

RASA SAFEGUARDING ADULTS POLICY AND PROCEDURE

RASA Merseyside Safeguarding Statement

RASA is committed to safeguarding and promoting the welfare of adults and expects all staff and volunteers to share this commitment.

We have policies and procedures in place that contribute to our safeguarding commitment, including our Safeguarding Adults Policy and Procedure.

Sometimes we may need to share information and work in partnership with other agencies when there are concerns about an adult's welfare. We will ensure that our concerns about our adult clients are discussed with the client unless we have reason to believe that such a move would be contrary to the adult's welfare.

Safeguarding Adults Policy and Procedure

Introduction

RASA are committed to providing confidential services to anyone who has, or is, experiencing sexual violence. RASA Merseyside aims to ensure that staff and/volunteers who have contact with vulnerable persons (children and/or adults) and, who in the course of their work, may become aware of situations where there is a risk of, or actual abuse, are able to act competently and confidently to protect that individual from further abuse or harm.

This policy is underpinned by the policies and procedures devised by Sefton/ Liverpool/ Wirral Local Safeguarding Partnerships.

1. Purpose

This policy aims to ensure that no act or omission by staff or the services they provide puts a service-user at risk; and that systems are in place to proactively safeguard and promote the welfare of vulnerable persons and to protect them from abuse. The policy recognises that safeguarding vulnerable persons is a shared responsibility with the need for effective joint working between agencies and professionals that have different roles and expertise if vulnerable persons are to be protected from harm.

This policy also sets out how staff should be alert to signs of abuse and takes appropriate action to safeguard vulnerable persons. For the purposes of this policy the term 'Vulnerable Persons' relates to service-users belonging to the following groups:

- People whose health or usual function is compromised
- People with visual / hearing impairment
- People with physical disabilities
- People with learning disabilities
- People with reduced independence, including those who do not speak English as their first language.

NB In all cases reasonable adjustments will be made accordingly

2. Definition

- 2.1 The term 'adults at risk' is used to replace the term vulnerable adult. This is because the term adult at risk focuses on the situation causing the risk rather than the characteristics of the adult concerned. No Secrets Guidance (2000) defines an adult at risk as a person who 'is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself from significant harm or exploitation'.

3. Abuse of Vulnerable Adults (adults at risk)

For adult safeguarding, the definitions are taken from The Care Act 2014.

Abuse is a violation of an individual's human and civil rights by other person or persons. Abuse may consist of single or repeated acts. 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 has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm, or exploitation of, the person subjected to it.

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

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

Psychological abuse including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Exploitation either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain.

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 education services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.

Discriminatory abuse including racist, sexist, that based on a person's disability, and other forms of harassment, slurs, or similar treatment. There are different types of discrimination including age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, having a disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, and sexual orientation.

Institutional abuse including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment.

Domestic abuse 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. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Self-Neglect Is a behavioural condition in which an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have. Extreme self-neglect can be known as Diogenes syndrome.

Forced Marriage and Honour Based Violence

RASA understand forced marriage and honour-based abuse to be a form of abuse and a breach of human rights. It is, therefore, important to safeguard any child, young person or adult subjected to a forced marriage or honour-based abuse. Forced marriage refers "a marriage conducted without the valid consent of one or both parties, where some element of duress is a factor" (Pan Merseyside Forced Marriage Protocol, 2019). The National Police Chiefs' Council (NPCC) define honour-based abuse as: 'an incident or crime involving violence, threats of violence, intimidation, coercion or abuse (including psychological, physical, financial or emotional abuse), which has or may have been committed to protect or defend the honour of an individual, family and / or community for alleged or perceived breaches of the family and / or community's code of behaviour' (NPCC 2015).

County Lines and Cuckooing

'County lines' is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine and crack cocaine are the most common drugs being supplied and ordered. In most instances, the users or customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment. The [National Crime Agency \(NCA\)](#) has more information about county lines and how to spot the signs that it's happening, as well as how to report concerns.

