



## **Safeguarding Policy and Procedures**

### **Contents**

1	INTRODUCTION .....	2
2	REASON FOR POLICY AND PROCEDURE .....	2
3	POLICY STATEMENT .....	3
4	PROCEDURES .....	5
<b>4.1</b>	<b>Responsibilities</b> .....	5
<b>4.2</b>	<b>Implementation Stages</b> .....	6
<b>4.3</b>	<b>Reporting</b> .....	8
<b>4.4</b>	<b>Recording procedures</b> .....	11
<b>4.5</b>	<b>Responding to allegations of harm or inappropriate conduct against a member of staff or volunteer</b> .....	12
<b>4.6</b>	<b>Out of Hours Support Rota</b> .....	12
<b>4.7</b>	<b>Monitoring</b> .....	12
5	IMPLEMENTATION .....	13
6	MEASURING SUCCESS.....	13
7	BACKGROUND.....	13
8	POLICY OWNER: .....	14
9	DATE APPROVED BY SMT - OCTOBER - 2015 .....	14
10	DATE OF NEXT REVIEW.....	14

## **1 INTRODUCTION**

This Policy has been updated to reflect the change in language suggested in the Care Act Guidance October 2015, revised March 2016.

This Policy and Procedures document seeks to ensure that Independent Age undertakes its responsibilities with regard to the protection of adults at risk and will respond to concerns appropriately. It establishes a framework to support staff and volunteers in their practices and clarifies the organisation's expectations.

Independent Age provides services and support delivered by staff and volunteers, to older people and their families and carers. The Charity Commission asserts that Safeguarding Policy and Procedures are vital for the effective operation of any charity that works with vulnerable groups.

Independent Age is committed to following statutory and specialist guidelines in relation to safeguarding for those staff and volunteers delivering front line services to service users, at risk of harm, and to working within the Safeguarding Adults National Framework 2010 of good practice and outcomes in adult protection work and also to implementing the requirements of all relevant legislation. Staff and volunteers delivering frontline services are protected by the Lone Working Policy.

## **2 REASON FOR POLICY AND PROCEDURE**

The Care Act recognises and reinforces that all staff and volunteers in any organisation who have contact with adults who could be at risk of harm or neglect, have a duty to act if they have any concern that an adult is being harmed, neglected or exploited.

This policy sets out the key elements and overarching principles that underpin Independent Age's approach to working with adults at risk including issues relating to safeguarding, suicide and self-harm (see Safeguarding Adults at Risk Guidance Appendix 3).

### **Impact**

This Safeguarding Policy and Procedures aims to protect the older people we support from avoidable harm and to enable older people to get the outcomes that they themselves want. Central to Independent Age's Policy is the impact of any harm on the person at risk, not on judging the person who may have harmed them.

### 3 POLICY STATEMENT

For Independent Age safeguarding encompasses everything we do to protect adults and children who need care and support, our staff and our volunteers from the risk of harm or neglect.

There are three main elements to our safeguarding work:

- **Person-centred** – we will treat each person with dignity and respect and as a unique individual
- **Prevention** – we will put measures in place to avoid harm including the use of safe recruitment practices for staff and volunteers, promoting safe working environments and raising awareness of safeguarding.
- **Protection** – we will provide policy, procedures, information and training to enable all Independent Age staff and volunteers to work safely and to identify and respond appropriately to concerns about abuse or harm that may be affecting an adult who needs care and support.

All staff and volunteers, whatever the setting, have a key role in preventing harm or abuse from occurring and in taking action when concerns arise.

In the vast majority of cases Independent Age will only be required to provide information and signposting, to empower those raising safeguarding concerns to obtain the support they need.

Where there are reasonable doubts about the ability of the person raising concerns to obtain the right support for themselves or others, or where allegations concerning Independent Age staff or volunteers are raised, more complex responses may be required.

Independent Age also recognises its legal duty and responsibility to safeguard children, which will be regarded as 'top priority' if the adults Independent Age is supporting are carers or parents of children aged less than 18 years.

