

Safeguarding Adults at Risk Policy

Version 2
June 2023



Title	Safeguarding Adults at Risk
Version	2
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Review schedule	This policy will be reviewed annually, or in line with organisational or legislative changes
Responsibility	Board of Trustees
Responsibility for development, review and implementation	DCEO
Target audience	All staff, volunteers, clients, students on placement with Mind in Bradford, visitors to Mind in Bradford, our funding bodies, job and volunteer applicants and the Board of Trustees.
Accessibility	Staff: OneDrive – People HR Volunteers: People HR Clients and others: Mind in Bradford website If you would like this policy in another format, such as large print or audio, please contact us on 01274 730815 or at email admin@mindinbradford.org.uk or speak to a member of staff
Associated policies	Safeguarding Children and Young People Policy Whistleblowing Policy and Procedure Boundaries Policy Self-Harm and Self Injury Policy Confidentiality Policy Data Protection Policy Recruitment Policy (Staff and Students)

1. Purpose

This policy applies to anyone working on behalf of Mind in Bradford, including, the board of trustees, paid staff, volunteers, contractors, agency workers and students. Its purpose is to:

- Provide protection for every adult who accesses Mind in Bradford services.
- Provide all staff and volunteers with guidance and procedures they should follow if they suspect an adult may be experiencing, or is at risk of, harm.

2. Policy Statement

We care passionately about people who both use our services and work or volunteer with us. We will ensure that all adults, especially those with care and support needs are protected from abuse and neglect.

People who use and are within our services will be supported in a respectful and dignified way and we will always support them in maintaining their human rights.

The Care Act 2014 statutory guidance defines adult safeguarding as:

“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.”

It is acknowledged that each person is an individual and whilst there is a process to follow when a safeguarding concern is raised or becomes evident, we must ensure that we keep the person at the centre of any decision making.

The policy provides clear direction about how we will safeguard people from harm. It has been evolved to ensure we are fulfilling our duty as a local mental health charity. **It is in line with and should be read in conjunction with:**

- Bradford Safeguarding Adults Board Joint Multi-Agency Safeguarding Adults Policy and Procedures (<https://wynny-bradford.trixonline.co.uk/>);

- North Yorkshire Safeguarding Adults Board Joint Multi-Agency Safeguarding Adults Policy and Procedures (<https://safeguardingadults.co.uk/working-with-adults/nysab-procedures>).

Relevant national and international legislation and guidance, including:

- Care Act 2014
- Care and support statutory guidance (Nov 2022)
- Data Protection Act 2018
- Human Rights Act 1998
- Health and Social Care Act 2012
- Mental Capacity Act 2005
- General Data Protection Regulations 2018
- Domestic Abuse Act 2021
- PREVENT Strategy (Home Office) (June 2011)
- Public Interest Disclosure Act 1998
- Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2014
- Safeguarding Vulnerable Groups Act 2006
- Information sharing Advice for safeguarding practitioners. (July 2018)
- <https://www.bradford.gov.uk/adult-social-care/adult-abuse/report-adult-abuse/>
- <https://www.saferbradford.co.uk/adults>
- <https://www.gov.uk/government/publications/the-caldicott-principles>

Our safeguarding duties apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs);
- Is experiencing, or at risk of, abuse or neglect;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

3. Commitment

We will seek to keep adults safe by:

- Valuing, listening to and respecting everyone.
- Appointing a nominated safeguarding lead, a deputy and a lead trustee/board member for safeguarding and ensuring each person understands their role and responsibilities.
- Ensuring everyone involved with Mind in Bradford understands adult safeguarding best practice through our policies, procedures and training, and knows what to do and who to contact if they have a concern relating to the welfare of an adult.
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently.
- Recruiting and selecting staff and volunteers in line with safer recruitment best practice, ensuring all necessary checks are made.
- Recording and storing and using information professionally and securely, in line with data protection legislation and guidance.
- Using our safeguarding procedures to work with and share information concerning a risk to an adult with the appropriate agencies. For example: Disclosure and Barring Service, Police, Local Authority/Social Services, other appropriate services.
- Using our HR procedures to manage any allegations against staff and volunteers appropriately.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Building a safeguarding culture where staff, volunteers and clients treat each other with respect and are comfortable about sharing concerns.

4. Safeguarding Principles

Six key principles underpin all Mind in Bradford's adult safeguarding work and are the cornerstone of *The Care Act 2014*. These are:

- 1. Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- 2. Prevention** - It is better to act before harm occurs.
- 3. Proportionality** - The least intrusive response appropriate to the risk presented.
- 4. Protection** - Support and representation for those in greatest need.
- 5. Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- 6. Accountability** - Accountability and transparency in delivering safeguarding.

