


Headway Norfolk & Waveney Norfolk and Waveney:

Safeguarding Adults at Risk

HNW-JB-01 Version 0.5

Controlled document:

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Individual responsible for implementation	Jessica Blomfield, Director of Operations
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Target audience	Area Managers, Therapy Services Manager, Occupational Therapists, Senior Support Workers, Key Support Workers, Senior Leadership Team, All colleagues and volunteers

Policy revisions:

Page No.	Date Added/Amended	Reason for Amendment	Initials
11	11/05/2023	Guidelines to include that the Safeguarding interaction is completed on Nourish and then the Appendix A and Appendix B is password protected and placed in the care plan.	RD
1	17/01/2024	Amended to reflect individual responsible for implementation as Jessica Blomfield, not Rosie Dunthorpe as previous Director of Operations	JB
10	17/01/2024	Amended to reflect Director of Operations role as Jessica Blomfield, replacing Rosie Dunthorpe as previous Director of Operations	JB
11,12	17/01/2024	Amended to reflect Safeguarding officer as Jessica Blomfield, replacing Rosie Dunthorpe as previous Designated Safeguarding Officer	JB
Throughout	08-05-24	Major Policy Review requiring re issue to all staff	JB

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1. Introduction

This policy sets out the responsibilities of Headway Norfolk & Waveney to ensure adults at risk are kept safe from harm.

The Care Act 2014 introduced statutory safeguarding duties for Local Authorities and other organisations.

In Section 42 of the Act, it states that a local authority's safeguarding duties apply to an adult (i.e. someone aged 18 years or over) who:

- Has (or appears to have) 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;
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

The Care Act 2014 has a wide definition of care and support needs, and these may be because the individual has a brain injury, mental health problem, a physical or learning disability, a sensory impairment, is older and frail, or has some form of long term illness.

The rights of all adults to live a life free from neglect, exploitation and abuse are also protected by the Human Rights Act 1998. Specifically, an adult at risk's right to life is protected (under Article 2); their right to be protected from inhuman and degrading treatment (under Article 3); and their right to liberty and security (under Article 5). Headway Norfolk & Waveney is a signatory to Norfolk Safeguarding Adults Board's Safeguarding Policy.

2. Aims and Our Commitment to Safeguarding

Abuse is a violation of an individual's human and civil rights; it can take many forms. The Board of Trustees, Staff and Volunteers at Headway Norfolk & Waveney are committed to a practice which promotes the welfare of adults at risk and safeguards them from harm.

The purpose of this policy and the associated procedures is to protect and promote the welfare of adults at risk using or receiving services provided by the Organisation and support the Organisation, its employees, and volunteers in fulfilling their statutory responsibilities.

All employees and volunteers have a clear responsibility to take action when they suspect or recognise that an adult at risk may be at possible risk of or a victim of significant harm or abuse.

Staff and volunteers at Headway Norfolk & Waveney accept and recognise our responsibilities to develop awareness of the issues that cause adults at risk harm, and to establish and maintain a safe environment for them. We will not tolerate any form of abuse wherever it occurs or whoever is responsible.

We are committed to promoting an atmosphere of inclusion, transparency and openness and are open to feedback from the people who use our services, carers, advocates, our staff, and our volunteers with a view to how we may continuously improve our services / activities. We will endeavour to safeguard adults by:

- Adhering to our safeguarding policy and ensuring that it is supported by robust procedures.
- Carefully following the procedures laid down for the recruitment and selection of staff and volunteers.
- Providing effective management for staff and volunteers through supervision, support and training.
- Implementing clear procedures for raising awareness of and responding to abuse within the organisation and for reporting any concerns to statutory agencies, while involving adults at risk and their carers (if appropriate to do so).
- Ensuring general safety and risk management procedures are adhered to.
- Promoting full participation and having clear procedures for dealing with concerns and complaints.
- Managing personal information, confidentiality, and information sharing; and
- Safeguarding adults at risk by implementing a code of behaviour for all involved with the organisation, including visitors.
- Headway Norfolk & Waveney appoints staff and volunteers with great care to ensure, as far as possible, that we do not employ anyone with improper motives for caring and working with clients.

The Organisation believes safeguarding is committed to the following principles for adults at risk:

- Their welfare is paramount.
- Whatever their background and culture, parental or pregnancy status, age, disability, gender, racial origin, religious belief, sexual orientation and/or gender identity, they have the right to participate in society in an environment which is safe and free from violence, fear, abuse, bullying and discrimination.
- They have the right to be protected from harm, exploitation, abuse, and to be provided with safe environments to live and participate.
- Working in partnership with them, alongside their families or carers and other agencies, is essential to the promotion of their welfare.

