



Covid-19 Bereaved Families for Justice

Safeguarding Adults Policy

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Introduction

We are committed to safeguarding adults (adult protection in Scotland) in line with national legislation and relevant national and local guidelines. We will safeguard adults by ensuring that our activities are delivered in a way that keeps all adults safe.

We are committed to creating a culture of zero-tolerance of harm to adults. We will support our people to recognise adults who may be at risk of harm and the circumstances which may increase risk of harm; recognise the signs of adult abuse and neglect; and be willing to report safeguarding concerns. This extends to recognising and reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the person's own home, and in any care setting.

We are committed to safeguarding best practice and to upholding the rights of all adults to live a life free from harm, abuse, exploitation, and neglect.

Policy Statement

Covid-19 Bereaved Families for Justice believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, gender, gender identity, ethnic, cultural, racial, or national origins, religious belief or non-belief, sex, or sexual orientation.

This Policy will give clear guidance to staff, volunteers, and associates about the behaviour we expect and our legal responsibilities to safeguard and promote the welfare of adults at risk of abuse or neglect that we come into contact with at our organisation.

Scope

Our organisation fully recognises the contribution we can make in protecting adults from abuse and neglect. Our Policy applies to all adults at risk of abuse or neglect, staff, volunteers, and anyone who comes into contact with our organisation.

We recognise that there is a legal framework within which we need to work to safeguard adults and for protecting those who are unable to take action for themselves. Our people will act in accordance with relevant safeguarding adults legislation, and with local statutory safeguarding procedures. Actions taken by Covid-19 Bereaved Families for Justice will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate, and that it includes and respects the voice of the adult concerned.

Adults at risk

Under the Care Act 2014, a person is considered to be an adult if they are 18 years and older, and could potentially be considered a safeguarding concern if:

- They have needs for care and support (regardless of the level of need and whether or not those needs are being met)
- They are experiencing **OR** are at risk of abuse **AND**
- As a result of those needs they are unable to protect themselves against the abuse or neglect, or the risk of it.

To be considered as a safeguarding concern, the adult must meet the criteria set out in Care Act 2014 and detailed above.

Our commitment

Our organisation will establish and maintain an environment where adults feel safe, secure, are encouraged to talk, and are listened to. Adults will be able to talk freely to any member of staff or volunteer if they are worried or concerned about something.

We will support anyone who, **in good faith**, reports a concern that an adult is being abused or neglected or is at risk of abuse or neglect even if those concerns prove to be unfounded.

We will:

- Ensure all staff and volunteers have access to, are familiar with, and know their responsibilities within this Policy.
- Design and undertake all its activities in a way that protects people from any risk of harm that may arise from coming into contact with our organisation. This includes the way in which information about individuals is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting and managing staff and volunteers.
- Share information about anyone found to be a risk to adults with the appropriate bodies. For example: Disclosure and Barring Service, Police, Local Authority/Social Services.
- Ensure staff and volunteers receive training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Put the well-being of those at risk of harm first and actively support the adult to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to.
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.

Through training we will ensure that all our staff, volunteers, and associates:

- Understand the importance of safeguarding and their role in safeguarding adults
- Recognise an adult potentially in need of safeguarding and know what action to take
- Are able to recognise a disclosure from an adult and react appropriately
- Are aware of the different forms of abuse and neglect
- Understand dignity and respect when working with individuals
- Know how to report a safeguarding concern in line with this Policy

All new staff, volunteers, and associates will be:

- Informed of the safeguarding arrangements in place
- Given a copy of our Safeguarding Policy and told who our Designated Safeguarding Officer is and how to contact them

- Given a copy of the recording format and guidance on how to complete it, and who to pass it to
- As part of their induction, given the appropriate Safeguarding Awareness Training

Roles and Responsibilities

Any concern for an adult's safety or welfare will be recorded in writing and given to the Designated Safeguarding Officer.

The Designated Safeguarding Officer is responsible for:

- liaising with Adult Social Services and other agencies where necessary and making referrals using the agreed procedures detailed below
- ensuring that all staff and volunteers are aware of our policy and the procedure they need to follow
- ensuring that all staff, volunteers and regular visitors have received appropriate safeguarding information and training during induction and this training is refreshed every three years
- ensuring that our safeguarding policy is in place, is reviewed annually and follows the guidance provided by the NSAB
- ensuring that at all times safer recruitment practices are followed

Our organisation undertakes to remedy without delay any weakness regarding our safeguarding arrangements that are brought to our attention.

