



Safeguarding Vulnerable Adults Policy

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Person/s responsible: SLT, DSL, all staff

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Aim

The purpose of this policy is to outline the duty and responsibility of company staff, representatives, and directors in relation to Safeguarding Vulnerable Adults.

Employers of apprentices enrolled on a programme of learning with Netcom Training will also be included in the scope of this policy

All adults have the right to be safe from harm and must be able to live free from fear of abuse, neglect, and exploitation.

Objectives

To explain the responsibilities the organisation and its staff have in respect of vulnerable adult protection.

To provide staff with an overview of vulnerable adult protection

To provide a clear procedure that will be implemented where vulnerable adult protection issues arise.

Context

For the purpose of this policy 'adult' means a person aged 18 years or over.

What do we mean by abuse?

Abuse of a vulnerable adult may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.

Concerns about abuse may be raised and reported to the social services agency as a result of a single incident or repeated incidents of abuse. However, for some clients the issues of abuse relate to neglect and poor standards of care. They are ongoing and if ignored may result in a severe deterioration in both physical and mental health and even death.

Anyone who has concerns about poor care standards and neglect in a care setting may raise these within the service, with the regulatory body and/or with the social services agency.

Where these concerns relate to a vulnerable adult living in their own home, with family or with informal carers, they must be reported to the social services agency.

Who is included under the heading 'vulnerable adult?'

An Adult (a person aged 18 or over) who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be

unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'.

This could include people with learning disabilities, mental health problems, older people and people with a physical disability or impairment. It is important to include people whose condition and subsequent vulnerability fluctuates. It may include an individual who may be vulnerable as a consequence of their role as a carer in relation to any of the above.

It may also include victims of domestic abuse, hate crime and anti-social abuse behavior. The person's need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behavior, drug, or alcohol problems, social or emotional problems, poverty, or homelessness.

Many vulnerable adults may not realise that they are being abused. For instance, an elderly person, accepting that they are dependent on their family, may feel that they must tolerate losing control of their finances or their physical environment. They may be reluctant to assert themselves for fear of upsetting their carers or making the situation worse.

It is important to consider the meaning of 'Significant Harm'. The Law Commission, in its consultation document 'Who Decides,' issued in Dec 1997 suggested that; 'harm' must 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 an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioral development'.

Legal framework

- Human Rights Act 1998, the Mental Capacity Act 2005, and Public Interest Disclosure Act 1998
- Data Protection Act 1998, Freedom of Information Act 2000, Safeguarding Vulnerable Groups Act 2006, Deprivation of Liberty Safeguards, Code of Practice 2008
- The Mental Capacity Act 2005, covering England and Wales, provides a statutory framework for people who lack capacity to make decisions for themselves, or who have capacity and want to make preparations for a time when they may lack capacity in the future. It sets out who can take decisions, in which situations, and how they must go about this.
- The Human Rights Act 1998 gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR).
- The Public Interest Disclosure Act 1998 (PIDA) created a framework for whistle blowing across the private, public, and voluntary sectors. The Act provides almost every individual in the workplace with protection from victimisation where they raise genuine concerns about malpractice in accordance with the Act's provisions.

The role of company staff, representatives, and directors

All company staff, representatives and directors working on behalf of the organisation have a duty to promote the welfare and safety of vulnerable adults, whether the latter are attending company premises or at their place of work.

Company staff, representatives and directors may receive disclosures of abuse and observe vulnerable adults who are at risk. This policy will enable staff/volunteers to make informed and confident responses to specific adult protection issues.

There is a shared commitment to identify and monitor pastoral issues that may later develop into safeguarding concerns. The company will promote a culture of mutual respect and will not tolerate any potential or actual cases of bullying, harassment, or victimisation. Employees must notify the DSL or Deputy of any concerns with inappropriate learner behaviour that may directly or indirectly affect others and similarly if colleagues breach the accepted codes of conduct.

Types of abuse

Abuse may consist of 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.

The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:

- **Physical abuse** - including hitting, slapping, 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.
- **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.
- **Discriminatory abuse** - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.

- **Institutional abuse** - Institutional abuse although not a separate category of abuse in itself, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level as detailed in the contract specification.
- **Multiple forms of abuse** - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence, or ignorance.

Domestic abuse

Home Office Definition 2004

'Any incident of threatening behavior, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.'

