



SAFEGUARDING VULNERABLE ADULTS

POLICY AND PRACTICE GUIDANCE

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DATE OF POLICY	May 2021

AUTHOR OF REVISION	
DATE OF REVISION	
REVISION NUMBER	

VERSION	v1.1
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REVIEWED	June 2025
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REVIEW DUE	June 2026
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SAFEGUARDING VULNERABLE ADULTS

POLICY AND PRACTICE GUIDANCE

1. Policy Statement

This Policy is based on the principles that underpin the Care Act 2014 – that promote wellbeing and place the service user at the very centre of adult safeguarding by making it personal to each individual.

We believe that all our service users, staff and other stakeholders have the right to feel safe. We also believe that vulnerable adults (or adults with care & support needs), without exception, have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

We aim to support our service users to reach their potential and develop resilience. We are committed to providing consistent, professional support and care.

2. Purpose & Scope

The purpose of this policy is to prevent and reduce the risk of harm to adults from abuse or other types of exploitation, whilst supporting our service users to exercise autonomy in their lives and to make choices without coercion.

The policy also informs our staff, volunteers and associates of the procedures which should be followed in relation to protecting vulnerable adults. These procedures are compliant with Gloucestershire Safeguarding Children and Adults Executive's procedures.

This policy applies to all A+bility staff, associates and volunteers.

The policy is one of a suite designed to enable staff to provide the highest possible standard of care and to protect the well-being of our service users. Other relevant policies include: Stakeholder Engagement; Restraint & Restrictive Practices Reduction; Complaints, Concerns and Compliments; Duty of Candour; Equality, Diversity & Inclusion; First Aid; Managing Challenging Behaviour; MCA & DOLS; Personal Care; Safer Caring Policy; Safe Recruitment; Recording Information and Data Protection and Whistleblowing.

3. Safeguarding Management Arrangements:

3.1 The Designated Safeguarding Manager is Fiona White.

3.2 The Designated Safeguarding Deputy Managers are Allyson Scott and Sadie Paul.

3.3 The Board of Directors ensures that there is always a Safeguarding Manager or a Deputy Safeguarding Manager on call to support and offer advice.

4. Legislation

Below is a list of the legislation pertinent to the safeguarding of adults with care and support needs.

The Care Act 2014

The Mental Capacity Act 2005

The Human Rights Act 1998

The Sexual Offences Act 2003

The Data Protection Act 2018

5. Definitions

5.1 Vulnerable adults (or adults with care and support needs)

An adult who is aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect and is unable to protect themselves from either the risk of, or the experience of abuse and neglect.

5.2 Care and support

This is the mixture of practical, financial and emotional help for adults who need it to manage their lives, be independent, and have autonomy.

5.3 Abuse

The term “abuse” can be subject to wide interpretation. It may be physical, sexual, verbal, financial or psychological. It may occur when a person is persuaded into a financial or sexual transaction to which they have not consented, or cannot consent.

5.3.1 Physical abuse

Physical abuse might involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a person. Physical harm might also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a dependent adult.

5.3.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person. It might involve conveying to people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It might feature inappropriate expectations that might include interactions that are beyond the

person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the person from participating in normal social interaction and taking decisions and making choices they would be entitled to make if they were not vulnerable. It might involve seeing or hearing the ill-treatment of another. It might involve serious bullying causing people frequently to feel frightened or in danger, or the exploitation or corruption of people. Some level of emotional abuse is involved in all types of maltreatment of a vulnerable adult, though it might occur alone. Emotional abuse can also include threats and stalking.

5.3.3 Sexual Abuse

Sexual abuse involves forcing another person to take part in sexual activities, including prostitution, whether or not that person is aware of what is happening. The activities might involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Adults with care and support needs can be vulnerable to sexual exploitation. See Appendix 2 for a signs and indicators checklist but bear in mind that some of these signs and indicators could have other explanations:

This type of abuse might also include non-contact activities, such as involving vulnerable adults in looking at the production of pornographic material or watching sexual activities, or being encouraged to behave in sexually inappropriate ways. Staff attending adults at home should accept the adults are entitled to have legal adult material should they wish it.

