

Safeguarding policy and procedure for Ashley Community Housing & Himilo Training

POLICY FOR SAFEGUARDING VULNERABLE ADULTS and CHILDREN

Policy: This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, agency staff, learners, tenants or anyone working on behalf of Ashley Community Housing and/or Himilo Training.

Purpose: The purpose of this policy is:

- To protect children, young people and adults at risk who receive Ashley Community Housing and/or Himilo Training services. This includes children of adults who use our services.
- To provide all staff and volunteers with the overarching principles that guide our approach to safeguarding.

Ashley Community Housing/Himilo Training owes a duty of care to all its learners, licensees, and other service users and has extended responsibilities for those who are young and/or at risk. Safeguarding describes the broad preventative and precautionary approach to planning and procedures the Ashley Community Housing and Himilo Training feels are necessary to have in place to protect children and adults at risk from any potential harm or damage. Safer recruitment is an important aspect of safeguarding. We believe that a child, young person or adults at risk should never experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and adults at risk and to keep them safe. We are committed to practice in a way that protects them.

Approved by: ACH Board

Date Approved: April 2021

Responsibility for Update: Company Secretary

Version Number: 02.2

Issue Date: April 2021

Date for Review: March 2022

1. Ashley Community Housing/Himilo Training consider the issue of safeguarding adults at risk and children to be highly important. The organisation has developed a policy and procedures that aim to prevent occurrences of harm or abuse to those at risk. It is stressed by Ashley Community Housing/Himilo Training that all employees have a duty to adhere to this policy.
2. This policy is important as it clearly states the measures taken by Ashley Community Housing/Himilo Training to ensure that all children or adults at risk who use the service regardless of gender, ethnicity, disability, sexuality or religion, are protected from all forms of abuse and safe from harm.
3. It has been written using the guidance offered by 'Every Child Matters, NSPCC and various local adult and child safeguarding boards.

The purpose of this policy is to:

4. Outline the company's policy on safeguarding and protection of residents and learners who use our services, the broad preventative and precautionary approach to planning and procedures necessary to protect children and adults at risk from any potential harm or damage, and describes how any allegations, reports or suspicions of abuse will be handled.

It aims to:

- Protect children and adults at risk who use Ashley Community Housing and/or Himilo Training services
- Ensure all staff and volunteers have clear guidance on our approach to safeguarding and are aware of their roles and responsibilities in the event that any allegations, reports or suspicions of abuse may arise

The procedures aim to make sure that:

- The needs and interests of adults at risk are always respected and upheld
- The Human Rights of adults at risk are respected and upheld
- A proportionate, timely, professional and ethical response is made to any adult at risk who may be experiencing abuse
- All decisions and actions are taken in line with the Care Act 2014 and the Mental Capacity Act 2005 including the checklist contained within the Act.

The procedures also aim to make sure that each adult at risk maintains:

- Choice and control
- Safety
- Health
- Quality of Life
- Dignity and respect
- This policy is embedded into the organisation through staff group training and our induction process, and all service users will be informed of our Adult Safeguarding and Complaints Policies at admission.

Definitions:

5. Key definitions of issues contained within this document are provided in the following passages, and details in appendices within the Safeguarding folder (contact Designated Safeguarding Officers for further information), for this purpose Ashley Community Housing/Himilo Training adopts the definitions used in the guidance document 'Working Together to Safeguard Children' (2006), which is a guide for safeguarding and promoting the welfare of children and adults at risk.

The definition of safeguarding can be summarised as follows:

- Protecting children / adults at risk from maltreatment
 - Preventing impairment of children's health or development
 - Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- And undertaking the role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Child

6. The Children Act 1989, states that the definition of a child means 'any person under the age of 18 years (16 years if married)'

Adult at risk

7. The definition of an 'adult at risk' referred to in the 1997 Consultation Paper, Who decides?, issued by the Lord Chancellor's Department, is a person:

'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Who decides, 2007).

Abuse and Neglect

8. Abuse and Neglect are defined as forms of maltreatment of a child/adult at risk. It is stated that somebody may abuse or neglect a child/adult at risk by inflicting harm, or by failing to prevent harm. Children/adults at risk may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

There are different forms of abuse, which can be categorised as follows:

- Physical abuse
 - Emotional abuse
 - Sexual abuse
 - Psychological - repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
 - Financial or material – stealing or denying access to money or possessions
 - Neglect
 - Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background
 - Self-neglect
 - Modern slavery
 - Prevent
9. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
 - Provide adequate food, clothing and shelter, including exclusion from home or abandonment
 - Protect a child from physical and emotional harm or danger
 - Ensure adequate supervision, including the use of inadequate care-givers

- Ensure access to appropriate medical care or treatment

10. Prevent

Exploitation by radicalisers who promote violence

Individuals may be susceptible to recruitment into violent and non-violent extremism by radicalisers. Violent extremists often use a persuasive rationale and charismatic individuals to attract people to their cause. The aim is to attract people to their reasoning, inspire new recruits, embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. If the person susceptible is a child or an adult at risk a safeguarding referral must be made as well as a referral through the Channel process.

