



Safeguarding Adults at Risk (of abuse or harm) Policy

Policy Summary

This policy sets the clear expectation that staff and volunteers will enable adults to make their own informed safeguarding decisions where they can and intervene or prompt interventions when adults are not able to protect themselves. It provides a clear framework for our approach to safeguarding adults at risk by setting out the standards and principles for effective adult safeguarding.

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|-----------------------------------|---|
| Policy owner | Executive Director, UK Operations |
| Policy lead | Safeguarding Adults Development Officer |
| Audience | All staff and volunteers |
| Legislation and regulation | Care Act 2014 (England), The Adult Support and Protection (Scotland) Act 2007, The Social Services and Well Being (Wales) Act 2014, Adult Safeguarding: Prevention and Protection in Partnership, July 2015, Inter Agency Safeguarding Adults: Adult Protection Policy 2016-18, Health and Social Care Act 2008 (Regulated Activities) Regulations 2014; Modern Slavery Act 2015. |
| Formally endorsed by | Board of Trustees |
| Endorsement date | December 2016 |
| Next review | December 2019 |

1 Introduction

- 1.1 The British Red Cross helps millions of people in the UK and around the world to prepare for, respond to and recover from emergencies, disasters and conflicts. We aim to put people in crisis at the heart of all that we do.
- 1.2 This policy must be read in conjunction with the safeguarding adults policy of the local authority of the adult at risk and with reference to the short glossary – see *appendix 4* and accompanying procedures.
- 1.3 If you have a concern about a child or young person under 18, use the safeguarding children and young people policy and procedures.
- 1.4 This policy states our commitment to ensuring that any concerns that arise regarding adult abuse and harm are effectively and appropriately addressed and that we play our part in safeguarding adults effectively.

2 Policy statement

Purpose and aims

- 2.1 The British Red Cross takes a *person centred approach* to all adult safeguarding work. This means we work preventatively, ensure that robust procedures are in place for responding effectively to incidents of abuse or harm, and respond to each adult at risk as a unique and valued individual, in ways which advance their rights, dignity and wellbeing and are legal, proportionate and reasonable; mindful at all times that we are working to safeguard adults who have the right to be involved in and informed of all safeguarding decisions which affect them.
- 2.2 The purpose of this policy is to help ensure we:
 - > meet our safeguarding adults standards whilst working within the framework of the six safeguarding adult principles;
 - > recognise signs of abuse, respond effectively, respect the rights and wishes of the adult at risk and report our concerns appropriately;
 - > support adults at risk in ways which are aligned with the Making Safeguarding Personal initiative, enabling people to make their own informed safeguarding decisions where they can;
 - > act or prompt action in ways which are legal, necessary and proportionate when an adult is not able to protect him/herself, acting in the ‘best interests’ of people who lack the capacity to make the decision that needs to be made at that time;
 - > take a thorough, fit for purpose and transparent person centred approach to all adult safeguarding work; and
 - > respect the rights of any alleged perpetrators who have their own care and support needs, raising concerns where these needs are not being met or addressed.



2.3 So that as an organisation we:

- > are open to and learning from our safeguarding adults work (both good practice and areas for improvement) and relationships and interactions with the people we support who are at risk and our other safeguarding partners;
- > fulfil our organisational commitment to safeguarding adults at risk (of abuse or harm), believing that all individuals have the right to live their lives free from abuse and ensuring their support upholds their dignity and rights;
- > comply with external legislation and regulations and standards set by partner or commissioning organisations; and
- > manage internal risks within the organisation.

2.4 The British Red Cross further :

- > recognises that delivering on this commitment also provides a framework that identifies and promotes best practice, and minimises uncertainty for volunteers and members of staff regarding their own behaviour and conduct;
- > stresses how essential it is that our people know how to respond when they have concerns about adults and are supported when they do, work/volunteer within the framework of this policy and are aware of any duties and responsibilities it places upon them;
- > highlights the importance of the people we support and all staff, volunteers, trustees and partners having awareness of our commitment to taking an outcomes and rights based approach to safeguarding adults; and
- > ensures that effective safeguarding is a corporate and management responsibility held and enacted by the organisation.

