

Safeguarding Policy

SAFEGUARDING AND PROTECTION – ADULTS

1. CONTEXT AND SCOPE

Renova Trust does not provide accommodation for children i.e. those under the age of eighteen. The charity is primarily a charity for homeless adults/over 18s and children are not permitted to be in or be brought to a Renova Trust house or any meeting with residents or service users.

Although the current referral criteria for Renova Trust would exclude anyone considered to be a 'vulnerable' adult by the definition given below, the guidelines in this policy statement will come into force should any resident fall into the definition of vulnerable adult, either by a change in the criteria authorised by the trustees or a decision to accept into residency someone who could be deemed a 'vulnerable' adult, following the interview and assessment process.

By the nature of their interaction with residents Renova volunteer befrienders/mentors do not represent any specific safeguarding issues. They do not provide personal care services and only meet in communal areas of Renova houses or in public spaces.

This policy relates to the Housing Management and Support Work potentially provided to a vulnerable adult resident by the Housing Project Manager, Support Workers and any other staff subsequently employed by the charity or by the charity's volunteers.

The following Principle will apply.

Renova Trust takes seriously its responsibility of promoting the highest standard of housing management and support to everyone we come into contact with. This requires a determination on our part to provide safe environments, and commitment to ensuring that 'Safeguarding' is everyone's responsibility, demonstrated through our strategic and operational practice.

Renova Trust acknowledges the duty of care to safeguard and promote the welfare of young people and adults and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice.

This policy's aim is to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all individuals have a positive and enjoyable experience at Renova Trust, in a safe environment.

Safeguarding relates to the action taken to promote the welfare of children, young people and adults in order to protect them from abuse and harm. Safeguarding is everyone's responsibility.

This Policy identifies the overall responsibility of the Trustees, Management, Operational Staff and Volunteers for ensuring that Safeguarding is implicitly embedded in our vision, values and service principles.

This Policy identifies responsibilities and obligations of Trustee, Management, Operational Staff and Volunteers in promoting the welfare and safety of residents in any Renova house. Safeguarding those

who are considered to be at risk, and to be able to recognise and respond immediately to any potential and actual protection concerns.

This Policy identifies the specific responsibilities and obligations of Renova staff when a concern regarding the protection and wellbeing of any adult at risk is noted.

This Policy identifies the requirements of Renova Trust and its Staff to work proactively with external authorities and communities in the interest of protecting any adult at risk that Renova Trust engages with during the course of its operational activities.

This Policy is not a standalone policy or activity, it is very much part of a variety of other interlinking Renova Trust Policies and Procedures and is to be read in conjunction with other Renova Trust Policies.

The Care Act 2014 replaces the 'No Secrets' guidance (DOH 2000) and makes Safeguarding Adults a statutory duty. This policy reflects local multi-agency Safeguarding Adults Board policy and standards, in accordance with The Care Act and associated statutory guidance. It describes how Renova Trust should proactively prevent abuse occurring and respond if abuse is identified, suspected or disclosed. It is essential that the response to all allegations must be in line with this policy.

This Policy also embraces the clarity and direction of the updated, 'Statement of Government Policy on Adult Safeguarding' (10 May 2013), which gives people at local level the national context for their own responsibilities and activities. It also describes in broad terms, the 'outcomes' for Adult Safeguarding, for both individuals and organisations and advocates leadership that moves to less risk-averse ways of working. The underpinning aim is to achieve good outcomes for adults at risk, based upon a culture of acceptable risk (including a person's right to make the 'wrong' decision).

Therefore, by applying and measuring ourselves against the **six principles of Safeguarding** as set out below, Renova Trust will ensure their part in preventing, identifying and reporting neglect and abuse, whilst balancing the protection from harm with the need for the individual to exercise control over how they live.

- **Empowerment** – adults should be in control of their own lives and their consent is needed for decisions and actions designed to protect them. It is therefore vital that, if someone has mental capacity and is able to make their own decisions, they maintain control, and the professional's role is to support their decision making at each stage of the process. This includes taking action only with consent unless there is clear justification to act contrary to the person's wishes e.g. if they lack mental capacity, or they and/or others are in danger.
- **Protection** - procedures should provide a framework by which people can be supported to safeguard themselves from abuse/harm, or be protected where they are unable to make their own decisions about their safety (due to reasons of mental capacity).

