



**Effective: January 2020**

**Review Date: January 2021**

## **SAILSHIP TRAINING AND LEARNING FOR LIFE SAFEGUARDING VULNERABLE ADULTS POLICY**

### **1 AIM**

1.1 The purpose of this policy is to outline the duty and responsibility of Staff, Volunteers and Trustees working on behalf of Sailship Training and Learning for Life in relation to Safeguarding Vulnerable Adults.

1.2 Sailship Training and Learning for Life (Sailship) is committed to safeguarding all the members of its community, particularly the vulnerable adults in its care and will not tolerate abuse in any form.

1.3 We believe that all adults have the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation.

*“Abuse can be something that is done to a person or something that is omitted from being done. It is a violation of an individual’s rights and can happen anywhere, including in someone’s home, a residential home, a nursing home, a day centre or hospital. It can happen once or repeatedly.”*

Essex County Council Safeguarding Vulnerable Adults (2014)

### **2 OBJECTIVES**

2.1 To explain the responsibilities Sailship and its staff, volunteers and Trustees have in respect of vulnerable adult protection.

2.2 To provide staff with an overview of vulnerable adult protection

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



### 3 CONTEXT

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

#### 3.2 **What do we mean by abuse?**

3.2.1 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.

3.2.2 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.

3.2.3 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.

3.2.4 Where these concerns relate to a vulnerable adults living in their own home, with family or with informal carers they must be reported to the social services agency. These reports must be addressed through the adult protection process and a risk assessment must be undertaken to determine an appropriate response to reduce or remove the risk.

#### 3.3 **Who Is at Risk?**

3.3.1 The Care Act 2014 identifies an 'adult at risk' and defines them as follows:

'An adult at risk of abuse or neglect is defined as someone who has need of care and support, who is experiencing, or is at risk of, abuse or neglect and as a result of their care needs is unable to protect themselves'

The Care Act 2014 s42

3.3.2 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.

Reviewed Jan 2020



3.3.3 *It may also include victims of domestic abuse, hate crime and anti-social abuse behaviour.* The persons' 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 behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

3.3.4 Many vulnerable adults may not realise that they are being abused. For instance, a young learning disabled person, accepting that they are dependent on their family, may feel that they must tolerate having no 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.

3.3.5 Vulnerable adults who also have SEND needs may also face additional safeguarding issues or may have communication or cognitive barriers in understanding or reporting any abuse they are at risk or have suffered from. Subsequently, staff should be aware of this in their dealings with these adults.

3.3.6 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 behavioural development

#### 4. LEGAL FRAMEWORK

4.1 The Care Act 2014, sets out in one place, local authorities' duties in relation to assessing people's needs and their eligibility for publicly funded care and support.

It sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. As such the local authority lead a multi-agency local adult safeguarding system that seeks to prevent abuse and neglect and stop it quickly when it happens.

4.2 Human Rights Act 1998, the Mental Capacity Act 2005 and Public Interest Disclosure Act 1998

4.3 Data Protection Act 2018, General Data Protection Regulations 2016, Freedom of Information Act 2000, Safeguarding Vulnerable Groups Act 2006, Deprivation of Liberty Safeguards, Code of Practice 2008

4.4 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.

4.5 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).

4.6 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.

## 5 THE ROLE OF STAFF, VOLUNTEERS AND DIRECTORS

5.1 All staff, volunteers and Trustees working on behalf of Sailship have a duty to promote the welfare and safety of vulnerable adults.

5.2 Staff, volunteers and Trustees 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.

5.3 Staff should undertake safeguarding training as directed by the Designated Safeguarding Lead.

### **5.4 Role of the Designated Vulnerable Adult Protection Lead**

5.4.1. The role of the designated officer is to deal with all instances involving adult protection that might arise within Sailship. They will respond to all vulnerable adult protection concerns and enquiries, as well as ensuring staff are appropriately trained and supported.

5.4.2. The Designated Vulnerable Adult Protection Lead for Sailship is Mrs. Lucinda Slavin. Throughout this policy they will be referred to as the Designated Safeguarding Lead (DSL). They can be contacted by telephoning the mobile number 07526 535 481

5.4.3 The Deputy Designated Safeguarding Lead (DDSL) is Ms Elizabeth Barritt and she can be contacted on the mobile number 07875 639 188

5.4.4. If neither the DSL or DDSL are available and a learner is in immediate risk you should contact Essex Social Care Direct.