Women's Aid Definition

'Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behavior. This can also include forced marriage and so-called "honor crimes". Domestic violence may include a range of abusive behaviors, not all of which are in themselves inherently "violent".'

Most research suggests that domestic violence occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class, or educational level.

Both definitions would therefore also include incidents where extended family members may condone or share in the pattern of abuse e.g., forced marriage, female genital mutilation and crimes rationalized as punishing women for bringing 'dishonor' to the family.

It is important to recognise that Vulnerable Adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

Where Vulnerable Adults are victims of Domestic Abuse, they may need extra support to plan their future. The violence or threat of violence may continue after a victim has separated from the abuser. It is important to ensure that all the vulnerable people in this situation have appropriate support to enable them to maintain their personal safety.

Procedure in the event of a disclosure

It is important that vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously.

This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused.

Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.

A full record shall be made as soon as possible of the nature of the allegation and any other relevant information.

This must 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.

Responding to an allegation

Any suspicion, allegation or incident of abuse must be reported to the Designated Safeguarding Officer or Senior Manager on that working day where possible.

The Designated Safeguarding Lead shall report the matter to the local Safeguarding Adults Board. A written record of the date and time of the report shall be made, and the report must include the name and position of the person to whom the matter is reported, if known. Refer to page 12 for current contact details for referrals.

Responding appropriately to an allegation of abuse

In the event of an incident or disclosure:

DO

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Listen
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your manager for Support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

DON'T

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- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the Designated Safeguarding Lead.

Confidentiality

Vulnerable adult protection raises issues of confidentiality which must be clearly understood by all.

Staff, volunteers, and trustees have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies, and adult social services.

Clear boundaries of confidentiality will be communicated to all.

All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.

If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.

Within that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.

Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.

Where a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result.

Staff must assure the adult that they will keep them informed of any action to be taken and why. The adult's involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

This policy needs to be read in conjunction with other policies for the organisation including:

- Disciplinary and Grievance
- Data Protection
- Recruitment and Selection

The role of key individual agencies

Adult Social Services

The Department of Health's recent 'No secrets' guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of vulnerable adults at risk of abuse. All local authorities have a Safeguarding Adults Board, which oversees multi-agency work aimed at protecting and safeguarding vulnerable adults. It is normal practice for the board to comprise of people from partner organisations who have the ability to influence decision making and resource allocation within their organisation.

The Police

The Police play a vital role in Safeguarding Adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

Role of designated safeguarding Lead and officer

The role of the designated safeguarding Lead is to deal with all instances involving adult protection that arise within the company. They will respond to all vulnerable adult protection enquiries and concerns and take overall responsibility for the Safeguarding policy and procedures.

Designated Safeguarding Lead (DSL): **Joanne Preece, Kevin Newton**

Deputy Designated Safeguarding Lead (DSL): **Sharon Bennett**

Designated Safeguarding Officer (DSO): **Emma Webb, Tim Childe, Zsuzsa Gyenge**

Staff will report any queries/concerns to the DSO as the first line of contact or directly to the DSL in the absence of the former.

Role of Line Manager

The role of the line manager is to support the member of staff or volunteer involved with the incident and to ensure the correct procedures are followed.

The line manager could, if agreed with the staff member dealing with the incident, make contact with the Designated Safeguarding Officer in the first instance.

The line manager must ensure that all staff within their team are familiar with the organisation's vulnerable adult protection procedures and ensure that all staff undertakes training, where appropriate.

Training

Training will be provided, as appropriate, via induction (including an online module), supervision, support, and quality assurance to ensure that staff are aware of the Safeguarding policy and procedures and always observe agreed codes of conduct and behaviour. Specialist training will be provided for the member of staff with Designated Safeguarding Lead/Officer responsibilities.

Learners will be made aware of the company Safeguarding policy and procedures and their own responsibilities at induction and issued with relevant content within the Learner guide, including how to raise any concerns. There is a dedicated e mail address for this purpose: safeguarding@netcomtraining.co.uk. Safeguarding team members will receive an automatic alert notifying them of any mail received in the inbox to assist the prompt response in any instance.

Information is available in the centre to signpost learners to local/regional services offering support where applicable. General e safety tips and guidance will be imparted at induction and as part of course/programme content.