- **Prevention** - this is the primary goal and everyone has a role in preventing abuse from occurring. This includes promoting awareness and understanding and supporting people to safeguard themselves, also about organisations having systems in place to minimise the risk of abuse.
- **Proportionality** - is the responsibility to ensure that responses to concerns/alerts are proportional to the assessed risk and the nature of the allegation/concern. Proportional decisions need to take into account the principles of empowerment and protection. Where a person lacks the mental capacity, decisions made on their behalf must be part of a wider assessment and made in the person's "best interests", respecting their rights and freedoms.
- **Partnerships** - working together to prevent and respond effectively to incidents or concerns of abuse. This includes working with the person to support their decision making, with relatives, friends, informal carers and other representatives (e.g. advocates) to achieve positive outcomes for the person at risk. Also working collaboratively with other agencies and for statutory agencies to value the role of non- statutory partners.
- **Accountability** - involves transparency in decision making, by individuals and organisations, ensuring that defensible decisions are made and there are clear lines of accountability. This means that organisations, their staff and partners understand what is expected of them, that they act on those responsibilities and accept collective accountability for Safeguarding arrangements.

2. DEFINITION OF AN ADULT AT RISK

The Care Act 2014 has replaced the term 'Vulnerable Adult' to 'Adult at Risk'. When a young person reaches the age of 18 the responsibility for their wellbeing may transfer to adult service providers. Although they cease to be subject of the Safeguarding Children Procedures, some adults may continue to be vulnerable.

- 2.1 An "**Adult at Risk**" is defined as any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

Has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse and 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.

- 2.2 An adult at risk may therefore be a person who, for example:

- Has a physical disability and/or sensory impairment
- Has a learning disability
- Has mental health needs, including dementia or personality disorder
- Is dependent on others to maintain their quality of life
- Has a long term illness or condition
- Lacks the mental capacity to make particular decisions and is in need of care and support

- 2.3 Some adults are less able to protect themselves than others, and some may have difficulty making their wishes and feelings known. This may make them vulnerable to abuse.

3. WHAT IS ABUSE?

- 3.1 Abuse is a violation of an individual's human and civil rights by any other person or persons and concerns the misuse of power, control and / or authority and can manifest itself as 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.

Incidents of abuse may be multiple, either to one person in a continuing relationship, service context or to more than one person at a time, or by more than one perpetrator.

Staff should look beyond single incidents or individuals to identify patterns of harm, and repeated instances of poor care may be an indication of more serious problems and what is now described as organisational abuse.

Some incidents of abuse will constitute a criminal offence in this respect vulnerable adults are entitled to the protection of the law in the same way as other members of the public. Examples of actions which may constitute criminal offences are assault, whether physical or psychological, sexual assault and rape, theft, fraud, or other forms of financial exploitation, and certain types of discrimination, whether on racial or gender grounds.

A continuum of abuse includes isolated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through pervasive ill treatment or gross misconduct at the other. This policy covers all circumstances where there are concerns that an adult has been abused. A wide range of people can and do abuse vulnerable adults.

These may include a:

- member of staff at any level within an organisation
- volunteer or a member of a recognised professional / community group
- fellow service user, spouse, relative, neighbour, or a member of the person's social network
- member of the public or stranger who deliberately targets vulnerable people in order to exploit

Abuse can take place in any context and at any time and can be either intentional and wilful or unintentional. Disclosure may take place many years after the actual event. Even if this is the case, there is still a responsibility to report the issue so the action can be taken to improve the circumstances and the quality of life of the person who is suffering as a result of the abuse.

Intent is not an issue at the point of deciding whether an act or failure to act is abuse; it is the impact of the act on the person and the harm to that individual. Intent is something that needs assessing once the potential harm and or harm has been established.

(Please refer to specific local area authority for the fuller scope of Safeguarding Adults Procedures.)

3.2 Categories of Abuse

The Care Act 2014 defines categories of abuse as the following;

Physical abuse- including hitting, slapping, and 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, or could not consent or was pressured into consenting.

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

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.

Modern Slavery – encompasses slavery, human trafficking, and forced labour and domestic servitude. 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.

Discriminatory abuse- including racist, sexist, that based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment.

Organisational Abuse – including neglect and poor care practice within an institution or specific care setting, or in relation to care provided in their own home. This may range from one off incidents to a result in the structure, policies, processes and practice within an organisation.

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.

Self Neglect – this covers a wide range of behaviours neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding that causes risk or harm.

Domestic Abuse – In 2013, the Home Office announced changes to the definition of domestic abuse.

Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality.

Domestic violence includes: psychological, physical, sexual, financial, emotional abuse, so called 'honour based' violence, female genital mutilation, forced marriage. The age was extended down to 16 years of age. Domestic abuse is not only about the behaviour of intimidated partners, but includes that of other family members.

Key considerations when working with domestic abuse:

- The perpetrator should not be informed of disclosures or referral
- Professionals should not attempt to mediate, but can provide information about specialist services, where safe and appropriate to do so
- Staff should refer to the Local Safeguarding Boards Policy and escalate to the safeguarding department

Forced Marriage and Honour Based Violence

- **Arranged Marriage**
In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.
- **Forced Marriage**
Forced marriage is a marriage conducted without the valid consent of one or both parties, where some element of duress is a factor.

