



Safeguarding Vulnerable Adults Policy & Procedure

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Safeguarding Vulnerable Adults Policy & Procedure

Autism Bedfordshire is committed to ensuring that any over the age of 18 who use our services are not abused and that working practices minimise the risk of such abuse. Staff, trustees and volunteers of Autism Bedfordshire have a duty to identify abuse and report it.

Our policy is written in line with The Multi Agency Adult Safeguarding Policy, Practice and Procedures for Luton, Central Bedfordshire and Bedford Borough

https://www.centralbedfordshire.gov.uk/migrated_images/multi-agency-policy-practice-procedures-jan-2018_tcm3-19861.pdf and the Care Act 2014.

ADAS guidance – Making Safeguarding Personal

Autism Bedfordshire will:

- Ensure people accessing services, visitors and relatives receive information about how to raise concerns if they suspect or experience abuse in all its forms including neglect.
- Empower individuals with knowledge and understanding so that they will be aware of what is appropriate or inappropriate behaviour towards them
- Raise awareness amongst people with care and support needs, who may cause harm, of what constitutes abuse and why.
- Provide the support that may be necessary to ensure adequate levels of understanding, and adequate skills to ensure that rights and responsibilities are recognised and asserted.

- Enable staff and volunteers to recognise poor practice, or abuse and respond appropriately.
- Raise awareness of how staff and volunteers can use their routine processes (e.g. single assessment, risk assessments, care planning, and triage) to enable people to acknowledge that they are at risk of abuse, and signpost them to effective support.
- Raise the profile of adult protection in all relevant internal and inter-agency meetings.
- Promote relevant advocacy and advisory services.
- Ensure that when commissioning, contracting, or monitoring services that service providers are aware of, and adhere to this multi-agency policy.
- Recognise that children may also be at risk when working with families and adults with care and support needs. Referrals must be made to relevant children and families departments.

Definitions

All people in the communities of Luton, Bedford Borough Council and Central Bedfordshire Council have a right to:

- live a life that is free from violence, fear and abuse.
- be protected from harm and exploitation.
- Independence which may involve a degree of risk.

Autism Bedfordshire is working to protect an adult from the risk of abuse will make the dignity, safety, and well-being of that individual a priority in their actions. Services provided should be appropriate to the individual including their communication needs, physical needs, mental abilities, and each of the 9 protected characteristics of the Equality Act 2010 (age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex or sexual orientation.)

All safeguarding work should aim to enable adults who experience abuse to retain as much control as possible over their own lives. The person who may be experiencing abuse should be given information, properly accessible to them, about the adult protection process.

Those who have experienced abuse will be offered the choice and support to participate or otherwise have their views included, in all forums that are making decisions about their lives. They should be offered contact with independent organisations and advocacy services. Where communication aids, interpretation or personal assistance are necessary for a person to participate, these must be provided.

Where an individual does not have the mental capacity to decide how to protect himself or herself from abuse, organisations will actively use legislative frameworks to protect that person and an independent Mental Capacity Advocate (or IMCA) must be sought to represent their interests during adult protection procedures. Where ongoing advocacy support is needed, an appropriately qualified professional must be nominated to act in the role of advocate.

All decisions taken by professionals about a person's life must be reasonable, proportionate and justified. Where organisations have a duty to intervene to reduce risk, then that intervention should be proportionate to the risk facing the person.

Any intervention in a person's life, including for immediate protection and its result, should match the wishes, where known, of that person as closely as possible. N.B. An individual's wishes cannot undermine an organisation's legal duty to act.

In achieving protection, the life of the person experiencing abuse should be disrupted as little as possible, unless they request otherwise. Where possible risks should be reduced by removing the abusive person and not the person experiencing abuse, maltreatment, or neglect.

Information will only be shared with the person's consent or where there is an overriding justification (for example, legal reasons to protect from harm a person without capacity) and on a need-to-know basis.

We will always consider how we can support unpaid carers who may be struggling to care appropriately.

Types of Abuse

Autism Bedfordshire does not limit their view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered

General indicators of an abusive relationship often include the misuse of power by one person over another and are most likely to take place in situations where one person has power over another. For example, where one person is dependent on another for their physical care or due to power relationships in society e.g., between a professional worker and a person accessing services, a man and a woman and a person belonging to the dominant race / culture and a person belonging to an ethnic minority.

There are many forms of physical, sexual, and emotional abuse and neglect; multiple forms of abuse may occur at the same time. Abuse may be deliberate, or unintentional. Abuse of a person often includes behavior that is abusive in one or more of the categories outlined below.