There is an e-learning short course available to staff and log on details are provided on Induction.

5.3.4 Domestic Violence

The impact of domestic violence can go beyond actual physical violence, to involve emotional abuse, the destruction of property, isolation from friends, family or sources of support, control over decision-making, money, transport or telephone and can include the impact of witnessing violence.

The government's core definition of domestic violence/abuse is:

"...any incident of threatening behaviour, 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."

(Home Office, Domestic Violence: A National Report, March 2004)

An adult is defined as any person aged 18 years or over. Family members are defined as mother, father, son, daughter, brother, sister, and grandparents, whether directly related, in-laws or stepfamily. A family member might be an individual who regularly visits or has contact with the household.

Stalking is closely linked to Domestic Abuse, and is a criminal offence. Guidance can be found in the Additional Information folder

5.3.5 Financial Abuse

Financial or material abuse can take the form of fraud, theft or using of the vulnerable adult's property without their permission. This could involve large sums of money or just small amounts from a pension or allowance each week. It is important not to jump to the wrong conclusions too quickly. See Appendix 3 for possible indicators of financial abuse:

5.3.6 Cuckooing

This is a particular type of criminal exploitation particularly common in county lines drug dealing where a vulnerable adult's home is taken over by a dealer through coercion, control or force. It can result in a vulnerable individual being subject to an increased risk of eviction or isolation from their community as well as other types of abuse and harm.

5.4 Neglect or acts of omission

This can include ignoring the medical, emotional or physical care needs of a vulnerable adult, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition, clothing and shelter. Neglect also includes a failure to intervene in situations that are dangerous to an individual or to others, particularly when the individual lacks the mental capacity to assess risk.

Neglect can be intentional or unintentional.

Self-neglect entails not caring about one's personal hygiene, health or surroundings and includes behaviours such as hoarding. It is defined as the inability (intentional or unintentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of the individual and sometimes to their community.

6. Mandatory Procedures

There are ten elements to our procedures to ensure we provide the highest level of support, care and protection to our service users:

6.1 Ensuring we practice safe recruitment in checking the suitability of staff, associates and volunteers to work with vulnerable adults.

6.1.1 All staff, associates and volunteers have clear enhanced DBS checks.

6.1.2 Staff, associates and volunteers who are not on the DBS update service are required to complete a suitability statement annually.

6.1.3 All staff, associates and volunteers will be registered with ISA once this becomes a requirement.

6.1.4 All staff and volunteers will have provided 2 verified references stating their suitability to work with vulnerable adults.

6.1.5 There is a clear process for renewing DBS checks before the 3-year threshold is expired using a spread sheet.

6.1.6 Those on the DBS update service will be checked annually for changes.

6.1.7 Managers sign up for safeguarding alerts and disseminate information to staff, associates and volunteers as appropriate.

6.1.8 Managers maintain an electronic file of safeguarding referrals to helpdesk/social care.

6.2 Raising awareness of safeguarding vulnerable adult's issues and equipping service users with the skills needed to keep them safe.

6.2.1 All staff, associates and volunteers are required to support vulnerable adults to learn ways to keep themselves safe. This includes promoting e-safety with reference to computers, laptops, tablets, mobile phones, and any other devices. This website is a useful source of information:

[Take A Stand - how to protect from abuse.](#)

6.2.2 Bullying is not tolerated. Staff provide support and guidance to service users who are bullies and bullied, to increase awareness of impact and to find strategies to keep themselves and others safe. See our Managing Challenging Behaviour and Anti-bullying Policies.

6.2.3 Domestic Abuse and related offences including stalking, "honour" based violence, forced marriage and female genital mutilation affect vulnerable adults. Staff can get information from the Gloucestershire Domestic Abuse Support Service (GDASS).

