

## SAFEGUARDING POLICY AND PROCEDURE (ADULTS)

### Policy Statement, Aims and Scope

This policy sets out the responsibilities of Response in protecting adults at risk from abuse, neglect, and exploitation. We are committed to promoting the well-being and safety of all individuals and ensuring they receive the support and protection they need. Safeguarding adults is about reducing or ideally preventing the risk of significant harm from abuse and neglect while simultaneously supporting people where it is possible to take control of their own lives by making informed choices.

Response has a duty to safeguard adults at risk, who access or visit its services and ensure we work in partnership with relevant agencies to protect adults from abuse. This includes recognising the signs and symptoms of abuse, reporting and acting on concerns in a timely manner.

Response will take all reasonable steps to prevent harm, to protect people and to respond appropriately when harm does occur. The aim of this policy is to ensure staff know the different kinds of abuse, how to identify abuse, respond, report it and are clear on staff responsibilities. Response will safeguard adults in a way that supports them in making choices and having control about how they want to live.

This policy applies to all employees, volunteers, contractors, and anyone working on behalf of Response who may come into contact with adults at risk. The policy covers anyone 18 years and older. Please refer to Response's Children & Young People Safeguarding Policy for safeguarding concerns for anyone below the age of 18.

### Definitions

Safeguarding is defined as 'protecting an adult's right to live in safety, free from abuse and neglect' in the Health and Care Act 2014.

**Adult at Risk:** A person aged 18 or over who may be unable to protect themselves from abuse, neglect, or exploitation due to age, disability, illness, or other factors.

**Abuse:** Any action that causes harm or distress, including physical, emotional, financial, sexual abuse, neglect, or discrimination. Abuse is the violation of an individual's human and civil rights and can be self-inflicted or inflicted by another person or persons. In the context of safeguarding, it is used to refer to any knowing, intentional or negligent act by another that causes harm or a serious risk of harm to another. The Care Act recognises the following ten categories of abuse experienced by adults:

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

Detailed definitions are provided in **Appendix 1**

### Commitment

Response is committed to ensuring support is in place for adults to prevent abuse from occurring by:

- Providing a setting where adults with care & support needs, feel listened to, safe, secure, valued and respected.

- Enabling access to mainstream community resources such as accessible leisure facilities and community groups can reduce social and physical isolation which in itself may increase the risk of abuse or neglect.
  - Appointing a Designated Safeguarding Lead and ensuring a clear line of accountability with regards to safeguarding concerns
  - Providing a clear process to follow when safeguarding concerns arise. All new staff will sign to confirm they have read the policy as part of their induction.
  - Ensuring staff are provided with up to date and relevant information, training, support and supervision/continuous feedback to enable staff to fulfil their role and responsibilities in relation to safeguarding.
  - Ensure that staff, volunteers, Trustees and clients maintain appropriate boundaries.
  - Assessing risks faced and taking steps to mitigate against these.
  - Maintaining a record, detailing investigations and outcomes and action taken using the internal Safeguarding Panel process.
  - Clarify how responses to safeguarding concerns deriving from the poor quality and inadequacy of service provision should be responded to.
  - Operate confidential reporting systems so that anyone who suspects that abuse is taking place or is concerned about it can follow the procedures set out in Responses whistleblowing procedures.
  - Supporting the development of a positive learning environment within the organization at all levels and across partnerships and challenge cultures that are risk-averse and seek to scapegoat or blame.
  - Raising all safeguarding concerns with the relevant Local Authority, Social Care and Safeguarding Team and escalating safeguarding concerns with the NHS
  - Building strong multi-agency partnerships that provide timely and effective prevention of and responses to abuse or neglect
- Undertaking checks on all staff and volunteers as per the Recruitment Selection and Appointment Policy at the recruitment stage, including professional references and the Disclosure and Barring Service.
- All Staff will be trained to Level 1 in Safeguarding, with front line delivery staff being trained to Level 2 and the Safeguarding Leads and managers being trained to Level 3.