For full definitions of terms see Appendix A- D (filed within Safeguarding Folder)

Disclosure of abuse or criminal activity may also be made by a person not covered by the definitions of an adult at risk or child within this policy. You may still need to act on this information. Please see the ACH Information Sharing Policy for further advice

Principals

11. Ashley Community Housing/Himilo Training recognises that:

All adults have a right to dignity, choice and respect. As a provider of care services, we have a duty of care to all residents. There is a zero tolerance response to any allegation of suspected abuse, and to do nothing is not an option. Residents, their families or representatives are advised of our Safeguarding policies and procedures and the reasons why they are in place.

Six key principles underpin all adult safeguarding work:

Empowerment

People being supported and encouraged to make their own decisions and informed consent.
"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens"

Prevention

It is better to take action before harm occurs.
"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help"

Proportionality

The least intrusive response appropriate to the risk presented.
"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed"

Protection

Support and representation for those in greatest need.
"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want"

Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me"

Accountability

Accountability and transparency in delivering safeguarding.

"I understand the role of everyone involved in my life and so do they"

Responsibilities

12. All Ashley Community Housing/Himilo Training Staff are aware of the procedures they should follow in order to reduce the risk of harm to learners and tenants and are aware of the code of practice adopted by Ashley Community Housing/Himilo Training.
 13. All staff and contractors are required to have an enhanced DBS check carried out whether they have contact with young children or vulnerable adults or not.
 14. Development of a code of practice
 15. Make all staff and contractors aware of organisational policy and procedures for safeguarding
 16. To ensure staff are recruited effectively and the proper checks are carried out.
- Related Policies and Procedures
17. This policy relates to the following:
 - Recruitment Policy
 - Data Protection
 - Equality and Diversity
 - Health and Safety

This policy will be reviewed in accordance with the dates shown in the opening section.

Safeguarding Procedure

Staff member is concerned about learner/ tenant/ client.

Vulnerable person has not disclosed anything, but staff member has suspicion of one of the following occurring:

- Physical abuse
- Sexual abuse
- Psychological abuse
- Financial/ Material abuse
- Neglect and acts of omission - Discriminating abuse
- Self-neglect
- Modern slavery
- PREVENT

Staff member to record suspicion and report to safeguarding lead for further action / investigation.
Safeguarding Lead to keep log of reports and define further action(s)

Vulnerable person confides incident(s) of apparent abuse to staff member.

Staff member to listen carefully (no probing/investigating). Explain that you will have to disclose to the Safeguarding Lead to reassure them.

Safeguarding Lead (or another designated member of the safeguarding team) is taking over

Staff member to write clear and concise report of disclosure and pass to safeguarding lead

Staff member to write clear and concise report of disclosure and pass to safeguarding

Contacts:

- Safeguarding Representative for the Board: **Ruth Pickersgill**
Email: ruth.pickersgill@ach.org.uk
- Designated Safeguarding Lead Officer: **Tom Dixon**

T: 0117 387 6834 E: tom.dixon@ach.org.uk

- Deputy Designated Safeguarding Lead Officer (Birmingham): **Mary Unsworth**

T: 0121 565 3384 E: mary.unsworth@ach.org.uk

- Deputy Designated Safeguarding Lead Officer (Bristol): **Esther Bakari**

T: 0117 9540 433 E: esther.bakari@ach.org.uk

- Deputy Designated Safeguarding Lead Officer (Coventry): **Zakariya Hussein**

T: 024 7518 5535 E: zakariya.hussein@ach.org.uk

- Deputy Designated Safeguarding Lead Officer (Wolverhampton):

Rashid Guled

T: 01902 429 163 E: rashid.guled@ach.org.uk

Appendix A: Definitions

Who is an adult at risk?

An adult at risk is an adult who:

- has needs for care and support (whether or not the council 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.

What is meant by abuse and neglect?