Standards

2.5 **Standard 1** – We support people to make their own informed safeguarding decisions as adults (in alignment with safeguarding and capacity legislation and guidance, this policy, the local authority safeguarding adults policy [of the adult at risk] and regulatory, commissioner and governance requirements).

2.6 **Standard 2** – We respond effectively when staff, volunteers or other representatives of the British Red Cross have concerns about an adult at risk of harm or abuse. Our approach advances the rights and upholds and promotes the dignity, wellbeing and welfare of the people we support so that we are *Making Safeguarding Personal*.

- 2.7 **Standard 3** – We expect, prompt, support and monitor Safeguarding Adult Alerts so we're learning from how we've handled adult safeguarding incidents and allegations in order to support continuous improvement in our adult safeguarding work.
- 2.8 **Standard 4** – We take our safeguarding responsibilities to adults and children seriously and have a consistent approach to agreeing and defining how these responsibilities are met.
- 2.9 **Standard 5** – Whilst recognising that the local authority has the lead role we are committed to working in partnership with the people we support and our multi-agency partners to improve safeguarding outcomes with and for the people we support.
- 2.10 **Standard 6** - In line with safer recruitment guidance we seek to recruit, support and manage staff and volunteers who can help adults to keep themselves safe and promote and uphold their rights, dignity and well-being at all times.

Scope

- 2.11 All UK and Crown Dependencies volunteers, staff, and any other representatives of the organisation involved in providing services or support to people using our services
- 2.12 Where people's work or volunteering brings them into contact with volunteers who are at risk of abuse or harm, this policy should be referred to. The need to involve and inform the adult at risk of any action taken is equally applicable to volunteers and people who use our services.

3 Responsibilities

- 3.1 Working with adults to help them keep themselves safe is part of the responsibilities of all of our people.
- 3.2 This means that anyone who hears from (or in relation to) an adult at risk about a safeguarding issue has a responsibility to take the matter seriously by responding to the person at risk with dignity, sensitivity and confidence, speaking with their Safeguarding Adults Officer (SAO) for support and guidance and/or line manager (for support and management) and following the reporting process.
- 3.3 The **Board of Trustees** has approved this policy and retains an overview of the safeguarding issues. The Board supports our ability to function as an effective learning organisation in relation to any incidents, allegations and concerns.
- 3.4 **The Service Quality and Assurance Committee** has delegated authority from the Board of Trustees to oversee and scrutinise safeguarding activity. The committee liaises with ELT to ensure we maintain a fit for purpose safeguarding response.
- 3.5 **Executive Director of UK Operations** has responsibility for the development, maintenance and adherence to this policy.
- 3.6 **UK Directors** have responsibility for adherence to this policy across their service line.

- 3.7 **Senior managers and policy developers** will consider and take account of safeguarding issues when policies are developed and decisions made which are likely to have an impact on our safeguarding adults work.
- 3.8 **Line Managers** ensure staff are trained and updated where appropriate; have responsibility to oversee and ensure that personnel work within the framework of this policy as well as the safeguarding adults policy of the service user's local authority to support adults at risk to make their own informed decisions and to take or prompt action if the service user is not able to protect him/herself.
- 3.9 **Service Line Safeguarding Leads** will act as a point of contact between the safeguarding adults development officer and their service including assisting with the initial set up of safeguarding arrangements for their service line, sharing learning and horizon scanning and service overview of safeguarding adults issues.
- 3.10 **The Lead Safeguarding Officer** role for the British Red Cross is the head of quality who is responsible for ensuring that:
- > the policy supports effective safeguarding of adults across the British Red Cross;
 - > safeguarding adult alerts are collated, monitored and used to improve our safeguarding adults work;
 - > the organisation is informed about our safeguarding work so we are well placed to support and make considered and informed decisions relating to the safeguarding of adults across the organisation; and
 - > appropriate and effective governance and assurance processes are in place.
- 3.11 **The Safeguarding Adults Development Officer/Policy Lead** is responsible for working towards the continuous improvement of our safeguarding adults work by:
- > developing and embedding this policy and working with learning and development colleagues to build training capacity within the organisation;
 - > identifying and developing standards and best practice and working with our safeguarding adults officers; and
 - > responding to reporters of safeguarding adults concerns where this is requested or needed with a view to supporting reporters, learning from our safeguarding work and sharing good practice.
- 3.12 **Safeguarding Adults Officers (SAOs)** support and inform (and sometimes lead) the initial response to a safeguarding adults concern, incident or allegation, working with the responsible managers. SAOs work with their service line colleagues to support effective, proportionate and legal safeguarding adults practice which advances the adult's rights, wellbeing and dignity and contributes to the ongoing improvement and development of our safeguarding adults work. In the UK they liaise with the statutory authorities and ensure concerns are reported.

