

# **Developing your Safeguarding Policy, Practice and Procedures for Vulnerable Adults**

Resource pack for groups

Revised March 2015

## Introduction

The London Community Foundation places great importance on the safety of vulnerable adults. As part of our commitment to this any grant that we make to organisations that are working with vulnerable adults may well be conditioned upon having satisfactory safeguarding policies and procedures in place.

The London Community Foundation has put together this guidance to assist small groups with developing their policy about vulnerable adults. It is designed to help you create safeguarding policies and procedures that are user friendly, practical and relevant for your organisation and the work it does.

Organisations and groups' policies, practices and procedures will not be identical. Each one will vary depending on the type of work it does, who it works with and provides activities for, or where and how it carries out its activities. You do not have to be an organisation that only runs projects specifically or regularly with or for vulnerable adults to need a safeguarding policy. Every group that has the public using its activities which could include vulnerable adults, even if only occasionally, must show that you can deal quickly and effectively with any concerns about the physical, sexual or emotional abuse of vulnerable adults and neglect of vulnerable adults.

All adults have the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation

## Definitions

Here are explanations of some terms used in this pack:

**Vulnerable Adult:** An Adult (a person aged 18 or over) 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 against significant harm or exploitation'. (*Definition from 'No Secrets' March 2000 Department of Health*)

This could include people with learning disabilities, mental health problems, older people and people with a physical disability or impairment. It is important to include people whose condition and subsequent vulnerability fluctuates. It may include an individual who may be vulnerable as a consequence of their role as a carer in relation to any of the above.

*It may also include victims of domestic abuse, hate crime and anti social abuse.* The persons' need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

**Abuse:** Abuse of a vulnerable adult may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.

**Vulnerable Adult Protection:** this is part of safeguarding and promoting welfare. It refers to actions undertaken to protect vulnerable adults who are suffering, or are likely to suffer, significant harm.

**DBS:** The Disclosure and Barring Service is the government agency which replaced the Criminal Records Bureau and Independent Safeguarding Agency. It processes requests for criminal record checks to prevent unsuitable people from working with vulnerable adults.

**Adult Social Services:** The Department of Health's recent 'No secrets' guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of vulnerable adults at risk of abuse.

**Safeguarding Adults Board:** All local authorities have a Safeguarding Adults Board, which oversees multi-agency work aimed at protecting and safeguarding vulnerable adults. It is normal practice for the board to comprise of people from partner organisations who have the ability to influence decision making and resource allocation within their organisation. As an example the details for the local Lambeth Safeguarding Adults Board is in the 'Further Help and Resources' section of this pack. You will need to research the contact details for your local Boards.

**The Police:** The Police play a vital role in Safeguarding Adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

**Safeguarding Policy:** This is the statement of intent setting out the principles the group will use to guide its decisions and plan of action.

**Safeguarding Procedures:** The particular courses of action that the group will use.

**Safeguarding practices:** The actual performance and carrying out of the procedures.

## **Why have a Safeguarding Vulnerable Adults policy?**

The Public Disclosure Interest Act 1998 places the responsibility on organisations and their staff to ensure their services, and any services that they contract out to others, are carried out having regard to the need to safeguard and promote the welfare of vulnerable adults.

Voluntary organisations play an important role in delivering services to vulnerable adults. Government guidance says they should have arrangements in place in the same way as organisations in the public sector, and that they need to work effectively with their Local Safeguarding Vulnerable Adults Board.

Paid and volunteer staff need to be aware of their responsibilities for safeguarding and promoting the welfare of vulnerable adults, how they should respond to vulnerable adult protection concerns and make a referral to local authority social care or the police if necessary. It is also about protecting workers and volunteers and ensuring best practice in working with vulnerable adults.

The action we take to promote the welfare of vulnerable adults and protect them from harm is everyone's responsibility. Everyone who comes into contact with vulnerable adults has a role to play.