We will review our policy, procedures, code of behaviour and practice at regular intervals, at least once every two years.

Headway Norfolk & Waveney strives to provide the best possible service and a high degree of security from danger for its clients. We recognise, however, that from time to time and for a variety of reasons, some failing from those high standards of service and security may occur and that serious failing may sometimes constitute abuse. Headway Norfolk & Waveney commits itself to tackling any such failing with due speed, adhering to legislation, government guidance and local procedures on safeguarding including sharing information. We will also ensure we follow appropriate Disciplinary Processes.

Abuse can occur either when clients are within the Headway Norfolk & Waveney Centre setting and when they are outside of such settings, either alone or escorted by staff, volunteers and/or others. Headway Norfolk & Waveney accepts a responsibility to try to protect its clients from abuse at all times when under Headway Norfolk & Waveney's care but recognises that it can be difficult to ensure clients' safety when they are away from the Headway Norfolk & Waveney Centre.

3. Categories of abuse

Headway Norfolk & Waveney recognises and seeks to prevent all forms of abuse including but not limited to:

- **Physical abuse:** which includes hitting, pushing, kicking, deliberate infliction of pain, rough, or inconsiderate handling, and the misuse of medication. Inappropriate restraint will also be seen as physical abuse and this can include tying to a chair, wheelchair or lavatory, locking into a confined space, holding longer than is necessary for safety, and the use of medication to keep a client quiet.
- **Sexual abuse:** which includes rape, sexual assault, any sexual act to which the client (if capable of doing so) did not give full informed consent, or is unable to give consent, unnecessary touching of private areas of the body, failure to provide privacy for personal activities such as toileting, and laughing at a client who is displaying themselves inappropriately. This may also include exposing to sexual material (on all forms of media) that the client has not given their consent to or is unable to give consent to.
- **Emotional abuse:** which includes using any form of intimidation, speaking rudely or without consideration for a client's feelings, talking disrespectfully about a client, threatening, ridiculing, deprivation of contact or isolation, shouting, talking in a way deliberately not to be heard or understood, and ignoring a client.
- **Financial, property or material abuse:** which includes theft, fraud, misuse or misappropriation of client's property, possessions or benefits, and exerting pressure by coercion or persuasion in connection with gifts, inheritance, or financial transactions.
- **Neglect:** which includes not giving adequate and appropriate food and drink, failure to provide timely help with physical and personal care needs, denying access to health promotion advice, ignoring medication requirements, ignoring a client's social needs, and not taking action to accommodate a client's disability.
- **Discriminatory abuse:** which includes using insulting descriptions, making unfavourable remarks or jokes about a client's race, ethnic or national origins, marital status, religion or belief, sex, sexual orientation, cultural background, disability or appearance, using unwelcome nick names, failing to provide facilities for a service user to practice their religion, and a lack of respect for deeply held or spiritual beliefs.
- **Organisational** - repeated poor practice throughout an organisation, inflexible services based on the needs of the staff/managers rather than the needs of the individuals they are supporting.
- **Modern slavery** – Which includes people being exploited for personal gain such as, domestic servitude, forced labour, criminal activities, and sexual exploitation. It also includes **Human trafficking** – which includes men, women and children being moved from one place to another for the purpose of exploitation. No border needs to be crossed and it can happen nationally or within one community.

- **Domestic abuse** – includes any incident or pattern of incidents of controlling, coercive or 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.
- **Self-Neglect** - The term “self-neglect” covers a wide range of behaviour neglecting to care for one’s personal hygiene, health, or surroundings. Examples of self-neglect include:
 - A refusal or inability to cater for basic needs, including personal hygiene and appropriate clothing.
 - Neglecting to seek assistance for medical issues.
 - Not attending to living conditions – letting rubbish accumulate in the garden, or dirt to accumulate in the house.
 - Hoarding items or animals.

Although not specifically defined in the Care Act 2014, it is also important to be aware of the following

- **Radicalisation** - is a psychological process where at risk and/or susceptible individuals are groomed to engage into extreme political, criminal and or terrorist activity. PREVENT is the government initiative that works to stop individuals from getting involved or limit ongoing involvement with such extremism.
- **Use of social media in an abusive way** - abuse can also occur through social media and this is often harder to detect. It is important to remember that the type of abuse that can occur through social media does not always include emotional and psychological abuse and can include attempts at radicalisation, modern slavery sexual and financial abuse. Social media includes (but is not limited to): networking sites such as Facebook, Twitter, TikTok and LinkedIn, email, text messages, Skype and instant messaging services.