The United Nations views Forced Marriage as a form of human rights abuse, since it violates the principle of freedom and the autonomy of individuals. This is acknowledged under the United Nations' Declaration of Human Rights, article 16(2):

Article 16

- (1) Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
- (2) Marriage shall be entered into only with the free and full consent of the intending spouses.
- (3) The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.

- **So called 'honour' based violence**

So called 'honour' based violence (HBV) is where the person is being punished by their family or their community. They are being punished because of a belief, actual or alleged, that a person has not adequately controlled themselves enough to conformity and this is to the 'shame' or 'dishonour' of the family.

‘Honour Based Violence’ is a crime, or incident, which has or may have been committed to protect or defend the honour of the family and/or community members.

For further details regarding reporting protocols, please seek advice from the Safeguarding department see the link below:

bracknellforestsafeguarding.org.uk

3.4 Apart from the main categories of abuse, there are other areas of concern that are now being reported.

Hate Crime – is described as “any hate incident which constitutes a criminal offence, perceived by the victim or any other person, as being motivated by prejudice or hate. Some offences are clear, such as robbery and assault. However, less obvious incidents such as verbal abuse, harassment and threats or intimidation may also be criminal offences.

Improved information sharing will assist in identifying hate crime offenders and enable a more effective joint agency approach. Further guidance can be found regarding Hate Crime MARAC (Multi Agency Risk Assessment Conference) Information Sharing Protocols, can be found on local websites.

Hate crime will be dealt with in accordance with these procedures and therefore referrals should in the first instance be made to Adult Social Care. Contact Bracknell Forest Adults Safeguarding Board Bracknellforestsafeguarding.org.uk

4. **High Risk Cases**

4.1 The following information explains the local arrangements for dealing with High Risk Cases. Where such cases involve an ‘Adult at Risk’ as defined within this document, they will be dealt with in accordance with these procedures and therefore referrals should in the first instance be made to Adult Social Care. Contact Bracknell Forest Adults Safeguarding Board bracknellforestsafeguarding.org.uk

3.2 When a case meets both MARAC (Multi Agency Risk Assessment Conference) and MAPPA (Multi-Agency Protection Arrangements), the Renova Housing Project Manager or the Designated Person should liaise with the respective Safeguarding Board to agree a way forward.

Radicalisation and Extremism

Radicalisation or Extremism is where someone holds views that are intolerant of people who are of a different ethnicity, culture, religion, gender or sexual identity. Extremists may try to force their views on others and, in some cases, may believe that these views can justify the use of violence in order to achieve certain aims.

There is no single distinct pathway of radicalisation towards violent extremism as the process is unique to each individual. However, there are some common elements in the experiences of most people who have become radicalised, regardless of their beliefs or motivations. Radicalisation happens when a person's thinking and behaviour become significantly different from how most members of society and community view social issues and participate politically.

What can put people at risk?

There is no single profile of a terrorist or violent extremist. Factors which may make people more vulnerable include:

- Substance and alcohol misuse
- Peer pressure
- Influence from older people or via the Internet
- Bullying
- Crime and anti-social behaviour
- Domestic violence
- Family tensions
- Race/hate crime
- Lack of self-esteem or identity
- Grievances (personal or political)
- Migration

The **Prevent** strategy will specifically respond to the ideological challenge of terrorism and the threat we face from those who promote it; prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and work with sectors and institutions where there are risks of radicalisation which need to be addressed.

If you have concerns about Radicalisation and or Extremism within Renova Trust, please make the Safeguarding Board aware, they will trigger the Local Safeguarding Children Board (LSCB) or Safeguarding Adult Board (SAB) procedures.

5. INTRODUCTION

- 5.1 Renova Trust is committed to the principles and objectives contained within Local Inter Agency Procedures and Guidance and will ensure that accountability and representation for Safeguarding adults is recognised throughout the organisation.

6. DESIGNATION OF RESPONSIBILITIES

- 6.1 The charity's Housing Project Manager, being the first point of contact for all accommodation enquiries and inter-project transfers, is therefore the key person to ensuring that the right level of information is made available for the purposes of assessment, allocation and for the planning of intervention and the level of service required.
- 6.2 It is the responsibility of Operational Managers/Directors, Housing Project Managers and all case/support workers or empowerment workers to ensure that those assessments are incorporated into the initial phase of the support planning and review process, promoting positive experiences and outcomes for service users/clients/residents.
- 6.3 With oversight from Operational Managers/Directors and Housing Project Manager, it is the responsibility of all staff to utilise all information provided to ensure that appropriate agencies and services are incorporated into the support of the individual, and that community assessments and plans are acknowledged.
- 6.4 Renova Trust will take all reasonable measures to ensure the risks of harm to adults are minimised, or prevented from happening in the first place.
- 6.5 In accordance with good practice, Renova Trust will ensure all relevant staff, casual workers, volunteers and hosts, carrying out unsupervised activity undergo an enhanced DBS check and further disclosures will be sought as appropriate. Should a member of staff, casual worker, volunteer or host commit an offence that questions their suitability to work with Children, Young People or Adults at Risk, the DBS (Disclosure and Barring Service) will be informed.
- 6.6 Renova Trust will ensure that staff have suitable DBS consent, as it is a criminal offence to knowingly employ anyone (allow to volunteer also) who is on a DBS barred list if they are to be engaged in 'regulated activity' with Children and Young People or Adults at Risk, or employed within specific occupations or establishments.
- 6.7 Renova Trust will arrange to take all appropriate actions to address concerns of the abuse or neglect of any adult at risk by working to agreed local protocols, policies and procedures in full partnership with local services
- 6.8 The Trustees undertaking the Safeguarding Champion role, and Senior and Operational Managers will each deliver effective leadership in their roles as Safeguarding Champions.
- 6.8 Renova Trust, its Trustees, its staff and volunteers are and will continue to be made aware of their responsibilities for the protection of adults from abuse, and from inappropriate / inadequate care and are committed to responding in all cases where there is concern.

