WELLSPRING SETTLEMENT SAFEGUARDING ADULTS AT RISK OF HARM POLICY

Name of Policy	Safeguarding Adults at Risk of Harm
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DESIGNATED ADULTS SAFEGUARDING LEADS

Designated Adults Safeguarding Leads have been appointed as responsible for dealing with any concerns about the protection of adults identified as 'adults at risk of harm' abbreviated to 'adults at risk' (see *Who is an Adult at Risk* section on page 4) using Wellspring Settlement's services. The term 'adult at risk' has replaced 'vulnerable adult'. The term 'adult at risk' is detailed in the Care Act 2014.

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Aims

This policy outlines steps to take with adults registered as Wellspring Settlement service users who fit within the definition of an Adult at Risk (Definition 3.1) and where there is a concern of abuse (Definition 3.2). Working with adults who do not fall within the Adult at Risk definition 3.1 who present in crisis fall under the Wellspring Settlement Crisis Management Policy.

If you have a concern or you're in any doubt about the safety of an adult, please speak to your line manager. In the event that your line manager is not available please speak to another relevant manager, in the event that another manager is not available please speak to one of the Safeguarding Leads. This policy also works alongside the Bristol City Council Safeguarding Adults policy and procedures.

Joint Safeguarding Adults Policy (bristol.gov.uk)

Further information about reporting suspected abuse within Bristol can be found

https://www.bristol.gov.uk/social-care-health/report-suspected-abuse

Statement of Purpose

Wellspring Settlement is a multi-purpose organisation with charitable status operating over two sites: Barton Hill Settlement, Ducie Road and Wellspring Healthy Living Centre, Beam Street. It is community-led and has a vision of building a thriving, inclusive and socially connected community where people are able to choose and influence their future, where people are able to work together to deal with the issues that affect their lives, can achieve their full potential, have the best opportunities and resources to reach their goals in education, employment and family life, and are financially secure.

Wellspring Settlement (WS) recognises that all people regardless of age, disability, gender, race, religious beliefs, or sexual orientation have an equal right to protection from all types of harm or abuse and is committed to safeguarding the welfare of adults that we are working with. It also recognises that good safeguarding and child protection policies and procedures are of benefit to everyone involved with the Wellspring Settlement's work, including staff, volunteers and trustees, as this policy can help protect them from erroneous or malicious allegations.

All staff and volunteers working at the Wellspring Settlement are required to:

- Recognise and accept their responsibilities when working directly or indirectly with adults (someone age 18+).
- Familiarise themselves with this Safeguarding Adults At Risk Policy and the Crisis Management Policy and their responsibilities within it.
- Develop awareness and recognition of the signs and indicators of the issues which can cause harm and/or constitute abuse.

- Adults, whatever their age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation have the right to safeguarding from abuse.

- It is everyone's responsibility to report any concerns about abuse to their line manager and named designated Safeguarding Leads following the process set out in this policy.

Wellspring Settlement will endeavour to Safeguard Adults at Risk by:

- Ensuring that all managers, employees and volunteers have access to and are familiar with this Safeguarding Adults at Risk Policy and understand their role and responsibilities within it.

- Ensuring all staff and volunteers receive training in relation to safeguarding and crisis management and at a level commensurate with their role.

- Ensuring all staff and volunteers complete a DBS check and register to the update service where applicable to their role.

- Ensuring all incidents of alleged poor practice, misconduct and abuse are taken seriously and responded to swiftly and appropriately.

- Appropriately reporting concerns to the authorities and relevant organisations, and work with them and their procedures.

- Carefully following a procedure for recruitment and selection of staff and volunteers.

- All staff, volunteers, contractors and trustees, and anyone in paid or unpaid work on behalf of the Wellspring Settlement with access to children will be vetted through the Recruitment Policy and Procedures and will complete a DBS check where applicable.

- All staff will discuss safeguarding practices and identify training needs as part of their supervision and team meeting structures, and this will be recorded in supervision notes and meeting minutes.

- Providing effective management for staff and volunteers through support and training.

- Ensuring there are a minimum of two named designated people to promote safeguarding awareness and practice within the organisation.

- All personal data will be processed in accordance with the requirements of GDPR.

- Wellspring Settlement will safeguard adults by ensuring that our activities, services and operations are delivered in a way that keeps all adults safe.