5. Roles and Responsibilities

Our Board of Trustees are responsible for:

- Having a lead trustee for safeguarding.
- Ensuring safeguarding policies and procedures are reviewed, fit for purpose and up to date.
- Challenging decisions which adversely affect anyone's wellbeing.
- Managing allegations of abuse against someone involved in the organisation.

The Accountable Officer for Safeguarding is responsible for:

- Keeping up to date with relevant safeguarding practice and legislation.
- Taking overall accountability for safeguarding practice within Mind in Bradford.
- Ensuring the Board are informed and updated to changes of Policy and safeguarding concerns.
- Escalating any concerns with external organisations regarding safeguarding.

The Operational Safeguarding Lead is Responsible for:

- Keeping up to date with relevant safeguarding practice and legislation.
- Taking the lead in ensuring appropriate arrangements are in place for keeping people safe.
- Deputising for the actions required by the Accountable Officer for Safeguarding if required.

All Operational Service managers

The Service Manager is a person within the organisation who will ordinarily be responsible for:

- Deciding whether to raise a safeguarding concern with the local authority.
- Making sure everyone in the organisation is aware of their safeguarding responsibilities and knows how to respond to concerns.
- Deciding when to share information with other agencies or raise a concern with local authority and, if consent is not given, whether to override and on what basis.
- Providing appropriate direction and coaching to staff to ensure the principles of making safeguarding personal are integrated into operational practice.
- Ensuring any training undertaken by staff is discussed in supervision so that staff understanding of safeguarding is clearly established and further support identified if required.
- Ensuring that lessons learned from safeguarding issues are discussed with the team and changes in practice embedded where appropriate.
- Ensuring staff members receive briefings on local authority updates and changes.

All staff are responsible for:

- Keeping people safe from harm.
- Ensuring they are aware of this Policy and how to access it.
- Promoting the safety and welfare of people involved in Mind in Bradford's activities at all times.

- Immediately alerting a senior member of staff if they have any challenges finding or understanding the content of this Policy.
- Knowing what to do if they suspect potential or actual abuse or neglect
- Undertaking any mandatory/essential safeguarding training as required by Mind in Bradford whether this be face-to-face or e-learning.
- Familiarising themselves with any local authority safeguarding adults training or information which may be available and relevant to their role.
- Taking immediate actions, wherever possible, to ensure the adult is safe from abuse or neglect.

6. Recognising a Safeguarding Concern

Harm can occur over a series of repeated incidents or a one-off, they may form a pattern of harm, or they may be sporadic, they may be happening currently, be historic and/or be potential future harm. Anyone may be the perpetrator of harm.

Harm may take place anywhere; for example, at home, work, health settings, in the local community, over the phone and online.

The ten main types of abuse are:

- Physical abuse.
- Domestic violence or abuse.
- Sexual abuse.
- Psychological or emotional abuse.
- Financial or material abuse.
- Modern slavery.
- Discriminatory abuse.
- Organisational or institutional abuse.
- Neglect of acts of omission.
- Self-neglect.

Harm to self and risk of online abuse would also be included.

See Appendix 1 – What constitutes abuse and neglect for more detailed information and guidance around the different types of abuse and neglect.

7. Disclosures

Disclosure is the process by which people share their experiences of abuse with others. Disclosures may be made against anyone, including staff and families.

If an adult discloses abuse to you directly, use the following principles to respond:

- Assure them that you are taking the concerns seriously;
- Do not be judgemental or jump to conclusions;
- Listen carefully to what they are telling you, stay calm, get as clear a picture as you can. Use open-ended questions;
- Do not start to investigate or ask detailed or probing questions;
- Explain that you have a duty to tell your manager or designated officer;
- Reassure the person that they will be involved in decisions about them.

Other ways a safeguarding concern may arise

Disclosures are only one way in which safeguarding concerns may arise. Other ways include:

- Observations of possible signs/indicators that harm has or may take place.
- Reports by a third party that harm has or may take place.
- Safeguarding concerns could arise from online posts or during a live chat.

8. Responding to Concerns

Based on the information gathered, discuss with a senior manager and decide whether to raise a safeguarding concern.

When making this decision, staff should consider:

- If the adult has care and support needs;
- If the adult is experiencing or is at risk of abuse and neglect, as defined by The Care Act 2014;

- The nature and seriousness of the risk(s);
- The wishes and desired outcomes of the adult;
- Situations when it is necessary to report a safeguarding concern even if it is contrary to the wishes of the adult.