Abuse is the violation of an individual's human and civil rights by someone else. Abuse might be unintentional; the important factor is whether the adult at risk is harmed or not. Abuse can be:

- **Physical abuse** - any form of assault, over-medication, restraint or poor manual handling practice.
- **Sexual abuse** - rape or any sexual act which was not actively consented to or the person did not have the capacity to understand.
- **Psychological / emotional abuse** - threats, intimidation, coercion, harassment or bullying.
- **Financial abuse** - theft, borrowing money without repayment and any pressure in connection with wills or property, possessions or benefits.
- **Neglect** - ignoring medical or physical needs, not providing access to appropriate care, the withholding of the necessities of life, such as medication, adequate food, water and heating.
- **Discriminatory abuse** - all forms of harassment, slurs or similar treatment based on a person's disability, ethnic origin, gender or sexuality. This is often called hate crime.
- **Institutional abuse** - repeated instances of poor care, ill treatment of vulnerable adults, and unsatisfactory professional practice in an institutional setting or in one's own home. This is often an indicator of more serious problems.
- **Modern slavery** - slavery, human trafficking, forced labour and domestic servitude.
- **Self-neglect** - this covers a wide range of behaviour; neglecting to care for personal hygiene, health or surroundings and includes behaviour like hoarding which puts the person, or others, at risk.
- **Grooming** into extremist behaviours and attitudes linked to the Prevent Duty

Prevent

Prevent is part of the Government's counter-terrorism strategy CONTEST and aims to stop people becoming terrorists or supporting terrorism; as such it is described as the only long term solution to the threat we face from terrorism.

Prevent focuses on all forms of terrorism and operates in a pre-criminal space, providing support and redirection to vulnerable individuals at risk of being groomed in to terrorist activity before any crimes are committed. Radicalisation is comparable to other forms of exploitation; it is therefore a safeguarding issue staff working in the housing sector must be aware of.

Housing professionals will meet and accommodate people who may be vulnerable to being drawn into terrorism and encourage a consistent and proportionate approach to raising awareness of Prevent as part of the wider safeguarding agenda.

Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The key challenge for the sector is to ensure that, where there are signs that someone has been or is being drawn into terrorism, the housing/support or care worker is trained to recognise those signs correctly and is aware of and can locate available support, including the Channel programme where necessary.

Preventing someone from being drawn into terrorism is substantially comparable to safeguarding in other areas, including child abuse or domestic violence.

Where abuse may happen

Abuse can happen in any setting

- At home
- In sheltered housing
- In supported living settings
- At day centres and other day services
- In care homes or hospitals
- Wherever people are dependent on the care of others for their well-being

Abuse happens to people in all sections of society.

Appendix B: How to Recognise Abuse

Abuse can happen any setting and comes to light in different ways. Sometimes a person may tell you that they are being abused, but more often concerns are raised by something that you see, or behaviour observed by you or others, or be discovered on admission to hospital.

What to look for

There are some situations that will alert you to the possibility that an adult is being abused. These are not proof in themselves that abuse has taken place as each indicator may have a different explanation other than abuse, but you must report your concerns.

If you notice an injury, you may have an opportunity to enquire of the adult in an open way about how it happened. It is very important not to suggest explanations, or put words into people's mouths, but a simple sympathetic "How did that happen?" may be helpful. Any injury that is not fully explained by the history given should alert you to the possibility of abuse. You should also be alert to frequent changes of address, changes of names or aliases and complex and inconsistent family histories that are not substantiated.

The following are examples of possible signs and symptoms of abuse, arranged according to type of abuse. It is important to remember that different types of abuse may, and very often are, happening at the same time.

Indicators of abuse

An indication of how to recognise abuse and what signs to look for in each category is outlined below. 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 includes assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.

Possible indicators:

- Unexplained or inappropriately explained injuries;
- Adult exhibiting self-harm;
- Medical problems that go unattended;
- Sudden and unexplained urinary and/or fecal incontinence.
- Evidence of over/under-medication;
- Adult flinches at physical contact;
- Adult appears frightened or subdued in the presence of particular people;
- Adult asks not to be hurt;
- Adult may repeat what the person causing harm has said (e.g. 'Shut up or I'll hit you');
- Reluctance to undress or uncover parts of the body;
- An adult with capacity not being allowed to go out when they ask to.

Psychological abuse includes 'emotional abuse' and takes the form of threats of harm or abandonment, humiliation, rejection, blaming, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), cyber bullying or "trolling", isolation or withdrawal from services or support networks.

Psychological abuse includes the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation/gender orientation.

All these behaviours are cause for concern and the reasons for them need to be established.
Possible indicators:

- Untypical ambivalence, deference, passivity, resignation, low self-esteem
- Adult appears anxious or withdrawn, especially in the presence of the alleged abuser
- Talking about the person as if they were a child or object
- Untypical changes in behaviour (e.g. continence problems, sleep disturbance)
- Adult is not allowed visitors/phone calls
- Adult is locked in a room/in their home
- Adult is denied access to aids or equipment, (e.g. glasses, dentures, hearing aid, crutches, etc.)
- Adult's access to personal hygiene and toilet is restricted
- Bullying via social networking internet sites and persistent texting

Financial or Material abuse can include theft, fraud, telephone and internet scamming, 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. A person living in poverty who cannot afford the basic necessities of life, but has adequate income, may be being deprived of money by others.

Sometimes adults at risk are manipulated or "groomed" for financial gain, e.g. a perpetrator may disclose sad family circumstances, borrowing small sums of money, breaching professional boundaries. Family members, friends or professionals may be the perpetrators of such abuse.

