



## Safeguarding Adults

### Policy Document

*This, and all other policies and procedures, apply to all members of the P3 Group.*

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#### 1. **INTRODUCTION**

The purpose of this policy is to protect any adult at risk.

#### 2. **WHY DO WE NEED THIS POLICY**

To provide staff and volunteers with the overarching principles that guides our approach to safeguarding.

#### 3. **SCOPE**

This policy applies to all P3 staff, volunteers, and trustees.

In all of its activities People Potential Possibilities, “the charity”, will work to reduce the risk of significant harm to adults from abuse and/or other types of exploitation, whilst supporting the people we work alongside in maintaining control of their own lives and making informed choices without coercion.

The charity will provide its services in safe, secure, and caring environments. All practicable steps will be taken to protect vulnerable adults from harm.

This policy is underpinned by the recognition that the Human Rights Act 1998 applies equally to every person regardless of age, race, gender, sexuality, disability, or immigration status and that people have a right to make their own decisions for themselves.

The charity will work within the knowledge that a lack of capacity or illness, age, race, religion, gender, sexuality, disability, or immigration status may severely compromise a person's ability to keep themselves safe.

The charity will comply with this standard in all of the services it delivers and comply with its responsibility to safeguard and promote the welfare of anyone who comes into contact with P3.

#### 4. **ROLES AND RESPONSIBILITIES**

<b>P3</b>	<p>The charity will ensure that all staff are informed about, undertake training so that they understand and accept their responsibilities regarding safeguarding. This will include the forms that it can take, signs and symptoms of possible abuse and the steps that they must take in recognising, preventing, and reporting safeguarding issues.</p> <p>The charity will ensure that all staff are trained in Level 2 Safeguarding as a minimum and, that they understand how this is intrinsically related to Safeguarding and how they are responsible for setting and maintaining these boundaries.</p>
<b>National Safeguarding Lead</b>	<i>Designated Person:</i> Esther Barrett is the National Safeguarding Lead. The role of the National Safeguarding Lead is to oversee the Regional Safeguarding Leads, all safeguarding policies, and procedures, and to update on legislation.
<b>Director of Quality, Performance and Safeguarding (DSL)</b>	Esther Barrett ensures compliance with safeguarding at an organisational level including liaison with the charity commission and monitoring this in relation to our internal governance. Chair of internal Serious Safeguarding Review meetings.
<b>The Board and Sub-Committee</b>	The HR, EDI & Safeguarding sub-committee will scrutinise and review safeguarding data on a quarterly basis, reporting to The Board who will have oversight of all safeguarding information.
<b>Heads of Community Support Services</b>	Heads of community support services will act as regional leads for safeguarding.
<b>All Staff</b>	All staff must adhere to the safeguarding policies and procedures which guide our approach locally and nationally.

## 5. HOW POLICY WILL BE IMPLEMENTED

The current version of this policy is available on SharePoint. All new staff should read this policy on induction. This policy is reviewed annually. Staff will receive an email update when this policy is revised or reviewed and should ensure they make themselves familiar with this update. As part of induction, all staff will read the local safeguarding procedure that sits alongside this policy and gives clear direction as to how safeguarding concerns should be managed in line with local protocols.

## 6. DEFINITIONS

Anyone who comes into contact with P3 for the purpose of this policy and associated procedures is any person aged 18 or over who is or could come to be, at risk.

## 7. POLICY STATEMENT

### Types of Abuse

There are a number of categories of abuse recognised by legislation, as follows:

**Physical Abuse:** Including assault, hitting, slapping, female genital mutilation (FGM), pushing, misuse of medication, restraint, or inappropriate physical sanctions.

**Domestic Violence:** including psychological, physical, financial, emotional abuse, so called 'honour-based' violence, including forced marriage and FGM.

**Sexual Abuse:** including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual assaults, or sexual acts to which an adult who has not consented or was pressured into consenting.

**Psychological Abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

**Financial or Material Abuse:** including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

**Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude and inhumane treatment.

**Discriminatory Abuse:** including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion.

**Organisational abuse:** includes neglect and poor practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill treatment. It can be through neglect or poor professional practice within an organisation.