If abuse is witnessed, reported or suspected, where it is safe to do so, take immediate action to ensure the safety of the person, and others who may be at risk. It may be necessary to contact the emergency services. The police must be contacted if a threat to someone's life has been made.

1. Gain consent if possible from the person to share information with other agencies or services. It may be necessary to share information without consent; however, this decision would need to be made with a senior staff member.
2. Where it is suspected that a criminal offence has occurred consent should be sought from the person and a proportionate approach should be considered to reporting to the Police.
3. If the incident has been reported to the police try to preserve any evidence if an assault has been alleged. Do not offer bathing or drinks which may contaminate evidence.
4. Include a senior member of staff in your actions for discussion and support.
5. Report to statutory mental health services as required.
6. Notify relevant others.

Within Mind in Bradford, staff (and volunteers) must always inform the available Service Manager without delay. If the concerns relate to the Service Manager, inform an alternative or more senior manager within your organisation of the concerns.

9. Record Keeping/Incident Reporting

Record keeping is essential in relation to safeguarding adults. These records must include:

- The name of the alleged victim and whether consent has been obtained to raise a concern with the local authority (if not, give the views and wishes of the alleged victim regarding the matter).

- The nature of the concerns (record as much detail as is practically possible).
- The time(s) and date(s) abuse is alleged to have taken place.
- The location where abuse is alleged to have taken place.
- Name (where disclosed) of alleged abuser and relationship to alleged victim.
- Who the concerns have been discussed with within Mind in Bradford.
- Actions taken, including contact with Social Services and the Police/other agencies.
- The reason for the action.
- Any discussions that have taken place with line management.

Record what you have been told and the actions you took at the time of the incident.

Record on an Incident Reporting Form and submit to your line manager and operational safeguarding lead at the time of the incident.

10. In an Emergency or Out of Hours

When managing an incident staff may need to call the Police and/or ambulance if an emergency or urgent medical attention is required (dial 999), if for example:

- Someone is alleging that they have been sexually assaulted
- Someone has been injured because of a physical assault
- The person alleged to have caused harm needs to be removed
- The person alleged to have caused harm is still believed to be near the premises
- There is reason to believe that a crime is in progress or has been committed
- There is likely to be evidence that needs to be preserved, in the case of physical or sexual assault the Police will be able to arrange for forensic evidence to be collected.

This list is not exhaustive.

Outside of office hours staff will need to access the On-Call manager who will need to be aware of the circumstances under which:

- The Police should be called in an emergency.

- If the Police do not need to be contacted but you still have immediate concerns and it is out of normal working hours, the local authority 'Emergency Duty Team' can be contacted.

11. Concerns Involving Staff or Volunteers

Allegations and concerns about staff or volunteers may arise in the context of their work or in their life outside work or at home.

If allegations or concerns are raised about abuse of a person by a Mind in Bradford member of staff or volunteer, you must immediately report it to the HR Manager, DCEO or CEO. If the HR Manager or DCEO are implicated in the allegations or concerns, you must raise the concerns with their line manager. If the CEO is implicated, you must raise the concerns with the Chair of the Board of Trustees.

If there is an immediate risk to people using the service and it is not possible to contact the HR Manager, CEO or DCEO, it is appropriate to take action such as sending the staff member or volunteer home. A Service/Programme Director should be involved in this decision.

Full details of the allegations or concerns should be recorded on an Incident Report and submitted via email to the senior member of staff to whom you escalated the matter. Do not record the allegations or concerns on MYMUP unless directed to do so by the HR Manager, DCEO or CEO.

Any members of staff or volunteers implicated in any safeguarding allegations or concerns will be subject to the Mind in Bradford Disciplinary and Grievances Procedure, a copy of which is in the Mind in Bradford Employee Handbook on OneDrive (Shared Staff Folder: Policies and Procedures).

12. Concerns Involving People Who Use Our Services

Allegations or concerns about clients requires escalation to the Accountable Officer for Safeguarding and a risk assessment to be completed. This must be undertaken collaboratively with staff who know the alleged perpetrator and a senior member of the team. The purpose of the risk assessment is to understand whether this is new or historic, the potential harm and the likelihood of it re-occurring.

The risk assessment should lead to an outcome that both safeguards the victim but also supports the perpetrator to access the support they need. The support does not have to be provided by Mind in Bradford.

13. Confidentiality

Sometimes, to protect people and to keep them safe we may need to share information with statutory organisations or the Police. It is important that when we do this, we speak to the client and seek to gain permission. If we have been unable to gain permission but still feel that there is a need to breach confidentiality, then we will do that as carefully and as sensitively as possible; ensuring that we comply with our own confidentiality policy and relevant guidance and legislation at all times.