6.2.4 Staff receive training to recognise the signs and indicators of, and report and record when vulnerable adults could be at risk of Female Genital Mutilation (FGM) (Appendices 10 & 11) and Forced Marriage. FGM suspicions must be reported to the Police immediately.

6.2.5 Staff receive training to recognise the signs and indicators of, and to report and record, where vulnerable adults could be at risk of Terrorism, Extremism, and Radicalisation.

6.3 Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.

6.3.1 All staff, associates and volunteers receive Safeguarding training at the point of joining the company.

6.3.2 All staff, associates and volunteers are given instructions about how to recognise signs and indicators of abuse, and how to report concerns.

6.3.3 All concerns and allegations of abuse are taken seriously and responded to appropriately - this might require a referral to the Commissioning Agency, the helpdesk and the Police.

6.3.4 Any and all concerns relating to the safety and wellbeing of service users or colleagues must be raised with the on call manager or Director by telephone on the same day the staff becomes concerned.

6.3.5 The Board has appointed a named person and deputy to take responsibility for Safeguarding Vulnerable Adults. These designated persons are: Fiona White (Lead), Allyson Scott and Sadie Paul can also deputise when they are on call managers.

One of these officers will pass on concerns to the appropriate authorities having made a dynamic risk assessment of the need to raise it as an emergency or wait until the next working day.

6.3.6 Process for reporting concerns for adults with care and support needs:

Staff must inform the manager on duty immediately, and the manager ensures that actions are compliant with the Gloucestershire Safeguarding Adults Executive's procedures. These are contained in our Additional Information folder.

The member of staff, or our Compliance Officer, must complete an incident report and send to the manager as soon as possible.

Unless it is not safe, the Adult must be asked for their views on the concerns or the incident. They should be consulted about what they would like to happen next.

If a decision is made to report the concerns, the manager will do this in one of 2 ways. Either

a. Telephone the Adult Helpdesk on 01452 426868 (8am – 5pm Monday – Friday) or during out of office hours the Emergency Duty team on 01452 614194. Alternatively, email socialcare.enq@gloucestershire.gov.uk. The information will be passed on to the Safeguarding Adults Team. The manager will complete the Safeguarding Spreadsheet. If the adult has not been consulted because it was not safe, the reasons are recorded on the spreadsheet.

Or

b. If the Adult has an allocated Social Worker, the Social Worker or the duty officer or manager must be informed. If the Adult has not been consulted because it is not safe, the reasons are recorded on the spreadsheet.

The Safeguarding Spreadsheet is taken to the Board on a monthly basis where it is monitored by the Directors. They check that all procedures and ensuing actions have been carried out, and they monitor all safeguarding concerns to identify trends that might need action.

6.3.7 Staff raising concerns will record them on the Company's record forms and pass to the designated person as soon as possible.

6.3.8 Concerns about safety will supercede agreements on information sharing. The welfare of our service users must be prioritised in compliance with the Gloucestershire Information Sharing Partnership Agreement when making records available to other agencies including when there is an enquiry. Transfer of information must be made safely in accordance with the Confidentiality and Data Protection Policy.

6.4 Supporting adults who have been abused, or are vulnerable to abuse, in accordance with his/her agreed Care or Support plan.

6.4.1 Commissioning agencies are required to provide information necessary to ensure each service user's needs are met.

6.4.2 This information is held on the individual risk assessment and behaviour management plan.

6.4.3 Support staff, Managers or Directors will attend multi-agency meetings as requested by commissioning agencies. This will feature in the service agreement.

6.4.4 Special care is taken when offering personal (intimate) care to vulnerable people, especially when those people have limited understanding and communication and therefore less able to raise concerns about their care. See Personal Care Policy

6.5 Establishing a safe environment in which people can have fun, learn and develop.

6.5.1 All staff, associates and volunteers have received Safeguarding training appropriate to their role and receive regular supervision and updated training annually, including accessing e-learning Basic Awareness training provided by *Care Skills Academy*.