The best advice is to trust your instincts. Even if someone isn't involved in county lines drug dealing, they may be being exploited in some other way, so it's always worth speaking out.

Professional criminals are targeting the homes of adults with care and support needs so that the property can be used for drug-dealing – a process known as 'cuckooing'.

Reporting any suspicious drug-related behaviour may assist in making your neighbourhood a safer place as professional criminals are using the homes of victims to manufacture and sell drugs.

These criminals are very selective about who they target as 'cuckoo' victims and are often entrepreneurial. A lot of the time victims are lonely, isolated, frequently drug users themselves and are already known to the police. Dealers often approach the victim offering free drugs to use their home for dealing.

'Cuckooing' means the criminals can operate from a discreet property, which is out of sight, making it an attractive option. They can then use the premises to deal and manufacture drugs in an environment under the police radar, usually staying for just one day.

When the criminals use the victim's property for criminal enterprises, the inhabitants become terrified of going to the police for fear of being suspected of involvement in drug dealing or being identified as a member of the group, which would result in their eviction from the property.

Below are some important signs to look out for if you feel you are living within or near a property used to deal drugs, or if you are concerned about your property as a landlord or property manager.

We are asking that you stay aware and spot potential signs of drug dealers near you.

Signs to look out for:

- usually takes place in a multi-occupancy or social housing property
- an increase in the number of coming and goings
- offenders will often have new vehicles outside the property, frequently use taxis or hire cars
- possible increase in ASB activity in and around the property
- disengagement with support services
- professionals visiting may be aware of new unidentified persons in the property
- the property may become to appear almost sparse of valuable possessions inside and go into a state of disrepair

Modern Slavery

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the of which comes from the Palermo Protocol).

These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

It is possible to be a victim even if consent has been given to be moved.

Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

Prevent Duty 2015

The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to "prevent people from being drawn into terrorism".

Hate Crime

Any crime that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability is a hate crime.

Hate crime is a form of exploitation which occurs when a person is harmed or taken advantage of by someone they thought was their friend.

Hate crimes can include:

- physical attacks - physical assault, damage to property, offensive graffiti, neighbour disputes and arson
- threat of attack - offensive letters or emails, abusive or obscene telephone calls, groups hanging around to intimidate you and unfounded, malicious complaints
- verbal abuse or insults - harassment over the phone, by text or face to face, abusive gestures and remarks, bullying and threats
- Hate crime is a form of disability hate crime, where vulnerable people, such as those with autism, are bullied or manipulated by people they consider to be friends

They can happen anywhere - at home, school, work or on the street. It can be frightening for the victim and witnesses.

5. Statement Principles

RASA are committed to protecting and promoting the wellbeing of adults at risk

6. Race, Ethnicity and Culture

In keeping with RASA's Equality and Diversity Policy all service-users will be provided with services without reference to race, colour, class, nationality, ethnic or national origins, sexual orientation, religion, age, disability, marital status or any other form of discrimination which hinders the promotion of equal opportunities.

7. Specific related Issues

7.1 The people ultimately accountable for safeguarding and promoting the welfare of all service-users of RASA is the Lead Designated Safeguarding Officer, and the Deputy Designated Safeguarding Officer. The contact details are as follows:

- Lorraine Wood (Lead Designated Safeguarding Officer)
Lorraine.wood@rasamerseyside.org, mobile: 07760764421
- Sarah Wood (Deputy Designated Safeguarding Officer)
sarah.wood@rasamerseyside.org, mobile: 07436 800 150

7.2 It is the responsibility of the Designated Safeguarding Officer to ensure staff are competent to comply with this Policy and its contents. All relevant staff will undertake safeguarding training in accordance with local LSCB/ LSCP procedures. In addition, in-house training is provided on a regular basis.