- Wellspring Settlement is committed to creating a culture of zero-tolerance of harm to adults which necessitates: the recognition of adults who may be at risk and the circumstances which may increase risk; knowing how adult abuse, exploitation or neglect manifests itself; and being willing to report safeguarding concerns.

Policy Definitions

Who is an 'Adult at risk'

The Care Act 2014 states that adult safeguarding duties apply to an adult at risk identified as an individual aged 18 or over, who:

- has needs for care and support* (whether or not the local authority is meeting any of those needs) **and**
- is experiencing, or is at risk of, abuse or neglect, **and**
- because of their care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Care and support* is the mixture of practical, financial and emotional support for adults who need extra help to manage their lives and be independent - including older people, people with a disability or long-term illness, people with mental health problems, and carers. Care and support includes assessment of people's needs, provision of services and the allocation of funds to enable a person to purchase their own care and support. It could include care home, home care, personal assistants, day services, or the provision of aids and adaptations.

If you have a concern about an adult who does not fit within the above criteria but who may have been harmed or is at risk of harm please discuss with your line manager and refer to Wellspring Settlements Crisis Management Procedure.

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Person Centred Safeguarding and Mental Capacity

The presumption is that adults have mental capacity to make informed choices about their safety and how they live their lives. Mental capacity and a person's ability to give informed consent are at the heart of decisions and actions taken under this safeguarding policy.

We make many decisions every day, often without realising. UK Law assumes that all people over the age of 16 have the ability to make their own decisions unless it has been proved that they can't. It also gives us the right to make any decision that we need to make and gives us the right to make our own decisions even if others consider them to be unwise.

People must be assumed to have capacity to make their own decisions and be given all practicable help before anyone treats them as not being able to make their own decisions. None of us can make choices for another adult. If we are supporting someone to make choices about their own safety we need to understand 'what matters' to them and what outcomes they want to achieve from any actions taken to help them to protect themselves.

The concept of 'Person Centred Safeguarding'/'Making Safeguarding Personal' means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety. Wellspring Settlement strategic aims are about being person centred, asset based and inclusive and works to support adults to achieve the outcomes they want for themselves.

The Law says that to make a decision we need to:

- Understand relevant information.
- Remember it for long enough.
- Think about the information.
- Communicate our decision.

A person's ability to do this may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health. Most adults have the ability to make their own decisions given the right support. A lack of capacity cannot be established merely by reference to a person's age, appearance, condition or an aspect of behaviour. A small number of people cannot make any decisions. Being unable to make a decision is called "lacking mental capacity". Mental capacity refers to the ability to make a decision at the time that decision is needed. A person's mental capacity can change. If it is safe/possible it is acceptable to wait until they can be involved in decision making or to make the decision themselves

For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

It is important to make sure an 'adult at risk' has choices in the actions taken to safeguard them, however, in some situations the adult may not have the mental capacity to understand the choice or to tell you their views. The principles underlying when and how we can make decisions for people who are unable to make decisions for themselves are:

- We can only make decisions for other people if they cannot do that for themselves at the time the decision is needed.
- If the decision can wait, wait – e.g. to get help to help the person make their decision or until they can make it themselves.

- If we have to make a decision for someone else, then we must make the decision in their best interests (for their benefit) and take into account what we know about their preferences and wishes.
- If the action we are taking to keep people safe will restrict them then we must think of the way to do that which impacts their freedom and rights as little as possible.
- Where an adult is found to lack capacity to make a decision then any action taken, or any decision made for, or on their behalf, must be made in their best interests.

The Mental Capacity Act (MCA) 2005 is a legal framework which protects people who may lack capacity to make decisions for themselves. The act says that: "… a person lacks capacity in relation to a matter if at the material time (s)he is unable to make a decision for her/himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain."

For more information, please use the following links:

Welcome to the Keeping Bristol Safe Partnership website. (bristolsafeguarding.org)

Mental Capacity Act (bristol.gov.uk)

If you have a concern or you're in any doubt about the safety of an adult, are unclear if they fit the criteria for an Adult at Risk, or if they have the mental capacity to make their own decisions, please speak to your line manager.

What is "Abuse"?

