

Active Impact Safeguarding Adults at Risk of Abuse Policy

Safeguarding Key Information	
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Deputy Designated Safeguarding Lead	Nicole Hastie, CEO 01452 341266 Nicole@activeimpact.org.uk
Trustee with Safeguarding Responsibility	Victoria Livingstone-Thompson Vicci_I_t@hotmail.com or 07590 111847
Reporting Concerns (over 18s at risk of harm)	
For emergency response Monday – Friday, 8am – 5pm Out of Hours	999 01452 426868 (Adult Helpdesk) 01452 614194 You can also email socialcare.enq@gloucestershire.gov.uk, however this email is unlikely to be monitored closely enough to be useful in an urgent situation.

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Safeguarding Adults at Risk of Abuse Policy

1. Introduction

Active Impact has a responsibility to be vigilant to, and report concerns about, the abuse, neglect and ill-treatment of adults who are at risk and therefore at increased risk of being harmed.

There are legal requirements on statutory bodies under the Care Act 2014, and statutory guidance (Care and Support Statutory Guidance 2018, updated 2021) applying to the voluntary sector across England and the devolved nations, for organisations to do everything they can to recognise and report abuse quickly and appropriately to keep adults safe, and to prevent such abuse from happening in the first place.

Anyone who is employed or volunteers for, or on behalf of, Active Impact, regardless of the type or amount of contact they have with adults who are at risk of harm, has a role to play in safeguarding and protecting them. They must:

- Know how to recognise potential abuse of adults at risk
- Know what to do when safeguarding concerns arise
- Understand what Active Impact expects of them in terms of their own behaviour and actions.

Active Impact is committed to ensuring that:

- Individuals' chosen outcomes are at the heart of any safeguarding activity ('Making Safeguarding Personal' or MSP approach)
- Safeguarding is always more focused on the adult than on processes
- Each person's dignity, and respect towards them, is central to all professional practice.

(taken from Gloucestershire County Council Safeguarding Adults Policy Procedures Feb 2022)

An adult at risk of abuse can be anyone over the age of eighteen, and may include beneficiaries, staff, or volunteers (see Section 3 'Definitions' below). Whilst some characteristics may make an individual more vulnerable (i.e., mental ill-health, illnesses) it is the context of the situation around an individual which may increase risk or place them at potential risk of harm. It is therefore vital to be open to the possibility that any adult may be at risk and that this can be temporary or on-going, depending on the support and protective factors around them.

2. Working together.

The policy in Gloucestershire is to

- work together to prevent and protect adults with care and support needs from abuse.
- empower and support people to make their own choices,
- make enquiries and take action about actual or suspected abuse and neglect,

- support adults with care and support needs and provide a service to those who are experiencing, or who are at risk of, abuse, neglect, or exploitation,
- share information in a timely way,
- co-operate with each other to safeguard adults with care and support needs - although the Care Act 2014 is clear that the lead role sits with the Local Authority, section 6 of the Act is equally clear that the Local Authority and other relevant partner agencies have duties to co-operate with each other.

Active Impact is committed to working co-operatively and proactively with other organisations to protect adults who are at risk of harm.

3. Links with other policies.

This policy must be read in conjunction with the following Active Impact policies:

- Safeguarding Children Policy
- Allegations Management Policy
- Safer Recruitment Policy
- Code of Conduct
- Whistleblowing Policy
- E-Safety and Acceptable Usage Policy
- Anti-Bullying Policy
- Equality and Diversity Policy

This policy applies to all staff and volunteers, including Trustees, interns, secondees, students, sole traders, contractors, and associates. Organisations working in partnership with Active Impact must ensure that their own Safeguarding Adults at Risk of Harm policy is commensurate with the Safeguarding Policy and procedures of Gloucestershire County Council, and that it is shared with Active Impact.

3. Legislation and Statutory Guidance.

Statutory guidance means that Active Impact must protect adults at risk. Active Impact works across Gloucestershire, and therefore adheres to the framework of relevant legislation and statutory guidance in England. The relevant law and guidance is as follows:

The Care Act 2014, which came into effect in 2015, is the primary legislation in England for the support and protection of adults. It represents the most significant reform of care and support in more than 60 years, putting people and their carers in control of their care and support.