Safeguarding principles

The following principles will underpin our delivery:

- **Empowerment:** we will empower adults who need care and support to make decisions about their lives and achieve the outcomes that they want
- **Protection:** we will give people information and advice to enable them to protect themselves. Where an adult is not able to protect themselves, or others may be at risk, we will take reasonable and appropriate action to promote their safety and well being
- **Prevention:** we aim to prevent harm happening by raising awareness and providing information. We will recruit, support and treat staff and

volunteers safely and fairly. We will ensure staff and volunteers have a safe working environment

- **Proportionality:** we will act and respond in a way which is proportionate to the presenting concern. We will aim to promote individual rights and secure positive outcomes in any actions that we take and any information that we provide
- **Partnership:** we will work co-operatively with adults who need care and support, those who support them and relevant agencies to secure good outcomes
- **Accountability:** we will take responsibility for safeguarding by being aware of safeguarding concerns, understanding how we can play a part in preventing and ending abuse and/or neglect, acting promptly and sensitively to safeguarding concerns, sharing information appropriately, learning from experiences and monitoring our progress.

### **Safeguarding language and terminology**

The Care Act Guidance March 2016 replaces the previous description of a Vulnerable Adult with the term "Adult at Risk" The term "vulnerable adult" may wrongly imply that some of the fault for the harm lies with the victim.

### **Adults at Risk**

An adult at risk is defined in the Directors of Adult Social Services (ADASS) Guidelines 2011 as "anyone with social care needs who is or may be at risk of significant harm".

The Care Act Guidance March 2016 illustrates each type of abuse:

- **Physical abuse** including assault, hitting, slapping, pushing, misuse of medication, restraint, and inappropriate sanctions.
- **Domestic violence** including psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.
- **Sexual abuse**, including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual assault or sexual acts to which the adult has not consented, 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, cyber bullying, isolation and unreasonable or unjustified withdrawal from services or supportive networks.
- **Financial or material abuse** including theft, fraud, internet scamming coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, and the misuse or misappropriation of property, possessions or benefits.

- **Modern slavery** encompasses slavery, human trafficking, forced labour and domestic servitude, traffickers and slave masters using 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 forms of harassment, slurs or similar treatment: because of race, gender and gender identity, age, disability, sexual orientation and religion.
- **Organisational abuse** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one off incidents to 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.
- **Neglect and acts of omission** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support 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 behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour.

## 4 PROCEDURES

### 4.1 Responsibilities

**All Independent Age staff and volunteers**, irrespective of their role, have a part to play in safeguarding the older people we support where safeguarding concerns are suspected or have been identified. All staff and volunteers will undertake safeguarding training and familiarise themselves with the Safeguarding Policy and Procedures. Independent Age operates within the United Kingdom, consequently it is essential that staff familiarise themselves with local safeguarding reporting requirements which vary between countries and local authorities as required to fulfil their role. Information on local Safeguarding Board contact details and information on referral and reporting requirements will be supplied to frontline staff and the referral process covered in the staff training.

Staff and volunteers are responsible for being aware of and alert to safeguarding concerns. **However they are not responsible for diagnosing, investigating or providing a therapeutic response to harm.**

**Trustees** have responsibility for the general control and management of the administration of Independent Age and have a duty of care which includes taking the necessary steps to safeguard those at risk of harm. Trustees also have a duty to manage risk and to protect the reputation of the Charity.

**The Senior Management Team** have a responsibility to ensure that issues relating to working with adults at risk are included, where appropriate in strategic plans, risk assessments, communications and quality assurance for their Directorates. In some cases they will be required to make decisions in relation to serious safeguarding concerns in consultation with the Head of Information and Advice. They must also ensure that Trustees are kept informed of safeguarding matters.