- 6.9 In accordance with good practice Renova Trust has Senior Officers taking lead responsibility for dealing with Safeguarding and adult protection issues. They provide advice and support to staff, liaise with staff and work alongside other agencies. They are known as the Charity's Designated Persons. All staff are and will continue to be made aware of these roles:

Amatesiro (AKA Tess) Osunkoya
Trustee responsible for Operations and Safeguarding Lead Officer

Contact Number: - 07534 920704
tess.osunkoya@renova.org.uk

(Designated Person for safeguarding compliance, including the development of safeguarding policies, protocols and procedures, and embedding these to ensure safe environments are maintained)

Vincent Balogun
Trustee responsible for Risk and Compliance

(Designated Person for managing allegations against staff)

Contact: - trustees@renova.org.uk

7. THE DESIGNATED PERSON(S)

- 7.1 Tess Osunkoya; Trustee in charge of Operations

Vincent Balogun; Trustee responsible for Risk and Compliance

- 7.2 The above-mentioned Designated Person's responsibilities are:

- To take a lead role in the development of Safeguarding policies and strategy
- To ensure this Policy and other charity associated procedures are implemented and followed correctly, issuing operational guidance and promoting good practice
- For ensuring effective communication and negotiation with statutory and other agencies within an inter-agency framework, as appropriate, in the event of adult abuse or neglect concerns being raised, or when professional persistence and / or the escalation process is required.
- To ensure staff and volunteers have an understanding of Safeguarding and the signs of adult abuse, and the organisation's responsibilities under national and local procedures
- To make staff and volunteers aware of the area specific procedures for Safeguarding vulnerable adults in Bracknell.
- To support and advise staff in their approach and response to adult protection issues
- To maintain their own knowledge and awareness of the issues, policies and practice of adult protection, through regular attendance at relevant training courses, and

- To cascade information and learning through regular training and through attendance at management and staff meetings.

8 THRESHOLDS FOR INITIATING SAFEGUARDING CONCERNS FOR ADULTS

8.1 On receiving a Safeguarding alert it is important to determine whether it's appropriate for the concern to be dealt with under local authority Safeguarding procedures. Therefore, before Safeguarding procedures are initiated, some questions must first be considered:

- Does the possible abuse relate to an adult at risk? (refer to local Safeguarding eligibility thresholds for reporting)
- Does the adult have capacity to consent to what has occurred, and not under duress?
- Has a duty of care been breached?
- Has the adult experienced significant harm?

8.2 There is no national consensus on the point at which housing providers should report their Safeguarding concerns to the local authority. Some local authorities prefer to know about all concerns, while others want housing providers to deal with minor concerns and make decisions about whether to refer to more serious cases. In order to ensure clarity and the appropriateness of all referrals made, understanding the threshold for reporting in your area can help, please refer to local multi-agency policies and procedures.

8.3 In determining how serious or extensive abuse must be to justify intervention through safeguarding procedures, the concept of 'significant harm' is to be considered;

'harm' should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical) but also the impairment of, or avoidable deterioration in, physical, mental health, and the impairment of physical, intellectual, emotional, social or behaviour development.

8.4 Other factors to consider will include:

- the vulnerability of the victim
- balance of power between victim and alleged perpetrator
- capacity of victim and perpetrator
- the nature and extent of the harm caused
- the frequency of incidents
- the impact on the person
- the views of the person and their carers
- whether the harm caused constitutes a criminal offence
- whether others (vulnerable adults or children) are at risk

8.5 People who self-neglect may not be considered eligible for social care services (please refer to the FACS -Fair Access to Care Services eligibility criteria) and the local authority may not consider self-neglect as a Safeguarding issue, and so social care professionals may argue that they cannot impose support on someone who is choosing to remain in an abusive situation or people who neglect themselves.