Possible indicators:

- Unusual bank account activity where sums withdrawn cannot be accounted for
- Lack of heating, clothing or food
- Inability to pay bills/unexplained shortage of money, especially after benefit day
- Unexplained loss/misplacement of financial documents
- The recent addition of authorised signatories on an adult's accounts or cards
- Disparity between assets/income and living conditions
- Power of attorney obtained when the adult lacks the capacity to make this decision
- Recent changes of deeds/title of house or will
- Acquaintances expressing sudden or disproportionate interest in the adult and their money
- Sending large amounts of money to "charities" or people they have not met
- Service user not in control of their direct payment or individualised budget

Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. Sexual abuse and exploitation can be perpetrated by one individual to another, and/or be perpetrated by an exploitative group who target individuals or a group of vulnerable people.

Any sexual relationship that develops between adults where one is in a position of trust, power or authority in relation to the other (e.g. day centre worker/social worker/residential worker/health or care worker etc.) may also constitute sexual abuse.

It should be noted that denial of a sexual life to consenting adults is also considered abusive practice and a potential breach of Human Rights.

Possible indicators:

- Adult has urinary tract infections, vaginal infections or sexually transmitted diseases that are not otherwise explained
- Adult appears unusually subdued, withdrawn or has poor concentration

- Adult exhibits significant changes in sexual behaviour or outlook
- Adult experiences pain, itching or bleeding in the genital/anal area
- Adult's underclothing is torn, stained or bloody
- A woman who lacks the mental capacity to consent to sexual intercourse becomes pregnant

Sexual exploitation of adults with care and support needs involves exploitative situations, contexts and relationships where adults with care and support needs (or a third person) receives affection or inclusion or some type of "reward", for example food, accommodation, drugs, alcohol, cigarettes, gifts, money) as a result of performing sexual activities, and/or others performing sexual activities on them.

Sexual exploitation can occur through the use of technology without the person's immediate recognition. This can include being persuaded to post sexual images or videos on the internet or a mobile phone, or being sent such an image by the person alleged to be causing harm. As above, sexual exploitation can be perpetrated by an individual or a group of perpetrators.

Neglect and Acts of Omission includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.

Neglect can be intentional or unintentional. It may take the form of isolated incidents or pervasive ill treatment and gross misconduct. Repeated instances of poor care may be an indication of more serious problems.

Possible indicators:

- Adult has inadequate heating and/or lighting
- Adult's physical condition/appearance is poor (e.g. ulcers, pressure sores, soiled or wet clothing)
- Adult is malnourished, has sudden or continuous weight loss and/or is dehydrated
- Adult cannot access appropriate medication or medical care
- Adult is not afforded appropriate privacy or dignity
- Adult and/or a carer has inconsistent or reluctant contact with health and social services
- Callers/visitors are refused access to the person

Organisational Abuse includes neglect and poor care practice within an establishment or specific care setting such as a hospital, day centre, or care home, or where care is provided within the adults own home by a provided service. This may range from one off serious incidents to on-going ill-treatment. Organisational abuse involves neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. Organisational abuse can occur in any setting where health or social care is provided.

Self-Neglect or lack of self-care includes neglect of personal hygiene, nutrition, hydration, and health, thereby endangering safety and well-being, and/or lack of care of one's environment – squalor and hoarding, and/or a refusal of services that would mitigate risk of harm. People who self neglect can present through a variety of key episodes – fire risks, drugs and alcohol abuse, infections from poor tissue viability, untreated diabetes or other serious medical conditions.

Possible indicators:

- Living in very unclean, sometimes verminous, circumstances
- Poor self-care leading to a decline in personal hygiene
- Poor nutrition
- Poor healing/sores
- Neglecting household maintenance

- Poor health with a refusal to take prescribed medication or medical advice
- Refusing all services which may help address health or self-care concerns

follow

Poor environments and personal hygiene may be a matter of personal or lifestyle choice or other issues such as insufficient income. The key consideration is – does this behaviour lead to risk of or actual harm to the individual? If there is no, or low, risk of harm to self or others, the persons choice should be respected.

Domestic abuse is defined as an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is or has been an intimate partner or other family member regardless of gender or sexuality. Domestic abuse may include psychological, physical, sexual, financial, emotional abuse; so-called 'honour-based' violence; Female Genital Mutilation (FGM) and forced marriage.

Female Genital Mutilation. There is no requirement for automatic referral of adult women with FGM to adult social services or the police. Professionals should be aware that any disclosure may be the first time that a woman has ever discussed her FGM with anyone. A referral to the police should not be an automatic response for all adult women who are identified as having had FGM; cases must individually have assessed, and a safeguarding adults referral made for any woman who is also an adult at risk. An adult woman who has had FGM may also be an indicator that others in the family, including children, may be a risk of FGM. There is a mandatory requirement to refer children who are at risk of, or have had, FGM, as a child protection referral.