Abuse is the violation of an individual's human and civil rights by any other person or persons. It may be something that is done to the person, or something not done when it should have been. It does not necessarily have to be intentional, abuse maybe perpetrated as a result of negligence, omission or ignorance - if the vulnerable person experiences it as abusive it is considered abuse.

There are different types and patterns of abuse and neglect and different circumstances in which they may take place. They include the following types of abuse:

- **Physical abuse** - which includes hitting, pushing, inappropriate use of medication, sanctions or restraint, involuntary isolation or confinement.

- **Domestic abuse** – including psychological, physical, sexual, financial, emotional abuse, 'honour' based violence.

- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- **Emotional/Psychological/Mental abuse -** is the persistent emotional ill treatment of a person such as to cause severe and persistent adverse effects on a person's emotional well being. It may involve conveying to adults at risks that they are

worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. This can include threats, intimidation, coercion, harassment, cyber bullying, failure to respect privacy.

- **Financial and material abuse**, which includes theft, and pressure in connection with wills or property, possessions or benefits.

- **Neglect and acts of omission**, which includes ignoring medical or physical needs, not providing access to appropriate health or social care, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

- **Discriminatory abuse**, which includes all forms of harassment, slurs or similar treatment based on a person's disability, ethnic origin, gender, age or sexuality (often called "hate crime").

- **Institutional/Organisational abuse**, which can include repeated instances of poor care, ill treatment of adults at risks, and unsatisfactory professional practice. This is often an indicator of more serious problems within a paid and/or regulated care environment.

- **Radicalisation as a form of abuse,** defined as causing someone to become an advocate of radical political or social reform by supporting terrorism and violent extremism. Unequal treatment based on protected characteristics, denying basic rights to health care, education etc.

- **Modern slavery**, including human trafficking, forced labour and domestic servitude, sexual exploitation and inhuman treatment.

- **Self-neglect**, including a range of behaviours, such as neglecting care for personal hygiene, health or surroundings and including such behaviours as hoarding. A safeguarding response in relation to self-neglect may be appropriate where:
    - a person is declining assistance in relation to their care and support needs, and
    - the impact of their decision, has or is likely to have a substantial impact on their overall individual wellbeing.

- Relevant and to be aware of are also Forced marriage, FGM, Cyber-bullying and Mate/hate crime.

This list is not exhaustive but gives an illustrative guide as to the sorts of behaviours that could give rise to a safeguarding concern.

Types and indicators of abuse: Safeguarding adults - SCIE

Awareness

As a Wellspring Settlement member of staff, trustee, service user, volunteer etc., you are not responsible for diagnosing abuse. However, you have a responsibility to be aware and alert to signs that all is not well with an adult and understand the policies and procedures in place to guide best practice. Not all concerns about an adult relate to abuse - there may well be other explanations. It is important to keep an open mind and consider what you know about the person and their circumstances. Wellspring Settlements ethos is the relationship between the worker and adult is key, with the wider staff team being available to support.

Abuse can happen in any setting - at home, in sheltered housing, in supported living settings, at day centres and other day services, in care homes, in hospitals, wherever people are dependent on the care of others for their wellbeing. Abuse happens to people in all sections of society.

The concept of 'well-being' is threaded throughout UK legislation and is part of the Law about how health and social care is provided. Our well-being includes our mental and physical health, our relationships, our connection with our communities and our contribution to society. Being able to live free from abuse and neglect is a key element of well-being.

Safeguarding

Safeguarding means being proactive by putting processes in place that minimise the risk of harm to adults at risk by ensuring that all staff, volunteers and trustees fully understand that they all have a duty of care to all service users accessing its services.

As part of Wellspring Settlement's Safeguarding process, it is policy that:

The organisation should know how to recognise and act upon indicators of abuse or potential abuse involving all Adults at Risk (Safeguarding Adults at Risk Policy) and where there are concerns about an Adult's welfare (Crisis Management Policy). There is an expected responsibility for all members of the organisation to respond to any suspected or actual abuse of all adults in accordance with these procedures.