Abuse can include physical, financial, material, sexual, psychological, discriminatory, emotional or neglect issues, organisational, modern slavery, domestic abuse, self-neglect and acts of omission. Each of these areas will be explored in more detail in the training and induction of all Autism Bedfordshire staff.

Aim

Autism Bedfordshire aim to provide services to vulnerable adults in a non-discriminatory and safe environment by employing and training staff and volunteers who practice in such an environment using methods and programs that enable the individual to feel safe and develop and progress towards achieving their full potential.

All people have a right to:

- live a life that is free from violence, fear, and abuse.
- be protected from harm and exploitation.
- Independence which may involve a degree of risk. (Multi Agency Adult Safeguarding Policy Statement)

The Care Act 2014 statutory guidance states that safeguarding should be personal; it should be person led and outcome focussed; it should enhance involvement, choice, and control as well as improving quality of life, wellbeing, and safety:

6 key principles underpin all adult safeguarding work:

- Empowerment
- Protection
- Prevention
- Proportionality
- Partnership

Autism Bedfordshire is a Company Limited by Guarantee. Registered in England No. 04632497
Registered Office: Suite B1, 1 Hammond Road, Elms Farm Industrial Estate, Bedford, MK41 0UD.

- Accountability

Our objective is to avoid and reduce the risk of harm to adults at risk of abuse or other types of exploitation, whilst supporting individuals in maintaining choice over their lives and in making informed choices without coercion.

Staff and Volunteers

All staff and volunteers working with vulnerable adults are exempt from the Rehabilitation of Offenders Act 1974 and therefore will have had to undertake and obtain appropriate DBS (previously known as CRB) clearances, together with at least two references and have undertaken appropriate selection procedures and training.

It is the responsibility of Autism Bedfordshire to ensure that all staff, paid and volunteer, are aware of vulnerable adult's need for protection. They will be made aware of and understand charity policies and procedures in relation to their work and will be given instruction on how to identify and report such incidents.

Appointed Safeguarding Officer

Our **Appointed Safeguarding Officer, Elizabeth Cook**, is the Senior Adult Services Manager, and takes lead responsibility for coordinating all adult protection activities within the charity. She provides support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the local safeguarding teams, adult social care. Health, police, etc. This person has lead responsibility and management oversight for safeguarding adults.

The Appointed Safeguarding Officer is supported by the following Deputy Safeguarding Officers:

- **Angela Amitrano, Adult Services Manager in Bedfordshire.**
- **TBC, Transitions and Social Co-Ordinator in Hertfordshire.**

The Deputy Safeguarding Officer is trained to the same level as the Appointed Safeguarding Officer and will undertake this role operationally with direct oversight and management from the Appointed Safeguarding Officer who maintains lead responsibility.

Adult Service Users

As part of the programs of work undertaken whilst with Autism Bedfordshire, all adult service users will be made aware of what is appropriate and inappropriate behaviour. They will also be made aware of the procedures and processes that are available to them to report such incidents of inappropriate or abusive behaviour and the processes that may follow from such reports. The adults will be given

People with care and support needs who are alleged to be causing harm

Whilst the protection of the person who may have been abused remains paramount, Autism Bedfordshire also have responsibilities to the alleged person causing harm who may be an adult in receipt of care services.

Abuse of one person with care and support needs by another person with care and support needs can occur in our community settings, places such as: Social Group, Skills development courses, employment support sessions and when out in the community.

In these cases, it will be necessary to consider the needs of both individuals separately. Some of the issues that may need to be examined include:

- The extent to which the alleged person causing harm is able to understand his or her actions.
- The extent to which the abuse reflected that individual's own needs and situation.
- The likelihood of the alleged person causing harm further harming others.

Where an offence appears to have been committed and the alleged person causing harm is considered to be a person with care and support needs an 'Appropriate Adult' under the terms of the Police and Criminal Evidence procedures and a legal representative must be provided when they are interviewed by the Police

Procedures

Any staff member or volunteer who has observed or been made aware of potential or actual abuse should, in the first instance, immediately discuss with their line manager/named person.

If they are not immediately available, then another appropriate representative of the organisation (e.g., Adult Services Manager should be informed.