<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

The legislation sets out how people's care and support needs should be met and introduces the right to an assessment for anyone, including carers and self-funders, in need of support.

The act's "wellbeing principle" spells out a local authority's duty to ensure people's wellbeing is at the centre of all it does with greater emphasis on outcomes and helping people to connect with their local community. It seeks to ensure that people's eligibility for services will be the same across England.

Guidance on safeguarding adults at risk of harm, which in England had taken the form of the 'No Secrets' (2000) guidance, has been replaced by statutory guidance issued under the legislation which is the **Care and Support Statutory Guidance** (revised October 2018):

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

Human Rights Act 1998

The Act applies to all public authorities (such as central government departments, local authorities, and NHS Trusts) and other bodies performing public functions (such as private companies operating prisons). These organisations must comply with the Act, and an individual's human rights, when providing a service or making decisions that have a decisive impact upon an individual's rights. The Care Act extends the scope of the Human Rights Act. This incorporates registered care providers (residential and non-residential) providing care and support to an adult, or support to a carer, where the care and support is arranged or funded by the Local Authority (including Direct Payment situations (Local Government Association, 2014)). It does not incorporate entirely private arrangements concerning care and support.

Although the Act does not apply to private individuals or companies (except where they are performing public functions), public authorities have a positive duty to promote the human rights of individuals, and this entails a duty to stop people or companies abusing an individual's human rights. For example, a public authority that knows an adult is being abused by their privately funded carer has a duty to protect the adult from inhuman or degrading treatment.

The Human Rights Act covers everyone in the United Kingdom, regardless of citizenship or immigration status. Anyone who is in the UK for any reason is protected by the provisions of the Human Rights Act.

The Mental Capacity Act (Including DOLS (Deprivation of Liberty Safeguards) 2005

The Mental Capacity Act 2005, covering England and Wales, provides a statutory framework for people who lack capacity to make decisions for themselves, or who have capacity and want to make preparations for a time when they may lack capacity in the future. These can be small decisions – such as what clothes to wear – or major decisions, such as where to live and what happens if abuse has occurred. The Act sets out who can take decisions, in which situations, and how they should go about this.

Gloucestershire Local Authority's Safeguarding Adults Policy and Procedures can be found [here](#).

5. Definitions

For the purposes of this policy and procedures, the following terms are used:

Adult at risk: An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their additional requirements for care and support' (Care Act 2014 [England]). This definition is broadly consistent with definitions across the devolved nations.

Adult at risk of harm: is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:

- Personal characteristics which may include, but are not limited to, age, additional requirements, special educational requirements, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain. and/or
- Life circumstances which may include, but are not limited to, isolation, socio-economic factors and environmental living conditions.

Adult in need of protection: is a person aged 18 or over, who is being exposed to harm through abuse, exploitation, or neglect, potentially increased by their:

- Personal characteristics,
- Life circumstances,
- Inability to protect their own well-being, property, assets, rights or other interests, or
- Where the action or inaction of another person or persons is causing or is likely to cause them to be harmed.

Safeguarding: This describes the activity that is undertaken to protect adults at risk from abuse, harm, ill-treatment, and neglect.

Abuse: This is the ill-treatment or abuse of an adult at risk. A person may abuse or neglect an adult at risk by inflicting harm or by knowingly failing to act to prevent harm. Adults can be abused in a family, at a community fundraising event, in any type of institution/organisation, by those known to them or others, for example by those responsible for organising, participating, or providing support or care.

Prevention: This is how we seek to reduce the abuse of adults at risk occurring in the first place. This includes training, guidance and support for employees and volunteers, as well as for those accessing services.

6. Equality Statement

Some people have an increased risk of being abused, and additional barriers can exist for some with respect to recognising or disclosing it. Active Impact is committed to anti-discriminatory practice and recognises people's diverse circumstances. We strive to

ensure that all adults who are at risk of harm have the same protection, regardless of any barriers they may face.