4 Safeguarding Laws and regulations

Legislation

- 4.1 This responsibility is enacted in line with safeguarding legislation as relevant to the service user's location:
- 4.2 **The Adult Support and Protection (Scotland) Act 2007** made adult protection a statutory responsibility and placed a responsibility on partner agencies to co-

operate with statutory investigations and to report concerns about abuse or harm to the relevant local authority (even if allegations are anonymous).

- 4.3 **The Social Services and Well Being (Wales) Act 2014** provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales. This act introduces a mandatory duty to report if you have a concern about 'an adult at risk' (as defined in this legislation – see glossary) who may be or has been abused or harmed.
- 4.4 **Care Act 2014 (England)** provides a coherent approach to adult social care in England. Part one of the Act (and its Statutory Guidance) sets out new duties for local authorities and partners, and new rights for service users and carers.
- 4.5 **Adult Safeguarding: Prevention and Protection in Partnership, July 2015** places significant emphasis on prevention and early intervention to improve safeguarding arrangements for adults who are at risk from harm and abuse.
- 4.6 **Inter Agency Safeguarding Adults Adult Protection Policy 2016-2018 (Isle of Man)** sets the expectation of us as providers of social care services to enact our core responsibility to provide safe, effective and high quality care. Adult protection concerns require a variety of responses including internal and external investigations, disciplinary processes, clinical governance processes and the involvement of the police, regulatory authorities and staff training.
- 4.7 There are other related pieces of legislation, which cover elements of safeguarding adults across England, Wales, Scotland, Northern Ireland and the crown dependencies (States of Jersey, Guernsey and the Isle of Man). *See appendix to the procedure for more information about capacity legislation.*

Regulations

- 4.8 We will ensure alignment with the regulations in all of the areas we operate in.
- 4.9 We are subject to the Data Protection Act 1998 when managing safeguarding issues. This means we are expected to uphold the data protection principles and adhere to data protection standards in line with information governance requirements. *See Data Protection Policy and Information Governance Policy and Procedures.*
- 4.10 Under the Charities Act 2011 we have a legal requirement to advise and provide the Charity Commission and the Office of the Scottish Charity Regulator with information about incidents defined as serious. *See Incident Reporting Policy.*
- 4.11 The safeguarding lead is responsible for identifying any safeguarding adult incidents that may be considered serious to manage and improve our safeguarding adults work.
- 4.12 Registered Services are required to submit reports to their regulating body when a safeguarding concern, allegation or incident has occurred as well as reporting it internally using the safeguarding adults reporting process and any additional service line reporting processes.

- 4.13 The Regulation of Care (Scotland) Act 2000 and the Health and Social Care Act 2008 requires registered providers to take 'reasonable steps to identify the possibility of abuse and prevent it before it occurs.'
- 4.14 Capacity Legislation in Scotland, England and Wales places a requirement on an individual or organisation to safeguard 'vulnerable adults' from possible or actual harm.
- 4.15 Within contracted services, safeguarding practice needs to meet commissioners' requirements and be delivered within the framework of this policy. Mechanisms are in place to address and close any gaps which may present between the two so that we fulfil our commitment to work towards a common purpose. Where further requirements are needed by commissioners and funders in relation to specific services these will be developed, agreed and implemented locally in addition to, and aligned with this policy.

