**Safeguarding Adults at Risk Policy (the Policy)**

*Approved by the Board of Trustees, 24/09/2020, Due for review: 24/09/ 2021*

*Last update by Safeguarding Lead to the HR Committee: 24 September 2020*

1. **GENERAL PRINCIPLES AND SCOPE OF POLICY**
   1. An "adult at risk" is anyone aged 18 or over who:
      1. has needs for care and or support;
      2. as a result of care and support needs is unable to protect themselves from abuse; or
      3. is currently experiencing or is at risk of abuse.

Adults at risk may:

* + 1. have a mental or physical illness;
    2. have a learning disability;
    3. have addiction problems; or
    4. be frail. [[1]](#footnote-1)
  1. A “Member” is any member of staff, sessional worker, volunteer of The NXG Trust, or partner that The NXG Trust is working alongside or funding, who come into contact with adults at risk through or alongside The NXG Trust.
  2. Where The NXG Trust works alongside or funds a third party organisation, that third party shall comply with their own adequate safeguarding adults at risk safeguarding policy. Where such policy is not in place, The NXG Trust expects that the third party shall comply with the terms this Policy.
  3. All other Members (i.e. members of staff, sessional workers and volunteers of The NXG Trust who come into contact with adults at risk through the NXG Trust) shall comply with the terms of this Policy.
  4. The NXG Trust recognises the principles set out by the Care Act that underpin the safeguarding of adults at risk:[[2]](#footnote-2)
     1. Empowerment – Understanding that adults at risk are supported and encouraged to make their own decisions and informed consent.
     2. Prevention - It is better to take action before harm occurs.
     3. Proportionality – Seeking the least intrusive response appropriate to the risk presented.
     4. Protection – Providing support and representation for those in greatest need.
     5. Partnership - Communities have a part to play in preventing, detecting and reporting neglect and abuse.
     6. Accountability – Understanding the importance of accountability and transparency in delivering safeguarding.
  5. The NXG Trust:
     1. Welcomes, respects and values adults at risk and will protect and empower them through the services that it provides.
     2. Will work to ensure that its Members will exercise the greatest care in their use of power and authority and will avoid taking advantage of trust and that they will maintain the highest professional standards in all activities, counselling, educational and recreational situations.
     3. Will ensure that all groups involving adults at risk that are run or funded by it, are run by Members who have undertaken the necessary training to recognise abuse of adults at risk and feel able to raise such concerns with the Safeguarding Lead or through the whistleblowing procedures set out below.
     4. Will refer allegations or disclosures of abuse to the appropriate qualified professionals such as the Police and the Lewisham Adult Social Care Access & Information Team (SCAIT) (see contact details below).
     5. Will collaborate fully with the statutory and voluntary agencies concerned with the abuse and will not conduct any investigations on its own.

1. **SAFEGUARDING LEAD**

The NXG Trust’s Safeguarding Lead will be the **Besson Street and Community Development Manager (Jill Mountford)** whose name and telephone number will be given to all Members and who should be the primary point of contact for advice on or reporting of abuse.

* 1. **Responsibilities of the Safeguarding Lead**

The Safeguarding Lead shall:

* + 1. Undertake relevant training updates at least every 2 years and will be expected to keep themselves informed of the latest developments in law and practice relevant to adult safeguarding.
    2. Maintain the Safeguarding Adults at Risk folder at Besson Street (which shall include this Policy, training slides and the Home Office guidelines Safe from Harm (or any subsequent or successor guidelines)).
    3. Ensure that all new and existing Members:
       1. Sign a record to indicate that they have read the full contents of the folder and discussed any questions on how it affects their work with the Safeguarding Lead
       2. Following any material updates to the folder, sign a record to indicate that they have read the updated documents and discussed any questions on how it affects their work with the Safeguarding Lead.
       3. Attend a Safeguarding Adults at Risk training by the Safeguarding Lead.
    4. Monitor this Policy and report on its application at least annually to the HR Committee.
    5. Be responsible for overseeing that appropriate adult at risk safeguarding steps are applied when recruiting for a new Member who is expected to have contact with adults at risk. These should include obtaining telephone reference checks (wherever possible) and a DBS check, prior to the commencement of their role.

