Purpose & Scope

Adullam Homes Housing Association is committed to the protection of both adults and children. The aim of this policy is to set out the values, principles and approach to safeguarding children, young people and adults. This policy sets out a framework for the conduct of all staff within the Association.

All employees, volunteers, agency staff, students and Board members must be aware of the contents of this policy and the Safeguarding Procedures in order to understand their individual responsibilities and help promote best practice. The policy demands the highest standards of professional practice which all staff are required to follow.

The policy applies to all adults and children, regardless of gender, age, ethnicity, disability, sexuality or religion.

A child is legally defined as anyone under the age of 18.

An adult in need of safeguarding is defined as a person over 18 who:
has eligible needs for care and support (whether or not the local authority is meeting any of those needs) and;
is experiencing, or at risk of, abuse or neglect; and
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.

Eligibility outcomes for adults with care and support needs under the Care Act 2014

The term service user is used to refer to all residents, tenants, and persons accessing

any offer of Adullam.

Definitions

1.0 Introduction

1.1 Adullam believes that every service user has the right to live their life with privacy, dignity, independence and choice and be free from abuse. Safeguarding is everyone's responsibility and all staff have a duty, during the course of their work to protect and promote the welfare of children and adults in need of safeguarding. The Association has a duty to make sure appropriate arrangements are in place to enable staff to do this.

1.2 During the course of their work, staff may have concerns that residents/service users are being abused by other people, including members of staff either within Adullam or other agencies. Residents/Service users themselves may disclose concerns and ask for help. In all cases staff have a duty to act in accordance with the Safeguarding Policy and Procedures.

1.3 Adullam has a duty to reduce risks to staff and avoid putting them in positions where abuse might be alleged.

2.0 Definitions of Abuse

2.1 Abuse is the violation of an individual's human and civil rights by any other person or persons. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act. In all forms of abuse there are elements of emotional abuse and some people may be subjected to more than one form of abuse at any one time.

2.2 **Examples of abuse include (not a definitive list):** Signs, symptoms and effects of abuse | NSPCC Safeguarding adults: Types and indicators of abuse | SCIE

Physical Abuse: inflicting any form of physical harm, pain or restriction e.g. hitting or misuse of medication.

Sexual Abuse: any sexual act which is unwanted or to which the person cannot consent. Examples include unwanted touching or kissing, being made to listen to sexual comments or being forced to look at sexual acts or materials. It can involve forcing or enticing someone to take part in sexual activities. It may also include grooming for abuse through exposing a child or adult in need of safeguarding to increasingly explicit materials or acts. Children, and adults with limited capacity to consent (e.g. due to learning disabilities or poor mental health) may also be at risk of **sexual exploitation**.
Exploitation: This is where an adult or child receives something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money) in exchange for sexual activities. **Sexual exploitation** and **criminal exploitation** can occur through the use of the internet or on mobile phones. In all cases, those exploiting the adult or child have power over them because of their age, gender, intellect, physical strength and/or resources.

Emotional Abuse: any act intended to inflict emotional harm or distress. This may include threats, humiliation, bullying (including cyber- bullying), harassment, intimidation, or isolation.

Neglect and acts of omission: this will include intentional or unintentional failure to meet the needs of a person who is dependent on others for those needs to be met. For example, withholding of necessities of life such as food or heating.

Appendix A in Working Together to Safeguard Children includes description of some specific types of abuse experienced by children including child sexual exploitation, extremism and county lines

2.3 For the purposes of national social care policy, the following categories are seen as applying to adults particularly although they may, in some instances, be experienced by children and/or there may also be implications for children within a household –
Institutional Abuse: includes isolated incidents of poor professional practice or neglect to pervasive ill treatment or gross misconduct in an institutional setting. It also includes organisational practices which consistently disadvantage service users.
Financial Abuse: this includes theft, fraud or exploitation for material gain. It can involve someone using or putting pressure on a person to use their money in a way that they do not want or is not in their best interests.
Discriminatory Abuse: includes behaviour intended humiliate or degrade a person or result in less favourable treatment, based on their actual or perceived membership in a certain group or social category (e.g. race, age, gender, disability, religion etc.) Discriminatory abuse may include hate crime
Stop Homophobic, Transphobic, Racial, Religious and Disability Hate Crime - True Vision

Domestic abuse any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality. The Domestic Abuse Act 2021 recognises that children can also be victims of domestic abuse. (See Domestic Abuse (TRS) Policy)

Modern slavery a relationship in which one person is controlled through violence, the threat of violence, or psychological coercion, has lost free will and free movement, is exploited economically, and paid nothing beyond subsistence.