## Principles

Response will adhere to the 6 key principles of safeguarding outlined in the Care Act 2022:

- Empowerment: Supporting adults in making their own decisions.
- Prevention: Taking proactive steps to prevent abuse.
- Proportionality: Responding to concerns appropriately and ensuring minimal intrusion.
- Protection: Providing support and representation for those in greatest need.
- Partnership: Working with other organizations to protect adults at risk.
- Accountability: Ensuring safeguarding practices are transparent and properly implemented.

## Roles and Responsibilities

Safeguarding is everybody's business, and everyone working with vulnerable adults has responsibility for keeping them safe and doing nothing is not an option. It is however important both individuals and organisations, are clear about their roles and responsibilities:

**The Board of Trustees:** Trustees should promote an open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to. They carry the overall responsibility for ensuring that people are protected and that safeguarding responsibilities are met through this policy. This overall responsibility has been delegated to the Quality & Performance Committee (QPC). A quarterly report on incidents and safeguarding is submitted to the QPC. The Board of Trustees will have a delegated Safeguarding Lead who meets regularly with the Director of Adult Services & Safeguarding and the Quality Improvement Manager.

**Lead Executive Director:** The Director of Adult Services and Safeguarding is the identified Executive lead for this policy and responsible for ensuring that safeguarding issues are managed, and internal reporting and monitoring is in

accordance with the policies and expectations laid out in any associated procedures. Safeguarding is an agenda item at the weekly Executive meeting and all Directors have a responsibility to oversee safeguarding issues within their department, using the organisation wide Panel Meetings to coordinate and plan work/responsibilities.

**Operations Managers, Registered/Service/Team Managers** are responsible for:

- ensuring the policy is accessible, read, understood, and adhered to by all staff within their teams/departments
- day to day operational decisions and escalating issues as required and in line with this policy and associated procedures
- ensuring all safeguarding issues are managed in accordance with this policy and in line with the incident threshold matrix
- providing relevant management reports to their director to support continuous improvement and development
- ensuring Safeguarding Panel meetings are arranged.

All Staff must comply with the requirements set out in this policy and associated procedures. Where there are safeguarding issues that fall outside these services, or where there is any query, the final determination of who has lead responsibility for implementing this policy will be made on a case-by-case basis by the Director of Adult Services and Safeguarding and/or Quality Manager.

### **Multi-Agency Safeguarding Arrangements and Learning from Serious Case Reviews**

The Oxfordshire Safeguarding Adults Board (OSAB) produces an annual report summarizing its work and highlighting key lessons learned from safeguarding cases. The 2023-24 report identified issues with communication, balancing independence with risk, the effectiveness of a coordinated approach, and the need for clearer mental capacity assessments.

### **Online and Digital Safeguarding**

We are committed to ensuring the safety adults who use our service in the digital world by promoting responsible technology use, educating residents and staff about online risks, and providing practical guidance. Our approach includes secure filtering and monitoring systems, clear reporting procedures for online concerns, and regular training using trusted resources. Online safeguarding is integrated into our broader protection framework, recognising that digital safety is as vital as physical safety.

### **Section 42 Enquiry**

This is an enquiry by local authority and applies where a local authority has reasonable cause to suspect that an adult in its area:

1. has needs for care and support (whether or not the authority is meeting any of those needs),
2. is experiencing, or is at risk of, abuse or neglect, and
3. as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case.

### **Information Sharing**

Any sharing of information between agencies for the purposes of safeguarding adults at risk of harm as a result of abuse must comply with the requirements of the Data Protection Act 1998 and any local Confidentiality and Information Sharing Agreement.

## Process

Where an individual is believed to be at risk of abuse or if an individual discloses or discusses potential abuse with you, it should be recognised that the individual may be describing abuse, albeit not explicitly. You should stay calm and show empathy, reassuring them that the information is being treated seriously.