**Heads of Service and Managers** are responsible for ensuring that they, and the staff they manage, are aware of, and confident in implementing Independent Age's Safeguarding Policy and Procedures and complete relevant training. They should ensure that safeguarding and risk assessment is discussed at team meetings and as part of the supervision process. They may be required to make decisions relating to complex or serious safeguarding concerns and can seek advice from the Head of Information and Advice where required.

**The Designated Person** for safeguarding at Independent Age is the Head of Information and Advice. The role of the Designated Person is:

- To develop and promote positive safeguarding policies, procedures, practices and training across Independent Age.
- To ensure that all staff are trained in safeguarding procedures and are confident in taking appropriate action when concerns or suspicions are raised.
- To ensure that all volunteers are trained in safeguarding procedures to enable them to understand reporting procedures, and take appropriate action when they have concerns or suspicions of potential safeguarding issues.
- To regularly audit the Independent Age Safeguarding Log to identify and analyse any safeguarding issues to improve policies and procedures.

To act as a source of support, advice and expertise within the organisation.

## 4.2 Implementation Stages

**Recruitment:** all staff and volunteers, who are in contact with adults at risk of harm must undertake a Disclosure and Barring Service check before they start their role.

**Induction for all staff:** as part of the initial induction with People and OD there will be a discussion of the Safeguarding Policy and Procedures, confirmation of understanding and familiarity with reporting processes. New staff will complete the e-learning package within the first two weeks of joining

the organisation. Face-to-face learning will be provided for frontline staff within the first month of joining the organisation.

**Induction for volunteers:** new volunteers will complete the safeguarding e-learning before they are matched with an older person. Face to face training is available for those who require it. Safeguarding is also covered as part of the role specific training for frontline volunteers.

**Training:** all Independent Age staff will complete the safeguarding e-learning and frontline staff will also complete the face-to-face training on working within, and implementing, the Independent Age Safeguarding Policy and Procedures.

All volunteers will complete the safeguarding e-learning package or face-to-face training on working within, and implementing, the Independent Age Safeguarding Policy and Procedures. New volunteers will complete the training before being matched with an older person.

All staff and volunteers will complete a refresher course every two years.

**Communicating the Safeguarding Policy and Procedures:** the Safeguarding Policy and Procedures will be available to all staff on ShareSpace and all staff will be made aware of their duty to read the documents and understand their role in the implementation of the Safeguarding Policy and Procedures.

All volunteers will be sent a copy of the Safeguarding Policy and Procedures, together with instructions on how to access Safeguarding training together with contact details for:

- Their Wellbeing Project Officer – Network/Wellbeing Project Officer
- Their National Wellbeing Manager/Telephone Friendship Services Manager
- The Out of Hours Support number

All new volunteers will be issued a copy of the Safeguarding Policy and Procedures on joining the organisation.

Independent Age is committed to facilitating effective discussion of safeguarding issues through a monthly Safeguarding Log review held during the Services Team Managers meeting. Learning from the Safeguarding Log review will inform policy and procedural changes which will be communicated to all staff and volunteers.

**Support:** All staff will have access to the Employee Assistance Programme. Volunteers will be signposted to other organisations.

**Boundaries:** maintaining professional boundaries is included in the induction for staff and volunteers. Professional boundaries are what define the limits of a relationship between staff, volunteers and the older people we support. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.

In addition, Independent Age's Financial Regulations states that staff members should not accept loans, gifts including financial gifts or items of any significant value from the people we support, nor should they be offered or accept gifts or loans from staff members or volunteers.

### **4.3 Reporting**

Independent Age has clear reporting and recording processes when safeguarding concerns have been raised, covering both standard working hours and out of hours (evenings and weekends). The processes are straightforward with referrals made to key contacts depending on the support the service user may receive from the organisation.

#### **Working and Out of Hours - Contacts**

##### **Out of Hours Support**

- **Out of Hours Support number on 020 7605 4455**

Out of Hours Support is provided by: National Wellbeing Managers, Telephone Friendship Services Manager, Head of Wellbeing, Head of Information and Advice and the Advice Manager.

