



## **Safeguarding Adults Policy**

<b>CONTENTS</b>		<b>Page</b>
<b>1.</b>	<b>Purpose</b>	<b>2</b>
<b>2.</b>	<b>Principles</b>	<b>3</b>
<b>3.</b>	<b>Review</b>	<b>3</b>
<b>4.</b>	<b>Responsibilities</b>	<b>3</b>
<b>5.</b>	<b>Scope</b>	<b>4</b>
<b>6.</b>	<b>Policy Statement</b>	<b>4</b>
<b>7.</b>	<b>Consultation</b>	<b>7</b>
<b>8.</b>	<b>Equality Impact Assessment (EIA)</b>	<b>8</b>
 <b><u>Appendices</u></b>		
<b>1</b>	<b>Safeguarding reporting and recording Procedures</b>	<b>11</b>
<b>2</b>	<b>More information</b>	<b>13</b>
<b>3</b>	<b>Signs of adult abuse</b>	<b>14</b>

## 1. PURPOSE

This policy statement explains the key principles that the Company will apply when dealing with suspected abuse of adults at risk of abuse, and provides an overview of, and guidance on, the relevant statutory processes.

At North Devon Homes we are committed to working with a wide range of “at risk” service users, and throughout our services, staff could, from time to time, become aware of or suspect situations where abuse of a person at risk may be taking place. We will not knowingly ignore or allow such incidents to continue unchallenged and will require our staff to take action in all cases where it is suspected that abuse of a person at risk is occurring, no matter whom the perpetrator is or who the victim is. We will respect and support anyone who whistle-blowers because they think someone is being abused and have a Whistleblowing Policy to support this.

The purpose of this policy is to protect those adults who are subject to or at the risk of abuse and neglect, who are:

- aged 18 years or over
- and who may be at risk and already be in receipt of or need of community care services by reason of mental or other disabilities, age or illness
- and who may be unable to take care of themselves or unable to safeguard themselves against significant harm or exploitation.

Client groups could include:

- People with Learning disabilities
- People with Mental health problems
- Older and Frail
- People with physical disabilities
- People with visual and sensory impairment
- People who rely on others for care and/or support.

This can also include people who are at risk themselves as a consequence of their role as a carer for such a person. They may need additional support to protect themselves, for example, in situations such as domestic violence, physical frailty or chronic illness, sensory impairment, challenging behaviour, drugs or alcohol problems.

We have developed this Safeguarding Adults policy using guidance from the department of Health publication ‘No Secrets’ (2000) and Care and Support Statutory Guidance issued under the Care Act 2014.

We have a separate Safeguarding and Child Protection Policy.

For the purposes of this policy, Adults are considered to be anyone 18 years old, or above. Some adults may still have access to services provided by children's services (particularly care leavers). If there is any doubt as to the status of a person at risk, then clarification should be sought from Social Services.

## **2. PRINCIPLES**

The following principles will apply to this policy:

- It will be open, fair and transparent
- It will be reviewed annually.

## **3. REVIEW**

We will review this policy annually to ensure that it continues to operate within best practice, achieve measurable results, and achieve continuous service improvement.

We will monitor this policy and our working arrangements with other agencies/departments through an annual report to the Board to ensure this policy remains effective in highlighting any disincentives to reporting abuse.

Alternatively, the policy and all associated procedures will be reviewed immediately following any relevant change to government policy, regulation or legislation, or in the event of a serious case review.

## **4. RESPONSIBILITIES**

The Executive Team will approve this policy and delegate responsibility to the Head of Customer and Housing Services for ensuring that this policy is communicated and implemented.

The Head of Customer and Housing Services will provide training for staff to ensure that they fully understand the wider issues surrounding this policy and the procedure.

The Head of Customer and Housing Services will be responsible for ensuring that policy reviews are undertaken, that appropriate consultation takes place and that revisions are reported to the executive team for approval.

An annual report to the Board will address:

- Number of Safeguarding Adult referrals

- Review of Safeguarding - including monitoring implementation, interagency response, training record and review of policy and procedure
- Evaluation of investigated cases and alerts and lesson learnt.

## 5. SCOPE

This policy applies to the NDH Group and must be adhered to by all employees, Board Members, involved customers, contractors (whether working in NDH offices or its homes), consultants and any other person working for or on behalf of NDH.

## 6. POLICY STATEMENT

### 6.1 The Care Act 2014

We will have regard for the Six Key Principles of **The Care Act 2014** in all adult safeguarding work:

The Care Act 2014 sets out the following key principles that will underpin our adult safeguarding work.