8.6 In such cases, Renova Trust and social care staff should jointly examine the situation carefully to agree appropriate support, and consider whether the person has capacity to make the decision, whether they are being put under any pressure, whether the individual has fluctuating or complex needs, or sudden changes in behaviour indicating an escalating problem, and whether others are at risk.

8.7 **What to do if the referral is not accepted**

- Check the multi-agency policy; is the interpretation of eligibility thresholds open for discussion? If so, challenge the decision.
- Reconsider the facts of your referral; have you left anything out, have you not accurately represented the risks? If so, make another referral
- Ask if they have a mechanism for gathering information on apparently low level cases
- Ask for advice on how to handle the situation yourself or via other agencies
- If the case is not accepted and the local authority does not make any enquiries, refer again if circumstances or risk changes
- Ensure that decisions are being taken at the right level within Renova Trust and within adult social care
- On reflection, agree that the referral does not require social care intervention or services

8.8 **What to do if the person does not fit the definition of Adult at Risk**

It has to be recognised that not all adults will fit within the Government's definition. Some adults may be at risk from abuse because of other factors such as lifestyle choices, homelessness, drug / alcohol abuse etc. Risk Assessments can be used to explore the level of risk posed and relevant service options made available to those adults who may be putting themselves at risk through self-neglect or lifestyle choices. Renova Trust can take the lead in such cases, until the appropriate services are made available and put in place.

8.9 It is important to make progress with persistent offers of support, however, where an individual has capacity and chooses to remain in an abusive situation or self-neglect then services should be accessed to ensure careful consideration of risk.

8.10 Professionals should try to build trust over time and persuade the individual to accept support and to make safer choices. Decisions should be recorded and the situation regularly reviewed with renewed offers of support – it is not sufficient to simply say 'it is their choice' or that they are making a lifestyle choice.

9. **PROFESSIONAL PERSISTENCE AND ESCALATION PROCEDURE FOR PROFESSIONAL DISAGREEMENTS**

9.1 Renova Trust strives to work in harmony within our own working environments and with all partners working with vulnerable adults. The charity recognises that there may be professional differences in relation to specific cases in determining levels of need, roles and responsibilities for action. This policy outlines how staff can escalate concerns inside and outside the Trust by managing professional differences in a respectful and constructive manner.

- 9.2 Disagreements over eligibility, or long arguments about whether someone has a genuine mental illness or not, could result in delays in assessment, support and treatment. Renova Trust's response will be to take a more proactive approach to Safeguarding, with systems in place for monitoring concerns and progress on Safeguarding and vulnerability alerts.
- 9.3 If there is recognition that there is a disagreement over the relevance of any referral made to social care or other services, or disagreement over a significant issue involving any professional then Renova Trust will work jointly to resolve any disagreements, and initial attempts should be made to resolve the problem at practitioner/case worker level within one working day.
- 9.4 Renova Trust, trustees and staff will identify explicitly what the problem is and have absolute clarity about the nature of the disagreement and what the respective workers aim to achieve.
- 9.5 Advice can be sought from the charity's Operational or Designated Safeguarding Lead Officer as and when required.
- 9.6 All concerns should be documented on an Escalation Notice within 3 days and this should be forwarded to the Operational or Designated Safeguarding Lead Officer.
- 9.7 A clear record must be kept at all stages, to include written confirmation between parties about the agreed outcome and how any outstanding issues will be pursued.
- 9.8 If unresolved, the disagreement should be referred through the line management structure, or escalated to the Safeguarding lead officer or a senior officer/trustee within one working day.
- 9.9 If professional disagreements remain unresolved following discussions between respective services, the Adult Safeguarding Board representative for each agency must be notified for resolution.
- 9.10 In the unlikely event that the steps described above do not resolve the issue and/or the discussion has raised significant policy/procedure issues, it should be referred to the Chair of the Trustees, who will offer mediation and determine a course of action.

10. PROCEDURES IN RELATION TO SAFEGUARDING INCIDENTS AND CONCERNS

- 10.1 Safeguarding is everyone's responsibility and the following guidance acts as a framework for any staff or volunteer response.
- Be accessible and receptive, listen carefully and ask open questions to clarify issues, e.g. who, what, when, where, how
 - Take it seriously!
 - Reassure the individual they are right to talk about it and that it's not their fault
 - Negotiate getting help, e.g. prepare them for the fact that you must involve others

- Explain that you cannot personally protect them – but will support them in telling the right people to make sure it does not happen again
- Report all suspicions or disclosures immediately
- Make precise records of what was said – immediately using their own words and including the questions you asked – keep your hand-written notes

Refrain from:

- Jumping to conclusions or making promises you cannot keep
- Trying to get them to disclose – let them talk and ask only the questions you need to know to ensure immediate safety
- Speculating or accusing anybody
- Asking any leading questions, e.g. was itetc, or any closed questions requiring only a YES/NO answer