All learners must agree to written terms and conditions covering the safe and acceptable use of IT before access can be granted to enable the use of the company's IT systems. This will serve to minimise the risk of them accessing illegal or inappropriate sites. To protect their safety. Unique user ID and login credentials observing generally agreed best practice password security measures will be provided which must not be shared with other learners. This will also enable individual usage to be tracked and monitored if there may be reason to do so to ensure the appropriate security processes are maintained and to avoid potential breaches of policy requirements.

Employers of apprentices enrolled on Netcom training programmes will also receive information and guidance to support their understanding of Safeguarding, their responsibilities, and the process for raising any concerns.

Complaints policy

The organisation has a complaints policy and procedures available to all company staff, management, representatives, and directors.

Recruitment procedure

The organisation operates procedures that take account of the need to safeguard and promote the welfare of vulnerable adults, including arrangements for appropriate checks on new staff, contractors, and volunteers where applicable.

Monitoring and review

Any Safeguarding incidents, concerns and disclosures will be monitored and analysed to inform future activity to minimise the risk of reoccurrence and the emergence of any trends. A focus group comprised of the Safeguarding Lead, Deputy and officers will meet at scheduled intervals to review any cases to identify further planning of activity around staff training and learner support. The policy will be reviewed on an annual basis and/or if significant changes to procedures or legislation require it.

Appendix 1: Safeguarding Vulnerable Adults during Coronavirus (Covid-19)

During an unprecedented period brought about by this pandemic, the business has continued to operate on a remote training delivery and assessment model. On site classroom-based activity has been suspended since the outbreak and learners have not been allowed to enter company premises.

Continuity of education has been of paramount importance and the business has demonstrated its commitment to all learners under very challenging circumstances by ensuring that access to online training and learning and assessment is available to support their progression and achievement. Learners continue to receive regular coaching, mentoring and support both in group and individual sessions according to their individual requirements.

Employers of apprentices enrolled on company training programmes are notified of all relevant activity for the purposes of supporting their progression and their assistance sought where likely to be of benefit to the health and well-being of individuals concerned.

The welfare of vulnerable adult learners continues to be a priority and relevant staff have been reminded of their responsibilities in line with Safeguarding policy and procedures, including the reporting of any concerns. There is an awareness that there may be heightened pressures on learners and their families whether as a result of financial difficulty and/or mental/physical health problems and this is considered when setting work for them to do at home.

Steps have been taken to ease the transition to online training and learning, bearing in mind any difficulties in accessing technological resources. Staff are vigilant in recognising any signs that learners may display when attending virtual sessions or meetings that might give cause for concern as to vulnerabilities in their physical

and/or mental health state. The process for raising/reporting any concerns remains the same.

All learner facing staff have been reminded of the need to maintain professional ethics within acceptable boundaries set out in the code of conduct and acceptable use of IT policies. Learners are also reminded of their responsibilities in this respect accordingly. Management will periodically observe online interaction to assure standards are maintained and in line with privacy and data protection requirements.

Learner attendance at scheduled sessions continues to be monitored and any concerns will be addressed through the normal absence management procedures.

The business will continue to operate on a remote delivery basis with a view to re-opening premises at such a time as it may be ready to do so to ensure the safety of learners and visitors on site. In this event, staff to learner ratios will be appropriate to government and medical advice and guidelines on social distancing and protective measures will be followed to limit the risk of the spread of the Covid-19 virus. Learners' circumstances will be assessed and reviewed as to any vulnerabilities that may present themselves in the light of them attending business premises for their learning.

[Appendix 2: Sexual Harassment and Online Abuse update-Sep 2021](#)

In line with recent changes in legislation and statutory guidance, Netcom Training recognises its responsibility in taking the appropriate steps to protect learners from sexual harassment and online abuse. It also recognises that Ofsted will apply the same expectations of the company in this respect as an independent training provider as for colleges and further education and training in general. Netcom Training will not tolerate any inappropriate behaviour or derogatory comments within the organisation that may cause harm or have the potential to do so. It will also ensure learners are made aware at induction as to expectations of them and their responsibilities when interacting with peers or company employees. This will apply equally to conduct within the training centre and when accessing online learning and communication.