1. **RECOGNISING ABUSE**
   1. **The NXG Trust recognises that:**
      1. facilitating the self determination of vulnerable people can involve risk and will therefore ensure that such risk is recognised, understood by all concerned, and minimised.
      2. adults with a preference for sexual relations with adults at risk often target organisations such as the NXG Trust to gain access to adults at risk, therefore the Trust will be sufficiently vigilant and observe good practice in the recruitment and appointment of volunteers and paid staff working with adults at risk and in the way in which they carry out their work.
      3. the internet provides an avenue for potential abuse. While Wi-Fi may be available within Besson Street and other locations where The NXG Trust operates, this will not be made open access, and individuals will only be able to gain access to the Wi-Fi if they specifically ask for the Wi-Fi code, which will be provided only when required in relation to the delivery of services provided by or facilitated by The NXG Trust.
   2. **The NXGT recognises the following main different forms of abuse that may be experienced by adults in accordance with the Care Act: [[3]](#footnote-3)**

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| **Physical Abuse** | This includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.  Further detailed information can be found here: <https://www.anncrafttrust.org/what-is-physical-abuse/> |
| **Self-neglect** | This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one’s personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.  Further detailed information can be found here:  <https://www.anncrafttrust.org/what-is-self-neglect/> |
| **Modern Slavery** | This encompasses slavery, human trafficking, forced labour, and domestic servitude.  Further detailed information can be found here: <https://www.anncrafttrust.org/modernslavery/> |
| **Domestic Abuse** | This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person’s family. It also includes so-called “honour” based violence.  Further detailed information can be found here:  <https://www.anncrafttrust.org/disability-domestic-abuse/> |
| **Organisational or Institutional Abuse** | This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one’s own home. Organisational abuse can range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.  Further detailed information can be found here: <https://www.anncrafttrust.org/institutional-abuse-definitions-signs-symptoms/> |
| **Sexual Abuse** | This includes 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.  Further detailed information can be found here: <https://www.anncrafttrust.org/what-is-sexual-abuse/> |
| **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.  Further detailed information can be found here: <https://www.anncrafttrust.org/what-is-emotional-abuse/> |
| **Financial or Material Abuse** | This includes theft, fraud, internet scamming, and coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.  Further detailed information can be found here: <https://www.anncrafttrust.org/what-is-financial-abuse/> |
| **Discriminatory Abuse** | Discrimination is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.  Further detailed information can be found here: <https://www.anncrafttrust.org/what-is-discriminatory-abuse/> |
| **Neglect and Acts of Omission** | This includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.  Further detailed information can be found here: <https://www.anncrafttrust.org/what-is-neglect/> |

The Ann Craft Trust also includes the following categories of abuse that, despite not being included in the Care Act, should also be considered by all Members:[[4]](#footnote-4)

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| **Cyber Bullying** | Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.  Further additional information can be found here: <https://www.anncrafttrust.org/what-is-cyber-bullying/> |
| **Forced Marriage** | This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.  Further additional information can be found here: <https://www.anncrafttrust.org/what-is-forced-marriage/> |
| **Mate Crime** | A “mate crime” is when “vulnerable people are befriending by members of the community who go on to exploit and take advantage of them” (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.  Further additional information can be found here: <https://www.anncrafttrust.org/what-is-disability-hate-crime/> |
| **Radicalisation** | The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.  Further additional information can be found here: <https://www.anncrafttrust.org/what-is-the-prevent-agenda/> |

* 1. **Who might abuse adults at risk?[[5]](#footnote-5)**

Abuse and neglect might be carried out by anyone in contact with adults, even by people employed to provide care.

There may be indicators that adults are experiencing harm. This may include:

* + 1. Spouses, friends, family and neighbours
    2. People employed to provide care
    3. Paid staff or professionals
    4. Volunteers
    5. Strangers
  1. **Common signs that may indicate abuse**

All Members should be alert to the following potential social and emotional indicators of abuse. The adult at risk may:

* + 1. Appear to be withdrawn or agitated or anxious
    2. Be isolated in one room or confined to living in a small space.
    3. Have restricted mobility due to absence of suitable mobility aids
    4. Be excluded from outside social contacts
    5. Be overly subservient or anxious to please
    6. Avoid eye contact – looking at the floor or others to answer questions
    7. Show dramatic changes in behaviour or personality;
    8. Be depressed or confused, for which no medical explanation can be offered.