## 5.5. Role of Line Manager

5.5.1 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.

5.5.2 The line manager could, if agreed with the staff member dealing with the incident, make contact with the DSL in the first instance.

5.5.3 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.

## 6 TYPES OF ABUSE

6.1 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.

6.2 Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it.

6.3 **The Care Act 2014** suggests the following as the main types of abuse:

6.3.1 **Physical abuse** - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

6.3.2 **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.

6.3.3 **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.

6.3.4 **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.

6.3.5 **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.

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

Reviewed Jan 2020



**6.3.7 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.

**6.3.8 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.

**6.3.9 Self Neglect** covers a wide range of behaviour including neglecting to care for own personal hygiene, health or surroundings and includes behaviour such as hoarding.

**6.3.8 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.

#### **6.4 What are the possible signs of abuse?**

Abuse and neglect can be difficult to spot. You should be alert to the following possible signs of abuse and neglect:

- Depression, self-harm or suicide attempts
- Difficulty making friends
- Fear or anxiety
- The person looks dirty or is not dressed properly,
- The person never seems to have money,
- The person has an injury that is difficult to explain (such as bruises, finger marks, 'non-accidental' injury, neck, shoulders, chest and arms),
- The person has signs of a pressure ulcer,
- The person is experiencing insomnia
- The person seems frightened, or frightened of physical contact.
- Inappropriate sexual awareness or sexually explicit behaviour
- The person is withdrawn, changes in behaviour

You should ask the person if you are unsure about their well-being as there may be other explanations to the above presentation.



## 6.5 Domestic abuse

### 6.5.1 Cross Government definition of Domestic Abuse and violence is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to:

Psychological, physical, sexual, financial and emotional.

(Home Office 2013. Updated 2016)

### 6.5.2 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 behaviour. This can also include forced marriage and so-called "honour crimes". Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently "violent".'*

6.5.3 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.

6.5.4 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 'dishonour' to the family.

6.5.5 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.

6.5.6 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.

6.5.7 A separate Domestic Abuse Protocol is in place between Police, Social Services and Health.

6.5.8 Incidents reported by the police through the domestic abuse protocols will be addressed under the adult protection processes if it is considered that a vulnerable adult may be at risk of abuse.



## 6.6 Additional Safeguarding Issues

### 6.6.1 Extremism and Radicalisation.

Radicalisation and extremism of adults with care and support needs is a form of emotional/psychological exploitation. Radicalisation can take place through direct personal contact, or indirectly through social media.

If staff are concerned that an adult with care and support needs is at risk of being radicalised and drawn into terrorism, they should treat it in the same way as any other safeguarding concern.

The government have a national strategy which includes procedures for referring these types of concerns which is called PREVENT. For more information about Prevent see:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

### 6.6.2. Cultural Issues including Honour Based Violence and Forced Marriage.

Honour based violence is a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and / or community by breaking their honour code. For victims it is a form of abuse and a serious abuse of human rights.

It can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members. Women, men and younger members of the family can all be involved in the abuse.

One example of this is forced marriage. A forced marriage is one in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced. Forced marriage is a criminal offence.

Should you have concerns that a vulnerable adult may be at risk of honour-based violence or forced marriage then report as a concern as you would for any other safeguarding issue.

### 6.6.3. Misuse of technology

Staff have signed to state that they have read and understood all regulations in relation to technology which are explicitly outlined in the Employee Handbook, and terms should be complied with at all times. All members of the community should ensure that whilst they are on site, they should not use mobile phones to access any material that is inappropriate for the setting, which could embarrass or offend, encourage activities not suited to the environment e.g. gambling or compromise relationships.



#### 6.6.4 Sexual Violence and Sexual Harassment

Sailship will not tolerate any inappropriate sexualised behaviour between staff and other adults or between adult learners. This includes sexualised language which may be deemed as “banter” or any use of mobile phones for the sharing of inappropriate sexualised imagery. Full details of expectations for staff can be found in the Employee Handbook.

If a staff member has concerns that a vulnerable adult has been the victim or perpetrator of sexual violence or sexual harassment, they should raise a concern and report this issue to the Designated Safeguarding Lead.