In all cases above, if the person is an adult at risk as defined by the Care Act you must also make a safeguarding adults referral. If children are also affected to make a referral to First Response on 0117 903 6444 or your local child protection agency.

Modern Slavery includes slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Modern Slavery should be considered if a person is:

- Forced to work - through mental or physical threat
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or has restrictions placed on his/her freedom of movement

If an identified victim of modern slavery and /or human trafficking is also an adult with care and support needs, the response will be co-ordinated under the adult safeguarding process. The police are the lead agency in managing responses to all adults who are the victims of human trafficking.

Possible Indicators:

- The adult is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else
- They are accompanied outside their address, they are not permitted to go out alone
- The adult perceives themselves to be in debt to someone else or in a situation of dependence
- The adult has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred
- The adult looks malnourished, unkempt, or appears withdrawn
- The adult has few personal possessions and often wears the same clothes. What clothes they do wear may not be suitable for their work.
- The adult is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them

- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work
- Fear of authorities

Discriminatory Abuse includes Hate crime, although will often involve other types of abuse as well, ie physical and psychological abuse. A Hate crime is any criminal offence committed against a person or property that is motivated by hostility towards someone based on the adult's: disability, race, religion or belief, sexual orientation, transgender. All hate crime is important and should be reported to the Police. Anyone can be the victim of a hate crime.

Discriminatory abuse occurs when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. Discriminatory abuse can also be a feature of any form of abuse of an adult at risk, where abuse is motivated by the perpetrators prejudice toward an adult at risk's age, gender, gender identity, sexuality, disability, religion, class, culture, language, political views or ethnic origin.

Possible indicators:

- An adult may reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices.
- An adult making complaints about service/s not meeting their needs.
- Physical attacks such as physical assault, damage to property, offensive graffiti and arson.
- Threat of attack including offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate, and unfounded, malicious complaints.
- Calling a person, a paedophile or attempting to damage their reputation and cause others to react against them.
- Verbal abuse, insults or harassment - taunting, abusive gestures and bullying.
- Offensive leaflets and posters, dumping of rubbish outside homes or through letterboxes.

Historical Allegations of Adult Abuse

There is no time limit in relation to historical allegations of adult abuse. Historical allegations should therefore be responded to in the same way as contemporary concerns - in line with the Safeguarding Adults process.

Historical Allegations of Child Abuse

If an adult at risk discloses abuse that happened when they were a child and from which they are now safe, i.e. they have no contact with the alleged perpetrator; this is not a concern that needs to be reported under safeguarding adults. However, several courses of action must still be considered:

- If the person has the capacity to decide they may wish to report their abuse to the police. This decision must not be rushed, and the person should be well supported throughout the process
- If the person does not have the mental capacity to make those decisions for themselves, a report may be made on their behalf if it is decided it is in their best interests to do so.
- If children are thought to be at risk from the alleged perpetrator a referral must be made to Bristol First Response (or the appropriate local agency) whether the victim consents or not. Tel 0117 903 6444. If you have a belief that children are at risk, then you have a duty to report this information to Children Services via First Response.

Appendix C: Taking Action

What you should know if you work with adults at risk

- You have a duty to report any concerns about abuse.
- ACH have a reporting procedure and will make sure staff know what you have to do.
- If you do not want to use your employer's procedure contact Bristol Care Direct on 0117 922 2700 - 8.30am to 5pm Monday to Friday (answerphone outside office hours).
- Further advice can be found in Bristol's Safeguarding Adults Board (SAB) guide, <https://www.bristol.gov.uk/documents/20182/33728/Safeguarding%20adults%20booklet%20%202014.pdf/45b136c5-5b13-4e07-a8df-415816866347> and provides an alerters guide <https://www.bristol.gov.uk/documents/20182/33728/Alerters%20%26%20Reporters%20Guide%202010%20%28amended%202012%29.pdf/a104323f-c4e7-4388-b5b9-7901e8bf2e90>
- Training is available for people working with adults at risk <https://www.bristol.gov.uk/jobs-training/training-courses-for-bcc-staff-and-care-professionals>
- Follow the reporting flow chart

Contact details for alerting

All abuse or neglect concerns relating to adults with care and support needs must be reported to the appropriate local authority agency. If you are unsure whether to make a safeguarding adult referral you are welcome to discuss your concerns and/or seek information and advice from the appropriate local agency.

If there is immediate danger, phone the police on 999.

If children may be at risk; including unborn children, contact Bristol First Response on 0117 903 6444 or the appropriate local agency.