- If the person is in immediate danger the police must be contacted urgently on 999.
- Inform the resident that information will be shared and why.
- Raise concerns with your immediate manager or your manager's manager (if the direct manager is unavailable) in the first instance. If you are a contractor, contact a member of staff or the manager as soon as possible.
- If concerns arise out of hours, contact the senior operations manager on-call on 07771 622193
- Refer to Responses Incident Threshold Matrix and complete a CCIA incident form on Inform
- Check the safeguarding threshold matrix for the local authority the concern is happening in. Where it meets the threshold, you must raise your concerns within 24 hours via the website, ensuring you have downloaded a copy of the notification before submission – the notification can be completed by anyone within the organisation. For Oxfordshire the matrix is linked here - [OSAB-Safeguarding-Adults-Consideration-SAC-Framework-V3.pdf](#).
- Ensure the clinical team is notified and a multi-disciplinary meeting is arranged.
- If you are unsure whether to raise safeguarding with OSAB please ring their advice line
- Contact the Quality Team to arrange an Internal Safeguarding Panel meeting.
- In Registered Services the Care Quality Commission must be notified.

Following the identification of a safeguarding concern, staff are responsible for:

1. Assessing the situation and determining whether emergency intervention is required
2. Ensuring the safety and wellbeing of the individual
3. Establishing the individual's views and wishes on the safeguarding issue taking into account and acknowledging the potential impact on important relationships for the individual (but not being distracted by this)
4. Maintaining evidence and clear documentation
5. Reporting the incident(s)/risk(s) to the Service Manager and completing a CCIA
6. Remaining calm and not showing any shock or disbelief
7. Be open and honest and do not promise to keep a secret
8. Listening carefully and with understanding, by acknowledging regret and concern over what has happened
9. Informing the individual that information will be shared and why
10. Share information without consent if it is in the public interest in order to prevent a crime or protect others from harm
11. Concerns about a colleague should be raised through the Whistleblowing Policy.

Do not attempt to prompt or encourage the individual to make a statement, however it is important to write down as soon as possible anything that is disclosed when offering safety and general support.

It is essential to ensure that the individual at risk of abuse remains at the center and involved in the safeguarding process, accounting for their views wishes, feelings and beliefs and individuals should be offered to have a family member, friend or advocate, if appropriate and desired, to be present during any discussions on safeguarding.

Any assessment of any safeguarding concern should be holistic and thorough considering the individual's emotional, social, psychological and physical presentation as well as the identified clinical need. There should be a balance between the principles of empowerment and protection. When discussing/assessing a safeguarding issue with an individual:

Be aware of the possibility of forensic evidence if the disclosure refers to a recent incident. If there is a possibility that forensic evidence exists, preserve the evidence. Do not clean it up.

## Safeguarding Teams

**The Oxfordshire County Council Safeguarding Team (OSAB)** can be contacted on 0845 0507666 (office hours) or by email on: [socialandhealthcare@oxfordshire.gov.uk](mailto:socialandhealthcare@oxfordshire.gov.uk)  
No-names consultation line: 01865 328232  
Out of hours contact the Emergency Duty Team on 0800 833408

### West Berkshire

[safeguardingadults@westberks.gov.uk](mailto:safeguardingadults@westberks.gov.uk)  
01635 519056

Buckinghamshire contact the Adults Safeguarding Team

During Office Hours:

9am – 5.30pm Monday to Thursday or 9am – 5pm on Friday

Tel: 0800 137 915

Outside office hours

Emergency Out of Hours

Tel: 0800 999 7677

Alert - <https://adultsportal.buckinghamshire.gov.uk/web/portal/pages/home>

[Safeguardingadults@Buckinghamshire.gov.uk](mailto:Safeguardingadults@Buckinghamshire.gov.uk)

You can also complete a [Adult Safeguarding Referral Form](#) and send it to

[Safeguardingadults@Buckinghamshire.gov.uk](mailto:Safeguardingadults@Buckinghamshire.gov.uk)

For further details and to download the referral form see:

<https://www.buckssafeguarding.org.uk/adultsboard/report-a-concern/report-a-concern-professionals/>

### Wiltshire

[Safeguarding \(wiltshire.gov.uk\)](http://wiltshire.gov.uk)

In all cases Response staff will

8. confirm they are raising a formal safeguarding adults concern
9. inform the Safeguarding Team how to contact Response to invite them to the strategy meeting.
10. if a crime may have been committed they will confirm if the Safeguarding Team will contact the police or wish Response to do so.
11. confirm if the Safeguarding Team wish Response to make the initial enquiries or the Safeguarding Team plan to take the lead in responding to the concern raised.