5 Policy Maintenance, Compliance and Audit

- 5.1 Oversight is the responsibility of the board of trustees.
- 5.2 The policy is owned by the executive director of UK Operations.
- 5.3 The head of quality is the safeguarding lead for the British Red Cross and is responsible for ensuring our approach to safeguarding is fit for purpose. Organisational responsibility for the implementation of this policy and the supporting procedures rests with the UK directors and line managers.
- 5.4 The policy is next due to be reviewed in December 2019 and is subject to interim updates as required.
- 5.5 Compliance with the policy will be supported by:
- > ensuring that all our volunteers and staff have access to this policy and its related procedures;
 - > ensuring that during induction our people are informed about the importance the organisation places on our safeguarding responsibilities;
 - > an annual safeguarding awareness week to raise awareness and improve understanding and compliance;
 - > supporting effective working relationships between Registered Managers & Responsible Managers and Safeguarding Adults Officers so that when a safeguarding concern is raised from within regulated activity the relevant regulator will be promptly notified along with the safeguarding adults officer and governance support unit;
 - > recording safeguarding adult concerns and developing systems which maximise the use of and learning from these reports;
 - > ensuring the head of quality has direct access to all safeguarding adults concerns, that safeguarding adult concerns are reported to senior managers on a quarterly basis and that where a concern is also categorised as a serious incident, the incident reporting policy is followed;

- > evaluating the understanding amongst volunteers and staff of our safeguarding procedures; and the support made available to people called upon to respond to safeguarding adult concerns; and
- > using internal and external reports of concerns for continuous improvement and to inform safeguarding audits.

6 Risk Management

- 6.1 The primary purpose of this policy (and procedures and guidance) is to help adults to keep themselves safe and to take or prompt action where adults are not able to protect themselves.
- 6.2 The British Red Cross takes any allegations of abuse or harm very seriously. In the event of any allegations of misconduct, we will seek to take action, including but not limited to disciplinary proceedings, and will work with safeguarding partners so that the rights, safety and wellbeing of the people we support are upheld and promoted.
- 6.3 Staff and volunteers are encouraged, through supporting procedures and training, to seek and secure any additional support they may require to effectively manage a safeguarding concern they have. This support could come from their line manager, their SAOs and other relevant colleagues.

7 Training and support

- 7.1 We train and support personnel so they are equipped to work safely and meet safeguarding standards and expectations.

Training

- 7.2 Volunteers and staff should be enabled to access the following training:
- > An introduction to safeguarding adults is part of both the Foundation and Retail Training Programmes for all new staff and volunteers;
 - > Additional training which has been developed to cover safeguarding adults awareness for specific services where the need has been identified within UK Operations;
 - > The safeguarding adults online refresher – accessed from the IFRC learning platform; and
 - > Two anti-trafficking modules developed by the PROTECT team which are available on the IFRC learning platform. E-module 1: Recognising trafficked people and providing a response and for more in depth information access and E-module 2: Assisting trafficked people to enact their rights and make informed decisions.