Active Impact gives particular consideration to people who:

- Are disabled
- Are carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example in temporary accommodation, or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers or belong to transient communities
- Are at risk due to either their own or a family member's unmet mental health needs
- Are care-leavers.

7. Key Principles

All adult safeguarding work should reflect the following key Principles: (The Principles are not in order of priority; they are of equal importance)

Principles	"I Statements"
Empowerment – People being supported and encouraged to make their own decisions and informed consent.	I am consulted about the outcomes I want from the safeguarding process and these directly inform what happens.
Prevention – It is better to take action before harm occurs.	I am provided with easily understood 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 confident the actions taken to risk will take into account my preferred outcomes or best interests

Protection – Support and representation for those in greatest need	I am provided with help and support to report abuse. I am supported to take part in the safeguarding process to the extent to which I want and to which I am able.
Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.	I am confident that information will be appropriately shared in a way that takes into account its personal and sensitive nature. I am confident that agencies will work together to find the most effective solutions to the problem.
Accountability – Accountability and transparency in delivering safeguarding.	I am clear about the roles and responsibilities of all those involved in the solution to the problem.

Active Impact's approach to safeguarding adults at risk of harm is based on the following principles:

- All adults at risk of harm have a right to equal protection from all types of harm or abuse, regardless of personal characteristics (which may indicate additional vulnerabilities)
- Where there may be safeguarding concerns about both children and adults (for example in family groups), the needs, and safety, of the child is paramount.
- Where concerns are identified, the key principles of working with adults at risk (embedded in the Care Act 2014) will inform Active Impact's approach to interventions at all times
- Where a concern is identified, we will communicate very clearly what we have done and will be doing to safeguard the adult at risk, unless to do so would in any way increase risk or harm to them or to a child.
- Capacity will be assumed unless there is reason to believe that the person cannot understand the situation and the actions that may be taken
- Where we are working together with adults at risk, their carers, family members and other agencies, it is essential to recognise that, in some circumstances, it will not be appropriate to engage with carers or family members to protect the adult at risk
- Concerns or allegations that Active Impact staff or volunteers have abused or neglected adults at risk will be managed in accordance with Active Impact's Allegation Management Policy, relevant legislation, and local procedures.

We deliver this policy by:

- Providing effective leadership and management for staff and volunteers through induction, supervision, one-to-one learning and mentoring, support, and training

- Ensuring effective and robust safeguarding practices by having clear policies, procedures, practice standards and guidance in place
- Enabling staff to exercise professional judgement based upon seeking to act in the best interests of, and outcomes for, the adult who is at risk
- Maintaining safe recruitment, employment, and performance management practices.

8. Roles and Responsibilities

8.1 All staff

All staff will:

- Make use of our systems and policies that support safeguarding, including this Safeguarding Adults Policy, the Child Protection and Safeguarding Policy, the staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy DSL, and the Behaviour Policy
- Be aware of the process for making referrals to the Gloucestershire Safeguarding Adults team, and for statutory assessments that may follow a referral, including the role they might be expected to play
- Ensure they are confident in what to do if they identify a safeguarding issue, or if an adult at risk tells them they are being abused or neglected, including specific issues, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- Ensure they understand the signs of different types of abuse and neglect, as well as specific safeguarding issues, indicators of being at risk from or involved with serious violent crime, FGM, and radicalisation.
- Engage in the ongoing learning and organisational development of Active Impact to ensure that our systems, policies, and practices are safe, and promote the welfare of our beneficiaries.

8.2 The Designated Safeguarding Lead (DSL)

Active Impact's DSL is Caroline Weston, Head of Development. The DSL takes lead responsibility for Safeguarding across the organisation. She can be contacted on 01452 341266. Alternatively, for conversations of a non-urgent nature, email caroline.w@activeimpact.org.uk.

When the DSL is absent, the DDSL, Nicole Hastie will act as cover. She can be contacted on 01452 341266 or at nicole@activeimpact.org.uk.

Both the DSL and DDSL can be contacted via phone and email (see contact information at the start of this policy). For an out of hours safeguarding response, the Gloucestershire out of hours team should be contacted. Their details are included on the front page of this policy.