**Radicalisation:** encouragement or coercion to become involved in terrorist activities.

**Neglect and acts of omission:** including ignoring medical, emotional or physical needs, failure to provide access to appropriate healthcare and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Self-neglect:** this covers a wide range of behaviours such as neglecting to care for one's personal hygiene, health or surroundings and includes such behaviours as hoarding.

### **Awareness and Responsibilities**

The charity will ensure that all staff are informed about, undertake training so that they understand and accept their responsibilities regarding safeguarding. This will include the forms that it can take, signs and symptoms of possible abuse and the steps that they must take in recognising, preventing, and reporting safeguarding issues.

The charity will ensure that all staff are trained in Professional Boundaries, that they understand how this is intrinsically related to Safeguarding and how they are responsible for setting and maintaining these boundaries.

*Designated Person:* Esther Barrett is the National Safeguarding Lead. The role of the National Safeguarding Lead is to oversee the Regional Safeguarding Leads, all safeguarding policies, and procedures, and to update on legislation.

Esther Barrett also ensures compliance with safeguarding at an organisational level including liaison with the charity commission and our internal charity governance.

The Board, supported by ELT and the HR, EDI and SG committee will have direct oversight of all matters relating to the implementation of this policy and will be available at all times to provide instructions, guidance, and support for the designated person.

The Board will receive from the designated person an annual report which sets out and reviews how they have discharged their duties throughout the year.

### **Recognition of Adult Safeguarding Issues**

The charity asks staff to highlight any causes for concern to the appropriate person and organisations, we also ask them to record these concerns on the internal safeguarding log where there are drop down options for staff to choose specific categories and identify the type of abuse they are reporting. However, where this is not clear the main focus should be on raising concerns to the appropriate person and organisation.

## **General Indicators of Concern**

- Bruising, pressure-finger marks, broken bones, abrasions, unexplained injuries can all be indicators of physical abuse, neglect, or mistreatment.
- Withdrawal from normal activities, sudden change in presentation, unusual depression can signify emotional abuse.
- Sudden changes in financial situation i.e. just been paid but no money left - this may be the result of exploitation.
- Dehydration, bedsores, poor hygiene, and unusual weight loss are possible indicators of neglect/self-neglect and abuse.
- Social isolation, extremist language, accessing violent extremist websites, significant change in appearance or behaviour.

The above list is not exhaustive, and staff must use their professional judgement and report anything they find concerning to their line manager above if their manager is not available.

## **Recording and Reporting of Incidents**

A full written record of all incidents which may indicate adult safeguarding concerns will be maintained, setting out what has been said and to whom.

All staff must enter any referrals made in relation to Safeguarding on the Central Safeguarding Log.

Staff will have due regard to information sharing procedures when communicating about matters of this kind, recognising that the protection of people is always the most important consideration.

If a member of staff suspects that a person is under threat, there are a number of steps that will be taken:

All suspicions will be reported immediately to the staff member's line manager and designated person who will consider referring the matter to the Local Authority Adult Safeguarding team / Police.

Detailed written records of suspicions will be kept which will include the following information:

- The nature of the suspicion;
- Details of any injury/indicator of abuse;
- Times, dates, and any other relevant information;
- Dates, times, and names of anyone else involved with the person who may substantiate the suspicion.

The person will be made aware that information around safeguarding concerns may have to be shared and cannot always be guaranteed to be kept confidential, unless there is anything to suggest this may pose further risk.

## **Disclosure of Abuse**

If an adult discloses to a staff member that they have been abused, that member of staff will:

Inform the person that in order to help them you have to tell your line manager/designated person. The member of staff will tell the adult concerned who this person is and reassure them that they have done the right thing in telling the staff member what has been going on.

The staff member must stay calm, not make promises which they cannot keep and offer reassurance and support.

Listen to the adult and note down what they say in their own words. It is important at this stage the person is not interrupted and questions are not asked. Record the facts and discussion in the person's own words and give a copy to their manager and the designated person.