##### **Face to Face Friendship Services**

- Main and first point of contact is the **Wellbeing Project Officer - Network**
- if the Area Manager is unavailable, refer to **National Wellbeing Manager**
- if the National Wellbeing Manager is unavailable, contact the **Out of Hours Support number**.

##### **Telephone Friendship Services**

- first point of contact is the **Wellbeing Project Officer**, who will escalate immediately to the **National Wellbeing Manager**
- if the National Wellbeing Manager is unavailable contact the **Out of Hours Support number**.

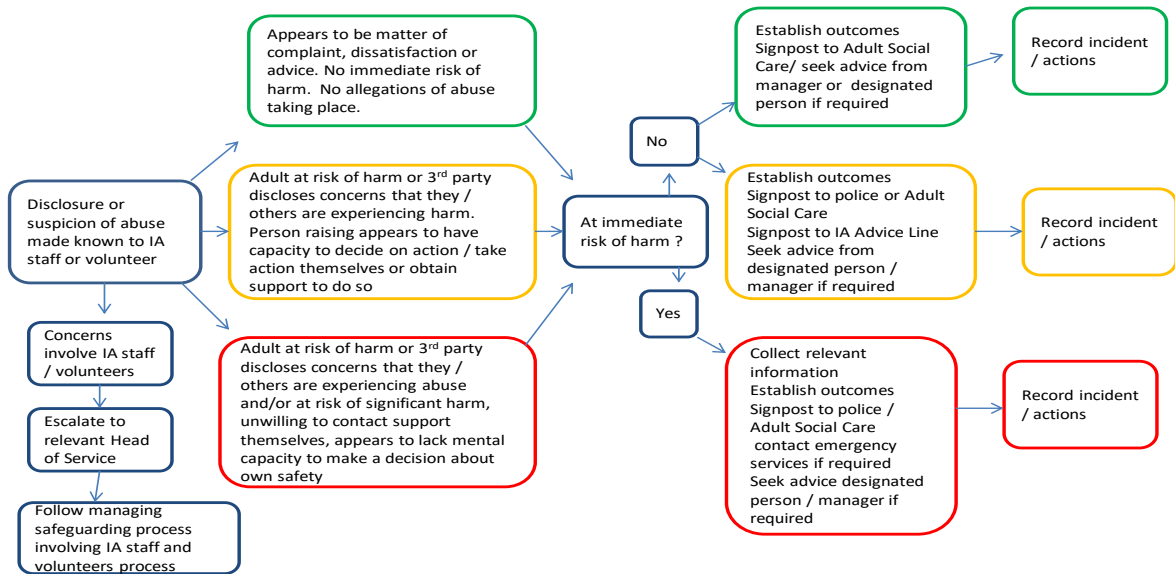
##### **Information and Advice, Grants and Regular Payments**

- main and first point of contact is the **Senior Advice Worker** followed by the **Advice Manager** or
- if Advice Manager is unavailable, refer to the **Head of Information and Advice**
- if the **Head of Information and Advice** is unavailable, contact the **Out of Hours Support number**.



However, when there is the possibility of immediate and significant risk to the service user, the police or emergency services should be contacted immediately on their behalf.

All concerns, disclosures, allegations and suspicions should be recorded on the Safeguarding Log.



### Resolution options

For all key safeguarding contacts within these procedures, the resolution options are as follows, depending on the potential level of risk of harm to the vulnerable adult:

- Decision taken that no action is required
- Refer to local Adult Safeguarding Services/emergency services
- Complete the Safeguarding Log

If it is not considered a safeguarding issue, and it is decided that there should be no referral made to a statutory authority, the Wellbeing Project Officer -Network or other key contact, may decide not to report at this stage. If this is the case a record should be made on the Safeguarding Log in line with data protection guidelines. These should include any action taken and the reasons for not referring.