Bristol

Report to Bristol Care Direct	Online	https://www.bristol.gov.uk/social-care-health/report-suspected-abuse-safeguarding-adults-at-risk
	Email	Complete the Bristol Safeguarding Adults Referral Form and email to Bristol Care Direct at adult.care@bristol.gov.uk
	Telephone	Care Direct 0117 922 2700 8.30am to 5pm Monday to Friday (answerphone outside office hours)

In addition, where there a safeguarding concern arises regarding a person placed under the Emergency Accommodation Open Tender, Ashley Community Housing's policy is to inform the booking agency of any new information regarding a risk or vulnerability for a service user, including where necessary, risk management arrangements and incident reporting. Reporting should be made via secure email.

South Gloucestershire

Report to SGSAB	Telephone	01454 868007 - Monday to Friday 9am - 5pm 01454 615165 - Out of hours and at weekends
-----------------	------------------	--

Birmingham

Report to Birmingham City Council	Online	https://www.bsab.org/how-to-report-abuse/
	Email	Complete the Referral Form at Appendix 4 or here and email to Birmingham Adults and Communities Directorate at ACAP@birmingham.gov.uk
	Fax	Complete the Referral Form at Appendix 4 or here and email to Birmingham Adults and Communities Directorate on 0121 303 6245
	Telephone	0121 303 1234 (Out of hours please call the emergency duty team on 0121 675 4806)
<p>If you have a query about someone who is in a position of trust (people who work with adults with care and support needs, whether paid or unpaid) please contact Denise Wilson, local authority safeguarding team manager, on 0121 303 1157 or email denise.a.wilson@birmingham.gov.uk</p>		

Coventry

Report to Coventry Safeguarding Board	Email	Email Adult Social Care Direct (Coventry) at ascdirect@coventry.gov.uk
	Telephone	024 7683 3003

Wolverhampton

Report to Wolverhampton Safeguarding Board	Email	Email Wolverhampton Safeguarding Board at AIA@wolverhampton.gov.uk
	Fax	Fax Wolverhampton Safeguarding Board on 01902 553992
	Telephone	01902 551199 (Out of hours Emergency Duty Team on Tel 01902 552999)

Remember: Doing nothing isn't an option. You must report your concerns.

How concerns arise

The possibility of abuse can come to light in various ways, for example:

- An active disclosure of abuse by the adult
- A concern or allegation raised from someone else aware of the symptoms of the abuse
- A growing awareness that "something is not right"
- A complaint or concern raised by an adult or a third party who doesn't recognize that it is abuse

Recognising abuse and neglect is not easy and it is not your responsibility to decide whether or not abuse or neglect has taken place. Don't delay in reporting abuse.

Emergency Situations

If the situation is an emergency, with a resident in immediate danger, staff are instructed to call for assistance immediately. They should give any necessary first aid and contact appropriate emergency services if necessary.

If the abuser remains present and poses a threat to any company staff present as well as the victim, staff are not expected to put themselves at risk of violence or other harm. They should then put into action company procedures on how to respond to abusive, aggressive or violent behaviour, which forms part of the company's policies on health and safety of its staff.

Immediate reporting to your line manager and referral to Bristol Care Direct or the appropriate local agency should follow.

Direct disclosures and allegations of abuse

If an adult at risk discloses an allegation of abuse to you:

- Stay calm
- Listen, and be sympathetic. Try not to show if you are shocked. Do not press for detail or take a written statement, as this could be stressful and jeopardise future investigations
- Tell them they have done the right thing in telling you, and that you take it seriously
- Ask them what they would like to happen next
- Let them know that you will be telling your manager. They may ask you not to, but you must let them know this is your duty
- Clarify the nature of the abuse and establish if it needs an urgent response, and call the police if so. You should stay with the adult until they are safe and well, or until the police arrive.
- Do not attempt to contact or question the alleged perpetrator as you may be placing the adult at further risk of harm.
- Adhere to information sharing protocols, only share the persons' information with the people who need to know and observe the confidentiality of all concerned at all times. Address immediate safety and protection needs
- If an adult is in need of emergency medical attention or in immediate danger, call 999 and wait for the emergency services to arrive. The NHS 111 service can be used for medical help or advice when it's not a life-threatening situation.
- Consider if there are children or other adults with care & support needs who are at risk of harm and take appropriate steps to safeguard them. In all cases of children (including unborn children) at risk you must refer directly to children's services on Bristol First Response 0117 903 6444 or the appropriate local agency.
- Take steps to preserve any physical evidence if a crime may have been committed.
- Make a written record of what was agreed, what action/s have been taken and make a record of any evidence that has been preserved and where it is stored etc.

Reporting and referring

If the adult is not in immediate danger, contact your immediate line manager reporting your concerns and the nature of the abuse. You will then be asked for a statement of your concerns detailing what you have observed.

If your line manager is not available or your concerns are regarding the actions of your line manager, then the information must be reported to the Safeguarding Lead.

