



Safeguarding Adults

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1.0 Introduction and scope

This Safeguarding Adults Policy has been developed in line with Wandle's values, which are:

- Think customer
- Build relationships
- Work together
- Aim high
- Own it

It will ensure that actions we undertake will be underpinned by our vision of:

"Homes to be proud of and services you can trust"

In particular we will 'think customer' by keeping the experience of our customers at the forefront of our minds and 'build relationships' by recognising that each person we interact with is unique, when handling adult safeguarding situations and concerns.

Scope

This policy applies to all staff (including temporary staff), apprentices, volunteers, contractors and agents who work for Wandle.

Our safeguarding responsibilities for anyone under 18 years old are set out in our Safeguarding Children Policy.

This policy relates to circumstances where another person or agent is causing harm to the adult at risk. It does not look to address issues of self-neglect, but recognises that sometimes self-neglect can be an indicator of safeguarding adult issues.

Our Commitments

We will:

- Empower our customers with information with what constitutes abuse and how to report it.
- Promote the dignity, safety and well-being of the adult at risk.
- Keep the interests of customers at the centre of any safeguarding activity where we can.
- Respect the rights of the person alleged to be causing harm, as far as is possible.
- Promote an organisational culture of fairness and openness to allow any concerned person to raise concerns without fear.
- Ensure that all staff and volunteers understand their role in relation to safeguarding adults. It will be mandatory for all relevant staff to undertake training to ensure that they are competent in preventing, recognising and acting on abuse and neglect, in accordance with Wandle's procedure.
- Ensure that all staff and volunteers receive management supervision that affords them the opportunity to reflect on their practice and the impact of their actions on others.

- Recognise the lead responsibilities of local authorities in coordinating safeguarding adults work. We will work in partnership with authorities and locally defined procedures when implementing this policy.
- Refer suspected or actual crime to the police.

2.0 Related Documents and Guidance

[HCA Regulatory Framework](#)

[No Secrets: guidance on protecting vulnerable adults in care](#)

[London Multi-Agency Adult Safeguarding Policy & Procedures](#)

[Safeguarding Adults – A National Framework of Standards](#)

MARAC referral form

CMARAC referral form (different Boroughs)

3.0 Internal Documents

Key Strategy	Customer Involvement
Policies:	Anti-Social Behaviour Data Protection Domestic Abuse (in development at time of writing) Safeguarding Children Whistleblowing Recruitment and Selection
Procedures	Lone Working Vulnerability
Other documents	Modern Slavery Statement ASB Permission to Disclose Form

4.0 Legal Framework

Legislation	Main powers and relevance to <i>policy subject</i>
Safeguarding Vulnerable Groups Act (2006)	<p>Prevents people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.</p> <p>Under the Act, organisations with responsibility for providing services or personnel to vulnerable groups have a legal obligation to refer relevant information to the Disclosure and Barring Service.</p>
Counter-Terrorism and Security Act (2015)	<p>Contains powers to help the UK respond to the threat of terrorism.</p> <p>It put Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism, on a statutory basis.</p>
Modern Slavery Act (2015)	<p>Gives powers for law enforcement agencies to fight modern slavery and sets out severe punishment for such crimes. Also enhances the level of support for victims of slavery.</p> <p>Also requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains. Wandle achieve this through our Modern Slavery Statement.</p>
The Care Act (2014)	<p>Under this Act we can obtain help from local authorities by referring cases to them, using their Safeguarding Adults Board (SAB). They can set up a Safe Guarding Review (SAR).</p> <p>The Act sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect.</p> <p>Any relevant person or organisation must provide information to Safeguarding Adults Boards as requested.</p>

5.0 Definitions

What does 'Safeguarding Adults' mean?

"All work to help adults at risk stay safe from significant harm." (*Social Care Institute for Excellence*)

This term replaces 'adult protection'.

Who is an 'adult at risk'?

An adult aged 18 years or over "who is or may be in need of community care services because of mental or other disability, age or illness and who is, or may be unable, to take care of him or herself against significant harm or exploitation" (*Department of Health*).

An adult at risk may therefore be a person who:

- Is elderly and frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability and/or a sensory impairment
- Has mental health needs, including dementia or a personality disorder
- Has a long-term illness/condition
- Is experiencing financial distress
- Misuses substances or alcohol
- Is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- Is unable to demonstrate the capacity to make a decision and is in need of care and support; and
- Is unable to take appropriate steps to protect themselves from harm.

This term replaces 'vulnerable adult'.

What does 'significant harm' mean?

"Ill treatment (including sexual abuse and forms of ill treatment which are not physical) and the impairment of, or an avoidable deterioration in, physical or mental health, and the impairment of physical, intellectual, emotional, social or behavioural development" (*Social Care Institute for Excellence*).

What is 'abuse'?

