

Safeguarding Adults at Risk

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Approval level	Trustee Board	
Status	Approved	

Policy Statement

Introduction

Hope Into Action: Foxhill takes its responsibilities to all its tenants, staff, volunteers and neighbours seriously. We recognise a particular responsibility to adults at risk of abuse or neglect and that supporting our particular client groups may mean many of those we work with might be 'at risk'. See Appendix 1 for a definition of Adults at risk and types of abuse.

This policy is based on national guidance on Safeguarding Adults, Thirtyone:eight, Ann Craft Trust & Norfolk Safeguarding Adults Board¹.

Purpose and Scope

The purpose of this policy is to demonstrate the commitment of Hope Into Action: Foxhill to safeguarding adults and to ensure that everyone involved in Hope Into Action: Foxhill is aware of:

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

This safeguarding adults at risk policy and associated procedures applies to all individuals involved in the work of Hope Into Action: Foxhill including Trustees, Hope Into Action: Foxhill staff, Empowerment Workers, volunteers, partner church volunteers and franchise staff and volunteers.

We expect our partner churches to affirm and demonstrate their commitment to the principles set out in this Safeguarding Adults Policy and associated procedures.

¹ National guidelines such as <https://www.adass.org.uk/AdassMedia/stories/Publications/Guidance/safeguarding.pdf> and <http://www.ccpas.co.uk/Documents/Help-VulnerableAdults.pdf> have been referred to.

Hope Into Action: Foxhill Safeguarding Statements

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

Hope Into Action: Foxhill is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

Hope Into Action: Foxhill acknowledges that safeguarding is everybody's responsibility and is committed to preventing abuse and neglect through safeguarding the welfare of all adults involved.

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

Hope Into Action: Foxhill recognises that there is a legal framework within which charities need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by Hope Into Action: Foxhill will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate, and that it includes and respects the voice of the adult concerned.

Hope Into Action: Foxhill Safeguarding Commitments

In order to implement our safeguarding statements we have the following commitments laid out in our Safeguarding Charter:

SafeGuarding Charter: HIA-F will:

- Prioritise and recognise the importance of Safeguarding and having an open and transparent culture
- Have robust Safeguarding systems, procedures and policies in place
- Respond promptly and appropriately to every Safeguarding concern or allegation
- Assign a named Safeguarding Lead and Trustee
- Effectively recruit, train and support all Staff, Trustees, and Volunteers to meet safeguarding standards
- Treat all individuals with dignity and respect and ensure equality and inclusion
- Communicate effectively and work in partnership with safeguarding partners in line with the law
- Challenge unsafe practices
- Hold a regular Safeguarding sub-committee to review serious cases & assess risks

All HIA-F staff and Empowerment Workers should:

- Read and understand the safeguarding policy and this Charter and sign a declaration to agree to adhere to its content
- Attend safeguarding training (internally at HIA UK, but preferably also locally)
- Submit all reports to the above email within 24 hours of any events
- Promote a culture and practice where anyone, whatever their position, can be challenged for unsafe practices
- Be encouraged to share any concerns, questions or issues with the Safeguarding team at HIA UK safeguarding@hopeintoaction.org.uk

Supporting Documentation

- Complaints Policy
- Disciplinary Procedure Advice (found in Staff Handbook)
- GDPR, Data Protection & Retention Policy

Main Safeguarding Contact Details

Keith Reynolds, Safeguarding Lead for HIA-F

Responsible to promote and enforce this Policy and act as reporting and escalation point for any incidents arising.

Email address: keith.reynolds@hopeintoaction.org.uk

Laura Cuthill, Safeguarding Lead for HIA UK

Will advise the charity on any matters related to the safeguarding of children and adults at risk and ensure appropriate action is taken when abuse is disclosed, discovered or suspected.

Phone number: 07702 881662/ 01158 242196

Email address: Laura.cuthill@hopeintoaction.org.uk

Procedure

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1. Understanding Abuse

1.1 Who can be an Abuser?

Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. With this in mind, we are aware that safeguarding issues are perpetrated by people both known and unknown to the victim.

1.2 The Hope Into Action: Foxhill ethos of empowerment & ‘making safeguarding personal’

The most recent approach to Safeguarding adults at risk concentrates on the notions of: ‘acceptable risk’ and ‘making safeguarding personal’ (MSP). MSP is a person-centred approach to adult safeguarding, the person must be involved in making decisions about their own safety wherever possible. The person may find taking certain risks acceptable, they are, after all, experts in their own lives. Lord Mumby summarised: “Physical health and safety can sometimes be bought at too high a price in happiness and emotional welfare. The emphasis must be on sensible risk appraisal, not striving to avoid all risk...what good is it making someone safer if it merely makes them miserable? We must tolerate acceptable risks as the price appropriately to be paid in order to achieve some other good.”

This ties in well to our ethos of empowerment at Hope Into Action: Foxhill and having tenant-led goals and personal development plans. The role of the Empowerment Worker is to journey alongside a tenant, listening to them and paying close attention to any risk elements. This means discussing with the person regularly whether these are ‘acceptable risks’ (and therein protecting

our tenant's Human Rights to privacy (article 8)) or whether it is a Safeguarding issue and that they are an adult at risk and are suffering unacceptable abuse or self-neglect which is endangering the person's Right to Life (article 2) or Right to Freedom from Degrading Treatment (article 3). This may need a referral to the local authority safeguarding service even if they do not consent **if** their 'vital interests' or the safety of other adults or children is at risk. For clarity, refer back to the section on definitions.