#### 6.6.5. Criminal exploitation of vulnerable adults and “County Lines”.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

If you have concerns about a vulnerable adult being targeted in this way you should refer your concern through to the DSL. Additional support can be accessed by government guidance issued here.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)

#### 6.6.7 Poor attendance and learners frequently missing.

Poor attendance or changes to attendance patterns can sometimes indicate that there is an underlying safeguarding issue. If a learner is frequently absent or has sustained period of absence without explanation then staff should raise this as a concern with the DSL.

## 7 CHILDREN

7.1 It is essential that the needs of any children within an abusive or domestic violence situation where there is a vulnerable adult involved are considered and acted upon. Please contact the Lead for Safeguarding (Mrs Lucinda Slavin, Welfare Officer for Sailship) and/or the local social services Safeguarding Children’s team.



## 8 PROCEDURE- IN THE EVENT OF A DISCLOSURE

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

8.2 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.

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

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

8.5 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.

## 9 RESPONDING TO AN ALLEGATION

9.1 Any suspicion, allegation or incident of abuse must be reported to the Designated Adult Protection Lead (Mrs. Lucinda Slavin, Welfare Officer for Sailship) on that working day where possible.

9.2 The nominated member of staff shall telephone and report the matter to the appropriate local adult social services duty social worker. 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. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

9.3 If there is a concern that a vulnerable adult maybe in immediate danger, the DSL and DDSL are not available because it is out of office hours, then Essex Social Care team can be contacted directly on 0345 606 1212.

## 10 RESPONDING APPROPRIATELY TO AN ALLEGATION OF ABUSE

10.1 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**

- 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

10.2 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 DSL or DDSL.

## 11 CONFIDENTIALITIES

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

11.2 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.

11.3 Clear boundaries of confidentiality will be communicated to all.

11.4 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.

11.5 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.

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

11.7 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.

11.8 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.

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

11.10 This policy needs to be read in conjunction with other policies for Sailship training and Learning for Life including:

Reviewed Jan 2020



- Confidentiality
- Disciplinary and Grievance
- Data Protection
- Recruitment and Selection
- Safeguarding children and young people

## 12 THE ROLE OF KEY INDIVIDUAL AGENCIES

### 12.1 **Adult Social Services**

12.1.1 The Care Act 2014, sets out in one place, local authorities' duties in relation to assessing people's needs and their eligibility for publicly funded care and support.

It sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect, lead a multi-agency local adult safeguarding system that seeks to prevent abuse and neglect and stop it quickly when it happens.

12.1.2 All local authorities must have a Safeguarding Adults Board (SAB) with core membership from the Local Authority, The Police and the NHS (specifically the local clinical commissioning groups) and the power to include other relevant bodies.

### 12.2 **The Police**

12.2.1 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.



### 13. TRAINING

13.1 Training will be provided, as appropriate, to ensure that staff are aware of these procedures. Specialist training will be provided for the member of staff with vulnerable adult protection responsibilities. This will be refreshed on a regular basis.

13.2. All staff will complete an induction period which will include safeguarding training. Details of this are included within the Employee Handbook.

13.3 Staff must make themselves available for safeguarding training and updates as requested by the Designated Safeguarding Lead.

### 14. CURRICULUM

14.1. At Sailship we believe that we have a duty to help our learners recognise, reduce and manage risk as part of our safeguarding responsibility.

14.2 As such we have introduced "staying safe" as part of our life-skills learning programme. We will cover topics such as:

- Keeping safe when you are out and about. This covers bullying, harassment and hate crime, including - 'stranger danger', road safety and travel training, staying safe in the community. How to seek help before, during and after an incident.
- Keeping safe in your home from bullying, harassment and hate crime, including looking after your valuables & money, and general home safety. Keeping in touch with your neighbours, not giving personal details out etc.
- Keeping safe at work from bullying, harassment and hate crime and how to report an incident at work.
- Online safety

14.3 The above is not an exhaustive list but we will adapt the curriculum to reflect the needs of our learners and any emerging local and national issues.

### 15. COMPLAINTS

15.1. Sailship has a complaints procedure available to all staff, volunteers and Trustees.

15.2. If you require a copy of the complaints procedure please contact Elizabeth Barritt.



## 16. WHISTLEBLOWING

16.1 All staff should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the DSL.

16.2 In the event of concerns or allegations about the DSL, allegations should be reported to the CEO of Sailship, Ms. Elizabeth Barritt. Sailships's handling of safeguarding concerns, allegations should be reported directly to the Local Authority Designated Officer (LADO).

