

Safeguarding Adults Policy

Version 4
June 2024



Title	Safeguarding Adults Policy
Version	4
Date first published	V1: November 2019
Previous review dates	V2: November 2022 V3: June 2023
Next review date	June 2025
Review schedule	This policy will be reviewed annually, or in line with organisational or legislative changes including MQM guidance.
Responsibility	Board of Trustees
Responsibility for development, review and implementation	Executive Leadership Team and Operational Delivery Team, led by the Accountable Officer for Safeguarding, the Child Safeguarding Lead and the Adult Safeguarding Lead
Target audience	All staff, volunteers, people who use services, students on placement, visitors, funding bodies, job and volunteer applicants and the Board of Trustees.
Accessibility	Workforce: People HR and People and Culture SharePoint Service members and others: Mind in Bradford website If you would like a copy of this policy or need it in another format, please contact us at 01274 730815, speak to a member of staff, or email us at admin@mindinbradford.org.uk
Associated policies	Safeguarding Children and Young People Policy Boundaries Policy Self-Harm and Self Injury Policy Confidentiality Policy Data Protection Policy Volunteer DBS Policy Recruitment and Selection (Staff Handbook)

1. Purpose and Scope

Safeguarding is everyone's responsibility

This policy is to safeguard any adults who are identified as at risk or potentially at risk of abuse.

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 our workforce¹ with guidance and procedures they should follow if they suspect an adult may be experiencing, or is at risk of, harm.

Everyone working on the behalf of Mind in Bradford must follow this policy, regardless of whether they work directly with children. This includes staff, volunteers, trustees, students, interns, contractors, agency workers, trainees, and subcontracted providers.

2. Policy statement

We are committed to safeguarding adults and upholding our responsibility as a provider of mental health services.

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.

We will ensure that all adults, especially those with care and support needs are protected from abuse and neglect.

The Care Act 2014 statutory guidance defines adult safeguarding as **“Protecting an adult’s right to live in safety, free from abuse and neglect.”**⁹

We recognise that each person is an individual and whilst there is a process to follow when a safeguarding concern is raised, we will ensure we keep the person at the centre of decision-making.

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.

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:**

¹ All Mind in Bradford Staff and Volunteers

Bradford, Airedale and Wharfedale

- Bradford Safeguarding Adults Board Joint Multi-Agency Safeguarding Adults Policy and Procedures <https://www.saferbradford.co.uk/resources/adults/safeguarding-adults-policy-and-procedures/>

Craven (North Yorkshire)

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

Core legislation and guidance

- 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
- Domestic Abuse Act 2021
- Safeguarding Vulnerable Groups Act 2006
- Information sharing Advice for safeguarding practitioners. (July 2018)
- Reporting a Safeguarding Concern
<https://www.bradford.gov.uk/adult-social-care/adult-abuse/report-adult-abuse/>

Other relevant legislation and guidance

- General Data Protection Regulations 2018
- Prevent duty guidance: England and Wales (2023)
<https://www.gov.uk/government/publications/prevent-duty-guidance>
- Public Interest Disclosure Act 1998
- Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2022
- Bradford Safeguarding Adults Board
<https://www.saferbradford.co.uk/adults>
- Guidance: The Caldicott Principles
<https://www.gov.uk/government/publications/the-caldicott-principles>

3. Commitment

We are committed to keep adults safe by:

- Valuing, listening to and respecting everyone.
- Appointing an Accountable Officer for Safeguarding, an Adult Safeguarding Lead and a lead trustee/board member for safeguarding, 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 our workforce know about and follow our policies, procedures 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.
- Building a safeguarding culture where staff, volunteers and people who use services treat each other with respect and are comfortable about sharing concerns.

Safeguarding principles

Six key principles underpin all our 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.

4. Roles and responsibilities

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 Child and Adult Safeguarding Leads are 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 managers are 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 our workforce receive briefings on local authority updates and changes.

All members of our workforce 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.
- 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.

5. Recognising safeguarding concerns

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.

Types of abuse are:

- Physical abuse.
- Domestic violence or abuse.
- Honour based violence and forced marriage
- Sexual abuse
- Psychological or emotional abuse
- Financial or Material Abuse
- Modern Slavery
- Discriminatory Abuse
- Organisational or institution abuse
- Neglect or acts of omission
- Self-neglect

Other categories of abuse include:

- Radicalisation and Violent Extremism
- Transitional safeguarding
- Fabricated or induced illness in adults
- Mate crime
- Modern slavery

- Harm to self and risk of online abuse

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

6. 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.

7. Responding to concerns

In the event of a safeguarding concern, you must make a professional judgement about the level of need and risk and respond accordingly. 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.

You may wish to speak with a senior member of staff to help with this.

Record keeping/incident reporting

Immediately record details on MYMUP profile, complete an incident report and send it to the relevant managers with a written copy of the safeguarding referral.

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, include advice given and actions taken.
- 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.

Follow-up and debrief

After the concern is reported and recorded, follow guidance given to you from the relevant statutory agencies and senior member/s of staff.

If your concerns remain in place and are not addressed within timescales agreed by statutory agencies or you are not satisfied with the follow-up actions taken by them, report this to your manager immediately so they can escalate the matter.