1.3 Suspicion of Abuse

In all discussions regarding suspicion of abuse and 'acceptable risk', it should be considered whether different cultures and lifestyles have any bearing on the matter. Hope Into Action: Foxhill does not make judgements about the acceptability or otherwise of lifestyles operating within the law, however it is important that this philosophy does not stand in the way of the organisation's responsibility to protect from harm. We must explore how aware they are as to whether abuse is taking place and / or whether they are choosing to allow this to continue. It may be that the person is not able to make a free choice because they are being coerced, are afraid or are addicted. This is only truly understood through honest and sometimes difficult conversations. Education and offering alternatives may be all that's required in some cases. Ensure you are accountable to line management and are logging discussions in field notes and or the Incident / Cause for Concern template (Appendix 2) if this is the case.

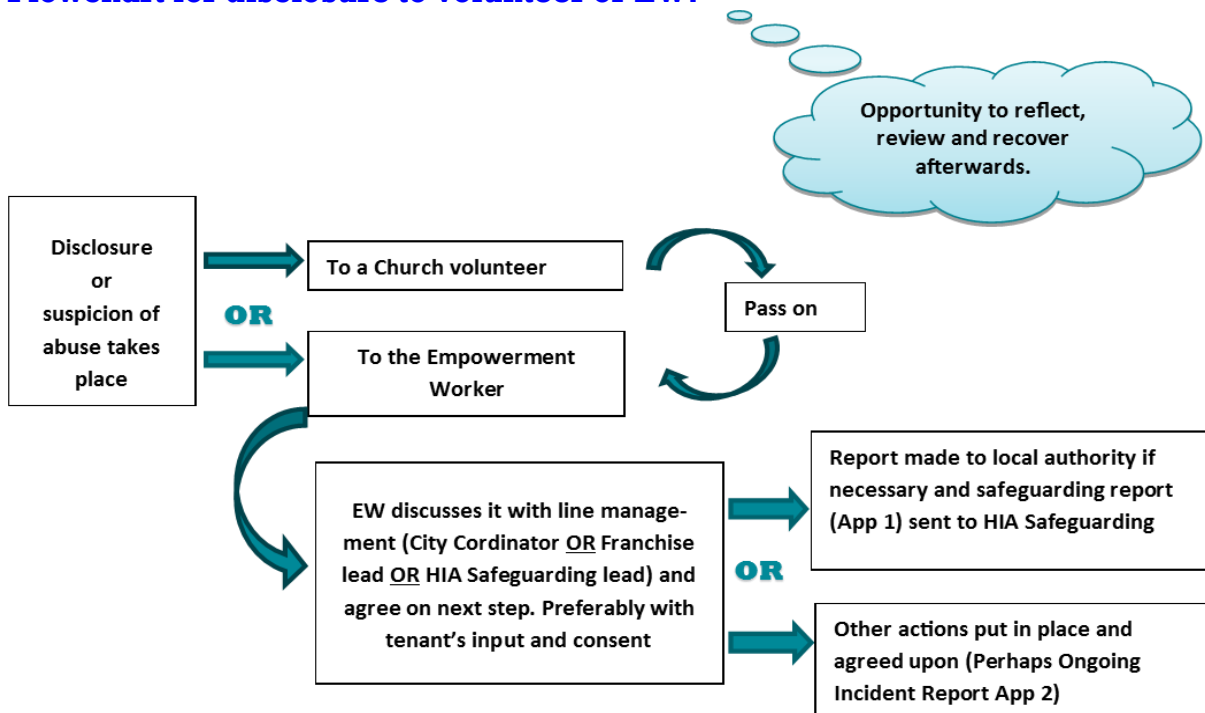
It is important to keep an open mind and consider what is known about the person and his or her circumstances. Any concerns or actions should be discussed with a line manager at the earliest convenience. Hope Into Action: Foxhill recommend that you share information or concerns and err on the side of caution. If you have **reasonable suspicion** that abuse is happening or has happened, it should NOT be kept to yourself. At best it will be emotionally burdensome, at worst, you could become culpable.

You, your line manager and the tenant (where possible) will then agree the next steps, whether that is to record it as an 'incident / cause for concern' (using Appendix 3), whether to keep it as a 'live' issue in need of further observation, whether to pass it onto the Local Authority and make a Safeguarding referral (using Appendix 2) and whether to put in some extra support (for example: additional house rules / more regular support meetings or a referral to a specialist agency for help). Tenant consent for a referral to the Local Authority is best practice, but not always essential – depending on the risk.