All Members should be alert to the following potential social and emotional indicators of physical abuse:

* + 1. Multiple bruising that is not consistent with the explanation (e.g. a fall)
    2. Cowering and flinching
    3. Unexplained bruises
  1. **Disclosing abuse**

Disclosure is the process by which a person starts to share their experiences of abuse with others. This can take place over a long period of time.

All Members should understand:

* + 1. Adults at risk may disclose directly or indirectly and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order.
    2. Not all disclosures will lead to a formal report of abuse or a case being made or a case being taken to court, but all disclosures should be taken seriously.

1. **RESPONDING TO ABUSE - IF ABUSE IS REPORTED, SUSPECTED OR DISCLOSED** 
   1. **Suspected abuse**

All Members working with adults at risk should be aware that they should never wait until an adult at risk tells them directly that they are being abused before taking action. **Instead, they should immediately discuss their concerns with the Safeguarding Lead**. If abuse is suspected, a Member is expected promptly to raise these safeguarding concerns with the Safeguarding Lead.

* 1. **Responding to actual or suspected disclosures**

When an adult at risk wants to talk about abuse to a Member (the “actioner”), the actioner will reassure them that it is right to talk about it, they will be listened to and that everything they say will be taken seriously.

* 1. **Respect for the individual**

If abuse is reported, suspected or disclosed it is important that the alleged victim be treated with dignity, involved as an equal in the investigation and kept fully informed on a regular basis.

Members shall deal with the situation sensitively and sympathetically. The feelings, views, wishes and beliefs of the adult at risk must be taken into account.

It is important that information remains confidential and that information should only be shared on a “need to know” basis.

A vulnerable adult has the right to be believed when they report abuse of themselves and/or others, unless there is unequivocal evidence to the contrary.

1. **REPORTING ABUSE**

The actioner should never talk to the alleged perpetrator about the adult at risk’s disclosure. This could make things a lot worse for the individual.

The actioner will not promise confidentiality to the adult at risk at any time and will inform them that someone else will need to be told about the matters they are talking about.

The actioner will try to maintain an unbiased approach when responding to disclosures and follow The NXG Trust’s procedures to ensure each case is treated in a fair and transparent manner and that the adult at risk gets the protection and support that they need.

* 1. **Note taking** 
     1. The actioner should make accurate and detailed notes of any concerns that they have regarding an adult at risk or disclosure that the adult at risk has made, including where possible:
        1. the adult's details (name, age, address);
        2. what the adult said or did that gave them cause for concern (if they made a verbal disclosure, write down their exact words); and
        3. any information the adult provided about the alleged abuser.
     2. These notes will need to be shared with the Safeguarding Lead.
  2. **Sharing concerns or reports of abuse with the Safeguarding Lead** 
     1. If a Member suspects abuse or an adult at risk discloses abuse, they must immediately contact the Safeguarding Lead to discuss their concerns and share all relevant information.
     2. If a Member thinks the adult may be in **immediate danger**, they should first try to discuss their concerns with the Safeguarding Lead, however if they are not available, the Member should call 999.
  3. **Reporting by Safeguarding Lead to third party agencies**
     1. The Safeguarding Lead will then assess the information and decide which is the most appropriate agency to refer the information to. This decision will be based on the urgency and time of day and may include:
        1. Lewisham Adult Social Care Access and Information Team (SCAIT)
        2. Police
     2. When the Safeguarding Lead notifies a third party organisation, they should consider what specific information is appropriate to share and who to share it with.
     3. The Safeguarding Lead shall respect the adult’s right to self-determination and the adult should be given the opportunity to decide whether they consent to their personal information being shared with a third party organisation.
     4. If consent is unable to be provided, refused or if the Safeguarding Lead is unable to seek consent, the Safeguarding Lead may use their discretion (and consult advice on an anonymous basis where necessary) to share information with third party organisations if they suspect that the adult is in immediate danger.
     5. If the Safeguarding Lead has made a verbal referral to Lewisham Adult Social Care Access and Information Team (SCAIT) or the Police, they should follow this up with a written referral as soon as possible, ideally within 48 hours.
     6. Further investigations will be carried out by the appropriate authorities and not by The NXG Trust. The NXG Trust will not hinder any authority from exercising its statutory responsibilities concerning the protection of adults at risk.
  4. **Self-Determination**

Members shall recognise that an adult at risk has a right to self-determination. Adults may choose not to act at all to protect themselves, and it is only in extreme circumstances that the law intervenes. This will often only happen when an adult is assessed to lack capacity in that area, or where the concerns may extend to children, such as when they are living in the same household.