## Advocacy

Clients are entitled to the use of advocacy to assist them in making an allegation of abuse. Details of local advocacy services are as follows:

12. Oxfordshire, please see <https://www.pohwer.net/oxfordshire>
13. West Berkshire please see <https://www.theadvocacypeople.org.uk/mental-health-advocacy>
14. Buckinghamshire, please see <https://www.pohwer.net/buckinghamshire>

Staff will support clients to access advocacy if required. The Care Act states that where the adult involved in the safeguarding process would have "substantial difficulty" in engaging in the safeguarding process they are entitled to a Care Act advocate if there is no other suitable adult (e.g. appropriate family member) to represent them. If the adult lacks capacity, they are eligible for an Independent Mental Capacity Advocate (IMCA) whether or not they have suitable family/friends.

## **Allegations against members of staff, volunteers or management committee members and trustees**

If serious allegations of abuse are made against a member of staff, they will be suspended with pay as soon as practicable following discussion and agreement where possible with the operations manager and HR and/or police. The staff may remain suspended while the allegations are thoroughly investigated and if necessary using the disciplinary action policy and procedure. Volunteers and management members in this position will also be suspended as soon as practicable following discussion and agreement where possible with a director and HR and/or police regarding the timing of suspension and may be subject to the disciplinary action policy.

The member of staff, volunteer or manager will be offered support via HR and the response Wellbeing Hub.

Should the investigation determine that there is a case to answer, the staff member, volunteer or management committee member will be subject to disciplinary action. The police may also be contacted to pursue legal action against them. Should the investigation determine that there is no case to answer, the staff member, volunteer or management committee member will be offered additional support and supervision to assist them in returning to work.

## **Allegations against clients**

If allegations of abuse are made against another client, that client may be offered other temporary accommodation until an investigation has been carried out, depending on the nature of the alleged abuse and its seriousness. They will be offered support in the temporary accommodation.

## **Allegations against visitors**

Should a visitor to the project be subject to an allegation of abuse, they will be excluded from the project as appropriate until an investigation has been carried out. Response may involve Social Services and the Police in such an investigation as it deems appropriate.

Where a visitor is a contractor, partner or supplier, Response will raise concerns confidentially with the organization at a senior level. They will be excluded from the project as appropriate until an investigation has been carried out. The details of the approach (including which organisation should lead the investigation) will be confirmed by the Director of Adult Services in liaison with the Quality Manager.

If any allegation is taken forward by the police, internal investigations may be delayed if this is required in order to not impede formal police action. Otherwise, internal investigations will run in parallel with the police process. In the former circumstance, Response may undertake a 'light-touch' review of client documents and notes from Inform or other CRM system. Once any formal police action has come to an end, Response will then review what action should be taken in line with policy, best interests, and best practice.

## **Staff Conduct**

Response will not tolerate any staff member, worker or other person engaged to support or provide services to, or on our behalf to have:

- Behaved in a way that has harmed, or may harm, an at-risk adult
- Possibly committed a criminal offence against, or related to, an at-risk adult
- Behaved towards an at-risk adult in a manner that may indicate they are unsuitable to work in a position of trust.

Any staff member identified to behave in such a way as to indicate one or more of the above statements, either within their work or because of actions within their personal life, may be subject to disciplinary action. Identification of such incidents can come from various sources. Response will take prompt action to investigate any allegations made and will take any actions necessary to protect individuals and those that work with us, for us, and on our behalf.

Resulting actions may include a staff member being suspended and possibly dismissed. All allegations that relate to registered services will be reported to the CQC without delay, as is required. Where the allegation is made against a healthcare professional we will liaise with and report to the relevant professional body.