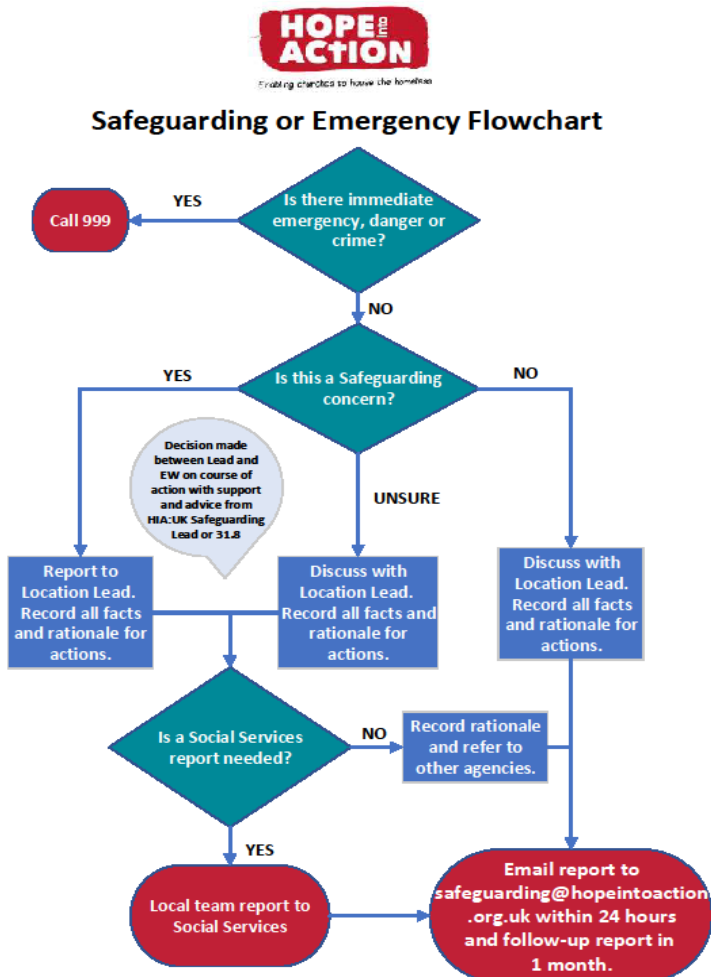
If a volunteer or housemate suspects abuse, they should contact Hope Into Action: Foxhill and be aware of how to do this. Information on how to contact the Hope Into Action: Foxhill Safeguarding Lead should be displayed in all properties, somewhere communal. Every Hope Into Action: Foxhill office should display not only the internal Safeguarding lead's contact information, but also contact details for the local MASH team / LADO or equivalent.

2. Flowcharts of Responsibilities

Flowchart for disclosure to volunteer or EW:



Flowchart for staff re safeguarding or emergency



3. Disclosures and Making a Safeguarding Referral

Disclosure of Abuse

If a person discloses that they are being abused or that they are involved in abuse of a vulnerable person, action should continue as in Section 1.3. All action must proceed urgently and without delay.

Hope Into Action: Foxhill staff or volunteers informed of abuse should remind the individual that confidentiality cannot be guaranteed where a vulnerable person is at risk of abuse or further abuse.

Volunteers should consult with the assigned Empowerment Worker as soon as possible. Refer to flowchart above if the disclosure is by a tenant.

If the disclosure is made by a member of staff then the Safeguarding Lead should be contacted to lead on the process. If it relates to a church volunteer then the Church Safeguarding Lead should be contacted to take the lead.

Actioning allegations, suspicions or disclosures of Abuse

There should always be the opportunity to discuss welfare concerns with and seek advice from colleagues, managers and other agencies. It is best practise to inform the individual of your plans, before informing the relevant authorities.

- Never delay emergency action if an adult is at risk
- Always record in writing concerns and discussions about a vulnerable adult's welfare using the Safeguarding Report template (Appendix 2) or Incident Report template (Appendix 3)
- Ensure that you reach clear and explicit recorded agreement about who will be taking what action, or that no further action will be taken (with rationale).

In circumstances where an individual declines to disclose, despite some work having been done towards disclosing, it may be necessary to report the alleged abuse without their agreement. In these circumstances, **the individual must be notified in advance of the decision to report to adult social services**. Any staff member may report a disclosure of abuse to social services irrespective of the opinion of other staff.

It is important for staff and volunteers to make written records of any Incidents or concerns that they have as soon as possible. It is also important to make a record of conversations with the adult at risk using the same language they used especially names used for body parts or sexual acts. A body map can be found in Appendix 5. If you believe the victim lacks mental capacity, refer to Appendix 6 for more information.

Historical disclosures from the past or self-inflicted Abuse

Should a disclosure be made about **historical abuse** (to a church volunteer for example), this should be passed on to the tenant's Empowerment Worker and logged as either a Safeguarding disclosure or an Incident / Cause for concern– depending on the severity.

After discussion with line management a decision will be made as to whether this information is passed on to the appropriate authority. It is largely dependent on whether the victim has informed anyone already and whether the perpetrator may still be abusing others. Historical abuse can also be passed on to the non-emergency police on 101 as anonymous intelligence if this is deemed an appropriate response. This is helpful to police if any other people also report about the same individual.

There are differing opinions as to whether abuse done to oneself is a safeguarding issue (note that 'self-neglect' has now been added as a category of abuse). We can all be guilty of not looking after ourselves properly, so it is difficult to put safeguards around this topic. However, please see below for guidance on two of the most common issues we may come across:

- 1) Should there be suspicion or disclosure of **worsening SELF abuse**, this should be recorded as an incident.² Many of our tenants may display self-harming behaviours at referral stage such as eating disorders, cutting, risky or addictive behaviour. If anyone has concerns that a tenant's 'normal' behaviour is worsening, they should discuss this with the Empowerment Worker assigned and agree on a course of action. It is worthy to note that those who self-harm often say it keeps them safe, as they find a release afterwards and it is actually a coping mechanism, whereas (for example), a relapse onto hard drugs definitely increases the risk element around that tenant (and the safety of the property) due the chaotic nature of those engaging in non-prescribed medications. Ideally, a plan of action made in agreement with the tenant should be made at referral stage, so that should risk increase, all parties know how to proceed.
- 2) Any **acts to end one's own life by suicide, or serious thoughts about suicide** should be passed on to relevant mental health teams. Should church volunteers be first to the scene, they should not hesitate in getting emergency help if required. The Crisis Team details for your area can be found in Appendix 4. If in doubt, encouraging the tenant to visit the local Accident & Emergency department may be good practice and will allow them to access emergency mental health assessments, especially if they have overdosed or hurt themselves badly. Try not to leave them alone until you believe they are safe. Inform Hope Into Action: Foxhill line management as soon as possible and use the HiA-F Out of Hours Emergency number 07848 795 171 to log any 999 calls.