- 7.3 RASA operates a safer recruitment procedure which ensures all staff and volunteers undergo a DBS check in accordance with the Agency's *Enhanced DBS Policy*. All staff and volunteers have an enhanced check as they may work with adults and children. All staff and volunteers go through a recruitment process that involves initial training, induction, with regular reviews and monthly line management. Staff and volunteers working as therapists will also receive monthly clinical supervision.
- 7.4 RASA is committed to the highest possible standards of openness, probity, and accountability. RASA expect employees and/or volunteers, who have serious concerns about any aspect of RASA's work to come forward and voice those concerns without fear of victimisation, subsequent discrimination, or disadvantage and in accordance with the agency's *Whistleblowing Policy & Procedure*. The policy is used when concerns are raised relating to:
- Financial malpractice or impropriety.
 - Failure to comply with a legal obligation.
 - Dangers to Health & Safety or the environment.
 - Criminal activity.
 - Improper conduct or unethical behaviour including issues of child and vulnerable adult protection.
 - Attempts to conceal any of these.

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the Operations Manager unless the complaint is against any member of the Operational Management Team. In such cases, the complaint should be passed to the **RASA** Management Committee for referral.
- In the case of a complaint, which is any way connected with but not against the Operations Manager or the Operations Management Team, the Operations manager will nominate the Chair of the Management Committee to investigate.
- Complaints against the Chair should be passed to the Operations Manager who will investigate.
- The complainant has the right to bypass the management structure and take their complaint direct to the Chair. The Chair has the right to refer the complaint back to the Operations Manager if she feels that the Operations Manager, without any conflict of interest, can more appropriately investigate the complaint.

If there is evidence of criminal activity, then the investigating officer should inform the police. RASA will ensure that any internal investigation does not hinder a formal police investigation. When there are concerns relating to a worker who works with children the Local Authority Designated Officer (LADO) should be made aware. Prior to this, seek advice and guidance from the Designated Safeguarding Officer. The LADO should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- poses a risk of harm to children

For more details on the local LADOs:

- Liverpool:

For more information on the Liverpool LADO and to access Liverpool LADO forms and details on how to make a referral: <https://liverpoolscp.org.uk/scp/local-authority-designated-officer-lado/what-is-the-lado-and-what-do-they-do>.

- Wirral:

For more information on the Wirral LADO and details on how to make a referral:

<https://www.wirral safeguarding.co.uk/professionals/lado-allegations/>

- Sefton:

For more information on the Sefton LADO and details on how to make a referral:

<https://seftonscp.org.uk/scp/professionals/managing-allegations-local-authority-designated-officer>

- 7.5 RASA ensures that all staff and service-users of the agency understand the correct procedure if an allegation is made against a person who works for the agency in accordance with the agency's *Allegations against Staff Policy & Procedure*

In the instance that a concern is raised against a member of staff, the following will apply in line with *Allegations against Staff Policy & Procedure*:

Where a service user has a grievance or complaint about a member of staff or the service, they will be asked to put this in writing. No action will be taken unless the complaint is in writing. The letter should include:

- Details of the complaint
- Date and time of incident
- Details of any witnesses to the incident

Should the complainant have literacy difficulties, an advocate can act on their behalf or assist them in making the complaint.

Unless there is a good reason for not doing so, a complaint should be raised within one month of the incident to which it refers. The letter should be addressed to the Clinical Lead, and in her absence, the Operations Manager, Lorraine Wood.

The clinical lead will communicate the results of the enquiry to the complainant with 21 days. All time limits will be met unless this is not possible due to annual leave in which case the complainant will be contacted at the earliest opportunity.

- 7.6 RASA ensures all staff and volunteers take preventative measures to ensure both their own safety, and the safety of others. All staff should adhere to RASA Code of Conduct which documents the responsibility of the professional in their manner and behaviour, and asks all staff to adhere to the lone working policy. Lone workers in outreach centres and other work-based premises, including working from home, should:

Where there is a situation where members of staff are in a working alone scenario, they should where possible ensure most/all the following are adhered to:

1. Ensure you have control of the access to the building/room
2. Only give access to others if you are sure that you know who they are
3. Arrange for someone to telephone you at a predetermined time to check you are ok
4. Check on means of escape from the building in an emergency
5. Check access to a telephone

6. Try to plan appointments etc. so that other people are in the building with you
7. Keep valuables – handbags, cases, equipment etc. out of site
8. If you are assaulted or threatened contact the police immediately on 999
9. If you are verbally abused or receive indecent telephone calls report the matter immediately.
10. In all instances complete an incident form
11. Never provide a service user with your home address or telephone number.