Six Key Principles of Safeguarding Adults at Risk

The following six key principles must underpin all adult at risk safeguarding work:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent. *"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."*
- **Prevention** – It is better to take action before harm occurs. *"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*
- **Proportionality** – The least intrusive response appropriate to the risk presented. *"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."*

- **Protection** – Support and representation for those in greatest need. *"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. *"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."*
- **Accountability** – Accountability and transparency in delivering safeguarding. *"I understand the role of everyone involved in my life and so do they."*

It is vital that all staff within Wellspring Settlement recognise that adult at risk safeguarding arrangements are there to protect individuals. We all have different preferences, histories, circumstances and lifestyles, so it is unhelpful to prescribe a process that must be followed whenever a concern is raised. **If any member of staff or volunteer has reason to believe that abuse is or maybe taking place you have a responsibility to act on this information with your line manager**. It does not matter what your role is, doing nothing is not an option.

Recording & Information Sharing

Wellspring Settlement must comply with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR). Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse. Processing information includes record keeping.

Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know. Sharing information, with the right people, is central to good practice in safeguarding adults. However, information sharing must only ever be with those with a 'need to know'. This does NOT automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe.

The purpose of Data Protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation.
- Case management meetings can take place to agree to co-ordinate actions by the organisation.

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to

statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information for example making and Adult Safeguarding referral. When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

Please see:

Wellspring Settlement:

- GDPR & Privacy and Information Sharing Policy
- FOCUS Procedure

Training and Supervision

All staff and volunteers who have the potential to come into direct contact with an adult at risk must undertake training about safeguarding. This policy will be issued to all new staff as part of their induction.

HR, in consultation with the Safeguarding Leads, will ensure all staff and volunteers receive training in relation to safeguarding and adults at risk at a level commensurate with their role.

Space will be given in each supervision session for staff to discuss any concerns or issues that they may have with regards to adults at risk. Please refer to Wellspring Settlements Staff Supervision and Annual Appraisal Procedure.

Level	Regularity/Staff	Overview
1	Induction Staff Supervision All staff every 2 years **INTERNAL**	• Understand Wellspring Settlements Policies Safeguarding Adults at Risk & Crisis Management • Awareness of which adults at risk/factors increase the likelihood of being at risk from harm. • different categories of abuse/potential warning signs associated with each type. • Understand how to respond appropriately to a disclosure and know what to do next. • Know how to report concerns
2	Line Managers/Hub Managers/HR Staff Every 3 years **EXTERNAL**	• As above + • Safeguarding Adults Legislation • Capacity to Make Decisions & Consent • Responding to disclosures and safer recruitment/DBS Checks
3	Safeguarding Leads Every 5 years **EXTERNAL**	• As above + • Post-disclosure practice and record keeping • Which statutory bodies have responsibilities? Allegations about members of staff • Complaints and whistleblowing • Staff responsibilities • Policies and procedure

