

## Introduction

ETF Group believes that every individual who accesses our services has a right to a life free from fear, to be treated with dignity and respect, to have their choice respected and not to be forced to do anything against their will. We believe that everyone has the right to protection from abuse, regardless of their age, culture, disability, gender, racial origin, language, religious belief or sexual orientation.

## Aim

To provide a policy that offers the necessary information and guidance for any individual to be able to recognise and report cases of abuse in order to safeguard any “At Risk” adult who may be victim to it.

Effective protection of vulnerable adults is achieved through a multi- disciplinary approach with consultation and the sharing of information. Each local authority area will have agreed Vulnerable Adult procedures. This policy and procedural guidance should be used in conjunction with those locally agreed policies and procedures. A copy of the local adult safeguarding procedures will be available and accessible in all ETF Group services.

Where a person, having been appropriately assessed, is deemed to lack capacity under the terms of the Mental Capacity Act 2005, any decisions which are made to protect them from abuse will be made in their best interests and after discussion with senior managers, other agencies as appropriate and, if necessary, through an Independent Mental Capacity (IMC) advocate.

## Policy statement

ETF Group recognises the importance of its services to families and vulnerable adults and its particular responsibility to safeguard and to promote the welfare of those who are vulnerable or at risk at any given time, not merely by label.

This requires us to:

- ✔ *1 Listen to, value, encourage and support those we work with*
- ✔ *2 Provide clear internal procedures for identifying and dealing with concerns about possible abuse, and ensure their implementation*
- ✔ *3 Provide effective management for staff and volunteers through supervision, support and training*
- ✔ *4 Adopt and promote a code of conduct for staff*
- ✔ *5 Include continuous risk assessment within our work with customers*
- ✔ *6 Recruit safely, ensuring all necessary checks are made*
- ✔ *7 Develop and maintain effective information sharing with statutory services and other agencies, involving service users as appropriate*
- ✔ *8 Work collaboratively with Local Adult Safeguarding Boards*
- ✔ *9 Form a Safeguarding Team that is responsible for implementing support for staff, volunteers, learners and customers and keeping updated with legislation and local network information.*

## Scope

This policy applies to all employees, volunteers, learners, customers, partner organisations and sub-contractors, engaged to provide services for ETF Group and anyone who has any concerns regarding the safeguarding of any “At Risk” adult, employee, learner or customer. This policy is reviewed annually.

## Objectives

Any allegation or concern about abuse must be responded to.

All work undertaken by ETF Group will be subject to continuous risk assessment and comply with ETF Group’s risk assessment procedures.

Any concern that a vulnerable adult is at risk of abuse must be discussed with the Designated Safeguarding Lead or Deputy without delay and further action taken as necessary.

A person “AT Risk” for the purpose of this policy is anyone who is or may be in need of Community Care Services by reason of mental or other disability, age or illness and is or may be unable to take care of himself or herself or is unable to protect themselves against significant harm or serious exploitation” No Secrets –DOH (2000)

People who may be included in a definition of a ‘At Risk’:

- ✔ *People with learning disability*
- ✔ *People with physical disabilities*
- ✔ *People with sensory impairment*
- ✔ *People with mental health needs including dementia*
- ✔ *People who misuse substances or alcohol*
- ✔ *People who are physically or mentally frail*

People using ETF Group outside these definitions may also be vulnerable due to low self-esteem, social exclusion, offending history, homelessness, domestic abuse, ethnicity, immigration status etc. It can sometimes be hard to decide if a person is vulnerable. If in doubt, always discuss this with your Designated Safeguarding Lead or Deputy.

ETF Group recognise people may also be vulnerable at a given period in time not because of the labels above but due to the situation they find themselves in. Where it is recognised that a customer is in this category we will put the person in contact with agencies who may be able to assist and support the person through this period.

ETF Group staff and volunteers must follow their Local Adults Safeguarding Board Procedures which take precedence over ETF Group’s Safeguarding Adults Policy, if there are any significant differences.

Every effort will be made to ensure that staff and volunteers recruited to work for ETF Group are suitable to do so. All references will be robustly scrutinised and other checks sought at the appropriate level. Please see the Safer Recruitment Policy.

ETF Group is committed to training all staff and volunteers in this policy, procedure and code of behaviour, as part of the induction process. It requires all those working with vulnerable adults to address safeguarding within the Induction Programme, and to undertake Safeguarding Adults

training within their probationary period. In addition, they will be required to undertake either refresher training or more advanced training every year.

### The following definitions are covered by this policy:

**Physical abuse**, including hitting, slapping, pushing, kicking, misuse of medication or inappropriate sanctions or restraint.

**Sexual abuse**, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, could not consent or was pressured into consenting.

**Psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation or blaming.

**Financial or material abuse**, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

**Neglect and acts of omission**, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care, or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Discriminatory abuse**. This abuse is motivated by discriminatory and oppressive attitudes towards race, gender, cultural background, religion, physical and/or sensory impairment, sexual orientation and age. Discriminatory abuse manifests itself as physical abuse/assault, sexual abuse/assault, financial abuse/theft and the like, neglect and psychological abuse/harassment, including verbal abuse.

**Institutional abuse, neglect and poor professional practice**. This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. (See "No Secrets" - Sections 6.22 to 6.37.)

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

Incidents of abuse may be multiple, either to one person in a continuing relationship or service context, or to more than one person at a time. This makes it important to look beyond the single incident or breach of standards to underlying dynamics and patterns of harm. Some instances of abuse will constitute a criminal offence. In this respect, vulnerable adults are entitled to the protection of the law in the same way as any other member of the public. When complaints about alleged abuse suggest that a criminal offence may have been committed, it is imperative that reference should be made to the Police as a matter of urgency. Criminal investigation by the Police takes priority over all other lines of enquiry.

### Reporting Concerns

If there is a suspicion that abuse is taking place an individual **MUST** decide if there is an immediate risk and if so dial 999 for the Police or Ambulance as appropriate.

If it is decided that the individual is not in any immediate danger then the incident **MUST** be reported to the Designated Safeguarding Lead or deputy

IF SOMEONE DISCLOSES ABUSE OR NEGLECT OR YOU ARE CONCERNED ABOUT A PERSON

**Recognise** – Listen Carefully – don't ask leading questions

**Respond** – Ensure you and the person is safe

**Record** - Use the Safeguarding Concern Form found on SharePoint Safeguarding Sites or print version in Centres

**Report** – Tell your Designated Safeguarding Team

This policy will be reviewed annually by Gail Rochelle, Quality and Safeguarding Designated Lead.

### Legal and procedural framework

- ✔ 1998 White Paper Modernising Social Services
- ✔ 1998 Human Rights Act
- ✔ 2000 No Secrets
- ✔ 2000 National Care Standards Commission
- ✔ 2000 In safe hands
- ✔ 2003 Sexual Offences Act
- ✔ 2006 Safeguarding Vulnerable Group Act
- ✔ 2004 Domestic Violence Crime and Victims Act
- ✔ 2005 Mental Capacity Act
- ✔ 2005 Safeguarding Adults - National Framework of Standards
- ✔ 2007 Mental Health Act
- ✔ 2008 Information Sharing: Guidance for practitioners and managers
- ✔ 2010 Equality Act
- ✔ 2014 Care Act
- ✔ "Every Child Matters" Green Paper
- ✔ Protecting the UK against terrorism 12/12/12 Government and Home office paper
- ✔ Prevent Strategy
- ✔ Keeping children safe in education: for school and college staff (part 1)

Date	Page	Details of the change	Agreed by
May 2022		Reviewed – no change	Board
Next review date May 2023			