Support

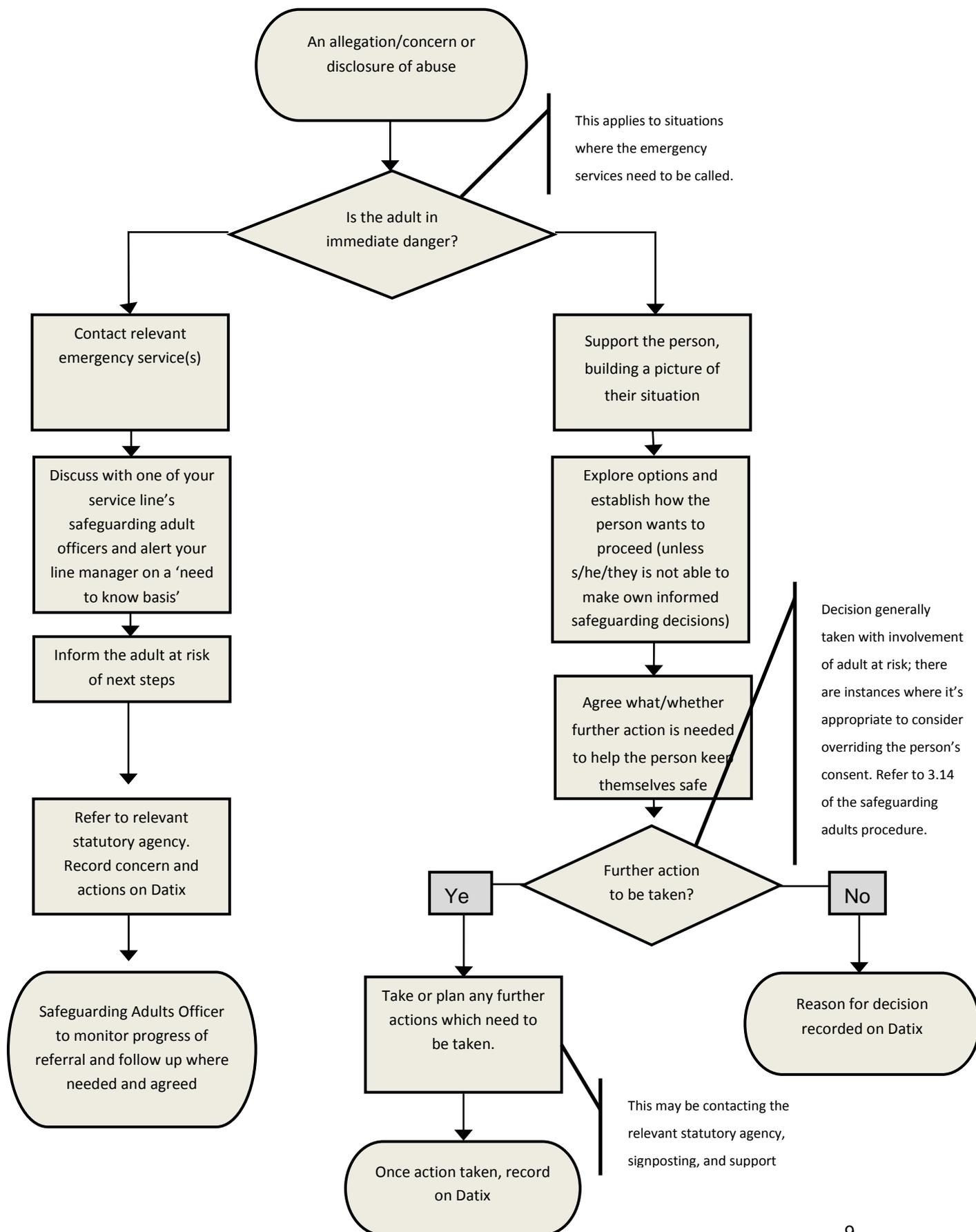
- 7.3 In addition to safeguarding training, staff and volunteers need ongoing opportunities to learn about safeguarding adult matters.
- 7.4 Assistance is available through the support line and debriefings. Support is also available through the psychosocial team.

8 Appendices

Appendix 1: Safeguarding Adults Reporting Procedure

Always work within the framework of the local authority's multi-agency safeguarding adults policy and procedures and the British Red Cross 'Safeguarding Adults at risk (of abuse or harm) Policy'.

NB: Alerts can be made by many people including people using services, staff and volunteers.



Appendix 2: Policy Essentials

As a representative of British Red Cross you are expected to:

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| ✓ | recognise indicators of abuse or harm; respond effectively; respect and uphold the rights and dignity of adult at risk and report, in line with policy and procedures – <i>see procedures for more information about the 4 Rs;</i> |
| ✓ | know the categories of adult abuse ¹ ; be aware of the six safeguarding adult principles ² and be able to use these to guide and inform your response to any adult at risk; |
| ✓ | know that any adult can be at risk whilst understanding that there are factors ³ that can increase the risk of abuse or harm; |
| ✓ | help adults to make their own informed safeguarding decisions and to take or prompt action if an adult at risk is not able to protect themselves from the risk of abuse ⁴ or harm; |
| ✓ | discuss your concerns in the first instance with the adult at risk unless doing so creates or increases the risk to them or you do not feel able to have this conversation, knowing that adult safeguarding is about working with adults at risk not something that is ‘done to them’ or carried out behind their backs or without their knowledge or involvement; |
| ✓ | take all safeguarding concerns seriously and raise safeguarding adult concerns you have with your safeguarding adults officer so that you can think through the options and decide your next steps; |
| ✓ | work within the framework of this policy as well as the local authority’s safeguarding adults policy and procedures, of the adult at risk; |
| ✓ | access and take an active part in safeguarding adults training and ongoing learning opportunities with a commitment to good quality safeguarding practice; |
| ✓ | ask if you are unsure what to do and keep yourself safe whilst maintaining your focus on safeguarding the adult at risk and others who may be affected. |

¹ **9 categories of adult abuse** – Physical, Sexual, Psychological/emotional, Financial and/or Material, Neglect and/or acts of omission, Discriminatory, Organisational, Domestic and Modern Slavery

² **6 principles of adult abuse** – Preventative; Proportionate; Protection (of people who are not able to protect themselves); Partnership; Empowering and Accountable, all underpinned by a person centred and rights based approach

³ **ABASHED LIPOGS** - Age; Bereavement or other trauma; Adjustment; Sensory Impairment; Health Status; Emergency Aftermath; Discrimination against people with ‘protected characteristics, Destitution, Dependence on others for help and support; Language and/or race; Insecure Immigration Status; Physical and/or learning disability; Occupation; Gender and/or Sexuality and Substance Misuse.

⁴ **Abuse** – ‘The violation of an individual’s human and civil rights by any other person or persons.’

Appendix 3: equality impact assessment

An assessment was carried out in October 2016 relating to the safeguarding adults at risk policy and procedures and positive improvements were made as a result.

Appendix 4: Short Safeguarding Adults Glossary

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| Adult |
| In line with the UN Convention on the Rights of the Child and the definition of a child in child protection guidance across England, Wales, Northern Ireland and Scotland, we define an adult as anyone who is 18 years old and over. |
| Safeguarding adults |
| The term used to describe all the work we (and others) do to help adults to keep themselves safe including taking or prompting action when people are not able to keep themselves safe which we refer to as statutory safeguarding or adult protection. Safeguarding “should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.” |
| Adult at risk |
| Scotland: “Adults at risk” are adults who: (a) are unable to safeguard their own well-being, property, rights or other interests, (b) are at risk of harm, and (c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected. Wales: An "adult at risk", is an adult who: (a) is experiencing or is at risk of abuse or neglect, (b) has needs for care and support (whether or not the authority is meeting any of those needs), and (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. Northern Ireland: An ‘Adult at risk of harm’ is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their: (a) personal characteristics and/or (b) life circumstances An ‘Adult in need of protection’ is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their: (a) personal characteristics and/or (b) life circumstances and (c) who is unable to protect their own well-being, property, assets, rights or other interests; (d) where the action or inaction of another person or persons is causing, or is likely to cause, him/her to be harmed. England: The safeguarding duties in the (Care) act apply to an adult who: |

- (a) has needs for care and support (whether or not the local authority is meeting any of those needs)
- (b) is experiencing, or at risk of, abuse or neglect
- (c) 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.

An adult at risk within British Red Cross

Any adult who is at risk of abuse or harm with a specific focus on adults at risk who use our services

Making Safeguarding Personal; taking a person centred approach

An initiative which supports us to have conversations with people about how we might respond in safeguarding situations in ways that enhance involvement, informed choice and control as well as improving people’s quality of life, wellbeing and safety. It is about seeing people as experts in their own lives and working alongside them with the aim of enabling them to reach better resolution of their circumstances and recovery. It is a shift from a process supported by conversations to a series of conversations supported by a process.

We work preventatively, ensure that robust procedures are in place and respond to each adult at risk as a unique and valued individual, in ways which advance the person’s rights, dignity and wellbeing and are legal, proportionate and reasonable; mindful at all times that we are working to safeguard adults who have the right to be involved in and informed of all safeguarding decisions which affect them.