Safeguarding Adults at Risk Procedures

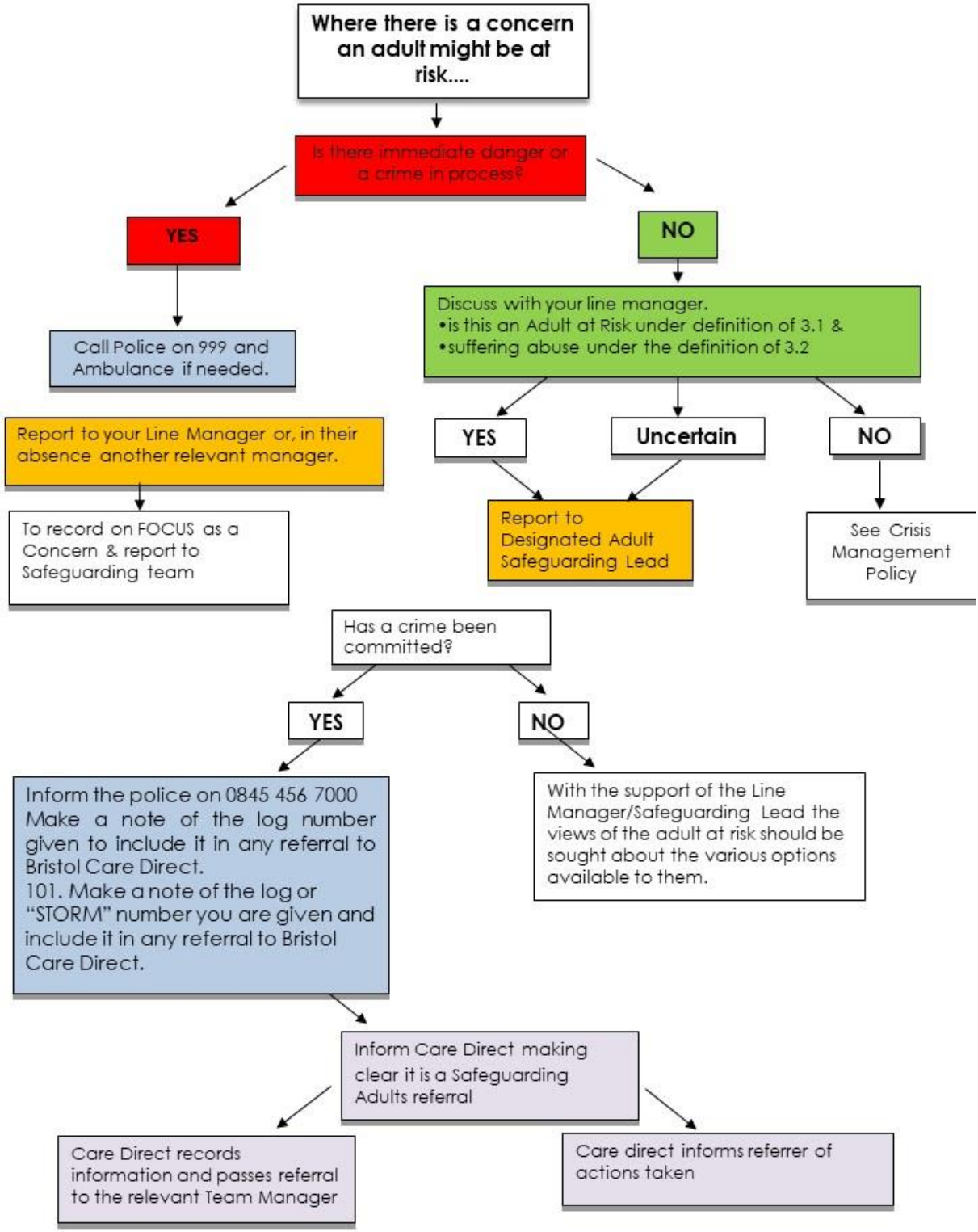
What to do if an adult discloses abuse or neglect

Hearing allegations of abuse and reporting your concerns is not always easy, you may feel you are betraying someone's trust. Whatever the source of the information it must be treated seriously, **it is your duty to report your concerns to your line manager**, and it may be considered a disciplinary matter not to do so. Wellspring Settlement will support you and ensure the relevant policies are in place to protect and support you in taking action e.g. whistle-blowing policies.

It is recognised that an adult at risk may seek you out to share information about abuse or neglect or talk spontaneously either individually or when in a group when you are present. In these situations, YOU MUST:

- LISTEN CAREFULLY, DO NOT directly question them.
- Give them time and attention.
- Allow them to give a spontaneous account; do not stop someone who is freely recalling significant events.
- Reassure them that: they have done the right thing in speaking out/telling you; reiterate they have not done anything wrong;
- Explain that you cannot promise not to speak to others about the information they have shared - do not offer false confidentiality.
- Tell them what you are going to do next and explain why.
- Make an accurate record of the information you have been given taking care to record the timing, setting and people present, the adults at risk's presentation as well as what was said.
- Do not throw this away as it may later be needed as evidence.
- Use the adults at risk's own words where possible.
- Follow the procedure as set out below:

Reporting Procedures: What to do if you suspect someone is being abused



If you consider an Adult to be at risk of immediate harm, then you should ring 999 for the Police.

What will happen when you raise a concern?

From the very first stage of concerns being identified, the views of the adult at risk should be sought. This will enable the adult to give their perspectives about the abuse or neglect concerns that have been raised, and what outcomes they would like to achieve. These views should directly inform what happens next. Involvement of adults in their own safeguarding has been prompted by a government lead initiative to improve the way that adults at risk are involved in their own safeguarding process engaging with people about how we might respond in safeguarding situations in a way that enhances their involvement, choice and control as well as improving their quality of life, wellbeing and safety; we must see people as experts in their own lives and work alongside them.

