



# Safeguarding Adults at Risk Policy Feb 2024

## Policy statement of purpose

This policy defines the safeguarding procedures implemented by Omega. It must be followed by all colleagues whether paid or voluntary in every area of work. Its purpose is to contribute to the prevention of abuse of adults at risk, by raising awareness of the importance of safeguarding. It provides a framework for action when abuse is suspected. As a general rule, if a colleague is in any doubt, they should err on the side of caution and report their concerns to the relevant authorities. This policy covers Omega's responsibility to all adults at risk (including Omega colleagues) and is not limited to vulnerable adults. It sets out responsibility of colleagues to:

- Beneficiaries / clients
- Supporters
- Each other

## Background to our work

Founded in 2007, Omega aims to help people to face the challenges of social isolation and loneliness. Many Omega clients have complex needs and have been overlooked by others. Typically they are either in crisis, coming to terms with loss or struggling to cope alone with difficult caring situations. Some are in poor health and many are frail-elderly and/or have poor mobility.

Our main support programmes comprise:

- Chatterbox: a free telephone befriending service
- A Letter from Louise (rebranding as 'Letterbox'): a free penpal befriending service
- Umbrella: support groups led by trained counsellors or facilitators
- iPads: Motor Neurone Disease Support, loaning iPads with speech synthesis software to people with MND or similar conditions
- Postcards from the Past (rebranding as 'Pastcards'): elderly clients living in care homes receive postcards from our volunteer befrienders.

## Definition of an adult at risk

Often referred to as a vulnerable adult; An adult at risk is a person 18 years of age or older whose ability to perform the normal activities of daily living, or to provide for his or her own care or protection, is impaired due to a mental, emotional, long-term physical, or developmental disability or dysfunction, or brain damage, or the infirmities of aging. The term “at risk” is slightly wider than the word “vulnerable”. If you have concerns, it is safer to consider that the person involved is at risk, vulnerable or otherwise and strictly follow this policy.

*The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2002* defines a vulnerable adult as follows:

1. In these Regulations “vulnerable adult” means a person aged 18 or over who is receiving services of a type listed in paragraph (2) below and in consequence of a condition of a type listed in paragraph (3) below has a disability of a type listed in paragraph (4) below.
2. The services are:
  - a. Accommodation and nursing or personal care in a care home;
  - b. Personal care or nursing or support to live independently in his own home;
  - c. Any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body;
  - d. Social care services; or
  - e. Any services provided in an establishment catering for a person with learning difficulties.
3. The conditions are:
  - a. A learning or physical disability;
  - b. A physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
  - c. A reduction in physical or mental capacity.
4. The disabilities are:
  - a. A dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions;
  - b. Severe impairment in the ability to communicate with others; or
  - c. Impairment in a person’s ability to protect himself from assault, abuse or neglect.

*The Law Commission ‘Making Decisions’ Lord Chancellor’s Department 1999* document states that a ‘Vulnerable Adult’ is defined as someone over 18 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/herself or unable to protect him/herself against significant harm or exploitation.

But please remember, as stated above, not all clients and colleagues at risk are vulnerable and most of us can be at risk, on a temporary basis at least, at some stage in our lives.

We stress that you should, therefore, interpret definitions of vulnerability and risk broadly. If in doubt, assume that victims are vulnerable and/or at risk, and immediately act on your concerns (see Reporting Procedures below).

## Definitions of Abuse

The Care and Support Statutory Guidance (updated 5<sup>th</sup> Oct 2023) published by the Department of Health and Social Care identifies 10 different types of abuse:

### **1. Physical abuse**

Including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanctions

### **2. Domestic violence**

Including:

- psychological
- physical
- sexual
- financial
- emotional abuse
- so called 'honour' based violence

### **3. Sexual abuse**

Including:

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

### **4. Psychological abuse**

Including:

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

## 5. Financial or material abuse

Including:

- 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

## 6. Modern slavery

Encompasses:

- 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

## 7. Discriminatory abuse

Including forms of:

- harassment
- slurs or similar treatment:
  - because of race
  - gender and gender identity
  - age
  - disability
  - sexual orientation
  - religion

## 8. Organisational abuse

Including 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 as a result of the structure, policies, processes and practices within an organisation.

## 9. Neglect and acts of omission

Including:

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services
- the withholding of the necessities of life, such as medication, adequate nutrition and heating

## 10. 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.

Multiple forms of abuse may occur in an ongoing relationship or abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

No abuse is acceptable; any criminal offence must be reported to the Police as soon as possible.

The policy will be made available to, and strictly observed by, Omega colleagues, in addition to equivalent policies adopted by delivery partners including, for example, *No Secrets: guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse* and the Social Care Institute for Excellence (SCIE) *Report 60 Safeguarding adults: multi-agency policy and procedure for the West Midlands*. The requirements of this policy together with those contained in policies issued by delivery partners should be met at all times.

If conflicts of definition and interpretation should arise, these must be construed favouring the interests of adults at risk.