This list is not exhaustive and there could be other forms of abuse which staff may become aware of.

4. External signs of Abuse

Physical Abuse:

Signs may include the individual:

- Showing obvious physical signs of abuse – bruising, cuts, abrasions, restricted movement and wincing in pain.
- Covering up: Long sleeves, long trousers, polo necks, long skirts, scarves, sunglasses, heavy make-up.
- Giving excuses like: ‘walked into a door’, ‘tripped over’.
- Flinching: Avoidance of contact (physical) with others.
- Acting withdrawn: Mood swings – could be time related i.e. pub closing time, when abuser finishes work, or is due to visit.
- Having very low self-esteem, may believe they’ve ‘asked for it’.

Emotional Abuse:

Signs may include the individual:

- Acting withdrawn.
- Being anxious/stressed.
- Having mood swings – highs and lows/manic behaviour.
- Exhibiting erratic behaviour.
- Having no self-confidence/self-doubt.
- Exhibiting an unwillingness to engage.
- Covering up – making excuses/tall stories.
- Exhibiting signs of depression.
- Exhibiting signs of self-harm.
- Unable to function properly in day-to-day life i.e. participating in activities, routines, daily structure.
- Looking to abuser for praise/approval.

Neglect:

Signs may include the individual:

- Having an unkempt appearance/not clean.
- Being hungry on numerous occasions.
- Being very quiet/withdrawn.
- Having poor surroundings.
- Having low self-esteem.
- Changing behaviour when carer, or certain other people are present.
- Concerns that the person is not receiving medication when someone is reliant on others to provide this support.

Discriminatory Abuse:

- Name calling.
- Favouritism.
- Discrimination based on an individual's religious beliefs.
- Sexual abuse
- Age discrimination
- Racial discrimination
- Illness or disability discrimination
- Discrimination based on an individual's gender

Financial Abuse:

- Stealing money (carer, family member – their lifestyle improves for the better)

- Red Letters – bills not paid
- No food in cupboards and poor appearance
- Lack of basic facilities
- May occur when the individual has no understanding of their own money
- Misuse of Power of Attorney

Sexual Abuse:

An individual may:

- Become withdrawn
- Not want physical contact
- Be uncomfortable being near to people
- Use inappropriate behaviour towards others
- Become pregnant
- Contract a sexually transmitted infection
- Change his/her behaviour when certain people are present

Organisational Abuse:

Examples include:

- Where there are policies or practices which are introduced that take away people's rights (e.g. refusing toilet requests)
- Inadequate facilities – e.g. toilets being inaccessible
- Unacceptable behaviour –e.g. clients left unattended, welfare ignored
- Internal cultures – employer bullying, taking jokes too far
- Double funding – charity grant and then make extra claims
- Separation of spouses when they can reasonably be kept together
- Not booking interpreters when appropriate
- Correct processes not being adhered to, e.g. moving and handling

Human Trafficking and Modern Slavery

Examples include:

- Appearing malnourished
- Showing signs of physical injuries and abuse
- Seeming to adhere to scripted or rehearsed responses in social interaction
- Lacking official identification documents
- Appearing destitute/lacking personal possessions
- Working excessively long hours
- Living at place of employment

- Checking into hotels/motels with older males, and referring to those males as boyfriend or “daddy,” which is often street slang for pimp
- Poor physical or mental health
- Tattoos/ branding on the neck and/or lower back
- Untreated sexually transmitted diseases
- Small children serving in a family restaurant
- Security measures that appear to keep people inside an establishment - barbed wire inside of a fence, bars covering the insides of windows
- Not allowing people to go into public alone, or speak for themselves

Radicalisation

Signs include:

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use.

This list is by no means exhaustive.

5. General principles

Headway Norfolk & Waveney appoints staff and volunteers with great care to ensure as far as possible, that we do not employ anyone with improper motives for caring and working with clients.

Headway Norfolk & Waveney selects staff and volunteers fairly but rigorously, requiring two references and a satisfactory ‘Disclosure and Barring Service’ check.

Our induction and training include material intended to alert staff to the possibility of abuse by themselves or others and to support them to work in anti-abusive / oppressive ways at all times.

Our complaints procedure, which is contained within Headway Norfolk & Waveney’s ‘Comments, compliments and complaints Policy and Procedure’ and Disciplinary Policy is designed to make it easy for clients, relatives, advocates and others to bring to the attention of management any feelings of concerns or unease they have about the treatment of clients, to investigate all criticisms or suggestions for changes in practice speedily, thoroughly, and to take appropriate corrective and disciplinary action.