There will be occasions where speaking to the adult could put them at further or increased risk of harm. This could be, for example, due to retaliation, or a risk of fleeing or removal of the adult from the local area, or an increase in threatening or controlling behaviour if the person causing the risk of harm were to know that the adult had told someone about the abuse or neglect, or that someone else was aware of it. The safety of the adult and the potential for increasing the risk should always be considered when planning to speak to the person. Any situations where there is the potential for endangering safety or increasing risk should be assessed carefully and advice taken from your line manager and/or Safeguarding team.

If the adult with whom the concern is raised about is deemed to have the mental capacity to manage the situation you will be supported by your line manager to address the situation. Please refer to Wellspring Settlements Crisis Management Policy. This may mean identifying appropriate agencies to refer the individual to or working to engage with the individual around appropriate boundary keeping, assertion skills, clear communication guidelines and support. Your line manager will monitor the situation closely with you and request updates and give guidance and support. You will need to ensure timely and appropriate records are kept up to date on FOCUS. Either Designated Adult Safeguarding Leads can offer additional support, advice, and guidance.

If the adult with whom the concern is related to is an adult at risk (under definition of 3.1) and is suffering abuse (under the definition of 3.2) You will be supported and advised by your Line Manager and, if appropriate, by the Designated Adult Safeguarding Lead.

The adult must also be asked for their consent to report the concern. If consent is withheld but there are risks to others including children and other adults at risk, or the risk to the adult at risk is serious, **if you are worried about someone else's safety and need an emergency response, call the Police on 999**. If it isn't an emergency but a crime may have taken place, call the Police on 101. A referral to adult care should still be made and the adult at risk informed that this has been done. Adult Care aims to respond to concerns raised within two working days.

Reporting concerns to Care Direct

Designated Adult Safeguarding leads can refer safeguarding concerns via Care Direct.

Care Direct Contact Details -

Telephone:

0117 922 2700 8.30am – 5pm Mon - Fri

01454 615 165 Outside of working hours Emergency Duty Team

or via the website

Report suspected abuse (bristol.gov.uk)

Details of the referral should be stored on FOCUS in accordance with FOCUS Procedure.

When reporting concerns to Care Direct you will be expected to give relevant details of the person you seek to protect, alongside good, organised information when you report the allegation or suspicion of abuse. It is useful to know:

- The adults name and date of birth if known
- circumstances, where they live and with whom
- services they receive and from whom
- who is providing the information
- who was the person suspected or implicated in the abuse
- your concerns, and the reasons for those concerns

If you do not have all this information and the situation is urgent do not delay, report it first. If you are quoting someone else then be sure that you report this, it is important that the initial referral is clear, so try to recall what was said using the person's own words. Do sign and date the record. There should be no delay in reporting serious concerns. The information will be treated in the strictest confidence within the limits of the law, which requires that the police are informed where there is serious risk to life, or information about a serious crime is discovered.

What happens next?

A Safeguarding Adults referral will be given high priority. It indicates that there is a risk to an individual's physical, emotional, or mental well-being and is considered a critical or substantial risk to independence under Section 42 of the Care Act 2014 (known as a section 42 enquiry).

Bristol Health & Social Care (H&SC) have the duty to co-ordinate the interagency response to safeguarding adults' referrals and will consult with the Care Quality Commission (CQC), the Police, and other relevant agencies where this is appropriate.

If an investigation is indicated, they will convene a strategy discussion to decide the best way to investigate the allegation(s). Bristol senior practitioners as well as team managers coordinate Safeguarding enquiries ensuring that the allegation is dealt with properly.

What will happen if any allegation is made against you?

In the case of an allegation against a staff member, while support will be offered as a Wellspring Settlement member of staff, volunteer or Trustee, the terms of the Wellspring Settlements Disciplinary Procedures, Volunteers Policy or Users Code of Conduct will be adhered to and suspension and/or disciplinary procedures may be implemented.

Whistleblowing

Any member of staff who raises an issue where they believe the employer, a fellow employee or any volunteer is acting in a way which is unlawful or falls below proper standards or contrary to this policy are protected by the Public Disclosure Act 1998, provided they comply with statutory procedures.

Please see Wellspring Settlement:

- Protected Disclosure Policy (V4)

Other information

This policy will be reviewed and, where necessary, revised annually. Wellspring Settlement operates to a culture of continuous learning and improvement across the organisation and welcomes staff, volunteer and trustee feedback and learning from good practice on this policy.