The NXG Trust recognises the rights of adults at risk under the Mental Capacity Act 2005 and shall not discriminate or make assumptions about someone’s ability to make decisions. No Member shall pre-empt a best-interest decision for an adult at risk on the basis of a person’s age, appearance, condition or behaviour.

Further information can be found:

<https://www.anncrafttrust.org/resources/why-have-different-policies-and-procedures-for-safeguarding-children-and-adults/>

<https://www.anncrafttrust.org/resources/capacity-making-decisions/>

* 1. **Internal reporting of abuse by The NXG Trust**
     1. Following the Safeguarding Lead’s disclosure of suspected or reported abuse to a third party organisation, they will promptly provide the HR Committee and Strategy Manager with a written report. This report will not contain any personal details of the individuals involved.
     2. Following consultation, the Safeguarding Lead, HR Committee and Strategy Manager may recommend updating The NXG Trustees, Chair, Risk Register and this Policy.
  2. **Allegations or suspected abuse by a Member**

If an allegation is made against a Member, the person making the allegation will be advised to contact Lewisham Adult Social Care Access and Information Team (SCAIT) (contact details below). Where possible, the NXG Trust Chair, HR Committee Chair, Safeguarding Lead and Strategy Manager will promptly be advised of the situation.

1. **WHISTLEBLOWING**

If a Member or other individual connected to The NXG Trust considers that The NXG Trust doesn’t have a clear adult at risk safeguarding procedure or is not comfortable with how The NXG Trust has responded to their report, they should first contact Lewisham Adult Social Care Access and Information Team (SCAIT) (or alternatively the Ann Craft Trust) to discuss their concerns on: [[6]](#footnote-6)

SCAIT

Tel: 020 8314 7777 (select option 1)

Email: [scait@lewisham.gov.uk](mailto:scait@lewisham.gov.uk)

Ann Craft Trust

Tel: 0115 951 5400

Email: [ann-craft-trust@nottingham.ac.uk](tel:ann-craft-trust@nottingham.ac.uk)

1. **REVIEW**

This Policy will be reviewed every year, or more frequently in the event of changes to legislation or best practice.

The Safeguarding Lead shall provide an annual update to the HR Committee on:

* + 1. any abuse reported or suspected by undertaken by Members since the last annual update
    2. any relevant legal or policy developments in the safeguarding of adults at risk
    3. suggested updates to this Policy

1. **KEY CONTACTS**

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| **Safeguard Lead** | Jill Mountford  02076397605 |
| **Lewisham Adult Social Care Access and Information Team (SCAIT)** | The team can be contacted Monday - Friday 9am - 5pm  Tel: 020 8314 7777 (select option 1)  Fax: 020 8314 3014  [scait@lewisham.gov.uk](mailto:scait@lewisham.gov.uk) |
| **Police** | Tel: 999  Available out of hours |
| **Ann Craft Trust Helpline** | Tel: 0115 951 5400  Email: [ann-craft-trust@nottingham.ac.uk](tel:ann-craft-trust@nottingham.ac.uk) |

1. Source: <https://knowhow.ncvo.org.uk/safeguarding/steps-to-a-safer-organisation/understanding-the-risks/understanding-the-risks#section-1> [↑](#footnote-ref-1)
2. Source: <https://www.anncrafttrust.org/resources/six-principles-adult-safeguarding/> [↑](#footnote-ref-2)
3. Source: <https://www.anncrafttrust.org/resources/types-of-harm/> [↑](#footnote-ref-3)
4. Source: <https://www.anncrafttrust.org/resources/types-of-harm/> [↑](#footnote-ref-4)
5. Source: <https://www.anncrafttrust.org/resources/who-might-abuse-adults/> [↑](#footnote-ref-5)
6. Full details here: <https://www.anncrafttrust.org/contact/> [↑](#footnote-ref-6)