It is the responsibility of all colleagues to carefully read safeguarding guidance and ensure that they fully understand what is required of them. If in doubt they must seek advice, in the first instance from their line manager. Line managers may be required to seek written clarification from delivery partners.

This statement of the Omega policy represents a general outline of a number of relevant issues. It is not exhaustive.

If you have concerns which relate to circumstances not reflected in the document, always place the needs of an adult at risk (or potentially at risk) first. Take appropriate action and urgently write a report or raise an alert.

## Recruitment and Selection

All staff and volunteers who have direct contact with clients go through a stringent onboarding process before they have any contact with them. The exceptions are A Letter from Louise (Letterbox) and Postcards from the Past (Pastcards), in which all letters and postcards are read by office colleagues before being forwarded on. Recruitment will be conducted in accordance with Omega's recruitment procedures and policies, including:

### **Chatterbox Telephone Befrienders:**

- Completion of a detailed application
- An interview, which will cover suitability for the role applied for
- DBS check
- 2 references are required from people who will vouch for their suitability
- An online safeguarding course must be completed
- An online induction
- An agreement to be signed stating all safeguarding procedures will be upheld

### **A Letter from Louise (Letterbox) Volunteers:**

- Completion of a detailed application
- An interview, which will cover suitability for the role
- 2 references

### **Staff:**

- Completion of a detailed application
- An interview
- DBS check
- 2 references
- Online safeguarding course
- Online induction
- Contract of employment

## Induction and Training

- The online induction is carried out by retired healthcare professionals who were the original instigators in developing the Chatterbox programme.
- As courses become available, these are offered to any volunteers who may be interested
- If there is a specific course a volunteer or member of staff would like that is relevant, this will be accommodated as much as possible.

## How Omega protects its clients and volunteers

### **Chatterbox:**

- Volunteers are only given the first name and telephone number of their client with minimal details of current situation, such as family support etc.
- Volunteers and clients are advised only to disclose information they feel comfortable sharing
- Volunteers are advised to withhold their telephone number when calling clients or Omega can provide an allocated mobile telephone
- 2 monthly reviews are done with both client and volunteer to check both parties are happy with the calls.
- Volunteers are encouraged to contact staff about any concerns they may have regarding their client's safety.
- If a safeguarding issue is reported, Liz Evans, Chatterbox coordinator will contact the relevant local social services and complete the relevant forms.

### **A Letter from Louise (Letterbox):**

- All letters are read by vetted staff and colleagues to ensure they do not contain any personal information they may identify a client or pen pal.
- The use of surnames, address, emails or telephone numbers are not forwarded by either party.
- Letters are also read for any sign of coercion or inappropriate language or behaviour

## Rights and Responsibilities

### **Responsibilities of Omega:**

- To ensure that all colleagues are aware of the Safeguarding Adults at Risk Policy and are adequately trained
- To immediately notify the appropriate agencies if abuse is identified or suspected

- To support and where possible secure the safety of individuals and ensure that clients working with us have full information in relation to identified risk and vulnerability
- To ensure that care is taken to check the background of all colleagues who work with adults at risk

#### **Responsibilities of Omega colleagues:**

- To be familiar with the Omega safeguarding at risk policy and procedures and any further guidance issued by Local Authorities
- To take appropriate action in line with our policies and procedures
- To declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct, possibly resulting in dismissal from employment or termination of your volunteering agreement.

## **Rights of Adults at Risk**

An adult at risk has the right:

- To be made aware of this policy
- To have alleged incidents recognised and taken seriously
- To receive fair and respectful treatment throughout
- To be involved in any process as appropriate
- To receive information about the outcome

Wherever possible this should be made in writing and acknowledged by clients at the beginning of our relationship. It is important to explain the implications of safeguarding, especially the need to breach confidentiality in some cases.

## **Support for Those Who Report Abuse**

Anyone making a complaint or allegation or expressing concern should be reassured that:

- Their concern will be taken seriously
- Comments will usually be treated confidentially, but concerns might be shared if the reporter or anyone else is at significant risk
- Reporters will be given immediate protection from the risk of reprisals or intimidation
- Colleagues will be given support and afforded protection if necessary, in line with the *Public Interest Disclosure Act 1998*.

## **Reporting Procedures**

Omega's designated Safeguarding Officer is Liz Evans. Exceptional incidents must be reported immediately, and followed up in writing by email to **chatterbox@omega.uk.net** on the same day, or the next working day at the latest. If a report is delayed, the reason(s) must be recorded. Omega colleagues should carefully study the guidance above; general examples of exceptional incidents include situations in which:

- Serious interpersonal conflict, whether verbal or physical, takes place
- An individual suffers deliberate or accidental harm, whether physical or psychological in nature, or in which there is evidence of an individual suffering harm elsewhere
- An adult at risk leaves a scheduled event without explanation in an unusually distressed or agitated state giving cause for serious concern
- Property is damaged, lost or stolen, or there is prima facie evidence of fraudulent or coercive activities
- The dignity or human rights of an individual are undermined, including acts of discrimination or harassment
- An individual suffers sexual infringement (direct or indirect) or in which an individual participates in sexual activity of any description to which they are unwilling or unable to give informed consent

Colleagues should seek urgent telephone advice from their line manager or the local authority safeguarding team if they are not sure whether to raise an alert.