The DSL and DDSL will also keep the Trustees informed of any significant issues and liaise with local authority representatives as appropriate.

The DSL has responsibility for the following:

- Recognising how to identify signs of abuse and when to make a referral
- Responding appropriately to disclosures or concerns relating to the wellbeing of an adult at risk of abuse
- Referring allegations or cases of suspected abuse to Gloucestershire County Council Safeguarding Adults team, ensuring they have access to the most relevant up to date information
- Sharing information in a timely and accurate manner to the appropriate people
- Liaising and cooperating with the relevant external agencies where necessary

- Representing and promoting Active Impact's safeguarding policy and procedures across the organisation
- Ensuring that procedures and policies are kept up to date and relevant, as new information is produced, and policies are made available to all relevant parties
- Ensure that appropriate staff training is carried out regularly, in line with requirements
- Liaising with the Senior Leadership Team and other relevant staff to ensure that those who 'need to know' are kept up to date with Safeguarding responses and actions
- Liaising with parents, carers, and guardians about how an adult at risk of harm is being supported
- Liaising with the CEO and Board of Trustees to inform them of any issues and ongoing investigations

- Referring cases to the Channel programme (Prevent) where there is a radicalisation concern as required
- Ensuring that relevant, detailed, and accurate written records of referrals/concerns are kept and that these are stored securely
- Ensuring that support measures are being followed correctly by staff and support agencies
- Ensuring that adults who are victims of abuse are supported appropriately and sensitively, and that all actions from planning and intervention meetings are carried out and monitored

- Completing appropriate DSL training every two years
- Being available to discuss safeguarding concerns during working hours
- Ensuring staff receive relevant support as required
- Ensuring that all safeguarding functions within the organisation are audited and evaluated yearly, to ensure their efficacy
- Ensuring their knowledge is relevant and up to date, on both key safeguarding themes but also on individual cases.

8.3 The Board of Trustees

Active Impact's Board of Trustees is responsible for the following:

- Approving this policy at each review, ensuring it complies with the law, and holding Active Impact's DSL and CEO accountable for its implementation
- Nominating a Safeguarding Trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL. The current Safeguarding Trustee is Victoria Livingstone-Thompson.

The Safeguarding Trustee will act as the 'case manager' if an allegation of abuse is made against the DSL or DDSL (see Appendix 3).

All members of the Board of Trustees understand and fulfil their responsibilities, namely, to ensure that:

- There is an up-to-date Safeguarding Adults Policy, together with a Code of Conduct for staff
- A member of the Board of Trustees has overall responsibility for Child Protection and Safeguarding
- Active Impact operates Safer Recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training
- Active Impact has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned
- A senior leader has Designated Safeguarding Lead (DSL) responsibility
- On appointment, the DSLs undertake all the necessary training to fulfil the role
- All other staff have safeguarding training updated as appropriate
- Any weaknesses in Safeguarding Children / Safeguarding Adults policy and/or procedures are remedied immediately
- This Safeguarding Adults Policy is reviewed annually and is available on Active Impact's website
- Enhanced DBS checks are in place for the Board of Trustees. Section 15 of this policy has information on how Trustees are supported to fulfil their role.

The Chief Executive Officer (CEO)

The CEO of Active Impact is responsible for providing appropriate support to the DSL, to ensure that:

- Staff and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Safeguarding is promoted as being of utmost importance across the organisation, in all its communications

- The DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL (or DDSL) is absent

9. Staff, Trustees, and volunteers outside of work

When staff, volunteers or Trustees of Active Impact are outside of work, they may identify safeguarding concerns in their own family or networks, community, neighbourhood or through activities in which they participate. Active Impact expects all its staff, Trustees, and volunteers to act appropriately on any safeguarding concerns they encounter about an adult at risk and will provide appropriate training to facilitate this.