8. Responsibility and Referral Process

- 8.1 In the first instance, concerns raised about an adult at risk should be brought to the immediate attention of the Designated Safeguarding Officer (in her absence the Deputy Safeguarding Officer who will ensure immediate safety has been considered).
- 8.2 For procedures for Safeguarding Adults at Risk see Appendix G.

When sharing information, only share on a need-to-know basis (see Confidentiality Policy, Information Sharing Policy, and Data Protection Policy).

9. Implementation and Dissemination

RASA will ensure all staff/volunteers will be issued with current policies and procedures as part of their induction into the agency. Revised/new policies and procedures will be issued to staff/volunteers within 5 working days of being approved by the Board of Trustees.

10. Monitoring and Compliance

RASA will ensure that all staff are utilising the policy and are fully conversant with its contents through monthly formal supervision and monthly group supervision. Informal supervision is continuous and available on a day-to-day basis.

12. Legislation and Guidance

Care Act 2014 (replaces No Secrets 2002)
Female Genital Mutilation Act 2003
Mental Capacity Act 2005 <http://www.legislation.gov.uk/ukpga/2005/9/contents>
Care & Support Bill due for enactment 2015
Serious Crime ACT 2015
RAPE Crisis National Service Standards
Prevent Duty Guidance 2015
Modern Slavery Act 2015
Criminal Exploitation of Children and Vulnerable Adults: County Lines 2018

13. Appendices:

- A. Adult Safeguarding Flowchart

This Policy is to be used in conjunction with:

RASA Self-harm Policy
 RASA Suicide Policy
 RASA Forced Marriage and Honour Based Violence Policy
 RASA Female Genital Mutilation Policy
 RASA Managing Allegations Policy
 RASA Whistle Blowing Policy
 RASA Information Sharing Protocol
 RASA Confidentiality Policy

RASA Data Protection Policy
RASA Code of Conduct
RASA Lone Working Policy

Adult Procedure Safeguarding Flowchart – Appendix A

When a concern is raised about an adult at risk this should be brought to the immediate attention of The Designated Safeguarding Officer (Lorraine Wood) and in her absence the Deputy Safeguarding Officer (Sarah Wood), who will ensure immediate safety has been considered for the adult at risk and all other vulnerable people.



If possible, assess the mental capacity of the vulnerable adult and their ability to consent. To have capacity a person must be able to:

- understand the information that is relevant to the decision they want to make
 - retain the information long enough to be able to make the decision
 - weigh up the information available to make the decision
- communicate their decision by any possible means, including talking, using sign language, or through simple muscle movements such as blinking an eye or squeezing a hand. (*Mental Capacity Act 2005*)



Make an initial contact with adult social care in the area that the adult resides:

Sefton Council Contact Centre: 0345 140 0845

<https://www.sefton.gov.uk/social-care-and-health/adult-social-care/adults/raise-a-concern/raise-a-concern-process/>

Wirral Central Advice and Duty Team:

call 0151 606 2006, Monday to Friday 8:50am to 5:00pm

call 0151 677 6557 all other times and on public holidays

email: cadt@wirral.gov.uk

<https://www.wirral.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults/reporting-abuse-or-neglect-adult>

Liverpool: 0151 459 2606. If a person is at immediate risk of harm and an urgent response is required please contact the police on 709 6010 (Liverpool Adults only).

<https://liverpool.gov.uk/adult-social-care/professional-referrals/safeguarding-adults/report-an-adult-safeguarding-concern/>

Always dial 999 in an emergency.



Ensure service-user should be kept fully informed of progress at all stages.

The staff member will clearly document the nature of their concerns on the service-users file and record the date of the referral in The Safeguarding Adults Referral Log.