We will welcome the involvement of the use of an advocate in cases where a client feels the need for such support in putting their concerns regarding possible abuse across. We also support the involvement of any relevant authority responsible for safeguarding to investigate any alleged abuse perpetrated by a member of staff or volunteer if it was felt that this would be more appropriate than an internal investigation.

Headway Norfolk & Waveney hopes to maintain an atmosphere of openness in its centres and within the service generally, which enables anyone to express concerns and for them to be taken and investigated seriously. We intend in this way to identify and deal with any possible abuse or shortfall from our standard of excellence at an early stage.

We aim to encourage staff and volunteers to observe and bring to the attention of management anything in the running of the service or the conduct of colleagues, which causes them concern.

We regard this sort of mutual criticism not as disloyalty or malicious whistle blowing but as a healthy defence against poor practice and against any potential abuse. Management undertakes to take such criticism seriously, to investigate all the points made and to protect staff and volunteers who speak out in this way.

If, however, a malicious allegation is made by an employee, which is found later to be untrue and deliberately misleading, disciplinary action against the informant might ensue.

It is important that staff and volunteers explain clearly to clients that if they divulge any information that relates to alleged abuse that the staff and or volunteer has a duty to report this to their senior manager, as there may be other issues relating to this client or situation that are known to other agencies or there may be others at risk. It is important to make it clear that in these circumstances, confidentiality or keeping secrets must be overridden when allegations of abuse/ safeguarding concerns are raised.

We will work in full cooperation with Norfolk Social Care and Norfolk Constabulary. Where we are uncertain if the issue is a safeguarding situation or not, we will always exercise caution and raise a referral to Norfolk Social Care for them to consider the situation and advise us on appropriate action.

6. Staff Responsibilities

Area Manager for Great Yarmouth and Waveney: Alva Bunce

Area Manager for Norwich, North Norfolk, and South Norfolk: Ellen Robinson

Area Manager for King's Lynn and Breckland: Gaynor Doy

Therapy Services Manager: Amanda Barmby

Director of Operations: Jessica Blomfield

CEO: Michael Kitching

6.1 CEO

- To ensure that this policy and related procedures are implemented, monitored, and consistently reviewed.

- To ensure that reports or concerns about the protection of adults at risk are dealt with appropriately and in accordance with the procedures that underpin this policy.
- To ensure that all staff, volunteers, and service users have access to this policy and therefore know what to do in the event of a breach of this policy.
- To ensure that safeguards are in place to protect the interests of the clients.
- To ensure that the Norfolk Social Care is informed if there are any concerns about a member of staff/volunteer regarding adults at risk.

6.2 Director of Operations / Area Managers / Therapy Services Manager/ Occupational Therapists

- To ensure that all staff, volunteers, and service users have access to this policy and therefore know what to do in the event of a breach of this policy.
- To ensure that safeguards are in place to protect the interests of the clients.
- To ensure that the Norfolk Social Care is informed if there are any concerns about a member of staff/volunteer regarding adults at risk.
- To ensure that should any member of staff / volunteer be dismissed for the abuse of a client that notification is made to the Disclosure and Barring Service and / or if professionally registered to their professional body. If the member of staff resigns and a disciplinary process is not completed this will also need to be considered.

6.2 All staff / volunteers

- To read, be aware of and understand the contents of and adhere to this policy at all times. All staff will be required to sign to say they have read the policy.
- To attend and complete available training.
- Carry out their duties in a way that actively safeguards and promotes the welfare of adults at risk. They must also act in a way that protects them from wrongful allegations of abuse as far as possible. They must bring any safeguarding concerns promptly to the attention of a manager or Director.

A failure to comply with this policy may be deemed as a disciplinary matter.

7. Audit Plan

Designated Safeguarding Officers/ Director of Operations /Area Managers / OT team / CEO – will:

- Monitor adherence of the policy and report findings to the Board of Directors.
- Report any concerns as required under the Disclosure and Barring Service.
- Review this policy and ensure that it is updated as required from time to time.

8. Scope of Policy

This policy applies within all Headway Norfolk & Waveney services and to all members of staff and/or volunteers.

While employees, volunteers and contracted services providers are likely to have varied levels of contact with adults at risk as part of their duties and responsibilities, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns. Responsibilities are limited and it is important to remember the following:

IT IS NOT THE RESPONSIBILITY OF ANY EMPLOYEE, VOLUNTEER OR CONTRACTED SERVICE PROVIDER TO DETERMINE WHETHER ABUSE IS ACTUALLY TAKING PLACE OR TO UNDERTAKE ANY FURTHER INVESTIGATION

HOWEVER:

IT IS THE RESPONSIBILITY OF ANY EMPLOYEE, VOLUNTEER OR CONTRACTED SERVICE PROVIDER TO TAKE THE ACTIONS SET OUT IN THE PROCEDURE, IF THEY ARE CONCERNED ABUSE IS TAKING PLACE

Designated Safeguarding Officers:

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Danielle Boggis
Senior Occupational Therapist
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9. Guidelines for dealing with concerns about suspected abuse, abuse reported to Headway Norfolk & Waveney staff, or where abuse might be happening outside the service.