Please also relook at the tenant's Risk Reduction Plan (RRP) and review all safety measures put in place. In some scenarios, worsening mental health (or an uncovering of such, which was not understood or admitted during the referral stage) may mean they are now deemed too high risk for our level of support and no longer suitable for HIA accommodation.

Making a Referral

Local authorities (Adult Social Services) are the designated lead agencies with the duty to coordinate a response to allegations or concerns of abuse (under section 42 of the Care Act 2014).

Referrals can be made by the Hope Into Action: Foxhill staff member most heavily involved, their Franchise Lead or the relevant HIA Safeguarding Lead. Please refer to Appendix 4 for the contacts in your area.

Staff should work within the following timescales for reporting allegations or suspicions of abuse:

- Immediate if the vulnerable person is at risk of serious physical harm, or a serious criminal act has taken place and evidence will need to be kept safe
- Within 24 hours if it relates to a specific incident which may be still going on, or may happen again
- Within 7 days if it is a more general concern, which does not indicate immediate harm

All staff and volunteers should carry with them an ICE (In Case of Emergency) Card, which is a quick and handy reminder of how to act in case of an emergency (see Appendix 7 for template). This is also covered in Induction of new staff.

4. Other aspects & implications

Supporting Staff and Volunteers

Hope Into Action: Foxhill accept that abuse and safeguarding concerns are a difficult topic and will endeavour to support staff, tenants and volunteers throughout the process. If a social services department needs further involvement from Hope Into Action: Foxhill staff following a report of

² Whether abuse of oneself is a safeguarding issue is a hotly contested issue. 'Self neglect' noted as a new category of safeguarding abuse concentrates more on behaviours linked to psychiatric disorders such as hoarding or neglecting to tend to personal hygiene (as opposed to being a lifestyle choice).

abuse, a member of the management team may intervene and discuss with social services department the nature of their needs and how they might be met.

Hope Into Action: Foxhill accepts that staff and volunteers may find journeying through a safeguarding disclosure incredibly traumatic. Location Leads will commit to aftercare, which may include recommending external counsellors, going through a WRAP³ (or other suitable mental health tool) with staff to see if they are deemed fit to return to work, allowing time off to rest if appropriate, discussing phased return and a 'back to work' report (template available in SharePoint). We value everyone who contributes to Hope into Action, please do let us know if you are struggling. All staff should familiarise themselves with the Staff Care Policy (on SharePoint) and advice around returning to work after needing time off.

All staff (and anyone offering tenant support on behalf of HIA or a HIA franchise) will be expected to:

- 1) Familiarise themselves with the safeguarding policy and procedures
- 2) Attend safeguarding training in line with our policy (see table in section 6.5 below)
- 3) Sign up to HIA-F Safeguarding Charter



Allegations made against staff or volunteers

Staff and volunteers may be subject to abuse allegations. Hope Into Action: Foxhill will offer support in these circumstances. Hope Into Action: Foxhill will assist the local authority and/or police in their investigation. As a result of the investigations, disciplinary procedures may be implemented.

Any allegation of abuse made against a church volunteer must be immediately referred to the church's safeguarding lead. As part of the due diligence with church, Hope Into Action: Foxhill will ensure that the church conducts appropriate screening of volunteers with the Disclosure and Barring Service (DBS) and adopts safeguarding measures.

Protecting against abuse by staff and volunteers or towards staff and volunteers

It may be very hard for a worker to report a concern about a colleague to a line manager, but the safety and protection of the adult at risk must always be the priority. For this reason, all concerns

³ There are many examples of Wellness Recovery Action Plans on line; there is a downloadable copy of an example on this website: <http://www.workingtogetherforrecovery.co.uk/links.htm>

around abuse relating to a member of staff must be immediately reported to HIA-F Safeguarding Lead.

Likewise, should a tenant wish to make a complaint about HIA-F, the procedure is explained in our Complaints and Whistleblowing policies (available on SharePoint). Any major breaches of policy by staff may require a 'Serious Incident' report which would be flagged up to Trustee level and potentially also the Charity Commissioning board.

If a member of staff or volunteer has concerns about abuse occurring **towards** a member of staff, or if a member of staff discloses abuse, then this should be reported directly to the Safeguarding Lead. Disclosures of abuse from a church volunteer or concerns of abuse **towards** a church volunteer must be immediately reported to the Church Safeguarding Lead.

DBS checks

It is important that all prospective employees or volunteers who will be working alone with adults at risk are vetted thoroughly before being recruited.

At Hope Into Action: Foxhill this means that prospective employees declare any offences at application. On appointment of all new staff and trustees a conditional offer is made dependent on satisfactory references being received plus the appropriate DBS check. Volunteers are also checked in the same way through a comprehensive process.

All Trustees, Empowerment Workers and staff should have their DBS renewed every 3 years.

It should be noted that having a criminal record does not necessarily prevent someone from being recruited as a staff member or volunteer.