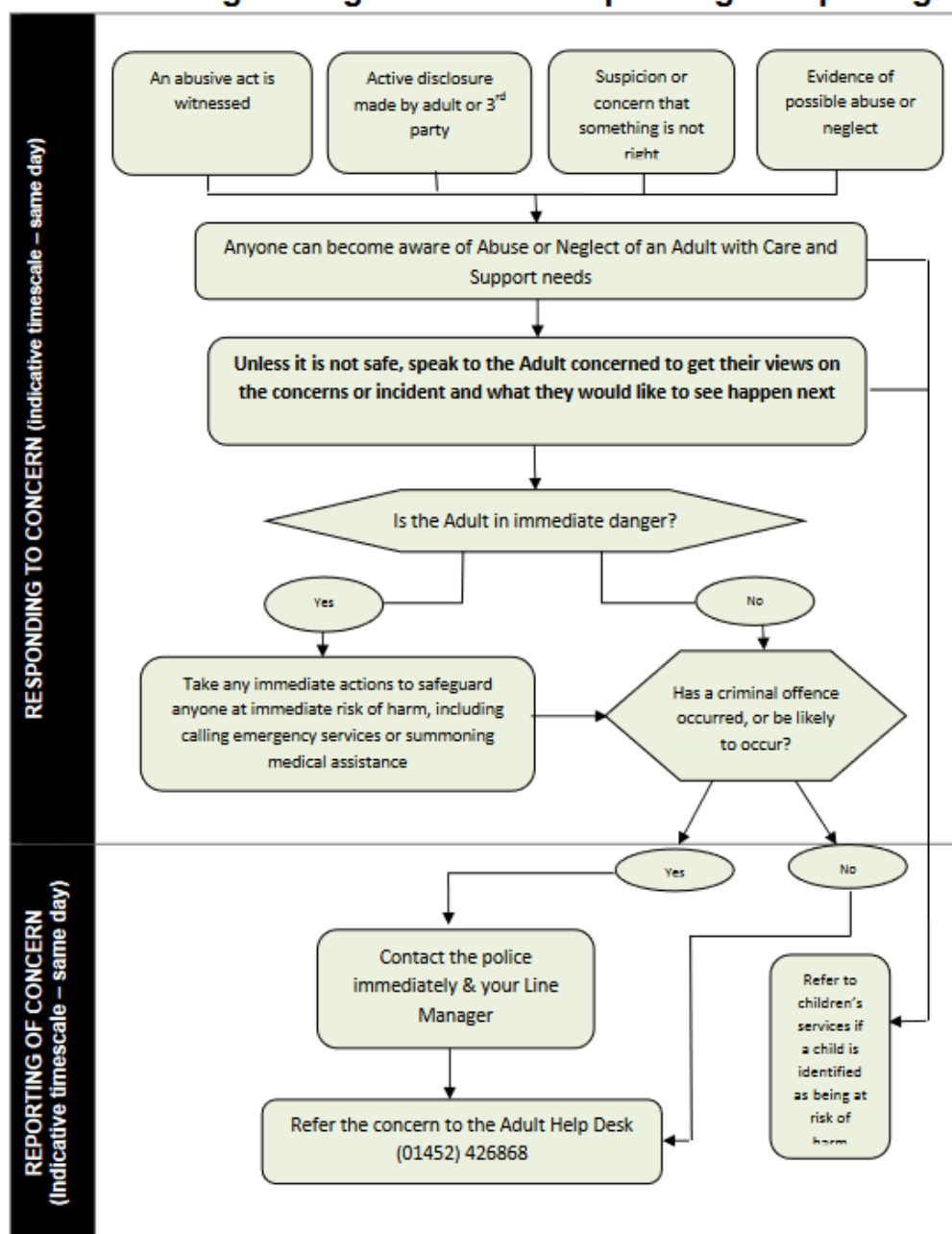
Staff and volunteers should share any safeguarding concerns with the Active Impact DSL or DDSL, Gloucestershire Safeguarding Adults Helpdesk (01452 426868), or the police in the case of an emergency. It is never an option to do nothing if you are concerned about the welfare of an adult who is at risk of harm.

10. Reporting a Safeguarding Concern.

In the event that an Active Impact employee, volunteer, beneficiary, Trustee, or partner identifies concerns that an adult with support or care needs may be at risk, this will be reported immediately to the Designated Safeguarding Lead (Caroline Weston – Programme Development Manager) or in their absence, Deputy Designated Safeguarding Lead (Nicole Hastie – CEO).