# Developing a Safeguarding Vulnerable Adults Policy for your group

## Who should be involved?

A Safeguarding Vulnerable Adults policy should be owned by the whole group. This means that staff, volunteers, parents, young people and children are all consulted and asked for their input and are informed of the development of the policy. Once the policy has been finalised, it must be signed by the Chair and the designated Vulnerable Adult Protection Officer in the organisation. When new people join the group they should be given the policy at their induction and have a chance to ask questions about it so they know how to work within its guidelines and use the systems if necessary. Vulnerable Adults and other adults taking part in the activities or using the services must also be told about any codes of conduct or behaviour and the consequences of not sticking to them.

## Getting started

The first step is to draw up an implementation plan with the people who are to take lead responsibility for developing the policy. This should include:

- Identifying who must and needs to be involved in the small development group
- What tasks these key people will do
- Timescales

There is an example plan in **Appendix 1** of this resource pack.

## The Policy

The following eight headings and their bullet points outline what should be covered by your policy. It does not have to be a long document, but it must contain these points.

### 1. The Policy Statement

- A positive statement that communicates what the organisation wishes to say about its approach to Safeguarding Vulnerable Adults.

*For example: Lollipop Luncheon Club believe that all adults have the right to enjoy the activities of the Club in a happy, safe, secure environment.*

- Why the organisation has developed a Safeguarding Vulnerable Adults Policy, for example: to protect vulnerable adults who receive (name of organisation)'s services.
- Who the policy applies and relates to - i.e. all staff and volunteers, and people who use the project.
- The legal framework – this policy has been drawn up on the basis of law and guidance that seeks to protect vulnerable adults as contained within the Human Rights Act 1998, the Mental Capacity Act 2005 and Public Interest Disclosure Act 1998, Data Protection Act 1998, Freedom of Information Act 2000, Safeguarding Vulnerable Groups Act 2006 and Deprivation of Liberty Safeguards, Code of Practice 2008.

- How the organisation recognises the needs of vulnerable adults from minority ethnic groups and disabled adults and the barriers they may face, especially around communication.
- How the organisation is going to implement this policy.

## **2. Safe practices when recruiting new paid and unpaid workers**

This should state:

- A written application form is to be completed for applicants to all posts, including volunteers. Ask on the form for any past convictions, cautions, reprimands and final warnings as well as any pending cases. Ask applicants if they have ever had any complaints of abuse against them.
- Face-to-face interviews will be held with anyone you may want to appoint, which will involve more than one person and use a transparent scoring system.
- Applicants must provide two referees; proof of identification; and original copies of any necessary qualifications before appointment.
- Most people will need a DBS check if they will be caring for, in sole charge of, or supervising vulnerable adults. These will normally be standard or enhanced checks, unless the applicant is to be appointed to a 'regulated activity' when a barred check will be required (for more information see the DBS website). There is also a summary found here [http://www.volunteering.org.uk/images/stories/Volunteering-England/Documents/Free-Information-Sheets/information\\_sheet\\_dbs\\_checks\\_2012.pdf](http://www.volunteering.org.uk/images/stories/Volunteering-England/Documents/Free-Information-Sheets/information_sheet_dbs_checks_2012.pdf)

## **3. Induction and on-going Training for Staff and Volunteers**

- All new paid and unpaid workers will have an induction and will work for a trial period before their appointment is confirmed.
- New staff and volunteers will be given copies of this policy and receive training about it to ensure they have an understanding of safeguarding.
- Supervision and support of all volunteers and staff will include monitoring of safeguarding practice and reviews of progress.
- The organisation will access further training and learning about safeguarding issues when these are relevant and required e.g. to update knowledge.