Report the disclosure to their line manager, who will discuss the case with the designated person responsible for adult safeguarding in the charity.

An immediate referral will be made to the Local Authority and Police (where appropriate) who will investigate the disclosure.

If a member of staff is named in the disclosure the designated person will be as discreet as possible and report to their manager or if not appropriate the next line manager up.

The Board will be informed as soon as possible and, in any case, not more than 12 hours after the police have been informed.

If a member of staff observes another member of staff harming a person we work alongside they will report this immediately to their line manager and to the designated person who will act according to the Care Act 2014.

If it is a manager, CEO or Trustee who is named in the disclosure the member of staff will be discreet and contact an alternative manager or HR.

## **Reporting Allegations of Abuse against Members of Staff**

The charity recognises that an allegation of abuse made against a member of staff will be made for a variety of reasons and that the facts of the allegation will or will not be true.

It is imperative that those dealing with an allegation maintain an open mind and the investigations will be thorough and not subject to delay.

The charity recognises that the welfare of the person is the paramount concern. But it also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the charity will do so with sensitivity and will act in a careful, measured way and with guidance from HR at all times.

## **Disclosure of a Serious Allegation**

Where a disclosure is made of a serious nature that may involve a P3 colleague or volunteer, P3 will immediately form a Serious Safeguarding Review chaired by the DSL involving all relevant leads / directors and the head of governance. This may be a disclosure of a physical, financial, sexual, psychological nature and the decision to progress with this procedure will be made by the DSL and head of governance / COO.

Clear guidance, direction and support will be agreed, and review meetings will be held weekly for the duration of the incident / alleged incident. We will ensure we are supporting and protecting people we work alongside and P3 staff members appropriately and reporting in line with relevant legislation.

## **Disclosure and Barring Service (DBS)**

Duty to refer: The Safeguarding of Vulnerable Groups Act 2006 makes it a mandatory requirement to refer anyone known to pose a threat of harm to a vulnerable adult to the DBS.

The Executive Leadership Team with the guidance of Human Resources will not knowingly approve the employment of anyone who poses a risk of harm to children or vulnerable adults. This includes anyone who is believed to have committed a relevant offence or who has a record of such conduct.

The charity has a legal duty to refer an employee who poses a risk of harm to children or vulnerable adults to the DBS, failure to do so can result in a fine and/or up to 5 years imprisonment. There will be sufficient and solid evidence that the employee poses a risk of harm before they can be referred to the DBS. The DBS will not consider evidence based on rumour or unsubstantiated reports. The charity will also inform the police and other relevant authorities if it believes that a relevant offence has occurred.

## **Barring Process**

Whenever new relevant information (such as a conviction or caution) becomes known to the charity, the information will be sent to the DBS. The DBS will consider this information, together with other information known on the individual, and decide whether it indicates that the individual poses a risk of harm to vulnerable groups. If so, the DBS will commence its barring process and the DBS will issue a disclosure certificate to the applicant with the barring information.

The applicant will be advised by the designated person to make a representation to the DBS regarding the barring information. The DBS will assess the barring information and representation and decide whether to bar the applicant. If there is sufficient barring evidence, the applicant will be placed on either the Children's Barred List or the Vulnerable Adults Barred List or both depending on the offence. The applicant will then be removed from regulated activity.

A staff member who contravenes this policy has the right of appeal and will be advised of this right. Serious offences committed against vulnerable adults will lead to instant dismissal and automatic barring. The staff member will have no right to make representations or to appeal against a barring decision.



## **Person in a Position of Trust (PiPoT)**

The charity has a legal duty to make a PiPoT referral to the Local Authority Safeguarding Team where allegations have been made against a person in a position of trust in relation to an adult with care and support needs.

As soon as a concern is raised about a person in a position of trust, this must be reported to the service manager, local safeguarding lead or HR immediately. HR will decide who is the best person to make the referral depending on the circumstances.

When concerns are raised, any immediate potential risk to adults with care and support needs who receive P3 services should be assessed, and, if necessary, action taken to safeguard those adults. This may include a referral to the police if it is believed a crime has been committed.