Additionally, Response has a duty to inform the Disclosure and Barring Service (DBS) if the staff member has:

- a) Satisfied the harm test, i.e., that the Company believes that the staff member(s) may:
  - harm a child or vulnerable adult
  - cause a child or vulnerable adult to be harmed
  - put a child or vulnerable adult at risk of harm
  - attempt to harm a child or vulnerable adult or incite another to harm a child or vulnerable adult.
- b) Received a caution or conviction for a relevant offence.

A relevant offence for the purposes of referrals to DBS is an automatic inclusion offence as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 and the Safeguarding Vulnerable Groups.

These offences include all sexual offences, all offences involving children, most prostitution offences and murder. If you are unsure, contact the HR Department for guidance.

### **Staff Training**

All staff and volunteers working with service users receive mandatory training in relation to the role and level of responsibility and accountability from Safeguarding Level 1 and 2 for front line workers to levels 3 and 4 for managers, senior managers/directors, the Mental Capacity Act, Deprivation of Liberty/Liberty Protection Safeguards and the Prevent Agenda. All training must be completed annually.

Trustees will receive specialist training on their safeguarding governance duties and safeguarding leads will attend management level training for both adults and children's services where required.

Discussion of safeguarding issues will form part of regular support and supervision sessions as set out in the policy and procedure on Support and Supervision.

All staff and volunteers must follow the guidance on appropriate professional boundaries that are set out in separate guidance document entitled Appropriate Professional Boundaries- held in the company Safeguarding folder.

### **Equality and Inclusion**

We are committed to promoting equality, diversity, and inclusion in all aspects of our safeguarding practice. Every person, regardless of their background, identity, or ability, has the right to feel safe, valued, and respected. We actively challenge discrimination and ensure our policies and procedures are inclusive and accessible to all. Our staff are trained to recognise and respond to the diverse needs of people using our services, fostering an environment where everyone is treated fairly and with dignity.

### **Other Legislation and Guidance**

This Policy is informed by The Oxfordshire Safeguarding Adults and West Berkshire policy and procedure, is in accordance with the Care Act 2014 and the revised Care Act Statutory, the Safeguarding Vulnerable Groups Act 2006 and the Mental Capacity Act 2005 including arrangements in respect of deprivation of liberty. Further information can be obtained from:

- Complaints Policy and Procedure
- Disciplinary Policy and Procedure
- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- Human Rights Act 1998

- Incident Reporting Procedure
- Oxfordshire County Council Safe from Harm website: [www.safefromharm.org.uk](http://www.safefromharm.org.uk)
- Oxfordshire Safeguarding Adults Policy
- Oxfordshire's Confidentiality and Information Sharing Agreement.
- Protection of Freedoms Act 2012
- Public Interest Disclosure Act 1998
- Recruitment and Selection Policy and Procedure
- Serious Crime Act 2015
- Sexual Offences Act 2003
- The Equality Act 2010
- The Mental Capacity Act 2005 and DoLS
- Volunteers Policy and Procedure
- Whistle Blowing Policy and Procedure

## Review

This policy will be reviewed on an annual basis.

If you require assistance in order to read or understand this policy, please let your manager or HR know as translation, interpretation, Braille or a signing service can be made available.

Directorate:	Director of Adults & Safeguarding		
Lead Officer:	Anne Clarke		
Approved by:	Policy Group and sent to Quality & Performance Committee		
Approval Date:	July 2025	Review Date:	July 2026

## Change History

Version	Issue Date	Originator/Modifier	Reason for Change
1	09.11.21	Angelo Fernandes	Annual Review
2	09.11.22	Louise Packer	Revision to include clarity on roles and responsibilities, process and authority contact details
3	09.11.23	Louise Packer	Annual review – no amendments required.
4	02.04.24	Angie Gallagher	Change of Lead Officer and escalation responsibly person
5		Lauren Livingstone/Anne Clarke	Due review
6.	08.07.25	Anne Clarke	Additional sections added: digital safeguarding, equality and inclusion, and learning from safeguarding reviews