## Reporting procedures

A) During working hours Monday to Friday 9 – 5:

If the service user is deemed **at risk of immediate harm**:

- the volunteer or staff member must contact the **emergency services**
- **Face to Face Friendship Services**; the volunteer must report their concerns and actions to their Wellbeing Project Officer - Network or if unavailable, the National Wellbeing Manager when safe and appropriate to do so
- **Telephone Friendship Services**; the volunteer must report their concerns and actions to the Wellbeing Project Officer who will escalate to the Telephone Friendship Services Manager
- **Information and Advice, Grants and Regular Payments**; Advisors must report their concerns and actions to the Advice Manager
- the person responsible for dealing with the concern must complete all relevant documentation including the Safeguarding Log on same working day
- the person responsible also emails the safeguarding group (SG) which is made up of Wellbeing Project Officers – Network, Advice staff, National Wellbeing Managers, Telephone Friendship Services Manager, Head of Information and Advice, Head of Wellbeing and the Media team to advise them that a safeguarding concern has been reported and has been recorded in the Safeguarding Log.

If the service user is **not** assessed as being at immediate risk of harm:

- the volunteer should contact their Wellbeing Project Officer – Network/Wellbeing Project Officer to raise their concerns. The Wellbeing Project Officer should escalate to the Telephone Friendship Services Manager.
- For Face to Face and Telephone Friendships Services if the Wellbeing Project Officer is not available, the National Wellbeing Manager or Telephone Friendship Services Manager should be contacted and in their absence, the matter should be referred to the Head of Wellbeing
- For Advice Service queries the service user should speak with the Senior Advisor in the first instance, or if available, speak with the Advice Manager, or Head of Information and Advice
- the person responsible for dealing with the concern must complete all relevant documentation including the Safeguarding Log on **same working day where possible**
- the person responsible also emails the safeguarding group to advise them that a safeguarding concern has been reported and has been recorded in the Safeguarding Log.

B) Out of hours and weekends:

If the service user is deemed **at risk of immediate harm**:

- the Volunteer or staff member must contact the **emergency services**

- the Volunteer or staff member must contact notify OHS
- the OHS must complete all relevant documentation including the Safeguarding Log on same working day
- the OHS also emails the safeguarding group to advise them that a safeguarding concern has been reported and has been or will be recorded in the Safeguarding Log.

If the service user is **not** assessed as being at immediate risk of harm:

- the Volunteer should contact the Out of Hours Support.
- the OHS should endeavour to resolve the concern.
- the OHS should inform the caller of the outcome, complete relevant documentation including the Safeguarding Log.
- the OHS also emails the safeguarding group to advise them that a safeguarding concern has been reported and has been or will be recorded in the Safeguarding Log.

Service users should report a safeguarding concern through the Member line 0207 605 4490 or Out Of Hours Support on 0207 605 4455.

In the event of the email system being down outside office hours, the Out of Hours Support would phone the relevant members of the safeguarding group and media team to inform them of a safeguarding concern.

### **Escalation for support options**

When a key contact, e.g. Wellbeing Project Officer - Network requires advice or additional support in the handling of a safeguarding concern, they should escalate to their National Wellbeing Manager or Out of Hours Support as appropriate.

In exceptional circumstances or when the safeguarding concern is of a complex nature, the National Wellbeing Manager/Out of Hours Support may need to seek advice and support from the Head of Wellbeing, , or the 'Designated Person' the Head of Information and Advice .

### **4.4 Recording procedures**

Details must be recorded in the Safeguarding Log. This is regularly reviewed by the Senior Management Team and Head of Information and Advice.

The Safeguarding Log records information on the adult about whom the concern is raised, the concern itself and any action taken. The record should be clear and factual, since any information gained may be valuable to professionals

investigating an incident and could at some time in the future be used as evidence in court. See Safeguarding Log template (Appendix 2).

#### **4.5 Responding to allegations of harm or inappropriate conduct against a member of staff or volunteer**

Independent Age recognises its duty to report concerns or allegations against its staff and/or volunteers. If an allegation of harm or inappropriate conduct towards an adult at risk is made against a member of staff, then this must be reported to their immediate line manager without delay. If the allegation concerns an Independent Age volunteer, this should be reported to their respective Wellbeing Project Officer – Network without delay.