In all cases a written record of the safeguarding concern will be made and a referral to Bristol Care Direct or the appropriate local authority agency where deemed necessary by the Safeguarding Lead / Team.

The Confidentiality policy should be considered, in particular the sections on when and how to refer.

Concerns and third party allegations of abuse

If you have concerns or suspicions, or evidence of abuse including an allegation or disclosure by a third party, record your suspicions and report them to your immediate line manager for further investigation, including:

1. why you're concerned
2. the adult's name, age and address
3. if anyone lives with them
4. if they're getting help from any organisation
5. who may be doing the abuse

Ensure that the report is received. If your line manager is not available or your concern is regarding your line manager, report the concerns directly to the Safeguarding Lead.

Investigation and reporting by the Safeguarding Lead

From the very first stage of concerns being identified, the views of the adult should be sought. This will enable the adult to give their perspectives about the abuse or neglect concerns that have been raised, and what outcomes they would like to achieve. These views should directly inform what happens next.

The adult must also be asked for their consent to report the concern. If consent is withheld but there are risks to others including children and other adults at risk, or the risk to the adult at risk is serious, a referral to adult care should still be made and the adult at risk informed that this has been done.

When speaking to the adult:

- Carefully consider the risk of increased harm to the adult from an alleged abuser or from flight risk from speaking to you. Take external advice if necessary
- Speak to the adult in a private and safe place and inform them of the concerns. The person alleged to be the source of the risk should not be present
- Obtain the adult's views on the concern and what they want done about it. Provide the adult at risk information about the adult safeguarding process and how that could help to make them safer; ask for their consent to refer
- Explain confidentiality issues, how they will be kept informed and how they will be supported
- Identify any needs, including what could be done to make them feel safer, communication needs, personal care arrangements and access requests
- Preserve evidence through recording. Take steps to preserve any physical evidence
- Discuss and agree any immediate protective actions needed.

Allegations concerning People in a Position of Trust

A Person in a Position of Trust (PiPoT) includes any employee, volunteer or student, paid or unpaid, who works with or cares for adults with care and support needs. Where a safeguarding concern or allegation is made regarding a person in a PiPoT, these additional procedures will be followed.

Reporting

Any allegation against people who work with adults with care and support needs should be reported immediately to a senior manager within that organisation and their PiPoT or Safeguarding Lead.

The PiPoT lead for Ashley Community Housing / Himilo Training is the Safeguarding Lead.

Where a member of staff in Ashley Community Housing / Himilo Training holds information regarding a PiPoT in another organisation or agency, they would normally make the PiPoT aware, and give them the chance to share the information with their employer first. If the PiPoT declines to share it with their employer for whatever reason, this does not mean the information cannot be shared. However, any decision to share must be considered on its own merits, with due regard to the Data Protection Act 1998, and Article 8 of the European Convention on Human Rights.

Assessment of concern

Where an allegation is made against a member of staff (paid or unpaid) of Ashley Community Housing / Himilo Training, the Safeguarding Lead will assess if the situation is a position of trust concern.

An allegation is a position of trust concern if the individual has:

- Behaved in a way that has harmed or may have harmed an adult with care and support needs.
- Possibly committed a criminal offence against or related to an adult with care and support needs.
- Behaved towards an adult with care and support needs in a way that indicates s/he is unsuitable to work with adults with care and support needs.
- Behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to adults with care and support needs must be reviewed.
- May be subject to abuse themselves and as a consequence means their ability to provide a service to adults with care and support needs must be reviewed.
- Behaved in a way which questions their ability to provide a service to an adult with care and support needs which must be reviewed e.g. conviction for grievous bodily harm against someone who is not an adult with care and support needs.

Taking Action

Where the Safeguarding Lead concludes the concern does not meet the definition of a PiPoT concern, they will make a record of the discussion and decision and the reasons for this conclusion. These details could be drawn upon if further concerns come about in relation to a PiPoT.

Where the Safeguarding Lead concludes the concern does meet the definition of a PiPoT concern, they will take appropriate action as follows:

- Act immediately to correct any abuse or neglect in the organisation, and protect adults at risk from harm as soon as possible; and inform the local authority in accordance with the local policy and procedures

- Consider what support and advice they will make available to their staff or volunteers against whom allegations have been made. Any member of staff about whom there are concerns should be treated fairly and honestly. Ashley Community Housing and Himilo Training as an employer recognise a duty of care towards them.
- If the member of staff is removed by either being dismissed or permanently redeployed to a non-regulated activity because they pose a risk of harm to adults with care and support needs, then Ashley Community Housing / Himilo Training have a **legal duty** to refer the person to the Disclosure and Barring Service.
- If a person subject to a PiPoT investigation attempts to leave their employment by resigning in an effort to avoid the investigation or disciplinary process, the Ashley Community Housing / Himilo Training is entitled not to accept that resignation, conclude whatever process has been utilised and, if the outcome warrants it, dismiss the employee or volunteer instead.