- 10.2 Safeguarding concerns can be received at any of Renova Trust's projects or by making direct phone contact with the Charity's Safeguarding Lead Officer. The concern will be logged and immediate reassurance given of a swift and appropriate response.
- 10.3 Once a Safeguarding issue is raised at any level, and by any person or organisation, the person receiving the information will make no comment in response.
- 10.4 When Safeguarding matters are disclosed by a staff member, appropriate information will be reported back to them.
- 10.5 When faced with a **disclosure, information or observation** from or about any adult at risk, staff and volunteers will remain calm and ensure the individual concerned is safe. At all Renova sites this information should be logged, on the event log, and if suitable the Risk Management Plan should be updated along with the Mainstay Support Plan which should reflect appropriate action.
- 10.6 The person who has been alerted must respond immediately and take responsibility for ensuring that the immediate and appropriate action is taken in order to eliminate, reduce or stabilise the immediate risk.
- 10.7 Minor incidents should be dealt with and resolved as soon as possible. Consult with the Housing Project Manager if an individual is in immediate risk and requires to be removed for their safety.
- 10.8 The seriousness or the extent of the abuse is often not clear when anxiety is first expressed. In making any assessment of the seriousness, the thresholds in Section 8 are to be considered.

11. When to make an External Alert

- 11.1 If abuse is suspected, referrals should be made to the local authority (see Bracknellforestsafeguarding.org.uk) within 24 hours of identification and the Safeguarding team will ensure that following receipt of an alert from staff that this will be followed up within 72 hours.
- 11.2 An alert should always be made if you have been told of or witnessed abuse, or if you have a concern about a potential abusive situation. The person who reports alleged abuse is known as the 'alerter'.
- 11.3 As an alerter, you are not being asked to verify or prove that information is true. You are being asked to, and must, record your concerns and any information that comes to your notice and also report them to the Designated Safeguarding Lead Officer. It is the police that have responsibility for establishing any criminal offence.
- 11.4 You must report any concerns, allegations or disclosures of abuse through formal channels, no matter who the perpetrator is, even if he or she is another Adult at Risk.
- 11.6 Whoever hears or receives the concerns, allegations or disclosures should not agree to keep things in confidence and will need to explain to the individual concerned that the information given may need to be shared.
- 11.6 If the eligibility thresholds have been met (see section 8), subsequent action will be taken in line with the local adult Safeguarding procedures, which will be followed scrupulously. These can be accessed via local websites for Bracknell. Bracknellforestsafeguarding.org.uk
- 11.7 If a member of staff, casual worker, volunteer or host feels that a concern should be acted upon and their colleague does not agree, they have a right to refer direct to the Adult Safeguarding Lead Officer or to the SAB but if they do should inform the Adult Safeguarding Lead Officer of their intended action.
- 11.8 If abuse is disclosed, it must not be investigated internally. It is enough to listen and give reassurance that the person has done the right thing. Ask the individual how they would like you to proceed and state how this would inform your response.
- 11.9 The following procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that an adult at risk has been abused, or following a serious incident.
- If you think an adult at risk has suffered sexual abuse that fits the (FACS) eligibility **criteria or adult Safeguarding thresholds** you must call the police and Adult Social Care immediately.
 - If you think an adult at risk has suffered severe harm (e.g. physical assault) caused by another person you must call the police immediately. If medical attention is required this must always take priority over any other action.

- If you think an adult at risk may be in need of protection to prevent harm occurring, you must refer the matter to Social Care for guidance.
 - It is important to note that abuse may not be deliberate or intentional; however, where harm has occurred as a result of an act of omission, Safeguarding Procedures should be initiated.
 - All reasonable steps must be taken to protect any possible evidence for the police to examine.
 - Serious Incident reports should be completed where necessary, and they should be completed in line with the Supporting People criteria, (the form can be obtained from the Renova policy bundle see Confidential/Serious Incident Form) they should then be submitted to the Charity's Designated Safeguarding Officer, who will forward appropriately.
- 11.10 All telephone referrals must be followed up by completing the appropriate reporting systems / forms, including completing the 'Confidential/Serious Incidents' form, or, if applicable via Web Incident reporting as per local authority procedures.
- 11.11 Please see details below and then confirm in writing within agreed timescales. (Social Care within 24 hours and Contact Commissioners within 3 days).

