

# Adult Safeguarding Policy and Procedure

***'Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances.'***

[Care and Support Statutory Guidance](#), Department of Health, updated June 2020

**Fulham Good Neighbours (FGN) will not tolerate abuse or neglect.** We are committed to safeguarding all adults, particularly those with care and support needs. We will ensure safe and effective working practices.

As per ['Making Safeguarding Personal' \(MSP\)](#) guidance, FGN ensures a person-led, outcome-focused approach. Adults will be empowered to make their own choices, identifying how best to respond to their situation. Agreed actions should be the least intrusive response to the risk; and organisations should work in partnership so to prevent, detect, and report concerns (with respect for confidentiality). FGN commits to transparency and accountability in delivering safeguarding actions.

FGN follows the [Six Key Principles](#) that underpin safeguarding work: **Empowerment, Prevention, Proportionality, Protection, Partnership and Accountability.**

## **Policy and procedure aims:**

- to outline the steps FGN will take to safeguard, minimising the risk of abuse and neglect.
- to define roles and responsibilities in collaborating with stakeholders, so to promote wellbeing.
- to ensure that necessary actions are taken where an adult is deemed to be at risk.

## **Legislation and legal requirements:** This policy is based on:

- The Care Act 2014 and the Care and Support Statutory Guidance; NCVO guidance.
- [London Safeguarding Adults](#); and [Hammersmith and Fulham's Safeguarding Adults](#) procedures; and
- [Human Rights Act 1998](#)

## **Adult safeguarding duties (as per The Care Act 2014) apply to any adult who:**

- has care and support needs; and
- is experiencing, or is at risk of, abuse and neglect; and
- is unable to protect themselves from the risk or experience, because of those needs.

**'An adult with care and support needs'** is an individual aged 18+ who is, or may be, in need of community care services by reason of disability, age or illness. They may need or be receiving:

- Health care, relevant personal care, or social care.
- Assistance in relation to household matters or other affairs due to age, illness, or disability.
- Conveying due to age, illness, or disability

**Some adults can be at increased risk of abuse and neglect** e.g., due to prejudice and discrimination, social exclusion, communication issues and reluctance of some adults to accept that abuse and neglect happens.

**Special consideration and attention** should be given to those who are:

- disabled or have special educational needs.
- living in a known domestic abuse situation; chaotic household; temporary accommodation.
- vulnerable to discrimination due to race, religion, or sexuality; asylum status; or English not being their first language.

**Abuse and neglect** include both **inflicting and failing to prevent**, significant harm to an individual. The Care and Support statutory guidance sets out the 10 main **types of abuse and neglect**:

- Physical, Sexual, Psychological, Financial, Discriminatory and Organisational abuse.
- Domestic violence; Modern Slavery.
- Neglect and Self-neglect.

These are not exhaustive; however, and circumstances of an individual case should always be considered. Please see section 14.17 of the [Care and Support Statutory Guidance](#) for more information.

**Cuckooing**: is when criminals target the home of vulnerable person, often so they can use the property for criminal purposes such as drug-dealing, hiding weapons and other criminal activities. A criminal will often befriend a vulnerable person in order to exploit them and use their property. The person is usually intimidated and too scared to report it to anyone.

**E-safety**: individuals can compromise their safety when using the internet and other technologies. Scamming, particularly financial scamming, is a threat which requires vigilance. Some individuals may find themselves involved in activities which are inappropriate/illegal including 'cyber-bullying'.

**Female genital mutilation (FGM)**: refers to procedures that intentionally alter and cause injury to the female genital organs for non-medical reasons. It is illegal in the UK.

**Prevent**: Radicalisation of adults with care and support needs is a form of emotional/psychological exploitation. It can take place through direct personal contact, or indirectly through social media. Common focuses of radicalisation include the far right, white supremacist ideology, ISIL, and Al Qa'ida.

**Possible signs of abuse and neglect** that you should be alert to:

- Depression, self-harm, or suicide attempts; behaviour change or withdrawal; anxiety; insomnia.
- Difficulty making friends; dishevelled appearance; limited financial means.
- Unexplained injuries (bruises, finger marks, 'non-accidental' injury, pressure ulcer)