"A violation of an individual's human and civil rights by any other person or persons which results in significant harm." (*Department of Health*).

There are many different types of abuse that can cause significant harm.

Common categories of abuse:

- **Financial** – including misuse of the person's money and possessions, blackmail, undue pressure in connection with wills, property or inheritance
- **Physical** – such as hitting, pushing, pinching, scalding, illegal restraint or misusing medication
- **Emotional** – such as threatening to harm or abandon, intimidating, shouting and swearing
- **Sexual** – such as inappropriate touching, indecent exposure, sexual assault, rape
- **Neglect** – such as ignoring medical or physical care needs, preventing a person getting the care they need

Where does it happen?

Abuse can happen anywhere – in a person's home, in the street, in a care home, at a day centre or resource centre, in a hospital or indeed any place where a vulnerable adult might be.

What do 'Person/Group/Agency suspected of causing abuse', 'Alleged Abuser' and 'Perpetrator' mean?

An individual, group or organisation may perpetrate abuse so there are various terms that can be used to describe the 'abuser', depending on the circumstances. For example, 'perpetrator' may not be an appropriate term for people who abuse without realising it.

In other instances, perpetrators of abuse can be extremely skilled at hiding the abuse from agencies. It is vital, therefore, that all staff members are alert to the signs of abuse wherever they work in the organisation.

6.0 Abbreviations

MARAC	Multi Agency Risk Assessment Conference
CMARAC	Community Multi Agency Risk Assessment Conference
DH	Department of Health
ADASS	Association of Directors of social Services
SCIE	Social Care Institute for Excellence
MAPPA	Multi Agency Public Protection Arrangements
SAB	Safeguarding Adults Board
SAR	Safeguarding Adults Review

7.0 Policy Statement

7.1 Introduction

We are committed to a zero-tolerance policy against any kind of abuse towards anyone. We all have a responsibility to prevent, recognise and act on abuse and neglect in a timely way.

Anyone raising a safeguarding alert or concern will always be listened to, taken seriously and assured that we will act on their concern.

We are committed to Equality, Diversity and Inclusion. This policy forms part of our range of documents and resources to embed these values into all areas of our work and business.

7.2 Roles and Responsibilities

Partnership Working

We are committed to meeting the multi-agency working requirements set out in statutory guidance and local authorities' policies and procedures. This policy should be read alongside those of the relevant local authority.

We realise that good information keeping and sharing with partners is key. We will engage with local MAPPA and Community-MARAC work and contribute to Serious Case Reviews when required by the lead authority or agency.

Staff Responsibilities

All staff, apprentices and volunteers who visit customers' homes must:

- Be aware they have a duty to act promptly on any concern or suspicion that an adult who is vulnerable and/or at risk is being or is at risk of being abused
- Be aware of the different types and signs of abuse that can occur
- Inform their line manager of abuse concerns
- Make clear factual records of their concerns and actions taken
- Understand this policy and complete mandatory Safeguarding Adults awareness training

Managers

Managers have an important role to:

- Be 'safe managers' for staff to bring their concerns to
- Take responsibility for the quality of safeguarding in their teams and encourage staff to raise alerts appropriately
- Act immediately when an alert is raised, take the concern seriously and support staff to take the appropriate steps
- Refer concerns to the local authority when required. Foster a fair and open culture of safeguarding awareness.

Contractors

Contractors who visit our customers' homes are expected to comply with our Safeguarding Adults policy by ensuring that their employees are able to report adult at risk concerns. Contractors must inform us when such concerns involve our customers.

Contractor Managers

To make sure their staff are regularly trained and know how to refer, where to refer, and when to call the police and or Ambulance Services.

Safeguarding Lead

The Senior Community Investment Manager is the safeguarding lead and has overall responsibility for safeguarding adults at Wandle. The lead will ensure that all reported cases are logged appropriately in a protected case log. They will also ensure that adult safeguarding procedures are reviewed on an annual basis.

7.3 Training

Wandle will deliver on an online safeguarding course to all staff that come into contact with customers, including managers and front line staff. This would be a mandatory e-learning objective monitored by the HR department.

7.4 Our Commitment

Awareness

We will ensure that **all** staff, volunteers, contractors, agents and any third party working on our behalf, who visit customers' homes, understand this policy, are aware of the signs of abuse and know what to do if they have reason to believe that abuse is taking place. We will empower our customers with information with what constitutes abuse and how to report it.

7.5 Freedom to speak & Duty to Act

We will follow rigorous procedures for the recruitment and selection of staff and volunteers. Disclosure and Barring Service (DBS) checks will be completed when recruiting staff and volunteers to work in a 'regulated' activity.

We believe that in order to look after the long-term interests of the communities we support, the wider public and our partners it is key that staff feel confident in voicing concerns. We will support any member of staff or volunteer who reports their concerns in good faith. It is better to report a suspicion and be wrong than not to report it at all. The procedures set out clearly and comprehensively how staff can report concerns.