B: Projects - please insert area specific details

Central Advice and Duty Team	01344 352000
Emergency Duty Team (out of hours)	01344 786543
Police	101 – Non emergency 999 – emergency
Safeguarding Unit	01344 352000
Supporting People (for the attention of the Contracts and Review team)	

Contacts and numbers for other relevant services that may be involved in the Safeguarding of adults can be accessed via websites <https://www.bracknell-forest.gov.uk/bracknellforestsafeguarding.org.uk>

- 11.12 Determine action to be taken, and ensure that this is recorded in the individual's file and attach the Risk Assessment and any other applicable documents.
- 11.13 At the earliest opportunity, staff must complete the Notification of Risk/Confidential /Serious Incident Report Form and insert all required detail onto the Charity's Single Notification of Risk Record.
- This should include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation
- 11.14 The Safeguarding Lead Officer and the Housing Project Manager have responsibility for overseeing and updating other applicable officers with regards to any investigation and response to Safeguarding matters and any adult abuse concerns.
- 11.15 The Safeguarding Lead Officer and the Housing Project Manager have responsibility for ensuring that all Safeguarding incidents and investigations are managed effectively through to conclusion. They are to decide which staff need to be directly involved and if applicable, ensure that all administrative matters are completed and that appropriate levels of confidentiality are maintained throughout.
- 11.16 The Safeguarding Lead Officer and the Housing Project Manager will sample and record audit information to ensure good recording and Safeguarding operational practice is embedded.

12. ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH VULNERABLE ADULTS

- 12.1 If another adult discloses information to you regarding another professional, sub-contractor or a member of staff of any position within Renova Trust, including a casual worker or volunteer, which gives you cause for concern, and which raises questions about their suitability to work with vulnerable adults or raises the possibility of abuse / harm occurring, **immediate action must be taken.**
- 12.2 The Housing Project Manager or the staff member, who has been alerted to the concern, must inform the Designated Safeguarding Lead Officer immediately.
- 12.3 Where anonymous allegations are being considered, Renova Trust's Confidentiality Policy applies.
- 12.4 In order to safeguard the individual and staff member concerned, advice will be given by the Safeguarding Lead Officer as to whether a temporary suspension or change of work location is needed whilst undertaking an investigation.
- 12.5 Both the individual and the staff concerned will be advised about the process for the investigation and will be supported by an independent person.

- 12.6 Local Authority procedures will be triggered by the Charity's Designated Safeguarding Lead Officer, who will inform the Local Authority Designated Officer (LADO), of the allegation, which must be done within 24 hours. The LADO will confirm as to whether the allegation meets the threshold for criminal investigation.
- 12.7 If the threshold for criminal investigation has been met, the Police and the LADO will take lead responsibility for the investigation.
- 12.8 If the threshold hasn't been met, then the applicable Renova's procedures will apply and will be led by the Trustees.
- 12.9 If the concern involves another professional and if applicable to do so, one of the charity's Safeguarding Leads will make direct contact with the individual's place of work.
- 12.10 Where an allegation against a professional is raised in relation to an adult at risk, the concern will be raised with the Charity's Designated Safeguarding Lead Officer who will refer to the Bracknell Safeguarding Board.

13 INFORMATION SHARING, CONFIDENTIALITY AND RECORDING

- 13.1 The Care Act 2014 recognises that there are circumstances in which it will be necessary to share information. Sharing information between organisations about known or suspected risks may help to prevent abuse taking place.
- 13.2 Multi agency Safeguarding hub where key agencies are located in all areas to enable 'real time' information sharing, decision making and communication.
- 13.3 The decision about who needs to know, and what information needs to be known, should be taken on a case-by-case basis.
- 13.4 The Trust Board, staff and volunteers, have a professional responsibility to share relevant information about the protection of any individual at risk with other professionals, particularly with investigative agencies and Social Care.
- 13.5 Safeguarding raises issues of confidentiality and the following documents will bring clarity and are to be applied in practice:
- Renova Trust's Confidentiality and Information and Data Management/Protection Policies;
 - Local Information Sharing Protocols and the Statutory Guidance on Adult Safeguarding as laid out in the Care Act 2014;
 - Information Sharing: Guidance for Practitioners and Managers (2008).
- 13.6 Sharing information that is proportionate, relevant, accurate, timely and secure ensures that the information you share is necessary for the purpose for which you are sharing it, and is only shared with those people who need to have it, and that it is shared securely.

- 13.7 Where information sharing applies, the individual should be fully considered and their wishes and feelings taken into account. Be open and honest with the person from the outset about why, what and with whom information will be shared, and seek their agreement if it is safe to do so.
- 13.8 In each case, it is important to find the right balance to keep people safe without overriding their rights to privacy and autonomy. Seek advice if you have any doubt, without disclosing the identity of the person if possible.
- 13.9 In some cases, where others are at risk, it may be necessary to share information without a person's consent. This does not mean sharing information without the person's knowledge; this may only be acceptable in exceptional circumstances where letting the person know might increase the risk to them and others.
- 13.10 If others are not at risk and the person has capacity to make choices about the particular issue, then it may be hard to justify a breach in confidentiality.
- 13.11 Keep a record of your concerns, the reasons for them and your decision about whether to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.
- 13.12 The purpose of records is to provide factual, consistent, accurate, current, comprehensive and concise information concerning all areas of service delivery, risk factors / concerns and action taken. To identify the chronology of events and the reasons for any decisions made, to support standard setting, quality assessment and audit, providing a baseline record against which improvement or deterioration may be judged.
- 13.13 When recording information about individuals, consideration needs to be given as to what format is to be used. There is the option to use current paper recording systems held centrally in the individual's case file, as well as inputting into the individual's electronic support module and risk management database if possible. All options should be used as applicable, until the final phase for maintaining all individual records electronically is completed.