Multi-agency working

A commitment to working with other *agencies to safeguard adults at risk.*

Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (England only):

Regulation 13: Safeguarding service users from abuse and improper treatment – to safeguard people who use services from suffering any form of abuse or improper treatment while receiving care and treatment <http://www.cqc.org.uk/content/regulation-13-safeguarding-service-users-abuse-and-improper-treatment>

Appendix 5 – Related Documents

| Document title | Relationship with this policy and REDX code | Policy | Procedure or Guidance |
|--|---|--------|-----------------------|
| Challenging Situations guidance | Guidance from the psychosocial team to assist dealing with a challenging situation. | | ✓ |
| Complaints, Comments and Compliments Policy and Procedure | Part of our commitment to learning, continuously improving our services and keeping people safe. | ✓ | |
| Confidentiality Policy; and Data Protection Policy | All of our work and practice must adhere to confidentiality and data protection requirements. | ✓ | |
| Equality and Diversity Policy | This policy is foundational to all of our work and practice. | ✓ | |
| Ex-Offenders Policy | Criminal convictions can only be considered where relevant to the role. | ✓ | |
| Guidance on risk assessment | Assists with completing assessments to minimise the impact of exposure to incidents and allegations of abuse or harm on the wellbeing of our people. | | ✓ |
| Guidance on Self Neglect | Guidance taking into account that self-neglect is reportable as a welfare concern under this policy. | | ✓ |
| Incident Reporting Policy | Part of our commitment to meeting our external responsibilities, as well as supporting good practice in reporting and responding to incidents. | ✓ | |
| Lone Working and personal Safety Policy | There are some situations when supporting an adult at risk could compromise your personal safety if you are working alone. | ✓ | |
| Procedure for supporting individuals at risk of being influenced into carrying out acts of extremism | Written in response to the government PREVENT strategy, one of four parts to the national programme for combatting terrorism in the UK (the CONTEST strategy) to outline our commitment to responding to risks of radicalisation as a safeguarding issue. | | ✓ |
| Raising a concern policy and procedure (formerly known as Whistleblowing) | Sets out avenues for our people to raise a concern about risk, suspected wrongdoing, or malpractice, within a supportive environment. | ✓ | |
| Recruitment and Selection Policy and Procedure | Robust recruitment processes are an essential part of an effective safeguarding approach. | ✓ | |
| Safeguarding Adults at risk Procedures and Guidance | Procedures and guidance to support the implementation of this policy. | | ✓ |
| Safeguarding adults with insecure immigration status | Information for people to consider when supporting people at risk who have insecure immigration status. | | ✓ |

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| Safeguarding Children and Young People Policy, Procedures and Guidance | Use if you have a safeguarding concern about a child or young person under 18 | ✓ | ✓ |
| Social Media Guidelines | Contains useful information about good conduct on social media. | | ✓ |

Appendix 6: document provenance

| Date endorsed | Category | Summarise changes made | Reason for changes | Consulted | Change endorsed by |
|---------------|------------------|---|--|--|--------------------|
| December 2013 | Scheduled review | <p>Updated on legislation changes & reviewed.</p> <p>To note:</p> <ol style="list-style-type: none"> 1. Shift in tone and approach away from the protection of 'vulnerable adults' towards safeguarding 'adults at risk' 2. Introduction of requirement to report 'welfare concerns' internally as a minimum and externally where needed 3. For the first time our safeguarding adults policy included a couple of 'International place-marks' | To ensure policy contemporary and fit for purpose. | UK Operations, P&L, ELT, | Board |
| December 2016 | Scheduled review | <p>Updated on legislation changes & reviewed so policy fit for purpose.</p> <p>To note:</p> <ol style="list-style-type: none"> 1. Sixth safer recruitment standard 2. Inclusion of the six safeguarding adult principles 3. Add in reference to 3 psychosocial support guidance documents and reference to safeguarding guidance for managers. | To ensure policy contemporary and fit for purpose. | UK Operations, Governance, P&L, ELT, Legal | Board |