We acknowledge that while the people we support have a right to confidentiality, it should be explained that we may need to breach confidentiality and share information externally with certain other agencies to protect people and get them necessary support.

14. Subcontracted Service Provision

Mind in Bradford sub-contracts a range of providers to deliver support to people on our behalf. All Service Level Agreements, Grant Agreements and other contracting documents used by Mind in Bradford to subcontract other providers require a clear commitment to safeguarding and may include; clear and detailed information about the provider's safeguarding responsibilities, and include mandatory expectations relating to safeguarding, which include:

- Having up to date, child and adult safeguarding policies, aligned with legislation and local procedures and reviewed annually.
- Ensuring all staff and volunteers have the mandatory training as stipulated in the contract.
- Having appropriate recruitment safeguards in place, relating to enhanced disclosure checks with the Disclosure and Barring Service.
- Providing Mind in Bradford with information regarding any safeguarding concerns that have been identified and any actions taken or the outcomes.

- Compliance with the above is monitored and reviewed by the relevant Mind in Bradford contract manager, and any concerns immediately escalated to the safeguarding lead.

15. Implementation and Monitoring

We monitor our performance in relation to concerns via:

- Weekly reviews performed by Service Managers on incidents within their service areas;
- Fortnightly Operational Leadership Meetings;
- Monthly Operational Delivery Team Meetings;
- Monthly reviews performed by Service Directors;
- Monthly reports submitted to the Executive Leadership Team, identifying themes, trends, issues and actions to drive development
- Quarterly reports to the Board of Trustees, this includes demographic data, themes and reports by exception. Recommendations are also shared with the Board.

16. Staff Training

Consideration is given to the level of safeguarding training required for staff based on their varying degrees of exposure to frontline client work.

Training available includes:

- Introduction to Safeguarding Adults (Level 1).
- Safeguarding Adults (Level 2).
- Annual refresher training.
- Domestic violence & abuse.
- Preventing radicalisation: Basic Prevent Awareness.
- Suicide prevention.
- Making safeguarding personal.
- Role of the Service Manager in Safeguarding Adults (2 days).

17. Important Contacts

Mind in Bradford contacts:

Accountable Officer for Safeguarding and Deputy Chief Executive Officer:

Frankie Hill | frankie@mindinbradford.org.uk | 01274 730815

Operational Safeguarding Lead:

Helen Ioannou, Service Director | heleni@mindinbradford.org.uk | 01274 730815

Trustee Lead for Safeguarding and Chair of the Board of Trustees:

Ruth Mulryne | ruth@mindinbradford.org.uk | 01274 730815

Chief Executive Officer:

Helen Davey | helen.davey@mindinbradford.org.uk | 01274 730815

HR Manager:

Susan Sumner | susan@mindinbradford.org.uk | 01274 730815

Mobile numbers are available in the on-call file in the office or in the on-call file on one drive for managers.

External contacts:

Bradford MDC Multi-Agency Safeguarding Hub (MASH)

Office hours: 01274 431077

Out of office hours, Emergency Duty Team: 01274 435400 (MASH will not screen concerns out of hours)

Online referral:

<https://systemonline.tppuk.com/Safeguarding/Home?OrgId=558423556104>

North Yorkshire Safeguarding Adults Board

Call anytime: 0300 131 2 131

To make a referral complete the “raising a safeguarding concern” form here:

<https://www.northyorks.gov.uk/adult-care/safeguarding/safeguarding-vulnerable-adults>

Appendix 1 – What constitutes abuse and neglect

Organisations should not limit their view of what constitutes abuse or neglect as they can take many forms. The circumstances of the individual case should always be considered. Exploitation, in particular, is a common theme in the following list of the types of abuse and neglect.

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

Physical abuse including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanctions.

Domestic violence including:

- psychological
- physical
- sexual
- financial
- emotional abuse
- so called ‘honour’ based violence.

Sexual abuse including:

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

Psychological abuse including:

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion
- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse including:

- theft
- fraud
- internet scamming
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- the misuse or misappropriation of property, possessions or benefits.

Modern slavery encompasses:

- slavery
- human trafficking
- forced labour and domestic servitude
- traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse including forms of harassment, slurs or similar treatment because of:

- race
- gender and gender identity
- age
- disability
- sexual orientation
- religion

Organisational abuse:

Including 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 ongoing ill treatment. It can be through

neglect or poor professional practice because of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission including:

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

Self-neglect:

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not prompt a Section 42 enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Appendix 2 - Adult Safeguarding Process Flowchart