The DSL will support the person reporting the concern to follow GCC's Adult Safeguarding Concerns reporting flowchart below (a text version is included in Appendix 4, page 24):

8. Adult Safeguarding Concerns: Responding & Reporting-



(Figure 1 taken from Gloucestershire County Council Safeguarding Adult Procedures 2020)

Decision-making around the appropriate course of action, following concerns being raised, will be guided by the GCC guidance: [adult-safeguarding-decision-making-support-tool.pdf](https://www.gloucestershire.gov.uk/adult-safeguarding-decision-making-support-tool.pdf) ([gloucestershire.gov.uk](https://www.gloucestershire.gov.uk)), and Active Impact will follow the guidance found at [safeguarding-adults-policy-procedures-final-feb-2020.pdf](https://www.gloucestershire.gov.uk/safeguarding-adults-policy-procedures-final-feb-2020.pdf) ([gloucestershire.gov.uk](https://www.gloucestershire.gov.uk)).

An easy read version of GCC's Adult Safeguarding Policy can be found at: [easy-read-policy-updated-sept-2020.pdf](https://www.gloucestershire.gov.uk/easy-read-policy-updated-sept-2020.pdf) ([gloucestershire.gov.uk](https://www.gloucestershire.gov.uk))

Record-Keeping.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing and saved in Active Impact's online, secure Microsoft Safeguarding file.

Written records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

If staff are in any doubt about whether to record something, they should discuss it with the DSL. Non-confidential records will be accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Active Impact staff have powers to share, hold and use information when identifying and tackling all forms of abuse and to promote the welfare of adults who are at risk. Staff are proactive in sharing information in a timely manner to assess and respond to concerns. Safeguarding records relating to individual people will be retained in line with regulations.

11. Confidentiality

Active Impact's approach to confidentiality is as follows:

- Timely information sharing is essential to effective safeguarding
- We recognise that all matters relating to Safeguarding are confidential, however, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of adults at risk of abuse
- The DSL/DDSL/Safeguarding Trustee will disclose any information about an adult at risk of abuse to other members of staff on a need-to-know basis only
- All staff must be aware that they have a professional responsibility to share information with other agencies, to safeguard adults at risk of harm
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping adults safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place an adult at risk
- We will always undertake to share our intention to refer an adult to the Gloucestershire Safeguarding Adults team with the adult at risk of harm,

and/or their parents /carers, unless to do so could put them at greater risk of harm or impede a criminal investigation. If in any doubt regarding this, we will refer to advice from Gloucestershire Safeguarding Adults team.

- If staff are in any doubt about sharing information, they should speak to the DSL (or DDSL).

Keeping Safe.

We recognise that high self-esteem, confidence, supportive friends, and good lines of communication with a trusted person help prevent abuse.

Active Impact will therefore:

- Establish and maintain an environment where beneficiaries feel secure, are encouraged to communicate, and are listened to
- Ensure that beneficiaries know that there are people within the organisation that they can approach if they are worried or in difficulty
- Include information within our materials and website detailing how to access support or gain advice around safeguarding
- Keep written records of concerns about adults at risk of harm (noting date, event and action taken), even where there is no need to immediately refer the matter to Social Services and other relevant agencies
- Ensure all records are kept in secure locations
- Adhere to GCC Guidance when any allegation is made against a member of staff
- Ensure the criminal background of applicants for vacant posts are checked before starting in post
- Designate a Trustee for both Adult and Child Safeguarding, who will oversee Active Impact's Adult Safeguarding and Child Protection policy and practice, and provide the necessary training for that Trustee
- Ensure we practise Safer Recruitment in line with government guidance on all interview panels and by checking the suitability of staff and volunteers to work with adults who are at risk
- Ensure that any unsuitable behaviour is reported and investigated
- Ensure procedures are in place to deal with any allegations made against staff, volunteers, or Trustees.