Responding to Disclosures

It is important that the adult is supported throughout the process. You can support the individual by following this guidance:

Do's

- Remain calm and do not show shock or disbelief
- Listen carefully to what is being said and record it in detail
- Be aware of the possibility that medical evidence may be needed
- Demonstrate a sympathetic approach by acknowledging regret and concern that what has been reported has happened
- Do confirm that the information will be treated seriously
- Give the person contact details so that they can report any further issues or ask any questions that may arise
- Ensure that the person with care and support needs receives regular feedback and updates
- Ensure that any emergency action needed has been taken
- Ensure that those who need to be informed have been informed

Tell the person that:

- It was not their fault, and they were right to tell you
- You must inform an appropriate Manager and/or the Police
- The safeguarding lead at Autism Bedfordshire will contact the Safeguarding Team
- The Safeguarding Team will consider their wishes and whether they consent to the matter being progressed further. There will be circumstances where an enquiry may have to progress even if they do not give their consent.

Don't:

- Do not press the person for more details
- But do not stop someone who is freely recalling significant events, as they may not tell anyone again
- Do not dismiss or disbelieve what you see or have been told
- Do not ignore the issue

- Do not promise to keep secrets- but do explain that the information will only be passed to those who “need to know”
- Do not make promises that you cannot keep (such as “this will not happen to you again”
- Do not contact the alleged abuser or anyone who might be in touch with him/her
- Do not be judgmental, e.g. “Why didn’t you run away?”
- Do not tell anybody who doesn’t need to know e.g. gossip
- Do not ask leading questions e.g. suggesting names of who may have perpetrated abuse if the person does not disclose it
- Do not interview staff or clean a person or area involved in a crime

Safeguarding Timetable

Staff have access to have access to a safeguarding timetable which breaks down who to contact and how communications are received.

Timetable for Bedfordshire and Milton Keynes office

Monday – Friday

- Staff Member – Elizabeth Cook - elizabeth.cook@autismbeds.org / 07712577173
- Unable to reach Lead – Angela Amitrano - angela.amitrano@autismbeds.org / 07878890658

Timetable for Hertfordshire Office

Monday – Friday

- Staff Member – Elizabeth Cook - elizabeth.cook@autismbeds.org / 07712577173
- Unable to reach Lead – TBC

In the Instance that Elizabeth Cook is **on annual leave please call Emma Reade** as per the table below. If Emma is unreachable and the issue is within Hertfordshire call TBC or Angela Amitrano if the safeguarding incident is within BLMK. Elizabeth Cook will always send an email to the office team to make them aware that she is on leave and who to contact in her absence if any safeguarding issues arise.

Holiday Timetable (If the Elizabeth Cook is off)

Bedfordshire

Monday – Friday

- Staff Member – Emma Reade - emma.reade@autismbeds.org / 01234 214871
- Unable to reach Lead – Angela Amitrano - angela.amitrano@autismbeds.org / 07878890658

Hertfordshire

Monday – Friday

- Staff Member – Emma Reade - emma.reade@autismbeds.org / 01234 214871
- Unable to reach Lead – TBC

Timetable for Evening Social Groups

Bedfordshire

Monday – Friday

- Staff Member – Angela Amitrano - angela.amitrano@autismbeds.org / 07878890658
- Unable to reach Lead – Elizabeth Cook - elizabeth.cook@autismbeds.org / 07712577173

Hertfordshire

Monday – Friday

- Staff Member – TBC
- Unable to reach Lead – Elizabeth Cook - elizabeth.cook@autismbeds.org / 07712577173

In the Instance that either Angela Amitrano or TBC are on annual leave please call Elizabeth Cook. An email will be sent out to the Senior Team Leader by the management team to let them know they are on leave and who to contact in their absence if any safeguarding issues do come up.

Any adult wishing to report any concerns should, in the first instance talk to a responsible member of staff. If this is impossible or impractical, they should talk to a trusted member of their family or other responsible adult.

Relevant information, including times, dates, witnesses, person providing information, factual descriptions should be noted as soon as possible after the event and recorded on the appropriate paperwork by the named person.

If abuse is suspected, then a referral to Adult Social Services should be made and recorded on salesforce.

Safeguarding contacts:

Local Authority	9am -5pm	Out of hours
Bedford Borough	01234 547659	0300 3008123
Central Bedfordshire	0300 300 8122	0300 3008123
Luton Borough	01582 276222	0300 3008123
Milton Keynes	01908 253772	01908 725005
Hertfordshire	0300 123 4042	0300 123 4042

The named person will discuss the concerns with parents/carers in a sensitive and tactful manner, unless the individual would be potentially at greater risk by doing this. In this case, further discussions should take place with social services or the police.

All those making a complaint or allegation or expressing concern, whether they are staff, volunteers, service users, parents, carers or members of the public should be reassured that they will be taken seriously, that their comments will usually be treated confidentially, but their concerns may be shared with the appropriate authorities if they or others are at significant risk.