A senior staff member will offer you a 1-1 debrief to ensure any welfare issues are addressed and followed up. You can also access clinical supervision.

Timescales

All the steps above should be followed within the timescales given. Sometimes this may require you to work beyond your scheduled work hours/pattern. In these circumstances, following the safeguarding procedure described above must always take priority. You should notify your manager or the on-call manager if you are working over your hours, and they will advise on next steps.

8. Responding in an emergency

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.

9. Concerns involving our workforce

Allegations and concerns our workforce 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 People and Culture Manager, Accountable Officer for Safeguarding or CEO. If the People and Culture Manager is 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 People and Culture Manager, CEO or Accountable Officer for Safeguarding, it is appropriate to act such as sending the staff member or volunteer home. A member of the Executive Leadership Team (ELT) 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 Accountable Officer for Safeguarding 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 the People & Culture SharePoint site.

10. Concerns involving people who use our services

Allegations or concerns about people who use services 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.

11. Confidentiality

To safeguard people, we sometimes need to share information with external organisations. When it is safe to do so, we will seek consent from the person first. If we cannot obtain consent, but must breach confidentiality, we will do so carefully and sensitively, in compliance with our **Confidentiality Policy**.

We acknowledge that while those we support have a right to confidentiality, the safety and welfare of people take precedence. Therefore, we must explain to people that we may need to breach confidentiality and share information with external organisations to protect them and provide necessary support.

12. Subcontracted service provision

At Mind in Bradford, we subcontract various providers to deliver support on our behalf. All Service Level Agreements and other contracting documents require a clear commitment to safeguarding children and include detailed information about the providers' safeguarding responsibilities. They also include the mandatory expectation to:

- Have up-to-date child and adult safeguarding policies, aligned with legislation and local procedures, and reviewed annually.
- Ensure their workforce have the mandatory training as stipulated in the contract.
- Have appropriate recruitment safeguards in place, relating to enhanced disclosure checks with the Disclosure and Barring Service.
- Complete the NHS Safeguarding Self Declaration and a remedial action plan annually
- Provide us with information about all Serious Incidents, Patient Safety Incidents and Notifiable Safety Incidents.

Compliance with the above is monitored and reviewed by the relevant Mind in Bradford contract manager, and any concerns immediately escalated to the Child Safeguarding Lead.

13. Implementation and monitoring

Implementation

All members of our workforce are made aware of this policy and expected to read and understand it in their first week of induction. It is accessible to them via People HR and the People & Culture SharePoint.

All members of our workforce undertake safeguarding training appropriate to their role, with the level of training tailored to the nature of their specific duties. Our mandatory safeguarding training programme includes:

- Introduction to safeguarding adults (level 1)
- Safeguarding adults (level 2)
- Annual refresher training
- Domestic violence and abuse.
- Preventing radicalisation: basic prevent awareness.
- Suicide prevention.
- Making safeguarding personal
- Role of the service manager in safeguarding Adults (2 days)

Monitoring

We monitor our performance in relation to concerns via:

- Weekly reviews by Service Managers of incidents within their service areas.
- Fortnightly quality & safety meetings.
- Monthly Operational Delivery Team meetings.
- Monthly reviews performed by the Operational Leadership Team.
- Monthly ELT report and quarterly report to Board of Trustees - reporting by exception.

Safeguarding is a standing item on all supervision and team meeting agendas. To promote ongoing learning and service improvement, teams and individuals are encouraged to discuss, reflect on and learn from safeguarding incidents.

14. Important contacts

Mind in Bradford contacts:

- **Accountable Officer for Safeguarding**
Frankie Hill, Director (equity and quality) | frankie@mindinbradford.org.uk

- **Adult Safeguarding Lead**

Heather Butcher, Director (adults and older adults) | heather@mindinbradford.org.uk

- **Child Safeguarding Lead**

Helen Ioannou, Director (children, young people and all age)

heleni@mindinbradford.org.uk

- **People and Culture Manager**

Samane Etesami | samane.etesami@mindinbradford.org.uk

- **Trustee Lead for Safeguarding**

Karen Dawber | karen.dawber@bthft.nhs.uk

All of the above can be contacted via our office phone number: 01274 730815.

- **On-Call Manager**

01274 952100

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

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.

If you require support, advice or guidance at any point in this procedure, please speak with a senior member of staff.

Take immediate action to ensure the safety of the person and others who may be at risk. If urgent attention is required call 999 or 112

Respond to the adult and gather information, do not ask leading questions or promise to keep secrets, ask open questions, do not try to investigate yourself. Remain compassionate and supportive

Gain consent (if possible) from the person to share information and report the safeguarding concern. It may be necessary to share information without consent. The decision to share information would need to be made with the adult safeguarding lead or a member of ELT for services.

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 if they may contaminate evidence.

Decide whether it is appropriate to raise a safeguarding concern.

Report to Local Authority (Bradford/North Yorkshire)

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://systmonline.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>

Include a senior member of staff, on-call out of hours and Service Manager within working hours

Refer to statutory mental health services as required

Record an incident report and document on MYMUP

Once the safeguarding incident is complete and all possible action taken. Ensure that a debrief with an appropriate senior member of staff is completed.

