting employees 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 employees they line-manage complete appropriate training and regular refreshers.

### 4. Legal framework

- 4.1. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect adults in England.
- 4.2. Key legislation informing this policy 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

## **5. Recruitment of staff and volunteers**

- 5.1. 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.
- 5.2. 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.

## **6. Supervision, support and training for staff and volunteers**

- 6.1. Safer London ensures that anyone working with adults at risk is appropriately monitored and supervised in accordance with their roles and responsibilities.
- 6.2. 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.
- 6.3. 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.
- 6.4. 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.
- 6.5. 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.

- 6.6. 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.

## **7. Equity statement**

- 7.1. Safer London is committed to ensuring that everyone it works with is treated fairly and equitably. If necessary, particularly in situations where diversity issues may be a factor, an Equality Impact Assessment (EIA) may need to be carried out to ensure that these are fully considered and that the process is not impacted by conscious or unconscious bias on the part of any participant.

## **8. Data protection**

- 8.1. Safer London processes personal data collected as part of its work in accordance with its Data Protection policy.
- 8.2. Specifically, any data collected during and in relation to any process under this policy, including any HR process arising from non-compliance, is held securely and accessed by, and disclosed to, only to those individuals who genuinely need access to this data.
- 8.3. Inappropriate access or disclosure of personal data constitutes a data breach and should be reported in accordance with Safer London's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure.

## **9. Related policies and procedures**

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

- Whistleblowing Policy
- Health & Safety Policy
- Safeguarding & Child Protection Policy
- Preventing Abuse for Extremist Purposes Policy
- Lone Working Policy
- Death of a Service User Policy
- Child Protection & Domestic Homicide Reviews Policy
- Acceptable Use of Social Media Policy
- Need to Know Protocol
- Confidentiality Policy

## **10. Review**

- 10.1. 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.
- 10.2. 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.

## Appendix 1 - Need to Know Protocol summary

All employees must ensure that the Designated Safeguarding Lead<sup>1</sup> (DSL) is informed as soon as possible of the occurrence of any of the situations set out below. The DSL will then keep the Chief Executive informed with regular updates. The DSL will also include details in reports to the Trustee Board.

Anyone who is not certain whether an incident or situation falls within this protocol should let the DSL know and they will make that assessment. **NB:** this is a summarized version of the **Need to Know Protocol** which can be accessed [here](#).

1	The death of a person who uses or has used our services
2	Death by suicide or attempt to take their own life by a person who is using 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"> <li>• is charged with murder, attempted murder, manslaughter, rape, torture, kidnapping, false imprisonment or firearms offences</li> <li>• is the victim of any of these offences</li> </ul>
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	Any other serious incidents involving people who use our services that could lead to further significant harm
12	Any concern raised in or as part of a referral into a Safer London service that could lead to a serious incident or issue arising during our work with the young Londoner or family referred
13	Osman warning has been issued by Police to a person who uses our services
14	Any matter or incident arising that may bring Safer London into the public eye or attract adverse media attention
15	Serious data breach that may result in sensitive or confidential data becoming available to unauthorised persons
16	Visits by OFSTED, Department for Education or other government agencies to a workplace where Safer London staff are located/co-located
17	Proposed visit to a workplace where Safer London staff are located/co-located by a Government Minister, MP or local Councillor