14. TRAINING

Renova Trust recognises the importance of regular learning and development for the Trustees, staff, casual workers, and volunteers:

- The Designated Safeguarding Lead Officers will attend appropriate training.
- All staff, volunteers and casual / part-time workers will be fully briefed concerning their Safeguarding responsibilities, prior to commencing their duties.
- All staff, casuals, volunteers and hosts, who come into contact with children, will receive a minimum of level 1 Safeguarding training, with opportunity for a refresher every two years.

- Additional multi agency Safeguarding training will be identified in accordance with the individual's role and responsibilities.
- Safeguarding updates at quarterly Renova Trustee meetings.
- Safeguarding – Adult Basic Awareness, E Learning programme can be completed via distance learning and includes a training booklet.

15. RECRUITMENT OF STAFF / CASUAL WORKERS / VOLUNTEERS

- 15.1 It is the role of the Renova Trust trustees, to ensure that all staff, casual workers and volunteers, involved in activity defined as regulated activity in relation to vulnerable adults or those employed within specific positions or establishments, should be subject to an enhanced DBS check to highlight any record of convictions or cautions prior to commencing employment or voluntary work if unsupervised.
- 15.2 To further support safe recruitment processes, two appropriate references in addition to DBS checks, where appropriate, will be sought for paid staff, casuals and volunteers to assess suitability to the role by the Trustees. References to Safeguarding will also be considered within application and interview processes.

16 APPROPRIATE BEHAVIOUR - (Please refer to the Charity's Code of Conduct Policy)

16.1 Employees and volunteers will:

- Remember they are a role model and provide an example for those they work with to follow.
- Bear in mind that some actions, no matter how well-intentioned, may be easily misinterpreted and so leave all parties vulnerable.
- Be alert to any potential harm to the individual.
- Respect the individual's right to privacy.
- Provide opportunities for service users to discuss any concerns they may have.
- Speak to their line-manager/Designated Safeguarding representative if concerned about the safety or welfare of an individual or if they believe professional boundaries of working are being compromised.

Employees and volunteers will not:

- Arrange to see or communicate with service users/residents/clients in circumstances unconnected with their work/role.
- Abuse their position of trust, nor develop personal connections outside the remit of the organisation with service users/residents through use of social media or mobile phones save as is allowed by their role.
- Be left alone for substantial periods of time with any individual, except where one-to-one work is necessary, in which case, they should inform another staff member where they are going, with whom and for how long.
- Permit abusive behaviour towards service users/residents/clients by others or engage in it themselves.

- Show favouritism to or become too closely associated with service users/residents/clients save as is permitted by their role. Nor should they get drawn into inappropriate, attention-seeking behaviour (e.g. crushes).
- Allow or engage in suggestive remarks, gestures or touching of a kind which could be misunderstood.
- Do anything which might undermine Renova Trust's reputation for providing a safe environment.

If an individual shares worrying or sensitive information with you, **do not**

- Promise to keep secrets.
- Hesitate to share concerns on any of these matters with the appropriate person.

16.2 Any member of staff/volunteer will be dealt with in accordance with our disciplinary procedures should they act in an unsuitable way with or towards service users or vulnerable adults.

16.3 Issues of unsuitable behaviour will also be dealt with via Renova Trust's Disciplinary Policy.

17. STAFF SUPPORT

17.1 The requirement for Renova Trust staff to have access to Safeguarding supervision is explicitly stated in Working Together to Safeguard Children, (HM Government 2018) and 'The Care Act 2014'. It is therefore understood that those providing supervision should be trained in supervision skills and have up to date knowledge of the legislation, policy and research, relevant to Safeguarding Vulnerable Adults.

17.2 Staff will be supported with regards to any case management and Safeguarding responsibilities through mandatory Performance Reviews. Regular face to face supervision and reflective practice will further support staff to undertake their day to day duties confidently and competently, especially with difficult and sensitive situations.

17.3 The impact on staff involved in any aspect of Safeguarding work can be considerable and the charity will ensure that staff is fully supported. The Operation Trustee and the Risk and Compliance Trustee are responsible for ensuring that support from outside the Trust is sought wherever appropriate.

18. MONITORING AND EVALUATION

The Trustees have ultimate accountability for this Safeguarding and Adult Protection Policy in accordance with local procedures.

18.1 The Trustees will implement annual review of this Policy, starting 1st November 2022.

18.2 The Head of Operations will provide an annual update to the Trustees regarding the implementation and review of this Policy.

If you do not understand or support this policy, then you should discuss this immediately with your line manager. Failure to observe this Policy may lead to disciplinary action.

Last review completed: 16 July 2026

Date of next review: July 2027