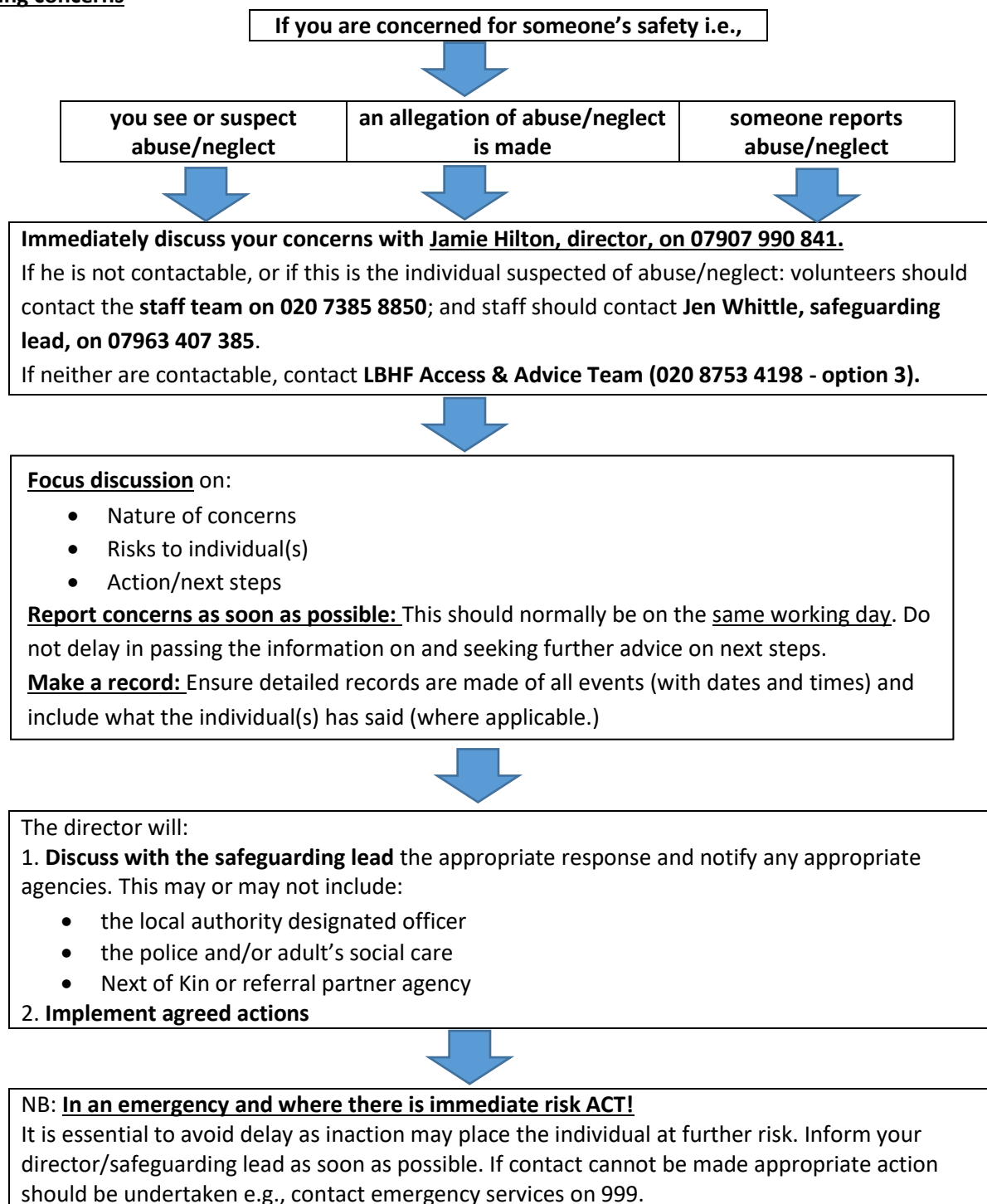
Again, this list is not exhaustive. Ask the individual about their well-being if you are unsure; there may be other explanations for the above.

**Abuse and neglect can happen anywhere**, most often by those in positions of trust. **Anyone can carry out abuse or neglect**, including:

- partners; other family members.
- neighbours; friends; acquaintances; residents; strangers; people who deliberately exploit adults they perceive as vulnerable to abuse.
- paid staff or professionals; volunteers

**All staff and volunteers have a responsibility to report** concerns to the director/safeguarding lead. If the allegation is against the director, seek advice from the safeguarding lead. If the allegation is also against the safeguarding lead, seek advice from LBHF Access & Advice Team (020 8753 4198 - option 3).

### Reporting concerns



**It is important to act** since it may be difficult for adults with care and support needs to protect themselves and to report abuse/neglect. They rely on you to help them.

### **Dealing with disclosures**

- Get brief details about what has happened and what the adult would like done, but do not probe or conduct a mini-investigation. Do not, under any circumstance, approach the alleged abuser.
- Seek consent from the adult to act and to report the concern.
- Consider whether the adult lacks capacity to make decisions about their own/other people's safety and wellbeing. If you act against their wishes or without their consent, you must record your decision and the reasons for this.

### **Recording concerns**

- A log of the concern with actions must be kept under the individual's database record and FGN's Safeguarding Log.
- As far as possible, records should be written contemporaneously and dated.
- Keep records confidential, located where the alleged abuser will not have access. Access should not be given to any unauthorised individual.