For the volunteers in our Friendship & Support teams, the responsibility lies with the Partner Church to get each individual a DBS check. All roles are classed as 'Volunteer'. The DBS form should state that volunteers are working with 'Adult Workforce' as they should never have direct responsibility for children. For those **not** directly working with tenants, a 'Basic' DBS will be sufficient.

The recognised DBS job role of 'Befriender' covers the support offered for those working directly with tenants. An adult is considered 'vulnerable' if they require the service you provide because of their age, illness or disability. As tenants may fall into any of these categories, volunteers will be eligible for an 'Enhanced' DBS check. Church volunteers will not be eligible for a check of the 'Adult's barred list' as this role doesn't include a regulated activity.⁴ There should be no charge for this service, as the volunteers are unpaid.

Should the house being supported include children additional information can be found on www.gov.uk and you can also refer to our Safeguarding Children Policy (available on SharePoint).

ID

All HIA staff and HIA volunteers will be required to offer ID if requested. If a contractor is going to a property, HIA should phone the tenants and give them as much warning as possible in order for them to gain access.

Contractors must be prepared to show ID if the tenants request it.

⁴ For example: Regular and formal provision of 1) managing the tenant's cash 2) paying their bills 3) shopping on their behalf.

5. Confidentiality and information held on adults at risk

Confidentiality is central to the work of Hope Into Action: Foxhill and the attention of all staff and volunteers is drawn to the Confidentiality policy and GDPR policy available on SharePoint.

HIA understands confidentiality to mean that discussions about tenants, staff, volunteers and those who we may routinely come in contact with are kept to those who need to be involved or have a direct involvement with the person whose information is being shared. **However, if abuse is suspected, this supersedes an individual's right to privacy and confidentiality:**

"The right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice. All staff and volunteers...can contact either the police or the local authority safeguarding lead for advice, without necessarily giving an individual's personal details, if they are unsure whether a safeguarding referral would be appropriate."⁵

LOCATION	LOCATION SAFEGUARDING LEAD PERSON	REPORT MADE TO AUTHORITIES	DATA PROTECTION & GDPR	FOLLOW UP
All Franchises	Location safeguarding lead to decide on how to proceed (HIAUK Safeguarding lead available for advice, if necessary) Next steps agreed upon and written report completed.	If decision made is to report to authorities, HIA Safeguarding Report including actions / advice given by authorities completed and shared with HIA:UK HIA Safeguarding lead	Location Lead to store report on Location SharePoint. HIAUK Safeguarding lead saves copy in SharePoint Franchise Safeguarding folder (only accessible to HIA Safeguard lead and Safeguarding sub committee members).	As above Bi-monthly sharing of all safeguarding incidents and complaints shared with Support Centre via Advisor as part of our Quality Assurance

*The HIA Safeguarding Report Template (App 1) can be substituted by LA Report Template if one has been completed, to avoid duplication of work. LA's methods of reporting differ. Discuss with HIA Safeguarding lead if in doubt.

HIA:UK Safeguarding Lead must be informed and a written report, within 24 hours, emailed using HIA:UK safeguarding template in the event of the any of the following safeguarding concerns:

- Sexual offence by a tenant or ex-tenant (this includes an allegation)
- Sexual offence where a tenant is victim
- Significant violence by a tenant or ex-tenant
- Arson by a tenant or ex-tenant
- Child protection – where the child is victim of a sex offence or where child is at risk of harm by tenant (including their mother / father)
- Threats or acts of violence or harm towards a member of staff, volunteer or member of public (such as a neighbour)
- Allegations of abuse made against a staff member or volunteer

The above categories of concern will be passed to the Executive, Chair of HIA UK Trustees and designated HIA UK safeguarding Trustee as outlined in the serious incident flow chart Appendix 9.

⁵ The Common Law Duty of Confidentiality taken from <https://www.scie.org.uk/care-act-2014/safeguarding-adults/sharing-information/what-does-the-law-say.asp>

6. Safeguarding Training

All HIA-F staff, Empowerment Workers, Trustees and volunteers must attend safeguarding training in line with the requirements set out below. HIA UK will provide access to all compulsory training through either an online training provider or training with HIA UK.

Role	Level 1 safeguarding	level 2 safeguarding	level 3 safeguarding	Child safeguarding level 2	HIA safeguarding Induction video/ session	EW yearly safeguarding workshop	Trustee Safeguarding training	Sign Yearly confirmation that have read and understood HIAUK safeguarding policy and procedures and Safeguarding Charter
All HIAUK Trustees	Every 3 years				compulsory		every 3 years	
HIAUK Safeguarding Trustee			compulsory in date training		compulsory		every 3 years	compulsory
HIAUK Safeguarding lead		compulsory in date training *	compulsory in date training		compulsory			compulsory
HIA UK Exec staff		compulsory in date training *			compulsory			compulsory
HIA UK non tenant facing staff	compulsory in date training*				compulsory			compulsory
HIAUK EW's and tenant facing staff		compulsory in date training *		compulsory in date if working with children *	compulsory	compulsory		compulsory
Franchises trustee					At least one representative recommended		recommended	
Franchise EW's and tenant facing staff		compulsory in date training *		compulsory in date if working with children *	compulsory	compulsory		compulsory
Franchise non tenant facing staff	recommended yearly				compulsory			compulsory
Franchise lead		compulsory in date training *			compulsory	recommended		compulsory
Franchise safeguarding lead		recommended minimum			compulsory every 3 years			compulsory

* course with the training provider HIAUK use cover staff for 12 months. Other providers used by franchises may cover staff for longer.