12. Training

All staff members will undertake Adult Safeguarding training at induction, including on whistleblowing procedures, to ensure they understand Active Impact's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners (Health, Local Authority, and the Police). All staff and volunteers will

have training in topical safeguarding areas, as appropriate to their role and responsibilities. This will be agreed individually as part of Active Impact's supervisory processes. Safeguarding training needs will be reviewed at least annually across the organisation.

12.1 The DSL and Deputy DSL

The DSL and Deputy DSL will undertake DSL training at least every 2 years.

In addition, they will update their knowledge and skills and training around topical issues at regular intervals and at least annually (for example, through e-bulletins, Gloucestershire DSL Hub, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

12.2 The Board of Trustees

All Trustees will receive relevant Safeguarding training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. As the Safeguarding Trustee may be required to act as the case manager if an allegation of abuse is made against the CEO, DSL and/or DDSL, they will receive training in managing allegations for this purpose.

12.3 Recruitment

For further details please see the Safer Recruitment Policy.

12.4 Supervisions

All staff will be offered regular supervisions to offer support, coaching and training, promote the interests of adults at risk of harm or in need of protection, and allow for confidential discussions of sensitive issues. Active Impact will offer this support in a manner that supports our team most effectively, and responds to their professional needs.

12.5 Working with Partners

Active Impact, as a development organisation, rarely comes into face-to-face contact with children, adults at risk of harm, and/or their families. Therefore, to ensure that our working practice is safe and pro-active in addressing risks and concerns, all Active Impact staff are committed to developing their professional practice to ensure that the welfare of adults who are at risk is front and centre of our daily activities.

This includes seeking to establish the best interests of our beneficiaries and their rights in our contact with partner organisations and beyond, striving to ensure that they can participate in shaping and delivering Gloucestershire services.

We are committed to supporting our partner organisations to continually improve and develop their own policies and procedures in safeguarding adults at risk. We will operate transparently and ensure that we audit our safeguarding arrangements annually.

13. Monitoring Arrangements

This policy will be reviewed annually by the DSL. At every review, it will be approved by the full Board of Trustees.

Appendix 1: Categories of Adult Abuse

Reference: Care and Support Statutory Guidance (2018)

What constitutes abuse and neglect?

This section considers the different types and patterns of abuse and neglect and the different circumstances in which they may take place. 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.

Organisations and individuals should not limit their view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered. Exploitation and abuse of power are common themes in the following list of the types of abuse and neglect.

Physical abuse.

This can include:

- Assault
- Hitting
- Slapping
- Pushing
- Misuse of medication
- Restraint
- Inappropriate physical sanctions

Domestic violence.

This can include:

- Psychological
- Physical
- Sexual
- Financial
- Emotional abuse
- Honour-based violence

The cross-government definition of domestic violence and abuse is: **“any incident or pattern of incidents of controlling, coercive, 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”**.

A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 years' imprisonment, a fine or both. The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members, sending a clear message that it is wrong to violate the trust of those

closest to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention, and prevention.

Sexual abuse.

This can include:

- Rape
- Indecent exposure
- Sexual harassment
- Inappropriate looking or touching
- Sexual teasing or innuendo
- Sexual photography
- Subjection to pornography or witnessing sexual acts
- Sexual assault
- Sexual contact without consent.

Psychological abuse.

This can include:

- Emotional abuse
- Threats of harm or abandonment
- Deprivation of contact
- Humiliation
- Blaming
- Controlling behaviour
- Intimidation
- Coercion
- Harassment
- Verbal abuse
- Cyber bullying
- Isolation
- Unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse.

This can include:

- Theft
- Fraud
- Internet scamming
- Coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance, or financial transactions
- The misuse or misappropriation of property, possessions, or benefits.

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults at risk and children. Financial abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring as well. Although this is not always the case, everyone should also be aware of this possibility.

Potential indicators of financial abuse include:

- Change in living conditions
- Lack of heating, clothing, or food
- Inability to pay bills/unexplained shortage of money
- Unexplained withdrawals from an account
- Unexplained loss/misplacement of financial document
- The recent addition of authorised signers on a client or donor's signature card
- Sudden or unexpected changes in a will or other financial documents.

Modern slavery.

