



For a brighter future,
free from abuse.

Safeguarding Adults Policy

Introduction

Safe Steps is committed to Safeguarding Adults 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 which keeps all adults safe.

Safe Steps is committed to creating a culture of zero-tolerance of harm to adults which necessitates: the recognition of adults who may be at risk and the circumstances which may increase risk; knowing how adult abuse, exploitation or neglect manifests itself; and being 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 community, in the person's own home and in any care setting.

Safe Steps is committed to best safeguarding practice and to uphold the rights of all adults to live a life free from harm, abuse, exploitation and neglect.

1. Policy Statement

Safe Steps believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

We are committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

Safe Steps acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all adults involved.

Safe Steps recognises that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

We recognise there is a legal framework within which domestic abuse services need to work to safeguard adults and others who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by Safe Steps 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.

2. Purpose

The purpose of this policy is to demonstrate the commitment of Safe Steps to safeguarding adults and to ensure that everyone involved in Safe Steps is aware of:

- The legislation, policy and procedures for safeguarding adults.
- Their role and responsibility for safeguarding adults.
- What to do or who to speak to if they have a concern relating to the welfare or wellbeing of an adult within the organisation.

3. Scope

This safeguarding adult policy and associated procedures apply to all individuals involved with Safe Steps, including Board members, Staff, Volunteers and to all concerns about the safety of adults whilst taking part in our organisation, its activities and in the wider community. Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. At the same time ensuring the adult's wellbeing is promoted; including where appropriate, having regard to their views, wishes, feelings and beliefs, where any decisions on action need to be made.

4. Legislation

Safe Steps seeks to ensure that its staff members work in line with national legislation and local Safeguarding Adult policies and procedures as set by the Southend, Essex and Thurrock (SET) guidelines.

Additionally, this safeguarding policy complies with the following:

Care Act 2014

<https://www.legislation.gov.uk/ukpga/2014/23/contents#:~:text=Advanced%20Search-Care,-Act%202014>

Care and support statutory guidance <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

Mental Capacity Act 2005 <https://www.legislation.gov.uk/ukpga/2005/9/contents>

The Human Rights Act 1998 <https://www.legislation.gov.uk/ukpga/1998/42/contents>

The Data Protection Act 2018

<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

General Data Protection Regulations 2018

[https://www.local.gov.uk/sites/default/files/documents/The+General+Protection+Data+Regulation+\(GDPR\)+--+Guidance+for+Members.pdf](https://www.local.gov.uk/sites/default/files/documents/The+General+Protection+Data+Regulation+(GDPR)+--+Guidance+for+Members.pdf)

4.1 The law provides a framework for good practice in safeguarding that makes the overall well-being of the adult at risk a priority of any intervention.

4.2 The law in all four home nations emphasises the importance of person-centred safeguarding, (referred to as 'Making Safeguarding Personal' in England).

4.3 The law provides a framework for making decisions on behalf of adults who can't make decisions for themselves (Mental Capacity [Act 2005](#)).

4.4 The law provides a framework for sports organisations to share concerns they have about adults at risk with the local authority.

4.5 The law provides a framework for all organisations to share information and cooperate to protect adults at risk.

5. Definition of an Adult at Risk

The Safeguarding Adults legislation creates specific responsibilities on Local Authorities, Health, and the Police to provide additional protection from abuse and neglect to Adults at Risk.

When a Local Authority has reason to believe there is an adult at risk, they have a responsibility to find out more about the situation and decide what actions need to be taken to support the adult. As such, it is vital that public services work together to identify people at risk and put steps in place to help prevent abuse or neglect. The Local Authority role includes having multi-agency procedures which coordinate the actions taken by different organisations.

The Care Act 2014 defines an adult at risk as an individual aged 18 years and over who:

- (a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND;
- (b) is experiencing, or at risk of, abuse or neglect, AND;
- (c) 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.

6. Safe Steps acts in accordance with the principles set out within the SET Adults Guidelines as follows:

- To take action to identify and prevent abuse from happening
- Respond appropriately when abuse has been, or is suspected
- Ensure the safeguarding of adults procedures are followed
- Ensure Safe Steps has a dedicated staff member with an expertise in safeguarding adults
- Provide support, advice, information and resources to staff in responding to safeguarding adult issues
- Inform staff of any local/national issues on safeguarding adults
- Ensure staff are aware of their responsibility to attend training, and to support staff in accessing these events
- Ensure staff have access to appropriate consultation and supervision relating to safeguarding adults
- Understand how diversity, beliefs and values of clients who use the Safe Steps service, may influence the identification, prevention and response to safeguarding concerns
- Ensure information (in accessible formats) is available for clients that use the Safe Steps service, explaining what to do if they have a concern
- Ensure all staff who have contact with vulnerable adults, have appropriate safer recruitment employment checks, in line with the requirements of the Disclosure and Barring Service, such as obtaining references
- Ensure staff are supported if they make a disclosure under the Public Interest Disclosure Act