Any concern relating to the abuse of customers may be raised in confidence but it will be investigated. Therefore, we will need to share details of the concern on a 'need to know' basis.

7.6 Whistleblowing

When raising a concern staff, apprentices and volunteers are encouraged to speak in the first instance with their line manager. If they feel this is inappropriate, or if the allegations regard their line manager, they should contact the Head of Risk Management (or relevant officer).

Our [Whistleblowing Policy](#) for Staff provides a confidential route for staff to raise serious concerns related to suspected wrong doing or dangers within the organisation. If a staff member or volunteer asks for their identity to be protected, anonymity will be maintained wherever possible.

We are committed to listening to any suspicion and acting. However, if a member of staff or volunteer feels that Wandle is not taking their safeguarding adults concerns seriously, they have the right to explain their concerns to the Police or Social Services/Local Authorities.

7.7 How to Refer

Any member of staff who may have a safeguarding concern regarding our customers can refer this to their line manager. This can be done via email or by using a "Concern Card" (either physical, an attachment to PDA, or via email). The manager must then forward this concern to Wandle's Safeguarding Lead who will record the case.

7.8 Confidentiality and Sharing Information

We strongly believe that a right to independence, choice and self-determination is integral to people's life chances. This right extends to their having control over information about themselves and how that information is shared.

We also recognise that information sharing between organisations is essential to safeguard adults at risk. Therefore, decisions about what information is shared and with who will be taken on a case-by-case basis.

The [Data Protection Policy](#) must be followed. Wherever possible, will seek an adult at risk's consent to share information. However, we cannot guarantee full confidentiality when a duty to safeguard adults at risk, vital interests or the public interest is greater than our responsibility to an individual.

7.9 Recording cases

Clear and detailed procedures will outline the process for recording adult safeguarding cases.

7.10 Safer Recruitment

We will follow rigorous procedures for the recruitment and selection of staff and volunteers. DBS checks will be completed when recruiting staff and volunteers to work in a 'regulated' activity.

We are committed to ensuring safe working practices after the recruitment stage by reviewing checks every three years.

We will meet our responsibilities towards the Independent Safeguarding Authority and any applicable vetting and barring schemes.

7.11 Allegations against staff

There will be occasions when allegations are made that staff have been guilty of abuse against adults at risk. If the staff member is subject to a criminal investigation, consideration will need to be given to the timing of any Safeguarding Adult Review (SAR).

The individual commissioned to undertake the SAR should be independent of the department or organisation involved. This will be decided by the Senior Community Investment Manager.

7.12 Prevention

Prevention strategies might include:

- Identifying adults at risk of abuse;
- Public awareness;
- Information, advice and advocacy;
- Inter-agency cooperation;
- Training and education;
- Integrated policies and procedures;
- Integrated quality and safeguarding strategies;
- Community links and community support;
- Regulation and legislation;
- Proactive approach to Prevent

8.0 Equality Diversity & Inclusion

Equality Diversity & Inclusion is central to our business; promoting fairness and opportunity for customers and staff; helping provide the best services shaped by and for customers; and right for recruiting and developing our staff.

We are committed to celebrating diversity. To ensure equal access to our services is available, we will comply with the Equality Act 2010 and all other legislative requirements relating to equality. We will work to avoid exclusions or restrictions that are not appropriate to the housing and support needs of our tenants and that may lead to discrimination. We will endeavour to ensure that all tenants receive a consistent level of quality service.

At Wandle, we have adopted equality, diversity and inclusion as core values and place all our policies in the context of the following objectives:

- Ensuring that all our customers and staff are treated with dignity and respect
- Providing a safe, supportive and welcoming environment for staff, customers and visitors
- We seek to be a genuinely inclusive organisation and our aim is to integrate equality and diversity in all aspects of our day-to-day activity.

- We are committed to supporting customers and staff access information in a way that suits individual needs.

Equality Consideration

Under the *Equality Act 2010* Wandle must consider whether our policies adversely affect our customers and/or staff.

The following table identifies whether this policy disproportionately impacts upon any individuals in regard to the key protected characteristics, as identified in the Act:

Special Characteristic	Disproportionate impact? (Yes or No)
age	No
disability	No
gender reassignment	No
marriage and civil partnership	No
pregnancy and maternity	No
race	No
religion or belief	No
sex	No
sexual orientation	No

We do not consider this policy to disproportionately impact any individuals in regard to these characteristics. However due to the nature of the policy it was agreed upon during staff consultation (via workshop) that a full Equality Impact Assessment should still be completed.

9.0 Performance Monitoring

Performance Indicator	Performance target
Contact made to victim	Logged within one working day
Action plan agreed and sent	Logged within one working day
Offer of extra home security	Logged within one working day
Case reviews	Complete within one working week and each week thereafter.