*Empowerment* – Personalisation and the presumption of person-led decisions and informed consent.

*Prevention* – It is better to take action before harm occurs.

*Proportionality* – Proportionate and least intrusive response appropriate to the risk presented.

*Protection* – Support and representation for those in greatest need.

*Partnership* – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

*Accountability* – Accountability and transparency in delivering safeguarding.

As part of this we will recognise our duty to co-operate with local authorities implementing their statutory duties around adult safeguarding. This will include carrying out 'enquiries' into incidents, information sharing where appropriate, participating in the statutory local Safeguarding Adults Board where possible. Making staff familiar with the principles of safeguarding, and training staff to be vigilant, recognise signs of abuse and know what to do if they see those signs.

### 6.2 Definition of Abuse

We will train staff to be vigilant and support staff to recognise the signs of abuse.

Abuse is a violation of an individual's human and civil rights by another person or persons which may result in significant harm to, or the exploitation of the person subjected to it. (See Appendix 3)

### **6.3 Capacity and Consent**

We recognise that capacity and consent are central themes in safeguarding adult work and that every adult has the right to make their own decisions, a person will be assumed to have capacity to do so unless it is proved that they do not.

#### Mental Capacity

A referral will be made to the local Social Care Team where there are concerns that a person being abused lacks mental capacity so a Mental Capacity Assessment can be made; the person will be informed of this referral.

#### Best interests

- Everything that is done for or on behalf of a person who lacks capacity must be in that person's best interests.
- The Mental Capacity Act 2005 provides a checklist of factors that decision-makers must work through in deciding what is in a person's best interests.

For further guidance please refer to The Mental Capacity Act 2005.

### **6.4 Confidentiality**

Our staff will respect confidentiality at all times and will not share any information given in confidence unless justified by the assessed risk to the person or required by law.

Confidentiality will be discussed with the customer where there are safeguarding concerns or alerts and an explanation will be given that this information may need to be shared with other people in order for the situation to be resolved.

### **6.5 Whistleblowing**

As a provider of services to adults at risk we will maintain our whistleblowing policy and make staff aware of this through our safeguarding training.

### **6.6 Additional Responsibilities**

We will consider and wherever possible follow the Local Authority Safeguarding Policy, Procedure and Practice Guidance.

We not only have a responsibility to all adults who have been abused or who are at risk of abuse, but also recognise responsibilities in relation to some perpetrators of abuse.

We have a responsibility to keep confidential and secure records of all safeguarding issues, with access limited to the safeguarding leads and nominees.

## **6.7 Service Standards**

We will meet our obligations through designing and managing appropriate services. We will follow a process of Plan, Do, Check, Act to ensure that the services remain fit for purpose.

### Service standards

We will:

- appoint a “Safeguarding Lead”, with appropriate knowledge, experience and skills, to provide help and advice to staff and to act as lead on safeguarding issues
- ensure that staff, NDH Board members and volunteers are aware of the Safeguarding policy and procedure
- ensure that NDH contractors are aware of the NDH Safeguarding policy and procedures (including how to raise concerns) through the contractor Code of Conduct
- ensure that staff and NDH Board members are appropriately trained, including induction training for new members of staff
- ensure that staff understand their roles and responsibilities and required actions
- DBS check employees that have access to or work with adults at risk or children
- ensure that staff and customers have access to information through in house publications and other media, and awareness raising initiatives
- conduct regular reviews of the Safeguarding policy/ procedures and log.

### Performance measures

We will measure:

- Number of Safeguarding Adult referrals
- Annual review of Safeguarding - including monitoring implementation, interagency response, training record and review of policy and procedure
- Evaluation of investigated cases and alerts and lessons learned.

Case Types captured and measured are:

- Safeguarding Adults
- Safeguarding Children
- Child in Need
- Child Protection
- Domestic Abuse
- Early Help
- Vulnerable Adult
- Vulnerable Child.

## **6.8 Safeguarding Leads**

The overall Safeguarding Lead for North Devon Homes is the Director of Neighbourhoods. To contact them, call 01271 312500 or email [marc.rostock@ndh-ltd.co.uk](mailto:marc.rostock@ndh-ltd.co.uk)

The Safeguarding Adults Lead for North Devon Homes is the Community Services Manager. To contact them, call 01271 313351 or email [jennifer.westacott@ndh-ltd.co.uk](mailto:jennifer.westacott@ndh-ltd.co.uk).