- Follow the safeguarding policies and procedures at all times, particularly if concerns arise regarding the safety or welfare of an adult
- Safe Steps will participate in safeguarding adults training, and maintain current working knowledge
- Ensure that information is available for people that use services, family members setting out what to do if they have a concern (e.g. reporting to Adult Social Care or Police)
- Ensure the adult (or their advocate) is involved in any decisions made about them
- Become familiar with the SET Safeguarding Adults Guidelines
- Staff will discuss any concerns about the welfare of a client that they have, with their Line Manager and/or Safe Steps Director of Services or CEO
- Contribute towards actions required, including information sharing and attending meetings
- Work collaboratively with other agencies/professionals, to safeguard and protect the welfare of clients who use the Safe Steps service
- Ensuring relevant policies and procedures are in place and reviewed and updated

7. Abuse Types

Physical abuse - including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

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

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

Modern Slavery – Modern Slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. The term Modern Slavery captures a whole range of types of exploitation, many of which occur together. These include but are not limited to:

- Criminal exploitation; this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- Domestic servitude; this involves a victim being forced to work in predominantly private households, usually performing domestic chores and childcare duties. Their freedom may be restricted and they may work long hours often for little or no pay, often sleeping where they work.

- Forced labour; victims may be forced to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to them or their families. It can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars). Often victims are housed together in one dwelling, working long hours, no pay, poor conditions, verbal and physical threats
- Sexual exploitation; This includes but is not limited to sexual exploitation and sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.
- Other forms: organ removal, forced begging, forced benefit fraud, forced marriage and illegal adoption

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

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. Safe Steps staff know it is important to consider capacity when self-neglect is suspected, to consider how it may impact other family members, and whether the situation is sufficient to raise a safeguarding concern.

Domestic Abuse – the new government definition of domestic violence and abuse now states:

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. This can encompass but is not limited to the following types of abuse:

- psychological
- physical
- sexual
- economic
- emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition, which is not a legal definition, includes **so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage**, and is clear that victims are not confined to one gender or ethnic group.

Discriminatory abuse - including harassment, slurs or other discrimination on grounds of age, race, gender and gender identity, marriage or civil partnership, pregnancy, disability, sex, sexual orientation or religion or religion.

Organisational abuse - including neglect and poor care practice within an institution, or specific care setting like a hospital or care home, or in relation to care provided in someone’s own home. This may range from isolated incidents to continuing ill-treatment.

8. Signs and Indicators of Abuse and Neglect

An adult may confide to a member of staff, volunteer or another service user that they are experiencing abuse inside or outside of the organisation’s setting. Similarly, others may suspect that this is the case.

There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person.
- Self-harm.
- A fear of a particular group of people or individual.
- They may tell you / another person they are being abused – i.e. a disclosure

9. Wellbeing Principle

The concept of ‘well-being’ is threaded throughout UK legislation and is part of the Law about how health and social care is provided. Our well-being includes our mental and physical health, our relationships, our connection with our communities and our contribution to society.

Being able to live free from abuse and neglect is a key element of well-being.

The legislation recognises that statutory agencies have sometimes acted disproportionately in the past. For example, removing an adult at risk from their own home when there were other ways of preventing harm.

For that reason any actions taken to safeguard an adult must take their whole well-being into account and be proportionate to the risk of harm.

10. Risk Enablement

Managing risk is a key aspect of keeping people safe. However, it is recognised that risk is an inevitable consequence of people making decision about their lives. If a person has the mental capacity to make a decision and understands the possible consequences of their choice, they are entitled to accept an element of risk.

11. Person Centred Safeguarding/ Making Safeguarding Personal

The legislation also recognises that adults make choices that may mean that one part of our well-being suffers at the expense of another – for example we move away from friends and family to take a better job. Similarly, adults can choose to risk their personal safety; for example, to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

None of us can make these choices for another adult. If we are supporting someone to make choices about their own safety we need to understand ‘What matters’ to them and what outcomes they want to achieve from any actions agencies take to help them to protect themselves.

The concept of ‘Person Centred Safeguarding’/‘Making Safeguarding Personal’ means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety. Organisations work to support adults to achieve the outcomes they want for themselves. The adult’s views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many ways to prevent further harm. Working with the person will mean that actions taken help them to find the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate (usually from a third sector organisation).