Dealing with allegations of abuse/neglect against our staff

Allegations of abuse or neglect can sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some people who harm or abuse adults.

We will support anyone who, **in good faith**, reports his or her concerns that an adult is being abused or neglected or is at risk of abuse or neglect even if those concerns prove to be unfounded.

- The concern should be raised immediately to the Designated Safeguarding Officer OR a member of the Board
- Any allegation made against a member of staff must be reported to relevant Adult Social Services within **1 working day**.
- If a concern involves immediate or serious risk or injury, we will report first to emergency services using 999.
- Where any allegations are made to the police or Adult Social Care about an employee, the relevant authorities will liaise with us about the appropriate course of action.
- If an individual [paid worker or unpaid volunteer] is dismissed or stopped from working in our organisation because the person poses a risk of harm to adults (even if they have left

e.g. resigned), we must make a referral to the Disclosure and Barring Service. **It is a criminal offence to FAIL to make a referral without good reason.**

Handling a disclosure of abuse

An adult may tell someone they trust that they are being abused or neglected. They will often not be aware of sources of help and support. It takes courage to confide in someone – the way in which staff/volunteers respond can be crucial.

Do:

- Remain calm and receptive
- Listen without interrupting
- Make it clear that you are taking the matter seriously
- Acknowledge their courage in telling you
- Let them know you will do what you can to help
- Try to get their permission for you to share the information on a need-to-know basis to enable them to receive the help or support they need
- Record, using ink, what was said as soon as possible — signing and dating it
- Contact the Designated Safeguarding Officer immediately
- Seek support

Do not:

- Allow your shock to show
- Ask leading questions
- Probe for more information
- Make assumptions or speculate
- Make negative comments about the abuser
- Make promises you cannot keep
- Give assurances of absolute confidentiality — particularly in those situations where other adults may be at risk

What to do if the adult asks you to keep the information secret

- If the adult has **mental capacity** the **public interest test applies** [if someone else could be a victim of the alleged perpetrator it is in the public interest to report it with or without the victim's consent]
- If they do not have mental capacity, you have a duty to report it without their consent

If in doubt, ask the Designated Safeguarding Officer

Making a Safeguarding Referral

We are clear that the local authority, and the Police where a concern relates to a potentially criminal matter, must lead all investigations into any allegation regarding safeguarding.

- Telephone the relevant local authority
- State that it is a safeguarding matter and explain your concerns
- Clarify with them what action should be taken and by whom
- Make a note of the person you spoke to, including the guidance they gave you, their name and contact details, on the reporting form.
- If we are unsure if a referral should be made, we will contact the relevant local authority and ask for advice. This can be anonymous on the part of the adult to help establish the level of concern and any action advised.

Records and confidentiality

If we are concerned about the safety or well being of any adult in our organisation, we will record our concerns immediately using our agreed reporting form, a copy of which is attached at the end of this Policy, and give this to the Designated Safeguarding Officer.

All information is confidential and must be managed and stored within our organisation in line with the Data Protection Act 2018 and General Data Protection Regulation (GDPR). However, we understand that where there are concerns that an adult may be at risk of harm or abuse, information can be shared with other agencies (e.g. Adult Social Care, the Police).

What is abuse and neglect?

The Care Act 2014 does not set out a specific definition of abuse. Abuse can consist of a single or repeated act(s); it can be intentional or unintentional or result from a lack of knowledge. Abuse and neglect

Can take many forms:

- It may be an isolated incident, a series of incidents or a long-term pattern of behaviour
- It could affect one person or many more
- It may be in someone's home, in public, or in an institutional setting
- It may be deliberate, or the result of negligence or ignorance
- Exploitation in particular is a common pattern in abuse and neglect
- The degree or lack of intent will inform the response which will be appropriate and proportionate to the concerns that have been raised.

Can happen anywhere — including:

- In a person's own home and/or other people's homes
- In public places or in the community
- In clubs

- At work
- Schools and colleges of further education
- In hospitals, surgeries or other health centres
- Care homes
- In places of worship
- Via electronic media including the internet
- Day centres

Patterns of abuse vary — and include:

- **Serial abusing** in which the perpetrator seeks out and ‘grooms’ individuals – sexual abuse sometimes falls into this pattern as do some forms of financial abuse and radicalisation
- **Long-term abuse** in the context of an ongoing family relationship such as domestic violence between partners/spouses or generations or persistent psychological abuse
- **Opportunistic abuse** such as theft occurring because money or jewellery has been left lying around
- **Situational abuse** which arises because pressures have built up and or because of difficult or challenging behaviour
- **Neglecting** a person’s needs because the carer has difficulties. These could be debt, alcohol, or mental health related or the specific demands resulting from caring for someone