This training includes signs and indicators, procedures for Reporting and Recording, E safety) Child Sexual exploitation, Terror, Radicalisation and Prevent , Stalking and Modern Slavery.

6.5.2 Full time staff working with adults have the opportunity of attending the Foundation level 1 and level 2 training. Staff also complete the Home office's e-learning Prevent course and staff are aware of the Prevent referral pathway and guidance. See Additional Information folder.

6.5.3 Managers are required to complete the Safeguarding Leadership e-learning training.

6.5.4 Staff should ensure they log on to <http://www.gscb.org.uk/> and <http://www.gloucestershire.gov.uk/gsab/> regularly. Alerts are received by the company from both websites and these are disseminated to staff.

6.5.5 The Directors of A+bility Limited will take all reasonable steps to ensure that no individual who is unsuitable will have unsupervised contact with the vulnerable adults in their care

6.5.6 Missing from care: Vulnerable Adults who go missing must be reported as Missing to the Police and the Social Worker/Commissioner/EDT.

6.5.7 Any concerns about the safety of Vulnerable Adults are reported via the Adults Helpdesk. Out of hours the manager on call contacts EDT on the professionals' phone line to report concerns.

6.5.8 Managers on call are aware of the Allegations Management processes for Safeguarding Adults and how to contact the Adult Safeguarding Team.

6.6 Informing all staff, Commissioning Agencies, and service users of the company's Complaints, Concerns, Compliments and Comments policy.

6.6.1 All staff and volunteers will have a copy of the Complaints, Concerns, Compliments and Comments Policy.

6.6.2 Service users are informed of the complaints policy, and will be given a copy on request.

6.6.3 Service users are supported to make complaints in ways that meet their needs in terms of age, understanding and preferred method of communication.

6.6.4 A copy of the policy is accessible to all on this website: [A+bility](#)

6.7 Establishing a safe environment for staff, associates and volunteers to carry out their duties.

6.7.1 All staff, associates and volunteers have a copy of the Complaints, Concerns, Compliments and Comments Policy.

6.7.2 All staff, associates and volunteers have a copy of the Whistleblowing Policy. This is to support them in their duty to report when staff practice is unsafe, or has safeguarding implications.

6.7.3 All staff, associates and volunteers have a copy of the Equality, Diversity and Inclusion Policy, which covers bullying and harassment.

6.7.4 Staff, associates and volunteers will be supported to make complaints or raise concerns when their safety has been compromised, or is being compromised.

6.7.5 If staff, associates or volunteers feel threatened, or have been threatened or hurt by service users, the Directors will ensure that this is taken up with the Commissioning Agency and ensure that all reasonable steps are taken to minimise the likelihood of a repeat.

This in no way affects the right of the aggrieved person to report offences to the Police or to take legal action.

6.8 Guidance on listening to allegations:

6.8.1 Do not promise to keep a secret; you have a duty to share concerns of abuse. There is some debate about what the term 'confidentiality' means so do not get hung up about it. Assure the person that you will only inform your manager and/or the police if necessary.

6.8.2 Listen to what is being said, without displaying shock or disbelief.

6.8.3 Accept what is said.

6.8.4 Offer reassurance, but only as far as is honest, don't make promises you may not be able to keep e.g. don't say '*Everything will be alright now*', '*You'll never have to see that person again*'.

6.8.5 Do reassure and alleviate guilt, if the vulnerable adult refers to it. For example, you could say, '*You're not to blame*'.

6.8.6 Do not interrogate vulnerable adult; it is not your responsibility to investigate.

6.8.7 Do not ask leading questions (e.g. *Did he touch your private parts?*)

6.8.8 Do not ask the vulnerable adult to repeat the information to another member of staff.

6.8.9 Explain what you have to do next and who you have to talk to.

6.8.10 Report to your manager or on call person as soon as you can after the conversation, regardless of the time of day. That person will inform the designated officer who will make decisions about how to report it.