**Referral to other agencies:** In deciding whether to refer, the director and safeguarding lead will consider:

- the adult's wishes and preferred outcome; and their capacity to make an informed decision about their own and others' safety.
- the safety or wellbeing of others with care and support needs; and
- whether an individual in a position of trust is involved and whether a crime has been committed.

This should inform the decision whether to notify:

- the police if a crime has been or is suspected of being committed; and/or
- [LBHF Access & Advice Team](#) for enquiry; and any relevant regulatory bodies (e.g., Care Quality Commission, Ofsted, Charities Commission).
- family/relatives as appropriate (dependent on advice from LBHF Access and Advice Team)

The director should keep a record of the reasons for referring/not referring the concern. The director and safeguarding lead meet six monthly to review decisions, processes, and records.

**Responsibility for acknowledging concerns,** including brief feedback, will be agreed between the director and safeguarding lead. Feedback should be sensitive; and should not breach GDPR. If involved, police should be consulted prior to feedback so not to compromise any criminal investigation.

**FGN will not conduct its own safeguarding enquiry** unless instructed to do so by the local authority. The local authority will allocate a case lead as appropriate.

**Confidentiality and information sharing:** FGN expect all staff and volunteers to maintain confidentiality. In line with GDPR, FGN does not share information if not required. Information should however be shared with authorities if an adult is deemed to be at risk of immediate harm. For further guidance on information sharing and safeguarding see [here](#).

**Working with partner organisations:** FGN is committed to working in partnership. Sometimes information might be shared with our partners/statutory agencies so to help protect a beneficiary. This information is stored as per our 'GDPR and Data Protection Policy'. Staff should only share information on a 'need to know' basis and as per advice of the relevant statutory agency.

**Information requests by the police** in relation to a beneficiary where there is no immediate danger to an individual must be submitted on a [Section 29 form of The Data Protection Act](#). This must be signed by an Inspector (or an Inspector's senior) and not released without the director's authorisation.

**Services provided by a partner organisation on FGN's behalf** require the partner to have appropriate safeguarding measures in place including policies and procedures, sound recruitment and selection practices and formal complaints procedures.

**Where FGN is collaborating with other organisations**, agreement on safeguarding policies and procedures must be detailed in any formal contract. Roles and responsibilities between organisations must be clear. Any concerns about the partner organisation's practice, may lead to cessation of that partnership. Any agreement should stipulate that FGN must be informed of all incidents. If staff or volunteers become aware of allegations of abuse/neglect relating to a partner organisation, this should be discussed immediately with the director.

**Professional boundaries** should always be maintained. Staff and volunteers should not share personal contact details with beneficiaries and should not befriend beneficiaries on social media sites. The prefix '141' should be used if calling a beneficiary via a personal/private phone. **Only the FGN email and telephone number should be shared** with beneficiaries. Staff and volunteers should avoid being placed in compromising situations with beneficiaries. Please refer to our Lone Working Policy.

**Disclosure and Barring Services (DBS) and recruiting safely** (please see Policy statement on Disclosure information) FGN is committed to the safe recruitment of staff and volunteers. We conduct a [DBS](#) check for all those in regulated activity and obtain two satisfactory references.

If a member of staff or a volunteer is suspected as being unsuitable to work with adults, the director must refer it to the DBS, detailing the concern and any relevant investigation or disciplinary hearing.

**Safeguarding awareness training** is given to all staff and volunteers. Safeguarding is an agenda item at all staff meetings and staff supervisions.

**Staff and volunteer supervision:** Dealing with safeguarding disclosures can be very emotional for the individual(s) involved. Staff involved with a safeguarding case should work closely with the director to ensure appropriate support is received and they have the chance to debrief about what has or is occurring. Volunteers will be supported by the volunteer coordinator (Ruth George).

**Allegations against staff and volunteers** should be reported to the director immediately; and will be dealt with as per all other safeguarding concerns. Where allegations are particularly serious and/or there is no doubt that an offence has been committed, the police and/or LBHF Access and Advice Team will be informed immediately. A strategy will then be agreed before notifying the staff or volunteer.

The individual concerned will be informed and given an opportunity to respond. They may be removed from duties involving direct contact with the other individual(s) concerned; or required to take special leave with pay without prejudice. If they are a member of a union/professional association, they should be advised to seek support from that organisation at the outset.

Where there are clear grounds to believe that the allegations are malicious, an internal investigation will be held within three days; and disciplinary action may be taken. In serious cases the police may be notified.

**Following an allegation:** the director will give careful thought to the provision of appropriate support to staff/volunteers affected. If an allegation is substantiated and an individual is dismissed (or barred from FGN), the director will discuss a DBS referral with the local authority. It may also be necessary to notify the Charity Commission.