Anyone can be an abuser or neglect someone — including:

- Spouses/partners
- Other family members
- Carers
- Neighbours
- Friends
- Acquaintances
- Local residents
- People who deliberately exploit adults they perceive as vulnerable to abuse
- Paid staff or professionals
- Volunteers and strangers

Types of abuse and neglect

The statutory guidance in the Care Act 2014 lists ten types of abuse. However, this is not intended to be an exhaustive list but rather a guide to the sort of behaviours which could give rise to a safeguarding concern. It is important that we do not limit our view of what constitutes abuse or neglect to those types or the different circumstances in which they can take place.

Physical Abuse — includes:

- hitting, pushing, pinching, shaking, grabbing, biting, hair-pulling, scalding
- misusing medication
- withholding food or drink, force-feeding
- restraint or inappropriate physical sanctions
- failing to provide physical care or aids to living – for example glasses or a walking stick

Psychological & Emotional Abuse — includes:

- threats of harm or abandonment
- deprivation of contact
- radicalisation [being exploited by those who would want them to embrace terrorism]
- humiliation, blaming, controlling
- intimidation, coercion
- harassment, verbal abuse and cyber bullying
- isolation or unreasonable and unjustified withdrawal of services or support

Financial or Material Abuse — While it can occur in isolation, it is often present with other forms of abuse and includes:

- theft and fraud
- internet scamming
- some forms can involve the perpetrator seeking out and grooming individuals
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- misuse or misappropriation of property, possessions or benefits

Sexual Abuse — includes:

- rape, sexual assault or sexual acts to which the adult has not consented to, was unable to consent to, or was pressured into consenting to
- indecent exposure; sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography, subjection to pornography or witnessing sexual acts

Sexual Exploitation is a subset of sexual abuse. It involves:

- exploitative situations and relationships where people receive 'something' (e.g. accommodation, alcohol, affection, money) as a result of them performing, or others performing on them, sexual activities
- can also involve serial abusing in which the perpetrator seeks out and 'grooms' individuals - Grooming is defined as developing the trust of an individual at risk of abuse and/or his or her family in order to engage in illegal sexual conduct

Organisational Abuse — includes:

- 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

Neglect and Acts of Omission includes:

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services
- withholding of the necessities of life, such as medication, adequate nutrition and heating

Discriminatory Abuse — includes:

- forms of harassment, slurs or maltreatment because of someone's actual or perceived age, disability, gender, gender identify, ethnic, racial, cultural or national origin, religious belief/non-belief or sexual orientation
- hate incidents are a form of discriminatory abuse

Domestic Abuse — The Domestic Abuse Act 2021 defines this as an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse **by someone who is or has been 'personally connected'** (so no longer just intimate partner or family member) regardless of gender or sexuality.

For this type of abuse **the age range is extended down to 16**. It includes:

- psychological, physical, sexual, financial, emotional abuse
- 'so called honour' based violence

Modern Slavery and Human Trafficking encompasses:

- Sexual exploitation including prostitution and 'adult entertainment'
- Forced Labour – commonly in agricultural, construction, food processing, hospitality industries, factories, car washes and nail bars
- Domestic servitude
- Organ harvesting
- Forced criminality — includes cannabis cultivation, street crime, forced begging, burglary, metal theft and benefit fraud

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. They may use concerns about an individual's immigration status or concerns that their families may be at risk if they resist exploitation.

Self-neglect covers a wide range of behaviour - including:

- neglecting to care for one's own personal hygiene, health, safety or surroundings
- behaviour such as hoarding.

The definition of self-neglect excludes a situation in which a mentally competent person, who understands the consequences of their decisions, makes a conscious and voluntary decision to engage in acts that threaten their health or safety as a matter of personal choice.

However, there is a need to assess your concerns - balancing the individual's right to choose their lifestyle, considering their mental health or capacity to understand the consequences of their actions. It can often be a care or risk management issue rather than a safeguarding concern and may require a social care assessment in the first instance.