The Care Act’s principles are:

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

12. Mental Capacity and Decision Making

The Mental Capacity Act 2005 (MCA) applies to anyone over 16 who is unable to make all or some decisions for themselves. Adults (over 18) can appoint people to make decisions on their behalf in the event that they become unable to make their own decisions under a Lasting Power of Attorney. Alternatively, if the person does not have capacity to do this, the Court of Protection may appoint a Deputy to make decisions on their behalf. If an adult is believed to lack the capacity to engage in decisions about how their needs will be met, the Mental Capacity Act Guidance must be followed: [Mental-capacity-act-code-of-practice.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362222/Mental-capacity-act-code-of-practice.pdf)

13. Young Adults

Where someone over 18 is still receiving children's services, (e.g., in an education setting until the age of 25), and safeguarding issues are raised, the matter should be dealt with through adult safeguarding arrangements. Children's social care and other relevant partners should be involved as appropriate. The level of needs is not relevant, and the young adult does not need to have eligible needs for care and support under the Care Act – refer to the Safe Steps Child Protection Policy for further information.

14. Remote Activities

Where unforeseen circumstances prevent Safe Steps from undertaking their usual service delivery, all possible adjustments will be made to ensure communication between staff, volunteers and service users is still available. This is crucial for those clients where there is a current, active safeguarding in place, or in process.

Safe Steps will make provision to ensure that where possible, increased telephone contact and/or, video meetings via computers/laptops, is readily available.

We understand that some clients may not have the facilities and/or the knowledge of the usage of certain types of remote communication. In such cases, we will adjust our communication method to written correspondence, or we will make all reasonable adjustments to visit where necessary.

In such cases where health risks may prevail, for example, in the case of a contagious illness or a pandemic, risk assessments will be undertaken, and all necessary precautions will be taken. For the latter – we will strictly adhere to the guidelines issued by the government via their website.

15. Recording and Information Sharing

Safe Steps is committed to compliance with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR).

Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping. Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know.

Sharing information, with the right people, is central to good practice in safeguarding adults. However, information sharing must only ever be with those with a 'need to know'. This does NOT automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe.

The purpose of Data Protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation
- Case management meetings can take place to agree to co-ordinate actions by the organisation

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information.

The circumstances when we need to share information without the adult's consent include those where:

- it is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- you believe they or someone else is at risk, including children.
- you believe the adult is being coerced or is under duress.
- it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
- the adult does not have mental capacity to consent to information being shared about them.
- the person causing harm has care and support needs.

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

If you are in doubt as to whether to share information seek advice, e.g. seek senior manager guidance, legal advice and/or contact the Local Authority and explain the situation without giving personal details about the person at risk or the person causing harm.

Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

16. Multi-Agency Working

Safeguarding adults' legislation gives the lead role for adult safeguarding to the Local Authority. However, it is recognised that safeguarding can involve a wide range of organisations.

Safe Steps staff may be required to cooperate with the Local Authority and the Police including to:

- Provide more information about the concern you have raised.
- Provide a safe venue for the adult to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Coordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.
- Provide a safe environment for the adult to continue their role in the organisation.

17. Safer Recruitment and Selection Procedures for Staff and Volunteers

Safe Steps will ensure that appropriate checks are applied to all staff and volunteers (including Trustees) who may work with vulnerable adults. References will also be obtained, and previous employment history verified.

The charity takes great care in the recruitment of staff, carries out all possible checks and recruits to ensure that staff are of a high standard. The charity ensures that new employees undertake the Enhanced Disclosure and Barring Service (DBS) checks, prior to the commencement of their employment.

18. Training

As part of their induction programme, all staff and volunteers (including Trustees) receive training in adult safeguarding. This includes recognising abuse and carrying out their responsibilities under this policy. Staff and volunteers also undertake Abuse Awareness training courses delivered by the local authority, either in person or online, on an annual basis.

As Safe Steps is commissioned by Southend City Council and Essex County Council for most of its services to adults, all staff must make themselves aware of the SET Safeguarding Adult Guidelines (version 10 May 2024), which are included within Safe Steps' policy and procedures file.

19. Related Policies and Procedures

This document should be read alongside the following relevant policies and procedures:

Internal:

- Safeguarding of Vulnerable Adults Procedures
- Child Safeguarding Policy & Procedure
- Data Protection Policy – Clients
- Information Sharing Without Consent Procedures
- Safer Recruitment and Selection Policy
- Induction Policy
- Training Policy
- Communication and IT Usage Policy
- Disciplinary and Grievance Policy
- Volunteer Policy

External:

- Southend Essex and Thurrock (SET) Safeguarding and Child Protection Procedures
- Children's Act 1989 and Amendment 2004
- Southend Safeguarding partnership guidance
- Working Together to Safeguard Children statutory guidance

20. Policy Review and Approval

This policy will be subject of annual review. In addition, further changes may be made at other times, such as in response to legislative and procedural changes or safeguarding incidents.

Policy Owner: Safe Steps

Policy approved by: Safe Steps Safeguarding Sub Committee

Independent Review: Completed

Date Policy approved: 18 August 2024

Next review date: Every 12 months or if change occurs