## **4. Running a safe organisation**

- Keep an up-to-date risk assessment of your venue and its activities.
- Assess the risks of an activity in advance and take precautions to prevent accidents.
- Carry out regular checks of any equipment, premises, or transport that you use

- Make sure you have the right insurance policies; that they are up to date; and that they provide adequate cover.
- Keep up to date information on each vulnerable adult's medical and dietary needs, any allergies or extra support needs they have.
- Have an accident book for recording incidents or accidents.

## **5. Measures to protect vulnerable adults at risk**

- Appoint a named officer in your organisation who takes the lead responsibility for safeguarding and vulnerable adult protection. This designated person will ideally have a deputy. This person should undertake regular training and keep updated on Safeguarding Adults issues and be the first point of contact for advice and support if a Safeguarding issue arises. This person will have knowledge of reporting procedures for incidents should they occur. Their contact details must be included in the policy.
- Create procedures for how your organisation will deal with situations where a child is in need of help and for situations where an allegation of abuse is made about somebody in your organisation.
- Develop a code of conduct which sets out the expected standards of behaviour of everyone in your organisation.
- Develop an anti-bullying policy which covers face to face, online or text bullying and is clear about how incidents of bullying will be responded to and dealt with.

## **6. Recording and storing information**

- Personal information, other than the individual's name, should be kept separate from information about other people.
- Make vulnerable adults and their families aware that your group/organisation keeps records, their purpose and how you use them. Give them access to these records unless it would be contrary to the child's best interests, as they have a right to ask to see any records that your organisation makes about them.
- Hard copies of records and any portable electronic equipment that holds or provides access to personal information must be stored securely. Unauthorised access to electronically stored personal and sensitive information should be prevented by the use of security measures, such as user names, passwords and encryption.
- Concerns that a vulnerable adult may be in need or at risk of abuse must be recorded and placed on file, together with a record of how the concerns have been dealt with. Any referrals made to a statutory agency about concerns for a child must be confirmed in writing within 48 hours.

- The organisation should hold a clear policy on time limits for retaining records before they are securely destroyed.

## **7. Links to other policies of your group**

The Safeguarding Policy is not a 'stand-alone' document. It should clearly connect to and interlink with other relevant policies and procedures of your group and in particular to your Confidentiality, Human Resources, Volunteering, Diversity, Health and Safety, ICT acceptable use, Safeguarding Children and Young People and Data Protection policies.

## **8. Policy Review**

The Safeguarding policy should state the date that it was adopted and how often it will be reviewed and updated. It should say who is responsible for reviewing it. The review must include an assessment of how effective it has been and whether any changes are needed to improve how it is implemented.



## The procedures

Once your policy is written, you will need to create the procedures to implement it.

1. Purpose and aim of the procedures. Be clear about who they apply to, including those people who do not directly work face to face with vulnerable adults.
2. Describe the different categories of abuse (for more about these please see **Appendix 2**).
3. How to recognise signs of abuse (for more about these please see **Appendix 3**).
4. How to respond to suspicions of abuse. Give details about when the Designated Person must be informed and how to contact them with any concerns about a vulnerable adult.
5. How to respond to abuse allegations against a member of staff, or any other worker or volunteer. Give details about who to report allegations to.
6. How to respond if an adult tells you about abuse. Give advice about what to do and say.
7. How to respond to allegations of abuse by a vulnerable adult, carer or any other adult.

When writing your vulnerable adult protection procedures, it is useful to think about the ways that people in your organisation or group might raise a concern. For example, situations when:

- An adult may disclose something that has upset or harmed them;
- Someone else might report something that an adult has told them, or that they believe that a vulnerable adult has been or is being harmed;
- A vulnerable adult might show signs of physical injury for which there appears to be no explanation;
- A vulnerable adult's behaviour may suggest he or she is being abused;
- The behaviour or attitude of one of the workers towards a vulnerable adult may cause concern.