#### **4.6 Out of Hours Support Rota**

Safeguarding Out of Hours Support will provide support and advice to staff and volunteers faced with a complex safeguarding issue or when they are unsure of the action required.

Out of Hours Support will be provided by senior managers on a weekly rota. (National Wellbeing Managers, Telephone Friendship Services Manager, Senior National Wellbeing Manager Head of Wellbeing, Head of Information and Advice, or Advice Manager).

#### **4.7 Monitoring**

The Head of Information and Advice will monitor the following to ensure the effective delivery of its Safeguarding Policy and Procedures:

- Safe recruitment practices for staff and volunteers
- DBS checks for all frontline staff and volunteers
- References taken up on all new staff and volunteers
- That all staff and volunteers have completed the safeguarding training
- Appropriate reporting of safeguarding concerns
- Regular review of the Policy and Procedure including the Safeguarding Log by the Head of Information and Advice.

Information will be gathered, recorded and stored in accordance with requirements under the Data Protection Act and Independent Age's Confidentiality Policy.

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard adults at risk. The public interest in safeguarding may override confidentiality interests. However, information will

be shared on a need to know basis only, as judged by the Designated Person. All staff and volunteers must be aware that they cannot promise older people or their families/carers that they will keep secrets.

The Safeguarding Log must be completed by the member of staff dealing with the concern.

## **5 IMPLEMENTATION**

Communication of the Policy and Procedures to staff Via ShareSpace (making clear that the training is mandatory) at a staff briefing in October 2015 and via email by the first week in November 2015

Communication of the Policy and Procedures to all Trustees including the Services Development Committee by email – November 2015

Communication of the Policy and Procedures to volunteers in a phased roll out, making clear that the training is mandatory, mailing November/December 2015

Communication of the Policy and Procedures to service users mailing November/December 2015

Safeguarding e-learning available to all staff by the first week in November 2015

Monitoring of staff members who have completed e-learning December 2015

Group training for frontline staff 11 – 25 November 2015

Safeguarding e-learning available to all volunteers November/December 2015 (New volunteers November 2015)

Monitoring of volunteers who have completed e-learning January/February 2016

Group training for volunteers who have not undertaken e-learning -January – June 2016

## **6 MEASURING SUCCESS**

The Safeguarding Log will be regularly reviewed to ensure compliance. Incidents logged will be reviewed by the Head of Information and Advice together with the Services Team. Learning from those reviews will inform process improvement ensuring that staff have the training to report safeguarding concerns appropriately.

Staff and volunteers have completed the appropriate level of safeguarding training and understand the requirements of the Policy and how to implement it. All potential issues are dealt with in accordance with the Policy and Procedures. The Safeguarding Log is in place and regularly reviewed by the Head of Information and Advice and any issues communicated to the Senior Management Team as required and the Senior Management team undertaking a quarterly review of the Safeguarding Log.

## **7 BACKGROUND**

The principal pieces of legislation governing this policy are:

Care Act 2014 –which places a duty to act on all staff and volunteers if they have a concern that an adult is being harmed, neglected or exploited

Data Protection Act 1998 – which places a duty on Independent Age to use data for limited, specifically stated purposes, used in a way that is adequate, relevant and not excessive and handled according to people’s data protection rights

This policy has been developed with reference to:  
Care and support statutory guidance – March 2016  
ADASS Safeguarding Adults 2011 Advice Note  
Independent Age Financial Regulations  
Independent Age Anti-Fraud Policy  
Independent Age Anti-Bribery Policy

**8 POLICY OWNER:**

Head of Information and Advice

**9 DATE APPROVED BY SMT - OCTOBER - 2015**

**10 DATE OF NEXT REVIEW**

March 2017

Version: V2.0, November 2016

Owner: Head of Information and Advice