Given the challenges presented by the pandemic and Netcom Training's responsiveness and current focus on remote learning delivery and engagement processes, the company will be vigilant in monitoring any signs of online abuse. While recognising and utilising the many benefits and learning opportunities that the online world provides, there is also an awareness that increased use of social media and the internet in general has increased the scope and potential for online abuse and harm. The company Safeguarding and Anti-Bullying and Harassment policies set out the key procedures and requirements of learner facing employees in particular to protect individuals from harm. In addition, they will be made aware of the

following examples of more prevalent types of activities that constitute sexual harassment and online abuse:

Cyber-flashing, including the sending of sexual images or video recordings that are intended to violate the recipient/victim.

Encouragement or glorification of serious self-harm, targeting individuals with intentional encouragement of self-harm or assistance thereof.

Flashing images with intent to induce a seizure, sending images to people with epilepsy.

Knowingly false communications, the posting or sending of communication known to be false with the intent of causing significant emotional, psychological or physical harm.

Threatening communications, threats of serious harm and where the perpetrator intends the victim to fear that they will be carried out. Examples include serious bodily injury, rape/sexual assault and serious financial harm.

Reporting of disclosures

Birmingham Safeguarding Adult Board

[The BSAB website Homepage](#)

[Email BSAB Support Team](#)

Postal address:

Safeguarding Adults Team
P.O Box 16466
Birmingham
B2 2DP

Location address:

1st Floor
10 Woodcock Street
Aston
Birmingham
B7 4BL

West Midlands Safeguarding Hub

[WM Adult Docs \(safeguardingwarwickshire.co.uk\)](http://safeguardingwarwickshire.co.uk)

	Adult Services	Out Of Hours
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Dudley	0300 555 0055	0300 555 8574
Sandwell	0121 569 2266	0121 569 2355
Walsall	0300 552 922	0300 555 2922
Wolverhampton	01902 551 199	01902 552 999

If you believe someone is in immediate danger, you must call the police on 999.

Useful Information for learner support/guidance:

Mind

T: 0300 123 3393

www.mind.org.uk

Advice and support for anyone experiencing a mental health problem

[Home - Mind](#)

Woman's Aid

T: 0808 2000 247

www.womensaid.org.uk

A national charity supporting women and children suffering from domestic violence.

[Home - Women's Aid \(womensaid.org.uk\)](http://www.womensaid.org.uk)

Crisis

T: 08000 384838

National charity for the homeless

[Crisis | Together we will end homelessness](#)

Macmillan Cancer Support

T: 0808 8080 000

[Macmillan Cancer Support](http://www.macmillan.org.uk)

A national charity supporting people with cancer

Modern Slavery Helpline

T: 0800 0121 700

www.modernslaveryhelpline.org

An external helpline for support 24/7

[Modern Slavery Helpline](http://www.modernslaveryhelpline.org)

Mankind

T: 01823 334244

www.mankind.org.uk

A national charity supporting male victims of domestic violence.

[About Us - \(mankind.org.uk\)](http://www.mankind.org.uk)

Samaritans

www.samaritans.org

Support for the suicidal and those that self-harm

Addaction

T: 01472 806 890

National treatment agency that helps individuals and/or their families manage the effects of drug and alcohol abuse.

[Addaction - Work with Offenders](http://www.addaction.org.uk)

The Money Advice Service

T: 0800 138 7777

www.moneyadviceservice.org.uk

Free impartial money advice.

Domestic Violence

National Domestic Violence

<http://www.nationaldomesticviolencehelpline.org.uk/>

Telephone: 0808 2000 247

Drink Aware

<https://www.drinkaware.co.uk/>

National Drugs Helpline

<http://www.drugline.org/>

Telephone: 0808 1606606

Careers Advice**Next steps**

<https://nextstep.direct.gov.uk/Pages/Home.aspx>

x

Telephone: 0800 100 900

Safer Internet Centre –

helpline@saferinternet.org.uk

Police (Non-emergency 101)

Professionals Online Safety Helpline – 0844 381 4772

Internet Watch Foundation (IWF) –

<http://www.iwf.org.uk>

Bullying

<http://www.nationalbullyinghelpline.co.uk/about.htm>

Drugs and Alcohol**Alcoholics Anonymous**

<http://www.alcoholics-anonymous.org.uk/>

Telephone: 0845 769 7555

Frank

<http://www.talktofrank.com/>

Telephone: 0800 776600

Eating Disorders

<http://www.mentalhealth.org.uk/help-information/mental-health-a-z/E/eating-disorders>

Crime, Victim Support**Victim Support**

<http://www.victimsupport.com/>

Telephone: 0845 3030900