What you should not do in any such situation is confront the suspected abuser, destroy any evidence, start to investigate the situation yourself, be judgmental, make promises you cannot keep or take the allegations lightly.

Confidentiality and Recording

Every effort should be made to ensure that confidentiality is maintained for all concerned.

Information should be handled and disseminated on a need-to-know basis only. Information

should be stored on salesforce with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

Details that should be recorded are as follows:-

- The vulnerable adult's name, date of birth, home address and telephone number.
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- The nature of the allegation including dates, times, any special factors and other relevant information.
- Make a clear distinction between what is fact, what is opinion and what is hearsay.
- A description of any visible signs (e.g. Bruising or other injuries) and any indirect signs or behavioral changes
- Details of witnesses to the incident(s).
- The vulnerable adult's account of what happened, their understanding of the nature of the harm they have experienced Their wishes and views on how to proceed
- Who has been contacted and what was said to them.

We will co-operate in the sharing of appropriate information based on the principles defined below:

- Information will be shared on a need-to-know basis when it is in the best interest of the individual and especially to protect people with care and support needs.

Confidentiality must not be confused with secrecy.

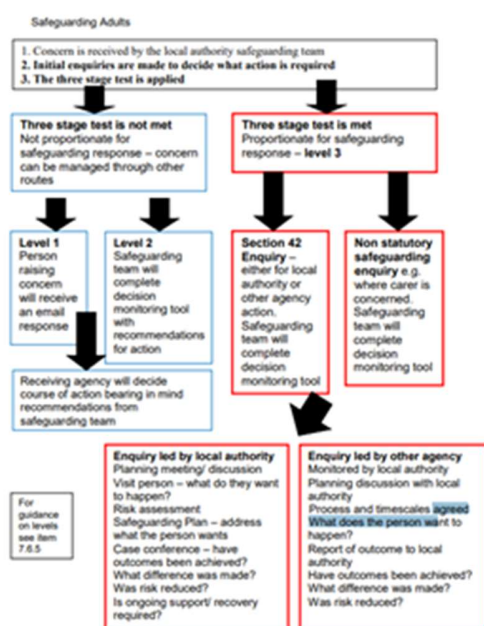
- Informed consent must be obtained, but if this is not possible and other adults are at risk, it may be necessary to override the requirement.
- It is inappropriate for agencies to give absolute confidentiality in cases where there are concerns about abuse, particularly when other people may be at risk or there is a legal duty to report criminal activity. Do not risk allowing a person to be abused by failure to share information necessary for their protection.
- Any exchange of information must be in accordance with the Data Protection Act 1998, the Human Rights Act 1998, and Caldicott Principles.

- The Adult Services Manager will refer all matters to the police where they believe there to be any possibility of criminal action or matters which may require police action. This form can be found at:

<http://lutonlscb.org.uk/wp-content/uploads/2019/05/Multi-Agency-Information-Submission-Form-Revised-March-2019.docx>

What Happens Next

What happens next will depend upon the wishes of the person and the seriousness of the situation. If the individual is in physical danger, then ensuring their safety is paramount.



Details should be taken as to who is making the concern and their contact details. At all times, a professional approach should be adopted when anonymous referrals are made in relation to whistle blowing policies and reassurance of anonymity is provided.

However, anonymity is generally discouraged and the person raising the concern should be supported to enable them to divulge their identity whenever possible. The referrer should be asked whether their safety is or will be compromised, should the alleged person causing harm know the source of the

concern.

Details about the alleged person causing harm must also be recorded; this includes name and address, the relationship to the person with care and support needs, their role and the organisation for which they work, if they pose a risk of further abuse to others. All information must be clearly recorded including dates and times when events took place. Facts and opinion should be clearly differentiated.

The person in the Adult Safeguarding Team receiving the concern will:

- Where it is identified by the Safeguarding Team that urgent action is needed to protect the safety of one or more adults and this has not already been taken, the Safeguarding Team will initiate immediate action to commence enquiries and protect any person with care and support

needs from the identified harm. This will happen on the same day that the concern is received. The action will be recorded by the Safeguarding Adults Team. If an adult or child is in immediate danger the police or other emergency service will be contacted. If it is identified that a child may be at risk a referral must be made as required by Child Protection Procedures.

- Contact the police immediately where a crime has taken place and advise the person raising the concern about preserving evidence until such time as the police arrive.
- Acknowledge receipt of the concern.
- Record the concern - All safeguarding concerns must be recorded within 24 hours of contact.
- Inform the regulator of registered services of allegations of serious abuse.