Upon receipt of an exceptional incident report, the Safeguarding Officer will notify relevant authorities to raise an alert. Should the Safeguarding Officer be temporarily absent, the reporter should immediately notify the relevant authorities themselves.

The exceptional incident report must include the following information if it is available:

- The name of the adult at risk (and as much identifying information as you can provide)
- Their full address (this should be available to Omega administrative colleagues)
- Allegation or evidence of harm or abuse
- Indication of frequency, severity and likelihood of reoccurrence
- Date(s) of incident
- Details of previous reports i.e., has this behaviour been reported previously?
- Has there been a recent escalation?
- Full details of the Omega event or activity (time venue and description e.g., Portobello Meeting Point Support group, this evening)
- Time concern was raised and exact location
- What immediate action, if any, was taken to safeguard the adult?
- Full name and contact details of any witnesses
- The name(s) of the perpetrators
- Is there evidence of institutional abuse?

When drafting a report, colleagues should:

- Distinguish between fact and opinion (both may be useful)
- Jot down a detailed note of what happened; this should be signed and dated
- Record the exact language used and precisely what they saw

If a colleague feels certain that an adult at risk has suffered significant harm, it is in order for that colleague to raise an alert independently even if, for example, a fellow colleague does not agree, or the Safeguarding Officer is temporarily out of contact. Sometimes it may be necessary to telephone the emergency services (by dialling 999) if an immediate danger is evident or a crime has occurred.

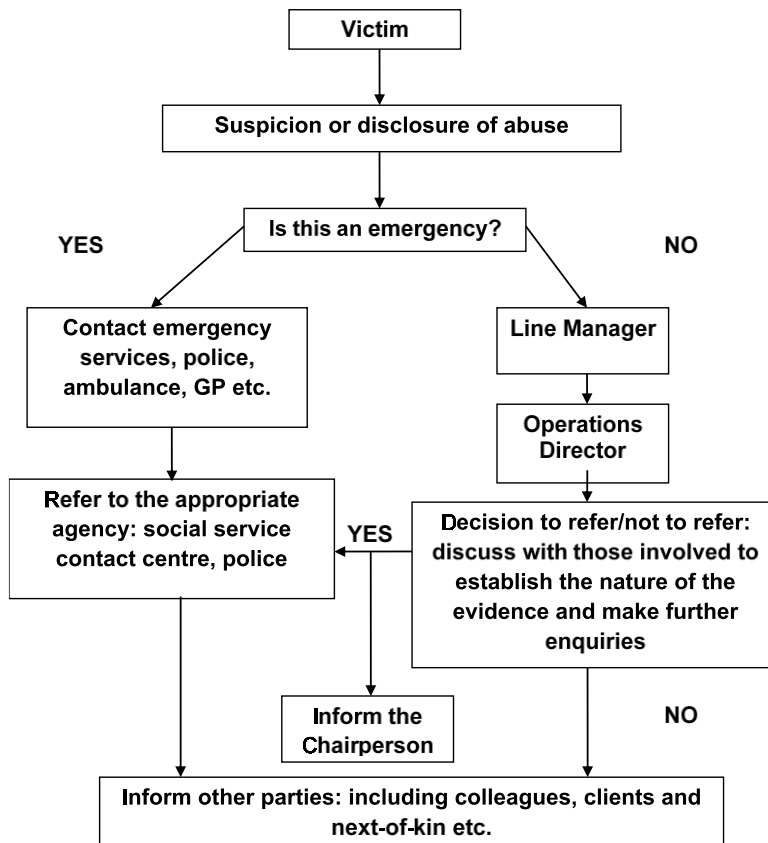
The Safeguarding Officer is responsible for conducting investigations and reporting to the Omega Board of Trustees, unless the Safeguarding Officer is personally involved in the



incident. In which case, the reporter should raise their concern with the Chairman of the Board of Trustees, Mr Linton Waters.

All evidence will be preserved. A detailed statement will be taken from each witness. Where possible we shall seek and share feedback once an external safeguarding strategy meeting has been held and a multi-agency decision has been reached. Failure to comply with this policy may result in instant dismissal.

**Safeguarding Adults at Risk Policy Flow chart**



Approval & Annual Review:

Approved by Trustees	July 2023
Amendment to designated Safeguarding Officer (LE)	Nov 8 <sup>th</sup> 2023
Addition of "Background to our work" section (LE)	Nov 8 <sup>th</sup> 2023
Updates to "Definitions of abuse" section (GM)	Nov 8 <sup>th</sup> 2023
Reviewed	Jan 2024
Added references to rebranding of programme titles (GM)	Feb 2024
Schedule review by F&GP for Board approval	Nov 2024