Radicalisation is the process by which an individual may be coerced or otherwise persuaded to adopt extreme ideology, including the justification of violence towards others. Where services users are thought to be at risk of or displaying such harmful beliefs this must be addressed as a safeguarding concern. Adullam's Preventing Radicalisation guidance provides further information on actions staff should take

2.4 Self-harm and self-neglect

In some situations, an adult may be at risk as result of their own actions **Self-harm:** Deliberate Self-Harm is a term used when someone intentionally injures or harms themselves. This can take a number of forms including: Cutting or burning; Taking overdoses of tablets or medicines; Punching themselves; Throwing their bodies against something; Pulling out hair or eyelashes; Scratching, picking or tearing at skin, causing sores and scarring.

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Self-neglect: is a behavioural condition in which an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have.

This may constitute a safeguarding issue where the person has eligible care and support needs. Eligibility outcomes for adults with care and support needs under the Care Act 2014

Self Neglect: advice for all

3.0 Key Principles (Safeguarding)

The following key principles underpin all our work in relation to safeguarding and promoting the welfare of children and adults:

3.1 Empowerment
Adullam staff will enable individuals to take their own decisions and give informed consent.

3.2 Prevention
Adullam believe that it is better to take action before harm occurs and will work towards preventing abuse occurring through working in a holistic and person-centred way that promotes resilience and wellbeing.

3.3 Proportionality
Staff will always adopt the least intrusive response to managing risk.

3.4 Protection
We will provide support and representation for those in greatest need and provide people with the resources to protect themselves.

3.5 Partnership
Adullam will work in partnership to safeguard children and adults, creating local solutions working together with local services as part of communities.

3.6 Accountability
We will ensure that our safeguarding practices are accountable and transparent.

4.0 Managing concerns

4.1   All staff have responsibility to identify and report safeguarding concerns. The Assistant Director of Quality & Support has the overall responsibility for the implementation of this policy.

4.2   Each region will appoint a safeguarding lead for adults and a safeguarding lead for children. The safeguarding leads are responsible for providing advice and guidance to staff dealing with concerns.

4.3   Each region will appoint a safeguarding coordinator who is responsible for ensuring cases are recorded appropriately and staff have received relevant training.

5.0 Recording safeguarding concerns

5.1   Children's and Adult's Social Care has a duty to provide advice and it may be that advice is

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sought from them initially. All concerns regarding safeguarding should be discussed with the person in the project designated as responsible for Safeguarding. See procedure for further guidance.

5.2 Each project should keep a safeguarding manual which contains information, advice and guidance on local authority safeguarding policy, procedures and documentation. Local procedures will contain essential contact details and all Projects working with children and young people must identify their Local Safeguarding Children Board/Local Safeguarding Partners and secure a copy of their procedures.

5.3 Cases will be recorded and monitored using the process outlined in the safeguarding reporting process

6.0 Overcoming Disincentives to report safeguarding issues

6.1 Adullam recognises the complexity of safeguarding issues. This may include service users being reluctant to disclose issues around safeguarding because of possible consequences. We approach this by keeping services users informed through briefings and leaflets and offering them the opportunity to speak to peer mentors about concerns they have, who can then inform a member of staff on their behalf. Service users will be encouraged, and supported, where appropriate, to be part of an annual event where they will be part of the improvement process to ensure barriers to reporting concerns are overcome.

7.0 Confidentiality

7.1 The welfare of the child or adult in need of safeguarding overrides the Association's commitment to confidentiality to an individual service user.

7.2 All referrals outside the organisation should be made in consultation with the Regional Safeguarding Co-ordinator or the appropriate safeguarding lead.

7.3 The welfare or safety of a child overrides any commitment to involve the parent or carer in the decision to make a referral to Children's Social Care and there should be no such discussion if this may place the child or adult at further risk of harm. Once a referral has been made a breach of confidentiality could be damaging to the child or young person and could compromise any subsequent child protection investigation.

7.4 For adults in need of safeguarding, concerns should be discussed with the service user before making a referral, unless so doing would increase the risk to them. Consent may also be disregarded where others may potentially be at risk from the same perpetrator, where there is a public protection issue or for the purposes of the prevention or detection of crime.

7.5 Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. Recorded information should be stored in a secure place with limited access in line with data protection laws and Adullam data protection policies.

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8.0 **Working with other agencies**

8.1 Adullam recognises the importance of working with other agencies both formally and informally and this multi-agency approach is reflected in an individual's support plan. We participate when invited in formal multi-agency approaches including, for example, CAF (Common Assessment Framework), CPA (Care Programme Approach), MARAC (Multi Agency Risk Assessment Conference) and MAPPA (Multi Agency Public Protection Arrangements). Where such formal arrangements are in place, we would be expected to share any concerns/information around safeguarding issues within these forums.

8.2 Adullam complies with legislation requiring that there are Information Sharing Protocols in place and recognises that joint working is essential in order to help ensure the welfare and safety of an individual is not missed.

8.3 The Local Authority Children's and Adult's Social Care has the statutory duty to respond if urgent safeguarding action is required and to provide advice and support to staff from different agencies.