The Safeguarding and Child Protection Lead for North Devon Homes is the Head of Customer and Housing Services. To contact them, call 01271 312507 or email [lindsey.eastman@ndh-ltd.co.uk](mailto:lindsey.eastman@ndh-ltd.co.uk)

#### Contacts and Reporting

Devon Safeguarding Adults Team

<https://new.devon.gov.uk/devonsafeguardingadultsboard/>

### **6.9 Devon County Council statement**

*Taken from the Devon County Council website:*

If you see, hear or suspect that an adult may be at risk of abuse or neglect, you must tell someone about it. If they are in immediate danger contact the police on 999. Otherwise contact Care Direct on freephone 0345 155 1007 or email [csc.caredirect@devon.gov.uk](mailto:csc.caredirect@devon.gov.uk)

Care Direct is open to take calls between 8.00am and 8.00pm Monday to Friday and from 9.00am to 1.00pm on Saturdays. Outside these hours and on Sundays and Bank Holidays, in emergency only, please contact DCC Emergency Duty Service on 0845 6000 388 (low-call rate).

## **7. Consultation**

The following have been consulted in developing the policy:

<b>Date</b>	<b>Consultation methodology</b>	<b>Challenge / impact / result</b>
17/12/2015	Review	
June 2023	Review by CS Manager	
July 2024	Review by CS Manager	Updates to Appendix 2



## 8. Equality Impact Assessment (EIA)

### Section 1: Contact details

Please complete your details and contact information in the spaces provided:

EIA Author:	
Job title:	Community Services Manager
Department:	Customer and Housing Services
	16/07/2024

### Section 2: About the policy

Please describe what you are impact assessing and who it applies to:

Title:	Safeguarding Adults Policy		
Aims / description / purpose:	The purpose of this policy is to provide a framework for ensuring a standard approach is taken to safeguarding concerns whilst clearly adhering to legislations and local authority guidance.		
People it applies to:	<input checked="" type="checkbox"/> Staff	<input checked="" type="checkbox"/> Customers	<input checked="" type="checkbox"/> Contractors

### Section 3: Gathering data and evidence

Have you identified relevant evidence (qualitative and quantitative) to establish whether this policy could potentially affect some equality groups more than others?

Have you analysed equality data for each of the groups identified in Section 2?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have you identified / researched anecdotal or alternative evidence?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have you attached the evidence to this impact assessment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

### Section 4: Assessing the impact

Based on your evidence, which equality groups might this policy affect more or less than others (if any)?

Age	<input checked="" type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Caring responsibilities	<input checked="" type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	Fuel and food poverty	<input checked="" type="checkbox"/>
Marriage and civil partnership	<input type="checkbox"/>	Young People who may be vulnerable	<input checked="" type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Single parents	<input checked="" type="checkbox"/>

Race	<input type="checkbox"/>	Drug and alcohol dependency	X
Religion and belief (including no belief)	<input type="checkbox"/>	Homelessness	<input type="checkbox"/>
Gender / sex equality	<input type="checkbox"/>	Rural Isolation	X

Using examples from the evidence you have collected, please describe the impact (positive, negative or neutral) on the equality groups you have identified above and highlight any different needs required for this protected characteristic.

**Note:** if you are reviewing a policy/ guidance please reflect on the scope, language used and its application - does it fully promote equality and inclusion?

**Section 5: Addressing any impact: action planning**

Please describe any actions or mitigation required as a result of this assessment – include the timescale for each and who is responsible:

Action / Mitigation	Timescale	Responsibility

**Section 6: Involvement and Consultation**

What involvement / consultation activity has been undertaken or is planned in relation to this policy?

Involvement / consultation activity	Results / Feedback
Community Services Manager	No Changes

**Section 7: Approval and Publishing**

Signature of EIA author:

Date:

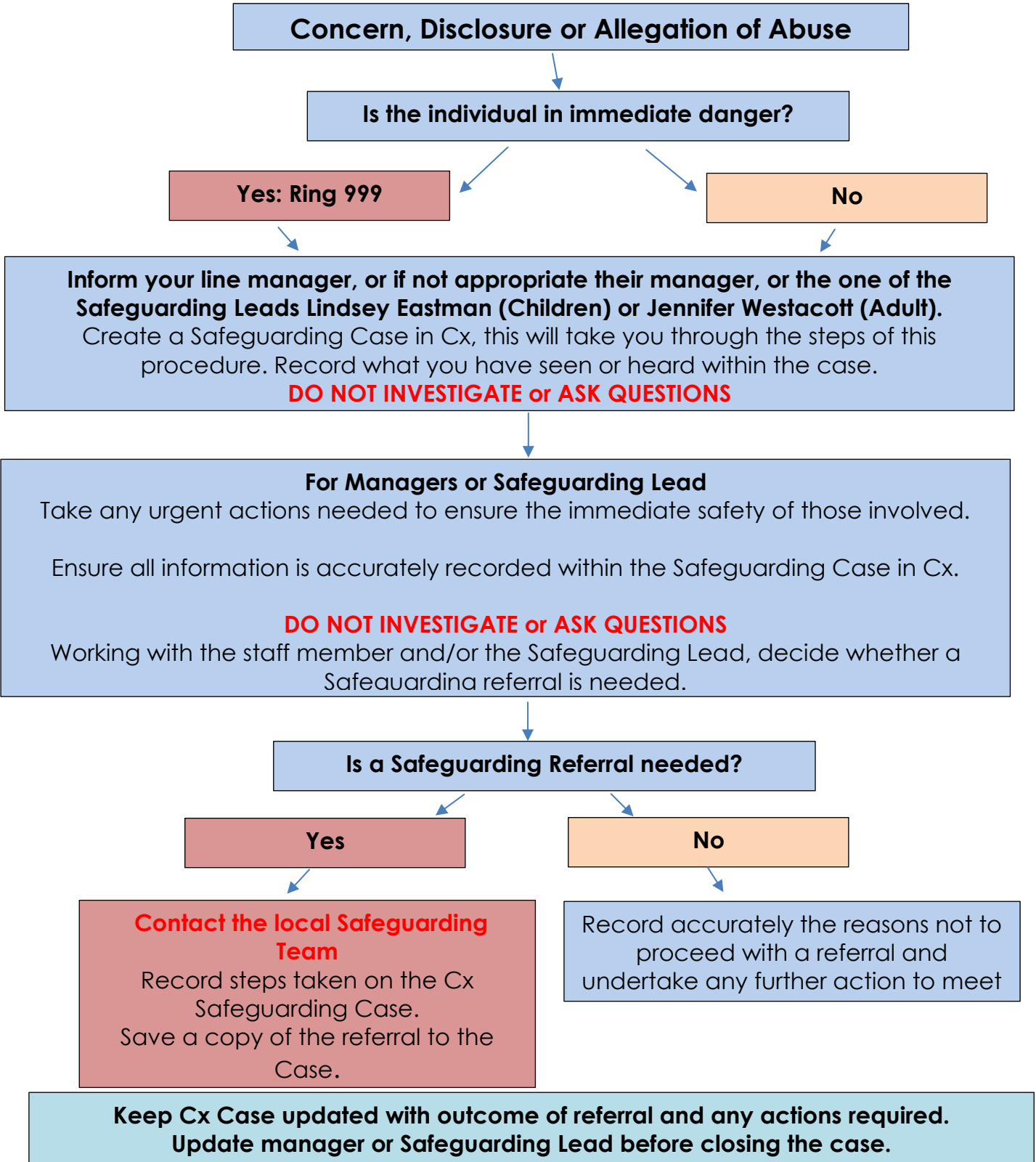
<b>Next Review Date:</b> Annual Next review date: July 2025	<b>Responsible Officer</b> Community Services Manager
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	<b>Related Documents</b>
01271 312500	Appendix 1 – Flow Chart Appendix 2 – Information Sharing Appendix 3 – Forms of Abuse Appendix 4 – Principles of Safeguarding

## Appendix 1

### Overview of NDH Safeguarding Reporting and Recording Procedure

To be read in conjunction with the NDH Safeguarding Adults and Safeguarding Children Policies and procedures. These steps are for anyone who has cause for concern that an individual is at risk of abuse, neglect or exploitation.



If the allegation / suspicion of abuse is against a member of staff, inform your line manager.

If they are implicated, inform their line manager, the Senior Manager, Safeguarding Lead, or the Head of Service or Director as appropriate who will decide on immediate action and make a referral to the Local Authority as required.