Signs and indicators of abuse, neglect, or human trafficking

The signs of abuse are not always clear. The following may, however, suggest the possibility of abuse:

- disclosures by the victim
- concern expressed by a third party
- admissions by the perpetrator
- someone expressing fears that abuse might happen
- evidence of unreported injuries
- signs of fear or distress
- injuries suggesting a possible non-accidental cause
- explanations that are incompatible with injuries presented or where conflicting explanations are given
- a history of persistent illness, infection or injury
- inappropriate use of medication
- possessions or money going missing or bills not being paid
- property being sold without the owner's consent or understanding
- sudden or unexpected removal of an individual from a care setting
- a person is uncharacteristically withdrawn, without apparent reason
- a person is found alone and at risk without adequate explanation
- a long time lapse between injury or illness and obtaining medical or other care
- abrupt or frequent changes of doctor or caring agency
- unexplained weight loss
- uncharacteristically unkempt appearance or surroundings
- agencies have repeated difficulty in gaining access to see someone
- it is made difficult to speak to a person alone without their carer/another person present
- evidence of avoidance, including regularly missed appointments, refusal of help, etc
- evidence of alcohol or other substance misuse
- signs of stress

- history of previous abuse or violence in the family
- unexplained pain, itching, infection or injury in the anal, genital or abdominal areas
- torn, stained or bloody underclothing
- multiple unrelated people living at one address living in overcrowded private rental accommodation

SIGNS AN INDIVIDUAL MAY BE BEING LED INTO EXTREMISM

The following may indicate that an individual is at risk of being radicalised or is being exposed to extremist views:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Accessing extremist material online, including through social networking sites
- Possessing or accessing materials or symbols associated with an extremist cause
- Justifying violence to address social issues
- Graffiti symbols, writing or artwork promoting extremist messages or images
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause
- Changing their style of dress or personal appearance to accord with the group
- Attempts to recruit others to the group/cause
- Using insulting or derogatory names for another group

HATE INCIDENTS

A hate incident is any incident which is perceived by the person, or any other person as being motivated by prejudice or hatred. Hate incidents / crime can be anything from name calling, physical attack, vandalism or stealing a person's property, motivated by prejudice, hostility or hatred towards that individual because they are 'different'. It may or may not be a crime and it may or may not be linked to a safeguarding concern. There are a number of ways to report a hate incident:

- In an emergency always phone 999
- Contact the police via email or visit their website
- Going to any local authority public building such as libraries and reporting it, where staff will be able to assist if needed
- Going to your district council, local police station or anywhere you see the 'Hate Incident Reporting Place' logo

Relevant Guidance and Legislation

Care Act 2014

Domestic Abuse Act 2021

Human Rights Act 1998
 Equalities Act 2010
 Public Interest Disclosure Act 1998
 Data Protection Act 2018 (and General Data Protection Regulations (GDPR))
 Care Standards Act 2000
 Sexual Offences Act 2003
 Domestic Violence Crime and Victims Act 2004
 Mental Capacity Act 2005
 Modern Slavery Act 2015
 'Safeguarding Adults' National Framework 2005
 The Safeguarding Vulnerable Groups Act 2006
 The Protection of Freedoms Act 2012
 Section 26 and 29 of the Counter Terrorism and Security Act 2015 (Prevent duties)

Other Relevant Policies

To underpin the values and ethos of our organisation and our intent to ensure the adults we work with and support are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

Code of Conduct	Health and Safety
Complaints	Recruitment
Confidentiality and Data Protection	Whistleblowing
Equality and Diversity	

Named Designated Safeguarding Officer and Deputies

Designated Safeguarding Officer	Clara Collingwood
Telephone Number	
Email Address	clara@covidfamiliesforjustice.org
Deputy Safeguarding Contact	Josephine Makepeace
Telephone Number	
Email Address	josephine@covidfamiliesforjustice.org



Covid-19 Bereaved Families for Justice

Safeguarding Reporting Form

This form should be used to record safeguarding concerns relating to vulnerable persons. In an emergency please do not delay in informing the police or social services. All the information must be treated as confidential and reported to the Designated Safeguarding Officer within one working day or the next working day if it's a weekend. The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken. Please complete the form as fully as possible.

1 Your details — the person completing the form

Name

Position

Telephone

Email

2 Details of the person affected

Name

Address

Telephone

Email

3 Details of the incident (please describe in detail using only the facts)

4 Other present or potential witnesses			
Name			
Address			
Telephone		Email	

5 Additional relevant information (please detail anything else that you believe to be helpful or important)			

I have completed this form and provided information that is factual and does not contain my own views or opinions on the matter.

Print Name	
Signature	
Date	

OFFICE USE ONLY

A Designated Safeguarding Officer (please detail actions taken)			
Print Name		Date	