7. Housing young people or children

Hope Into Action: Foxhill primarily houses adults/over 18s. The families we house take parental responsibility for the children in the house.⁶ We would only house a minor without a live-in parent or guardian in exceptional circumstances and only with the permission of the CEO and Trustees.

8. If a tenant becomes pregnant during their stay

The risk reduction plan must be reviewed on all tenants of the house. Ideally, HIA-F will be able to secure more appropriate accommodation before the child is born. If this doesn't happen and the child is born whilst in HIA accommodation any regular visitors will need to be included in the risk assessment. Overcrowding may become an issue, therefore alternative, more suitable accommodation will be a better option.

9. Safeguarding and Fundraising

HIA recognises that some supporters may be vulnerable in the context of how HIA interacts with them, by virtue of their personal circumstances. This might be because they are in a vulnerable circumstance (for example have a medical condition, or are experiencing a stressful time), have

⁶ Please refer to Hope Into Action: Foxhill's Child Protection Policy for further information, available on Sharepoint.

particular language or communication needs, haven't got the mental capacity to make a financial decision, or just need more time, help and patience to make a decision about whether to donate.

We will ensure that:

- We comply with the Code of Fundraising Practice, including fundraising that involves children (if applicable).
- Staff and volunteers are made aware of the Institute of Fundraising guidance on keeping fundraising safe and follow our guidance laid out in our Marketing policy
- Our fundraising material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate
- We do not either solicit nor accept donations from anyone whom we know, or think, may not be competent to make their own decisions.
- We are sensitive to any particular need that a donor may have and will make reasonable adjustments and support mechanism to take account of these.

10. Review

The policy will be reviewed annually by HIA-F Board of Trustees.

11. Appendix 1 Definitions of abuse

In defining abuse it is important to clarify the following factors:

- Which adults are 'at risk', what is 'abuse' and why do we 'safeguard'?
- Categories of abuse and what actions or omissions constitute abuse?
- Who may the abuser(s) be?
- When should we pass concerns on?

Which adults are 'at risk'?

An 'adult' means a person aged 18 years or over.⁷ Our definition of an 'adult at risk' follows the Care Act 2014⁸ where a person:

- has needs for care and support (whether or not the authority is meeting any of those needs)
- is experiencing, or is at risk of abuse or neglect and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

What is 'abuse'?

The term 'abuse' can be subject to wide interpretation and even the Care Act admits that its definition is not conclusive. No Secrets 2000⁹ notes that.

Abuse is the violation of an individual's human and civil rights by another person or persons."¹⁰

'Action on Elder Abuse' explains that abuse is:

"A single or repeated act occurring within a relationship where there is an expectation of trust which causes harm to an individual."

Why do we 'safeguard'?

Hope Into Action: Foxhill agree with the aims of the Care Act with regards to Safeguarding:

- To stop abuse or neglect wherever possible
- To prevent harm and reduce risk of abuse
- To safeguard adults in a way that supports them in making choices and having control about how they want to live
- To promote an approach which concentrates on improving life for those concerned
- To raise awareness and help people understand abuse and how to raise concerns

What constitutes abuse?

Abuse may consist of a single act or repeated acts, but is rarely accidental. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she

⁷ For further information <https://bristolsafeguarding.org/policies-and-guidance/mental-capacity/>

⁸ For the Care Act see <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

⁹ For No Secrets 2000 see <https://www.gov.uk/government/publications/no-secrets-guidance-on-protecting-vulnerable-adults-in-care>

¹⁰ The Human Rights Act 1998 <http://www.legislation.gov.uk/ukpga/1998/42/contents>

Article 2 gives the Right to life (and decision on how to live their own life within the law). Article 3 is the Prohibition of inhuman or degrading treatment. Article 5 is the Right to Liberty (and freedom to make their own choices) and Article 8 is the Right to respect for private life

has not consented, or cannot consent. It varies from trafficking workforces across the globe to domestic violence within a home.

Safeguarding is everyone's responsibility.

Employees and volunteers have a responsibility to be aware of and alert to signs that all is not well with a tenant, volunteer or staff member. However, they are not responsible for diagnosing, investigating or providing a therapeutic response to abuse. In addition, not all concerns relate to abuse, there may well be other explanations.

Categories of abuse

The Care Act now identifies ten types of abuse:

1. **Physical abuse**, including hitting, slapping, pushing, kicking, misuse of medication, restraint.
2. **Sexual abuse**, including rape and sexual assault or sexual acts to which the vulnerable adult, young person or child has not consented.
3. **Psychological/ emotional abuse**, including verbal & mental abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment.
4. **Financial or material abuse**, including theft, fraud, exploitation, the misuse or misappropriation of property, possessions or benefits.
5. **Neglect**, including 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. -
6. **Self-neglect¹¹**, including ignoring medical or physical care needs e.g. hoarding, not taking prescribed medication or not washing. Can be deliberate (e.g. Refusing to eat) or failing to recognise that one's own needs are not being met (e.g. a dementia patient forgetting basic tasks).
7. **Discriminatory abuse**, including racist, sexist or religious harassment, hate crime or negativity towards other cultures, not recognising or making reasonable adjustments to another's religious or disability needs or identity.
8. **Domestic abuse and violence¹²**, including controlling, threatening or coercive behaviour. It also includes honour based violence, female genital mutilation and forced marriage. Often a combination or several other forms of abuse (e.g.: psychological, physical, financial etc).
9. **Organisational abuse (previously known as 'institutional')**, including the misuse of power and abuse of trust by professionals, the failure to act, poor care or neglect.