Also, think about how you will:

- Keep a clear, written record of any concern identified.
- Ensure that any concerns are reported to a line manager, or the designated member of staff who is responsible for safeguarding, who will then decide what (if any) further action is required. – include the name and contact details of the person in the procedures.
- Produce guidelines about how and whether to discuss the concern with the vulnerable adult and/or family; and when to pass on a concern for further action to be taken to adult social services, or the police
- Think about **Children**: It is essential that the needs of any children within an abusive or domestic violence situation where there is a vulnerable adult involved are considered and acted upon. Please contact the Lead for Safeguarding or Senior Manager and/or the local social services Safeguarding Children's team.

For further guidance about handling concerns of abuse, see **Appendix 4**.

## Resources, further help and information

There is a lot of good advice, information and resource material available for free. That is why we have given website addresses in this section of the pack, so you can download and print off what you need. Please note that web addresses can change - although all of the links that follow are up to date and functioning at the time of publication of this pack. We have used Lambeth Borough as an example of local information but you can look up your local equivalent if you are in another borough.

- **To report concerns about abuse:**

Lambeth Adults' and Community Services  
020 7926 5555

Call them on 020 7926 1000 outside of office hours. Office hours for this service are 9am to 5pm.

For details of your local Safeguarding Adults Board see the website:

<http://www.childprotectioncompany.com/CPC/local-safeguarding-adults-boards>

- **Helplines and advice services for vulnerable adults**

Action on Elder Abuse (AEA) is a charity working to protect, and prevent the abuse of, vulnerable older adults:

<http://www.elderabuse.org.uk>

The Centre for Policy on Ageing was established in 1947 by the Nuffield Foundation with a remit to focus on the wide-ranging needs of older people

<http://www.cpa.org.uk/index.html>

Citizens Advice, Lambeth: 1, Barrhill Road, Streatham Hill; 0844 245 1298; or

[www.adviceguide.org.uk/england.htm](http://www.adviceguide.org.uk/england.htm)

- **Further information, training and other resources:**

No Secrets Report: The first national policy developed for the protection of vulnerable adults, for use by all health and social care organisations and the police. It introduced guidance around local multi-agency arrangements and was issued under Section 7 of the Local Authority Social Services Act 1970. Its implementation is led by local authorities with social services responsibilities.

[http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Dearcolleagueletters/DH\\_4002849](http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Dearcolleagueletters/DH_4002849)

Disclosure and Barring Service can be accessed through the gov.uk website:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

## Appendix 1

### Example of a Policy development plan:

Lollipop Luncheons Club's Safeguarding Vulnerable Policy Development Group

### Working Group

Eleanor – Chair

James– Treasurer

Khalid – Management Committee Member

Grace – Support worker

Meena – Community Rep.

### Implementation Plan

Action	Date to be completed by	Person/s to action
Meet together to draw up a draft policy statement	2 June	All
Contact borough Safeguarding Vulnerable Adult's Board to get information on training available in borough and Safeguarding Vulnerable Adults guidelines – distribute to group	10 June	Grace
All to meet to discuss information to date	18 June	All
Draw up a draft policy and discuss it with young people and workers	28 June	Khalid
Meet with group to adjust policy if needed	10 July	All
Write up final policy and distribute to group Review training needs of all.	15 July	Khalid
Group to agree final policy. Chair to sign policy and copies made to distribute to all group members. Add it to induction pack for new staff & volunteers.	28 July	Eleanor & all

## Appendix 2

### Definitions of abuse

Abuse may consist of a single act 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 it may result in significant harm to, or exploitation of, the person subjected to it.

The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:

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

**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, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**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** - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment and hate crime.

**Institutional abuse** - Institutional abuse although not a separate category of abuse in itself, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level.

**Multiple forms of abuse** - Multiple forms of abuse may occur in an ongoing relationship or an 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.

## **Domestic abuse**

Home Office Definition 2004

'Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.'

Women's Aid Definition

'Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behaviour. This can also include forced marriage and so-called "honour crimes". Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently "violent".

Most research suggests that domestic violence occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class or educational level.