Record Keeping

Written records of safeguarding concerns will be kept, even where there is no need to refer the matter immediately.

All records will be kept securely, separate from other student files, and in secure electronic file locations by the DSL. These will be stored in line with our document retention policy (see the Company Handbook)

Appendix D: Prevention

Ashley Community Housing / Himilo Training are committed to ensuring that the requirements of effective safeguarding are integrated throughout the organisations, to minimise the likelihood of safeguarding issues arising.

Admissions

Ashley Community Housing and Himilo Training follow careful Admissions Procedures. These ensure that:

- All tenants and service users are made aware of relevant policies including Safeguarding, Complaints and Confidentiality policies, and support workers discuss vulnerability and abuse with tenants.
- A risk assessment is carried out that may flag safeguarding concerns.
- Tenants and service users have full and appropriate inductions.

Recruitment

Safeguarding is integrated into the company's recruitment procedures including voluntary and enhanced disclosure, references and identity checks. Please see the company Recruitment procedures for more detail (Company Handbook March 2017 Section 4).

Code of Conduct

All staff are expected to follow the Code of Conduct at all times. Failure to follow the Code of Conduct (Company Handbook Section 1) or the procedures outlined in this policy may lead to action being taken through the company's Disciplinary procedures (Company Handbook March 2017 Section 10).

If you observe failures of conduct by other members of staff you must raise these through the company's Grievance procedures (Company Handbook, Section 10) or safeguarding policies relating to People in a Position of Trust.

Staff Training and Inductions

Ensuring staff are provided with good quality and regular training is integral to good safeguarding. Please see the company Training procedures for more detail (Company Handbook March 2017 Section 4).

Staff management and supervision

Ashley Community Housing / Himilo Training encourage regular discussion of Adult Safeguarding issues especially in team meetings to ensure that the requirements of Adult Safeguarding are well understood and that the organisation continues to learn from any issues that may arise.

All staff are required to attend monthly supervision. This is an opportunity for staff members to learn about safeguarding procedures in accordance with their roles and responsibilities and resolve any questions or issues. Staff performance against the expectations of their role, the code of conduct and the needs of safeguarding will be monitored and assessed through supervision, and any actions including additional training taken as a result.

Whistleblowing

Ashley Community Housing / Himilo Training's Whistleblowing Policy provides guidelines to all our employees, casual, temporary agency staff, freelancers, trainees, home workers and contractors,

who feel they need to raise certain issues, in confidence, and protects workers who raise legitimate concerns from being subjected to detrimental treatment or victimised. The company recognises Safeguarding concerns as qualifying for protection under the Whistleblowing Policy. Please see the company Training procedures for more detail (Company Handbook March 2017 Section 12).

Complaints

The complaints procedure is made readily available to all service users and publicised in a way in which anyone can voice concerns about unacceptable and/or abusive behaviour towards vulnerable adults, or any failures to adhere to these policies and procedures. Please see the Complaints Procedure for more detail.

Confidentiality

The Confidentiality Policy should be followed in any decisions to share confidential information. See the Company Handbook for more information.

APPENDIX E SAFEGUARDING POLICY

Safeguarding Disclosure Form

Ashley Community Housing	Record of Concern	Part 1
Name of vulnerable adult/ Child/young person:		
Vulnerable adult/ child/young person's address:		
Vulnerable adult/child/young person's date of birth:		
Name of parent/carer:		
Contact number of parent/carer:		
What is said to have happened or what was seen?		
When and where did it occur?		
What was said by those involved?		
Were there any obvious signs e.g. bruising, bleeding, changed behaviour?		
Was the vulnerable adult/child/young person able to say what happened? If so, how did they describe it? (record using their words be considerate of language barriers)		
Who has been told about it and when?		
Do the parents know (if applicable)?		
Print name and signature of person filling in record		

Date of record

Ashley Community Housing Record of Concern Part 2

Consultation taken:

Decision made:	No further action	
	Continued Monitoring	
	Formal Referral	

Date:

Details:

Details of Formal Referral (including Agency to which the case is being referred, contact name within the agency and date of referral)

Designated Safeguarding Officer:

Name:

Signature:

Date:

Copy of Record Form to:

Policy Framework

Ashley Community Housing / Himilo Training's Safeguarding Adults Policy and Procedures draw on the following regional and national policy and guidance:

- Care Act 2014 <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 1998
- Sexual Offences Act 2003

Responsibilities

All staff (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Lead Safeguarding officer

The Designated Safeguarding Lead (DSL) officer for with overall responsibility for monitoring all cases of abuse or alleged abuse within Ashley Community Housing / Himilo Training is **Tom Dixon** – Research and Project Lead (tom.dixon@ach.org.uk). See full list of contacts above – page 5.