A Safeguarding Enquiry under section 42 of the Care Act will be undertaken when the concern meets all elements of the three-stage test:

- A person has care and support needs
- They are experiencing or at risk of abuse
- As a result of their care and support needs is unable to protect themselves

Advocacy Support

Under the Care Act 2014 the local authority has the duty to provide independent advocacy to people (adults and carers) with care and support needs:

- Who may have capacity but would have substantial difficulty (understanding retaining weighing up, communicating) in being involved in care and support processes (subject of a safeguarding enquiry and / or safeguarding adult review)
- When there is no other suitable person to represent and support them
- Advocacy must be independent of the local authority The advocate's role is to facilitate the person's involvement, not merely be consulted about

Independent advocacy services in Bedfordshire, Milton Keynes and Hertfordshire are:

Location	Organisation
Central Bedfordshire and Bedford	VoiceAbility Advocacy and involvement
Milton Keynes	Home The Advocacy People
Hertfordshire	Hertfordshire Home POhWER

Recruitment

Autism Bedfordshire has written recruitment and selection policies and procedures in place and these will be followed at all times.

For all candidates:

- written information about previous employment history must be provided
- checks need to be carried out to ensure that the information is not contradictory or incomplete and
- before interview all shortlisted candidates' references will be sought (including internal ones).

Any information about past disciplinary action or allegations must be considered carefully when assessing an applicant's suitability for the post.

Any offer of employment is conditional (and it shall be made clear to the successful candidate that this is the case) on satisfactory completion of the necessary preemployment checks. These checks include:

- verification of candidates' identity
- obtaining a certificate for an appropriate DBS check which will include barred list information, for those who will be engaging in regulated activity
- verification of the person's right to work in the UK.

Complaints against staff or volunteers can result in three types of investigations, a criminal investigation, an adult protection investigation or a disciplinary/misconduct investigation. Once the allegations are received by any other agency, then the resulting process will follow their own Safeguarding procedures.

Whistleblowing

If you have concerns about a colleague or staff who are concerned about the conduct of a colleague are undoubtedly placed in a very difficult situation. They may worry they have misunderstood the situation and will wonder whether a report could jeopardise the colleague's career. All staff must remember that the welfare of the adult is paramount. The Autism Bedfordshire Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns about poor practice or concerns about a adult's welfare due to the behaviour of a colleague should be reported to the Designated Person

for Safeguarding adults. Complaints about the Designated Person for safeguarding adults should be reported to the Chair of the Board of Trustees.

Concerns under Prevent

We recognise that Autism Bedfordshire's groups and activities are intended to be safe places in which service users and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. Autism Bedfordshire acknowledges its duty to have "due regard to the need to prevent people from being drawn into terrorism" in line with the governments prevent duty guidance. [The Counter-Terrorism and Security Act 2015 \(Risk of Being Drawn into Terrorism\) \(Amendment and Guidance\) Regulations | 2015 \(legislation.gov.uk\)](#)

In compliance with this duty Autism Bedfordshire where applicable will:

- carry out risk assessments in order to assess the risk of vulnerable adults being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology (including the risk of online radicalisation);
- promote fundamental British values;
- ensure all staff undertake the online general awareness training module on Channel: www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html and are aware of when it is appropriate to make a referral to Bedfordshire Police prevent department who will work with the individuals.
- ensure that there are suitable filters in place for all IT equipment and that service users are equipped with the knowledge to stay safe online. Every member of staff will be aware of the risks posed by the online activity of extremist and terrorist groups.

References

The Multi Agency Adult Safeguarding Policy, Practice and Procedures for Luton, Central Bedfordshire and Bedford Borough	https://www.centralbedfordshire.gov.uk/migrated_images/multi-agency-policy-practice-procedures-jan-2018_tcm3-19861.pdf
Police form for any possibly criminal action or matter	http://lutonlscb.org.uk/wp-content/uploads/2019/05/Multi-Agency-Information-Submission-Form-Revised-March-2019.docx
Independent advocacy services in Bedfordshire	VoiceAbility Advocacy and involvement
Independent advocacy services in Milton Keynes	Home The Advocacy People
Independent advocacy services in Hertfordshire	Hertfordshire Home POhWER
Counter Terrorism And Security Act 2015	The Counter-Terrorism and Security Act 2015 (Risk of Being Drawn into Terrorism) (Amendment and Guidance) Regulations 2015 (legislation.gov.uk)
General Awareness Training Course	www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html