¹¹ "Self-neglect has been added as a category of abuse by the Care Act. Mental Capacity comes into play here, as it is a fine line between one's own choices in life and our Duty of Care. "Self-neglect is reported mainly as occurring in older people, although it is also associated with mental ill health. Differentiation between inability and unwillingness to care for oneself, and capacity to understand the consequences of one's actions, are crucial determinants of response. Professional tolerance of self-neglect as lifestyle choice is higher than when it accompanies physical/mental impairment. Professionals express uncertainty about causation and intervention." Abuse was typically viewed previously as to be harm caused by another. More recently the safeguarding definition draws "a distinction between **unwillingness** to maintain health and safety and **inability** to do so." Taken from <https://www.scie.org.uk/publications/reports/report46.asp> SCIE report on self neglect and safeguarding. See footnote 3 for link to Care Act.

¹² Domestic Violence is a form of abuse that many of our tenants may have experienced in their past and may do so while in a Hope into Action house. It warrants special attention and handling. While it is most likely to occur against women it is also important staff and volunteers are mindful that it can happen to male tenants as well. When reporting incidents of Domestic Violence we have to remember that on average there has been at least seven prior incidents before the victim has been able to report it. This means that although we would want to and always seek to gain the victim's permission to report, if after discussion with the safeguarding lead, location lead and at times with the ED it is considered that for the victim's safety and wellbeing, reporting may be necessary without permission.

10. **Modern slavery**, including being forced to live in overcrowded accommodation, forced to work for unfair pay, important documentation held by others.

Please see footnotes on radicalisation¹³ and trafficking¹⁴.

12. Appendix 2 Safeguarding Report Template

[Safeguarding report Link](#)

Follow up report (to be complete 1 month later)

[Safeguarding follow up LINK](#)

Please use full names and as much information as possible in these reports. Hard copies not to be kept in tenant folders, but referred to in field notes (e.g. Safeguarding referral made to local authority and report emailed to safeguarding@hopeintoaction.org.uk on 13/4/19 Reference 190413 Harper GH ASB)

13. Appendix 3 Incident or Cause for Concern Report Template

[Cause for Concern Report LINK](#)

Follow up report (to be completed not later than 1 month later, where necessary update the safeguarding lead as often as events dictate and is required.)

[Follow up report LINK](#)

Please only use the name of the main individual in these reports and refer to other parties anonymous (e.g. 'house mate 2' or 'alleged perpetrator') then write separate report from other perspective. This is for GDPR and data protection reasons. These reports can therefore be kept in tenant folders, as they do not incriminate or identify anyone else.

These reports should be completed by Empowerment Workers.

A copy should be sent to the Safeguarding Lead at Hope Into Action: Foxhill. If there is more than one alleged victim a separate form should be completed for each.

All efforts must be made to keep the information confidential. The information should only be shared with those that need to know if it is in the best interest of the child or adult at risk.

Please note that where a concern is immediate, please make initial contact by telephone and then return the completed form as soon as possible. The HIA Safeguarding report should be completed after alerting the Local Authorities or when it has been agreed that other (or no) further action is the best approach.

¹³ **Radicalisation** is a process by which an individual, or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or undermine contemporary ideas and expressions of freedom of choice (NSAB training). If you would like training in this area, please approach your local authority, who may be offering PREVENT training which will help you understand the topic and learn how to spot the signs in others. You can also refer to www.stophateuk.org

¹⁴ **Trafficking** for info see www.gov.uk or www.city-hearts.org.uk or <https://www.theclewerinitiative.org/> for info on how your church can spot the signs of trafficking.

14. Appendix 4 Contact details and Links for Adult Safeguarding

Reporting Crimes to the police:

In an emergency, where an immediate police response is required, dial 999. Where an immediate response is not required or if you are unsure as to whether the abuse constitutes a crime, honour-based violence or Domestic Abuse dial 101.

Thirtyone:eight (previously known as CCPAS - Church Child Protection Advisory Service) Contact Details:

0303 003 1111 <https://thirtyoneeight.org/>

HIA Membership number 7361, but it's strongly recommended partner churches and Franchises have their own account

BaNES Local Authority Designated Officer:

Local Council Safeguarding Team lead: Victoria Harlin

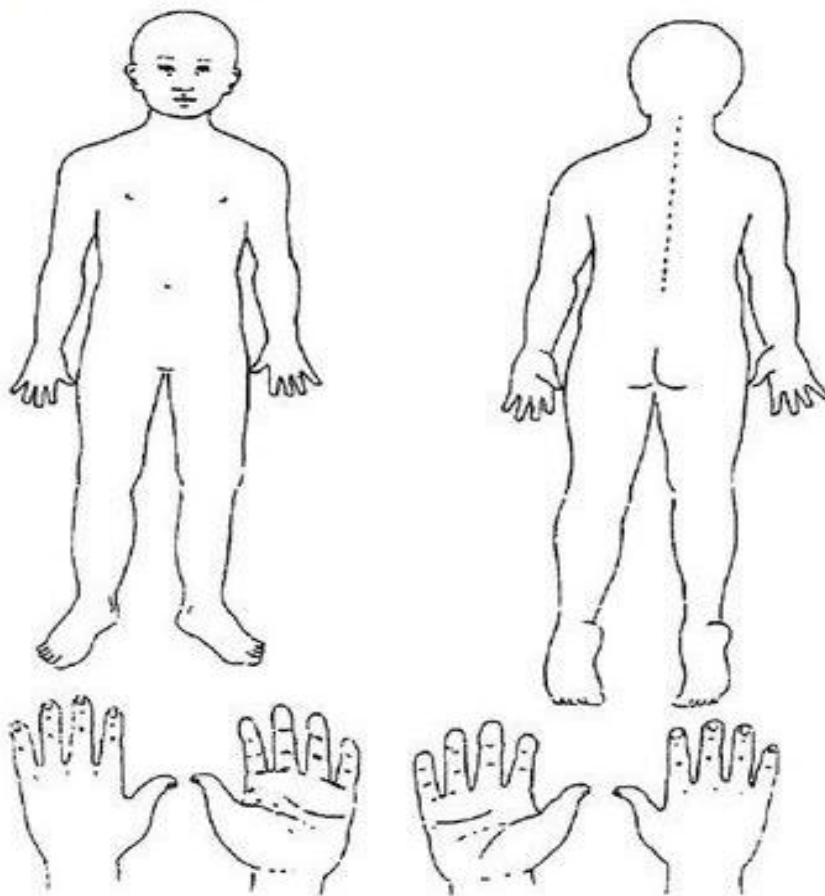
Phone: 01225 396 810

Email: LADO@bathnes.gov.uk

Franchise Coordinator and EW's have copies of BaNES Leaflets for the LADO and how to access them.

15. Appendix 5 Body map

This body map is just a tool to log physical injuries seen or reported, it IS NOT a substitute for a professional medical record.



16. Appendix 6 Guidance on Mental Capacity

Mental Capacity means being able to make your own decisions. It means having the 'capacity' to decide for yourself. For handy wallet sized reminder cards contact nhs.uk or scie.org.uk

The five statutory principles that underpin the legal requirements in the Mental Capacity Act of 2005 are as follows:

1. Assume a person has capacity unless proved otherwise
2. Do not treat people as incapable of making a decision unless all practicable steps have been tried to help them
3. A person should not be treated as incapable of making a decision because their decision may seem eccentric or unwise
4. Always do things or, take decisions for people without capacity, in their best interests
5. Before doing something to someone or making a decision on their behalf, consider whether the outcome could be achieved in a less restrictive way

How to assess capacity:

- The assessment must be time specific and decision specific
- Is there an impairment in decision making (eg: neurological difficulty)
- Can the person UNDERSTAND the information > RETAIN it > WEIGH IT UP and > COMMUNICATE their decision. If so, they have capacity.

Should you have reason to believe someone does NOT have mental capacity, contact your local authority / MASH team etc. for advice on getting a professional capacity assessment.

17. Appendix 7 Guidance / Press Release for a serious offence

Guidance for those housing tenants accused or convicted of a sexual offence (or other high profile cases which the media may pick up on, such as drug dealing, harm to children or particularly bad GBH/ABH):

Although rare, tenants or ex tenants are sometimes accused, awaiting trial or convicted of heinous crimes. Should your location have to deal with this, here are some simple suggestions as to how to approach this delicate issue.

- 1) Agree on who should deal with any press or media enquiries. We suggest:
 - If any enquiries come to via the location (eg: HIA Mid Sussex), they are directed to the Team Lead or Chair of trustees. No one else should speak or respond to the press.
 - Any enquiries that come to HIA UK should be directed to the Executive Director, Head of Network or Franchise Lead. No one else should speak or respond to the press.
- 2) Our only message initially should be: "No comment" and if pushed "it is not our policy to house anyone with a known sex-offence."

If it's deemed a press statement is necessary and wise, use this template as a guide:

We have some difficult news which has also hit the press. A (ex-)tenant and someone we know well was, last Friday, convicted of rape. I want to state categorically that we absolutely condemn any form of sexual violation and abuse, of any kind. Our hearts and prayers are completely with the victim.

It is absolutely right that justice is done. Justice plays a vital role in protecting society and also, at best, contributes to the victim's healing after a highly traumatic experience, one they may take a lifetime to recover from.

In no way do we excuse, justify or exonerate the perpetrator.

- 3) *When it comes to communicating internally (within the HIA Network or location team), something like the below may be used:*

In this messy work we are involved in, we recognise the perpetrator is also, somehow, loved by God.

**Details prevalent to the case, such as:*

The incident did not occur in a house in our care. Nor was the perpetrator in our care at the time of the incident.

OR

The EW was aware of this allegation and reported it to their line manager and the HIA UK Safeguarding Lead. They have adhered to policy throughout and shown incredible strength. We hand it all over to God in prayer, the pain, the trauma and many other emotions.

Praying for the victim, for healing. Praying for the perpetrator.

For now, I would like to keep it to that, but we now feel it is important to let you know, so you are prepared and informed.

If there are any enquiries from the press please direct them to myself or xxx in the short-term. Do not say anything to them other than that.

Regards

18. Appendix 8 Serious Incident Flow Chart

Serious Safeguarding Incident Flow chart

HIA Safeguarding Lead becomes aware of serious safeguarding incident

Immediate report made to HON, CEO, safeguarding trustee and chair of Trustees

Safeguarding Lead to work with team lead / Franchise lead seeking support from Safeguarding trustee and 31.8. HON and CEO to be copied into decisions made

Safeguarding Lead to lead review following serious incidents to reflect on practise and identify any areas for improvement

Safeguarding lead to report all serious safeguarding incidents to Charity Commision and Funders who require serious safeguarding issues to be reported (Pears)