9.0 **Staff support and training**

9.1 Training will take place to ensure all staff are able to implement the Safeguarding Policy and Procedures. This will include information on all Adullam's policies and procedures, and training on child and adult safeguarding awareness for all staff and volunteers.

9.2 All Adullam employees will receive Safeguarding level 1 training.

9.3 Safeguarding coordinators and safeguarding leads will receive additional designated officer training. (Minimum level 3)

9.4 Staff dealing with safeguarding concerns will be provide with support through regular supervision and weekly/monthly/quarterly meetings.

10.0 **Perpetrators**

10.1 Some service users of Adullam may be perpetrators of abuse. Their individual support needs and risk should be assessed and managed in the same way as all other service users. If a service user's actions/behaviours raise a concern, then staff must discuss this with their line manager and safeguarding co-ordinator for appropriate advice.

10.2 If information from or involving the service user highlights the risk or potential risk of harm to another person, then the divulgence of this override's confidentiality.

10.3 Adullam will keep a record of people we work with who may pose a risk to others. It is the responsibility of the safeguarding coordinators to keep this record for each region.

11.0 **Allegations about members of staff**

11.1 Where a member of staff has concerns that relate to an employee, volunteer or agency worker they should speak to their line manager. However, depending upon the nature of the concern,

this can be reported directly to a Regional Manager, a Head of Department or Director, or the Human Resources (HR) department. All concerns will be dealt with in conjunction with the HR department.

11.2 Adullam's Whistleblowing Policy is in place to support staff reporting concerns about colleagues.

12.0 Disclosure and barring service

12.1 If Adullam removes an employee or volunteer from working with children or adults in need of safeguarding, or if they leave while under investigation for allegedly causing harm or posing a risk of harm, Adullam is required by law to refer this information to the Disclosure and Barring Service.

12.2 Any referrals to the Disclosure and Barring service will be made in conjunction with a member of the HR department. Prior to final submission, approval will be required from a director.

12.3 The decision on who should be placed on the barred lists will lie with the Disclosure and Barring Service.

12.4

13.0 Monitoring and reviewing procedures

13.1 Each region will hold a quarterly safeguarding meeting which will review all safeguarding incidents logged. The composition of these meetings will be determined by the incidents that have been reported that quarter and will include those with a designated responsibility for safeguarding. The meetings will follow a standard format and will feed into the Associations safeguarding review group.

13.2 The Regional Safeguarding Co-ordinators and Leads will meet every 6 months as designated representatives from each region. The group will be responsible for identifying trends, consider issues arising from reported incidents and reviewing policies and procedures.

14.0 Review

14.1 This policy will be reviewed where:
- There are significant changes to legislation or regulation;
- There are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations.

At which point the lead officer will initiate an immediate review.

14.2 In any event this policy will be reviewed no later than two years from the effective date of this version.

15 Appendices

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Internal Documents – available on Policy Hub

- Safeguarding Policy Statement
- E-Safety Procedure
- Anti-bullying guideline
- FGM Guidance
- Managing Allegations – Adults Process
- Managing Allegations – Children and Young People Process
- Preventing Child Sexual Exploitation
- Preventing Child Criminal Exploitation
- Preventing Radicalisation
- Procedure for missing from home
- Safeguarding Reporting Process
- Self-harm Guidance
- Supervision Guidance
- Understanding Capacity and Consent
- Role of Safeguarding Co-ordinator
- Role of Safeguarding Rep
- Guidelines for when recording and monitoring safeguarding cases
- Guidelines for when recording and monitoring safeguarding cases
- Safeguarding Posters (QR Code)
- First Aid Guidelines
- Guidance on dealing with a disclosure

16   Reference Documents

Alongside this safeguarding policy there are a set of procedures which must be followed.

The accompanying procedures describe what action must be taken when a member of staff becomes aware that an adult or child may be experiencing abuse or their welfare is of concern. In addition to these procedures, Adullam has a framework of policies and procedures designed to ensure the emotional and physical safety of all residents, service users, staff and volunteers:

Internal Documents – available on Policy Hub

- Whistleblowing Policy
- Integrity at Work
- Complaints Policy
- Equality and Diversity Policy
- Recruitment Policy
- Confidentiality Policy
- Disciplinary Policy and Procedure
- Statement of Professional Boundaries

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- Lone working policy and procedures
- Domestic Abuse Policy
- Disclosure and Barring Service (DBS) Policy
- High Risk Offenders Policy & Procedures
- Risk Management Protocol & Procedure
- Data Protection Policy
- Harassment Policy
- Support Policy
- Contractors Code of Conduct Policy

External Documents
- Safeguarding Vulnerable Groups Act (Wales) 2006
- Social services and well-being (Wales) Act 2014
- Working together to safeguard people guidance
- Domestic Abuse (Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

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