Both definitions would therefore also include incidents where extended family members may condone or share in the pattern of abuse e.g. forced marriage, female genital mutilation and crimes rationalized as punishing women for bringing 'dishonour' to the family.

It is important to recognise that Vulnerable Adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

Where Vulnerable Adults are victims of Domestic Abuse, they may need extra support to plan their future. The violence or threat of violence may continue after a victim has separated from the abuser. It is important to ensure that all the vulnerable people in this situation have appropriate support to enable them to maintain their personal safety.

A separate Domestic Abuse Protocol is in place between Police, Social Services and Health.

Incidents reported by the police through the domestic abuse protocols will be addressed under the adult protection processes if it is considered that a vulnerable adult may be at risk of abuse. *(See your local authorities joint Police, Social Services and Health protocol for dealing with cases of domestic abuse where vulnerable adults are involved).*

## **Appendix 3**

### **Possible signs of abuse**

#### **Physical abuse signs**

Note: Some ageing processes can cause changes which are hard to distinguish from some aspects of physical assault e.g. skin bruising can occur very easily due to blood vessels becoming fragile.

- A history of unexplained falls or minor injuries
- Bruising in well protected areas, or clustered from repeated striking
- Finger marks
- Burns of unusual location or type
- Injuries found at different states of healing
- Injury shape similar to an object
- Injuries to head/face/scalp
- History of GP or agency hopping, or reluctance to seek help
- Accounts which vary with time or are inconsistent with physical evidence
- Weight loss due to malnutrition, or rapid weight gain
- Ulcers, bed sores and being left in wet clothing
- Drowsiness due to too much medication, or lack of medication causing recurring crises/hospital admissions

#### **Sexual abuse signs**

- Disclosure or partial disclosure (use of phrases such as 'It's a secret')
- Medical problems, e.g. Genital infections, pregnancy, difficulty walking or sitting
- Disturbed behaviour e.g. depression, sudden withdrawal from activities,
- Loss of previous skills, sleeplessness or nightmares, self-injury,
- Showing fear or aggression to one particular person, repeated or excessive masturbation, inappropriately seductive behaviour,
- Loss of appetite or difficulty in keeping food down.
- Behaviour of others towards the vulnerable adult
- Circumstances – e.g. two service users found in a toilet area, one in a distressed state

#### **Psychological/emotional signs**

- Isolation
- Unkempt, unwashed, smell
- Over meticulous
- Inappropriately dressed
- Withdrawn, agitated, anxious or not wanting to be touched
- Change in appetite
- Insomnia, or need for excessive sleep
- Tearfulness
- Unexplained paranoia, or excessive fears
- Low self esteem
- Confusion

**Neglect signs**

- Poor physical condition
- Clothing in poor condition
- Inadequate diet
- Untreated injuries or medical problems
- Failure to be given prescribed medication
- Poor personal hygiene

**Financial or material signs**

- Unexplained or sudden inability to pay bills
- Unexplained or sudden withdrawal of money from accounts
- Disparity between assets and satisfactory living conditions
- Extraordinary interest by family members and other people in the vulnerable person's assets

**Discriminatory signs**

- Lack of respect shown to an individual
- Signs of substandard service offered to an individual
- Exclusion from rights afforded to others, such as health, education, criminal justice

**Other signs of abuse**

- Inappropriate use of restraints
- Sensory deprivation e.g. spectacles or hearing aid
- Denial of visitors or phone calls
- Failure to ensure privacy or personal dignity
- Lack of flexibility of choice e.g. bedtimes, choice of food
- Restricted access to toilet or bathing facilities
- Lack of personal clothing or possessions
- Controlling relationships between care staff and service users

## **Appendix 4**

### **Guidance on how to respond to a person disclosing abuse**

#### **DO**

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Listen
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your manager for support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

#### **DON'T**

- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the designated Vulnerable Adult Protection Officer.



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