Headway Norfolk & Waveney has a duty to ensure that our clients are protected, and we need to ensure that we respond in the best interest of our clients. Such action will be taken as outlined in the Headway Norfolk & Waveney Recording, Reporting Concerns, Disclosures and Allegations or Suspicions of Abuse Procedure.

Staff who suspect abuse should be aware of the need to collect and report information given, but they are not investigating officers. This must be left to the staff of Norfolk Social Care who are trained in this work. If abuse is suspected, detailed evidence can only be obtained by investigating officers, e.g., police, otherwise evidence and reports can be contaminated and affect any further action being taken or indeed legal proceedings.

All staff are to familiarize and refer to the following aspects of Headway Norfolk & Waveney's Safeguarding Policy for reference:

- Recording, Reporting Concerns, Disclosures and Allegations or Suspicions of Abuse Procedure

Depending on the circumstance, reporting safeguarding concerns might or might not be made with the involvement / agreement and / or consent of the client. Guidance should be sought from the Line Manager and Designated Safeguarding Officer. Staff should ensure that all concerns are dealt with sensitively and in the strictest confidence.

Where it is believed that a client may lack capacity to make decisions in relation to safeguarding themselves, action should be taken in the best interests of the client and advice sought from Norfolk Social Care. A general rule is that all adults are assumed to have capacity to make decisions unless an assessment has indicated to the contrary.

Staff should be aware it might not always be appropriate to take minor concerns forward formally and therefore all suspected concerns of abuse (even if they are considered minor) should be reported to their Line Manager, Designated Safeguarding Officer or member of the Senior Leadership Team. It is the responsibility of the Manager or another senior person to decide the course of action to be taken.

All relevant documentation i.e. personal files and a Headway Norfolk & Waveney 'Incidents and Accidents – People We Support' interaction on Nourish should be completed. Confidentiality should be respected at all times and information should only be shared with those 'on a need to know' basis.

The severity of the suspected abuse may require the matter to be referred to appropriate agencies e.g. care/ case manager, social care, or the police.

10. Guidelines for dealing with concerns about allegations of abuse concerning Headway Norfolk & Waveney staff, or Volunteers

Managing Allegations

- **Our Safeguarding officers are Jessica Blomfield, Amanda Barmby and Danielle Boggis**

When allegations or concerns are expressed about an employee or volunteer:

- Take the allegation or concern seriously.
- Immediately inform the Safeguarding Officers.
- If the Safeguarding Officers feel a safeguarding referral is appropriate- CEO to be informed.
- A Senior lead at the earliest opportunity, provides a report of the incident, the intended action and investigates the allegations.
- If the Senior lead believes an adult is 'at risk' of immediate significant harm, which includes situations which they would reasonably believe requires the emergency services, then they will contact the relevant emergency services.

- Managers / Senior person should ensure that all reports are written promptly by any person (s) who has witnessed or have direct knowledge of the incident/ event e.g. to whom a report has been made by a client. If writing reports based on information provided by a client, it is important to use their exact words and the circumstances of their disclosure.
- It is a requirement to contact Norfolk Social Care if there are any concerns about any member of staff/volunteer working with adults at risk and therefore you must speak to your manager or senior person if you have any concerns about any member of staff/volunteer, who will decide on the appropriate course of action to take.

This procedure will be used when allegations, from whatever source, are made that the person has:

- Behaved in a way that has harmed or may have harmed a child, young person, or adult at risk.
- Possibly committed a criminal offence against or related to a child, young person, or adult at risk.
- Behaved towards a child, young person, or adult at risk in a way that indicates he or she will pose a risk of harm if they work regularly or closely with children, young persons, or adults at risk.

In addition, these procedures will be used:

- If there are concerns about the person's behaviour towards their own children, or children unrelated to their employment or voluntary work, and there has been a recommendation from a strategy discussion that consideration should be given to the risk posed to children, young persons, or adult at risk they work with.
- When an allegation is made about abuse that took place some time ago and the accused person may still be working or having contact with children, young persons, or adults at risk.

Appendix A: Recording, Reporting Concerns, Disclosures and Allegations or Suspicions of abuse procedure