6.8.11 Write up the conversation as soon as possible afterwards.

6.8.12 Record the date, time, and place, any non-verbal behaviour and the words used by the vulnerable adult (do not paraphrase).

6.8.13 Record statements and observable things rather than interpretations or assumptions.

6.9 Allegations Management

If a professional has a concern about another professional or volunteer where they have:

6.9.1 Behaved inappropriately in a way that has harmed or might have harmed a vulnerable adult or

6.9.2 Possibly committed a criminal offence against or related to a vulnerable adult or

6.9.3 Behaved towards a vulnerable adult in a way that indicates s/he is unsuitable to work with them then these concerns should be dealt with by reporting to the on call manager or another manager or director as soon as you can.

6.10 Guidance on Whistleblowing

6.10.1 In the Company's Induction training, staff are made aware of the need to be vigilant regarding the behaviour of other staff and professionals.

6.10.2 Staff are required to have a duty of care to the service user which might involve them talking to a supervisor or manager about their concerns regarding another member of staff. They are protected by the Whistleblowing policy.

7. Monitoring

Adult Safeguarding issues are monitored monthly at Board Meetings. Staff are invited to recommend amendments to any policy at any time. All policies are reviewed by the management team annually. Amendments are disseminated to staff.

8. Additional Information

In the Policy folder on the shared P: Drive there is a sub-folder called Additional Useful Information. This includes the following:

Gloucestershire's Multi-Agency Policy & Procedures for the Protection of Adults with Care & Support Needs.

A link to Gloucestershire's Safeguarding Adults Good Practice Guides.

Sexual Abuse: Signs and Indicators

Staff should remember this is not an exhaustive list and that some of the signs and indicators may have other causes or explanations.

- ✓ Aggression.
- ✓ Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- ✓ Sexually transmitted infections.
- ✓ Pregnancy.
- ✓ An injury for which the explanation seems suspicious or inconsistent.
- ✓ The individual describes what appears to be an abusive act involving themselves.
- ✓ Unexplained changes of behaviour (e.g. becoming quiet, withdrawn or displaying sudden outbursts of temper).
- ✓ Engaging in sexually explicit behaviour.
- ✓ Distrust of other adults, particularly those with whom a close relationship would normally be expected.
- ✓ Difficulty in making friends.
- ✓ Prevented from socialising with others.
- ✓ Variations in eating patterns including overeating or loss of appetite.
- ✓ Loss of weight for no apparent reason.
- ✓ Becoming increasingly dirty or unkempt.
- ✓ Clothes not appropriate for season
- ✓ Multiple layers of clothes
- ✓ Cutting (self-mutilation) and other forms of self-harm.
- ✓ Drug and/or alcohol abuse.
- ✓ Restlessness and aimlessness.

- ✓ Recurrent headaches.
- ✓ Poor trust and secretiveness.
- ✓ Indiscriminate and careless sexual behaviour.
- ✓ Onset of enuresis (bedwetting) or daytime wetting.
- ✓ Recurrent abdominal pains.
- ✓ Sleeping disturbances.
- ✓ Smearing faeces.
- ✓ Social withdrawal.

Financial Abuse – Possible indicators

Staff should note this is not an exhaustive list and that some of these indicators may have other causes and explanations.

- ✓ Sudden inability to pay bills
- ✓ Sudden withdrawal of money from an account
- ✓ Person lacks belongings that they can clearly afford
- ✓ Lack of receptivity by the person's relatives to necessary expenditure
- ✓ Power of attorney obtained when the person is unable to understand what they are signing
- ✓ Extraordinary interest by family members in the vulnerable adult's assets
- ✓ Recent change of deeds to the house
- ✓ Carers' focus is financial with little regard for the health and welfare of the vulnerable adult
- ✓ The person managing the finances is evasive and uncooperative
- ✓ Reluctance to accept care services
- ✓ Purchase of items that the individual does not require or use
- ✓ Personal items going missing
- ✓ Unreasonable or inappropriate gifts