This can include:

- Slavery
- Human trafficking
- Forced labour and domestic servitude.
- Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment

Discriminatory abuse.

This is linked to Protected Characteristics (Equality Act 2010), including forms of harassment or ill treatment because of:

- Race
- Gender confirmation status
- Sex
- Age
- Disability
- Sexual orientation
- Religion
- Pregnancy and maternity
- Marriage or civil partnership.

-

Organisational abuse.

This can include neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.

This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice due to the structure, policies, processes, and practices within an organisation.

Neglect and acts of omission including:

- Ignoring medical, emotional, or physical care needs

- Failure to provide access to appropriate health, care and support or educational services
- Withholding 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. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this without external support.

Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. To see these patterns, it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse
- long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- opportunistic abuse, such as theft occurring because money or jewellery has been left lying around.

Note: This is not an exhaustive list, nor do these examples prove that there is actual abuse occurring. However, they do indicate that a closer look and possible investigation may be needed.

Appendix 2

Care and Support Statutory Guidance (Re-issued 2018) Key principles when working with Adults at Risk.

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.

Appendix 3: Capacity and Consent

It is important to be alert to issues of cognitive capacity which can increase the vulnerability of people where they have a reduced ability to make informed decisions in the moment. This may be transient (e.g., due to fear, shock, injury, illness) or long term (e.g., due to dementia, cognitive impairment, mental health illnesses).

Whilst this is a complex issue, it should not get in the way of staff and volunteers seeking to ensure that all individuals are respectfully consulted in relation to participation in activities and/or sharing of information about them.

A young person aged 16 or older is presumed in law to have capacity to consent, unless there is evidence to the contrary. All practicable steps should be taken to assist people with cognitive impairments to decision-make.

When assessing a person's understanding of the issues around them, you should seek to explain using their preferred mode of communication and language, with due consideration to all that you know about them from your contact with them.

If you are unsure whether an adult has the capacity to consent to the actions you propose to take to Safeguard them, you should seek advice from Active Impact's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. Their details can be found on the first page of this policy. The person's friends, carers, another professional working with them, or an advocate, may be able to provide relevant information or advice on consulting with the person to ensure that they are always treated with dignity and respect.

The following points should be considered when assessing whether a person has sufficient understanding at any time to consent, or to refuse consent, to the sharing of information about them, or to participate in specific activities:

- Can the person understand the question being asked of them?
- Are they taking an active part in the discussion?
- Can they rephrase the question in their own words?
- How would they explain it to someone else?
- Do they have a reasonable understanding of what the risks or benefits of giving their consent or saying no?
- What do they say they think would happen if they agree the action being suggested?
- Can they appreciate and consider the alternatives, weighing up one aspect against another and express a clear and consistent personal view? Encourage them to say out loud, or write down, their view of the pros and cons. You could recheck these views later or at a later contact with them

Appendix 4 (text version of GCC flowchart on page 13).

Adult Safeguarding Concerns: Responding and Reporting to concerns about an adult with care and support needs.

An abusive act is witnessed, an active disclosure is made by an adult or a third party, there is a suspicion or concern that something is not right, or evidence is identified that someone is being abused or neglected.

1. Unless it is not safe, speak to the adult concerned to get their views on the concerns or the incident, and ask them what they would like to happen next. Do not promise to 'keep secrets' or 'not to tell'. If someone is at immediate risk or a child is at risk, this must be reported and acted upon. You must make the person aware of your safeguarding responsibilities.
2. Report to your Designated Safeguarding Lead as soon as possible. Write down your concerns straight away, including what any party involved has said, verbatim (word for word what was said, not your interpretation of what was said).
3. If the adult who is at risk of harm is at immediate risk, take all actions necessary to safeguard the person (do not put yourself in danger), including calling the Police or seeking medical attention.
4. If a criminal act has occurred, or is likely to occur, the Police should be contacted immediately (take your lead from the DSL/DDSL).

Do not discuss any safeguarding concerns to anyone other than your Designated Safeguarding Lead (Caroline Weston) or Deputy Designated Safeguarding Lead (Nicole Hastie). Personal information about the people we work with should be shared on a need to know basis only.