Useful Links:

Cx Procedures

<S:\01 Digital Together Cx Procedures\Cases and Tasks>

Online Safeguarding Referral Form

[New Safeguarding Adult Concern Referral Form - Provider Engagement Network \(devon.gov.uk\)](New Safeguarding Adult Concern Referral Form - Provider Engagement Network (devon.gov.uk))

Safeguarding Adults Policy

[https://teamndh.sharepoint.com/:b:/s/AllStaff/EfZEtsssmxxNI\\_r3UKgXORcBmS575dtcZp-oJpKvIR62UA?e=vd9cN2](https://teamndh.sharepoint.com/:b:/s/AllStaff/EfZEtsssmxxNI_r3UKgXORcBmS575dtcZp-oJpKvIR62UA?e=vd9cN2)

Safeguarding Children Policy

<https://teamndh.sharepoint.com/:b:/s/AllStaff/ERNS6czGQx9OuS-U7x1lm1YBmzzfenEQCosMTbSwoOnZ9Q?e=wZdAFD>

Outside the hours above, or on bank holidays, call the Emergency Duty Service on <0345 6000 388>.

## Appendix 2

### Safeguarding Adults – Where to find more information

<p><b>Devon – reporting a concern</b> <b>Care Direct -Tel: 0845 1551 007</b> 8am - 8pm weekdays; 9am - 1pm Saturdays; Out of Hours – Tel: 0845 6000 388 Csc.caredirect@devon.gov.uk <b>Devon Safeguarding Adults Board Procedures and Information:</b> <a href="#">Devon has a duty to keep vulnerable adults safe and away from harm</a></p>
<p><b>Devon Domestic Abuse Helpline – Tel : 0345 155 1074</b> <a href="https://www.devon-cornwall.police.uk/ro/report/domestic-abuse/a1/report-domestic-abuse/">https://www.devon-cornwall.police.uk/ro/report/domestic-abuse/a1/report-domestic-abuse/</a> <b>Torbay Domestic Abuse - TDAS team on 0161 872 7368 / 07845 443 840</b> <a href="http://www.areyouok.co.uk/">http://www.areyouok.co.uk/</a></p>
<p><b>Cornwall Domestic Abuse 24hr Helpline Tel: 01872 225629</b> 24- hour National Domestic Violence Helpline 0808 2000 247 <a href="http://www.nationaldomesticviolencehelpline.org.uk/">http://www.nationaldomesticviolencehelpline.org.uk/</a></p>
<p><b>Hate Crime Reporting Devon and Cornwall Police:</b> <a href="#">Safeguarding links to those who can help   Devon &amp; Cornwall Police (devon-cornwall.police.uk)</a></p>
<p><b>Modern Slavery Reporting and Information: Tel: 0800 0121 700</b> <a href="#">Modern slavery - GOV.UK (www.gov.uk)</a></p>
<p><b>Fraud and Scam Reporting and Information:</b> <a href="http://www.actionfraud.police.uk/">http://www.actionfraud.police.uk/</a> <b>Tel: 0300 123 2040 online reporting;</b> see also: <a href="#">Personal fraud and how to prevent it   Devon &amp; Cornwall Police (devon-cornwall.police.uk)</a></p>
<p><b>Action on Elder Abuse Tel: 0808 8088141;</b> <a href="http://www.elderabuse.org.uk/">www.elderabuse.org.uk/</a></p>
<p><b>SCIE Safeguarding Adults for Housing Staff Website:</b> <a href="http://www.scie.org.uk/publications/guides/guide53/frontline-housing/index.asp">http://www.scie.org.uk/publications/guides/guide53/frontline-housing/index.asp</a></p>

## Appendix 3

<b>Can you spot the signs of Adult Abuse?</b>	
<b>Types of Adult Abuse</b>	<b>Possible Indicators</b>
<p><b>Physical Abuse</b> includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.</p>	<ul style="list-style-type: none"> <li>• bruises, cuts, bites, abrasions fractures, burns, scalds, loss of hair in clumps,</li> <li>• unexplained injuries or inconsistent accounts of how they were caused.</li> </ul>
<p><b>Domestic Abuse</b> is 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.</p> <p>Includes: psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence; forced marriage.</p>	<ul style="list-style-type: none"> <li>• low self-esteem</li> <li>• feeling that abuse is their fault when it is not</li> <li>• physical evidence of violence such as bruising, cuts, broken bones</li> <li>• experiencing verbal abuse and humiliation in front of others</li> <li>• fear of outside intervention</li> <li>• damage to home or property</li> <li>• isolation – not seeing friends and family</li> <li>• limited access to money.</li> </ul>
<p><b>Sexual Abuse</b> includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.</p>	<ul style="list-style-type: none"> <li>• significant change in sexual behaviour</li> <li>• appearing withdrawn, depressed, stressed</li> <li>• unusual difficulty in walking or sitting</li> <li>• bruises, bleeding, STDs, pain or itching in genital area; wetting or soiling</li> <li>• eating problems e.g. overeating / anorexia</li> <li>• In receipt of unexpected / unexplained gifts, money, cigarettes accommodation, drugs, alcohol, etc.</li> </ul>