Examples of where a PiPoT referral would be expected are where a person has;

- Behaved in a way that has harmed, or may have harmed an adult with care and support needs.
- Possibly committed a criminal offence against, or related to an adult with care and support needs.
- Behaved in a way which has harmed children or may have harmed children which means their ability to provide a service to adults with care and support needs must be reviewed.
- May be subject to abuse themselves and as a consequence means their ability to provide a safe service to adults with care and support needs must be reviewed.

This list is NOT exhaustive.

The charity will be guided by the Local Authority Safeguarding Team regards further action once the PiPoT referral has been sent.

## **Local Safeguarding Procedures**

Each P3 service delivery area has a specific local reporting procedure that is informed and in line with the local authority guidelines. This includes a clear process map and contact information for key people and/or teams.

The local safeguarding procedure details the specific reporting process, responsibilities, and contact information for key personnel, both internally and externally, including the Local Authority Designated Officer (LADO).

It is the responsibility of the service manager/co-ordinator to ensure that this information is complete and kept up to date.

All local safeguarding procedures written by P3 are saved locally and are written/updated by the local Head of Community Support services annually, when there is a legislation change, or at contract renewal.



These versions are signed off by the director of quality, performance and safeguarding (DSL). All old versions must be archived and new versions marked clearly in accessible folders for all relevant staff to access.

### **Safer Recruitment and Selection**

The charity has safer recruitment and selection procedures in place covered by our recruitment and selection policies and procedures (reviewed in parallel with the reviews of this policy) which stipulate the following:

In order to maintain the levels of protection, all persons working with vulnerable adults will have an Enhanced Disclosure through the Disclosure and Barring Service, Children's Barred List checks and have completed an application process, interview and have two references (we will maintain sensitive and confidential use of the applicant's disclosure).

Upon starting employment with P3, staff will receive a copy of P3's Code of Conduct and Safeguarding Policies.

Verification of previous employment history.

Use a variety of selection techniques (e.g. qualifications, previous experience, interview, and reference checks) and Identification checks on any candidate selected for employment.

### **Training**

All staff will receive training as part of their induction and in the form of annual updates to ensure that they are familiar with the safeguarding of vulnerable adults, issues and responsibilities and the charity's policies and procedures, with refresher training at least every year.

### **Confidentiality**

In the context of Safeguarding, the right to confidentiality can be overridden and certain situations may warrant the sharing of information without consent. This may be in an emergency or life-threatening situation, furthermore the law does not prevent the sharing of information between organisations where public interest outweighs protection of confidentiality, for example a crime could be prevented or has been committed or a person poses significant risk to themselves and/or others. Staff must always discuss this with their manager before sharing information unless the situation is life threatening.

## **8. LEGISLATION**

- The Care Act 2014
- Care Standards Act 2000
- Health and Social Care Act 2012
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2010
- Safeguarding Vulnerable Groups Act 2006
- NHS and Community Care Act 1990
- The National Assistance Act 1948

- Mental Capacity Act 2005
- Protection of Freedoms Act 2012
- No Secrets: guidance on protecting vulnerable adults in care 2000
- Human Rights Act 1998
- The Data Protection Act 2018
- The General Data Protection Regulation
- Criminal Justice and Court Services Act 2000
- Sexual Offences (Amendments) Act 2000
- Health and Safety at Work Act 1974
- Disclosure and Barring Service DBS.gov.uk
- Modern Slavery Act 2015
- Equality Act 2010
- Carers (Recognition and Services) Act 1995
- Vulnerable Adults Act 1989
- Public Disclosure Act 1990

## 9. **OFSTED REGULATION STANDARDS**

This policy is aligned with the Ofsted Guide to Supported Accommodation Standards and Quality Standards 2023.

The protection standard (Regulation 5)  
 Workforce Plan (Regulation 10)  
 Safeguarding Policy (Regulation 20)  
 Behaviour Management Policy (Regulation 22)  
 Young People's Case Records (Regulation 24)  
 Notification of a serious event (Regulation 27)

## 10. **DOCUMENT CONTROL**

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