<p><b>Psychological Abuse</b> includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks, trafficking, depriving the person of the right to choice, information and privacy.</p>	<ul style="list-style-type: none"> <li>• changes in mood / behaviour / appetite / responsiveness / sleep patterns / continence being withdrawn / distracted</li> <li>• low self-esteem, deference, passivity and resignation</li> <li>• compulsive behaviour and/or self-harm</li> <li>• unexplained fear or defensiveness</li> <li>• signs of distress, tearfulness, anger.</li> </ul>
<p><b>Financial and Material Abuse</b> includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements including in connection with wills, property, financial transactions, the misuse or misappropriation of property, possessions or benefits. Includes Mate Crimes when someone befriends an adult at risk to exploit them</p>	<ul style="list-style-type: none"> <li>• bills not paid / unexplained lack of money e.g. after benefit / pension day</li> <li>• unexplained withdrawals from account or loss/misplacement of financial documents</li> <li>• unexpected changes in a will or other financial documents</li> <li>• goods or services purchased in someone's name without consent</li> <li>• bogus callers, scams, phishing.</li> </ul>
<p><b>Modern Slavery</b> includes slavery, human trafficking, forced labour, domestic servitude, sexual exploitation (such as escort work, prostitution and pornography and debt bondage (being forced to work to pay off debts that are unrealistic to be paid off)</p> <p>Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.</p>	<ul style="list-style-type: none"> <li>• looking malnourished / unkempt; appearing withdrawn; frightened or hesitant to talk to strangers; avoid eye contact</li> <li>• rarely allowed to travel on their own, isolated from the community, seem under the control / influence of others</li> <li>• living in dirty, cramped or overcrowded accommodation; wear same clothes every day</li> <li>• lack of personal possessions or ID documents</li> <li>• fear of law enforcers.</li> </ul>



<p><b>Discriminatory Abuse</b> includes forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion e.g. Hate Crimes</p> <p>A discriminatory incident is any incident which is perceived to be discriminatory by the victim or any other person.</p>	<ul style="list-style-type: none"> <li>• being withdrawn and fearful as a result of verbal or physical harassment, or from being shunned or denied cultural needs</li> <li>• people prevented from carrying out cultural and or religious practices</li> <li>• lack of self-esteem or confidence</li> <li>• people belittled and humiliated on the basis of their age race, gender, disability, sexual preference or orientation.</li> </ul>
<p><b>Organisational / institutional abuse</b> includes neglect and poor care practice within an institution or specific care setting or in relation to care / support provided in one's own home. This may range from one off incidents to a pattern of on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation</p>	<ul style="list-style-type: none"> <li>• poor professional practice</li> <li>• lack of flexibility / choice for service user</li> <li>• lack respect shown to personal dignity</li> <li>• misuse of medication</li> <li>• lack of privacy</li> <li>• inadequate staffing, training, record-keeping, supervision and management</li> <li>• lack of relationships between staff and service users</li> <li>•</li> </ul>
<p><b>Neglect or Acts of Omission</b> Includes 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, heating</p>	<ul style="list-style-type: none"> <li>• in pain or discomfort</li> <li>• untreated injuries or medical problems</li> <li>• very hungry, thirsty, untidy, unclean, cold, isolated</li> <li>• absence of or wrong dosage of prescribed medication</li> </ul>

**Self-Neglect**

The Care Act 2014 has widened the scope of adult safeguarding to include "self-neglect" as a new category. This means that people who self-neglect can now be supported by safeguarding adults approaches, as well as receiving more general support from other practitioners.

Self-Neglect covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

- lack of self-care: personal hygiene, nutrition and hydration, or health
- lack of care of one's environment: domestic squalor, hoarding
- refusal of services that might alleviate associated risks
- concerns for safety due to extreme clutter; windows / locks broken; no heating / water/ electricity; little or no sign of food at home / fire hazards such as unsafe electrical appliances; infestations.