16.3 All members of staff should be aware that it is a neglect of their safeguarding responsibilities not to report concerns about the conduct of a colleague that could place a vulnerable adult at risk

16.4 Staff can also contact Essex County Council if they do not feel able to raise concerns regarding safeguarding failures internally. This can be done by contacting an external whistleblowing service EXPOLINK on 01249 661600.

## 17. SAFER RECRUITMENT PROCEDURE

17.1 Sailship 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, volunteers and Trustees where applicable.

17.2 Sailship will ensure that all steps are taken to recruit staff who are safe to work with our learners. We are committed to:

- safeguarding and protecting all vulnerable adults by implementing robust safer recruitment practices;
- identifying and rejecting applicants who are unsuitable to work with vulnerable adults;
- responding to concerns about the suitability of applicants during the recruitment process;
- responding to concerns about the suitability of staff members once they have begun their role;
- ensuring all new staff participate in an induction which includes training in core safeguarding procedures.

17.3. We advise all staff to disclose any reason that may affect their suitability to work with vulnerable adults including convictions, cautions, court orders, cautions, reprimands and warnings.

17.4 If an applicant has not been barred from working with vulnerable adults but the checks have raised concerns (for example if they have a criminal record), Sailship will carry out a risk assessment to ascertain whether the applicant is suitable to work with our learners.



17.5. Sailship will only share information about an applicant's criminal record with those who need to know. The applicant will be told who in the organisation knows about his/her record.

17.6. All staff are to undergo Enhanced DBS checks.

17.7 Staff must provide the recruitment team with the necessary documentation to process a DBS and they must comply with all the relevant steps of the process in a timely manner.

17.8 Sailship has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

17.9 A full Safer Recruitment Policy is available on request.

## 18. ALLEGATIONS AGAINST OTHER STAFF MEMBERS

18.1 Sailship recognises that it is possible for staff to behave in a way that might cause harm to others and takes seriously any allegation received. Such allegations should be referred immediately to the DSL. The DSL should review the information available and consideration should be given as to whether the case meets the threshold of harm/risk of harm.

- If it is decided it meets the threshold of harm/risk of harm and therefore is an allegation they should follow the procedures below and notify the LADO within one working day. If appropriate, the police should also be notified within one working day – or immediately if necessary;
- If it is decided that the incident does not meet the threshold of harm/risk of harm and is a concern only, then they should take steps to ensure any conduct or behaviour issues are addressed with the member of staff through normal employment practices. The decision and a justification for it should be recorded by the DSL;
- If the designated safeguarding lead is unclear whether the incident meets the threshold of harm/risk of harm they may wish to seek advice from the LADO.

18.2 A clear and comprehensive summary of allegations and details of the subsequent actions taken should be kept on the confidential personnel file of the accused. Details of allegations against staff that are found to have been malicious should be removed from personnel records.

18.3 The DSL should inform the accused person about the allegation as soon as possible. The DSL should provide the accused person with as much information as possible at that time. However, where a strategy discussion is needed, or police or social care services need to be involved, the DSL should not do that until those agencies have been consulted.



18.4 Sailship Trustees will consider carefully whether the circumstances of a case warrant a person being suspended from contact with learners or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

18.5 Allegations about the conduct of the DSL should be taken to the CEO Elizabeth Barritt, Concerns about the CEO should be directed to local authorities,

18.6 The vulnerable adults LADO can be contacted by calling 0345 603 7630 or emailing: [Socialcaredirect@essex.gov.uk](mailto:Socialcaredirect@essex.gov.uk)

## 19. REFERENCES, INTERNET LINKS AND FURTHER SOURCES OF INFORMATION

### 19.1 **The Care Act 2014**

19.2 **No Secrets Report 2000** - The first national policy developed for the protection of vulnerable adults, for use by all health and social care organisations and the police. It introduced guidance around local multi-agency arrangements and was issued under Section 7 of the Local Authority Social Services Act 1970. Its implementation is led by local authorities with social services responsibilities.

[http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Dearcolleagueletters/DH\\_4002849](http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Dearcolleagueletters/DH_4002849)



SAILSHIP TRAINING AND LEARNING FOR LIFE

**Safeguarding Vulnerable Adults Policy – Initial cause for concern form**

*Initial cause for concern form which must be discussed with Line Manager/ Designated Safeguarding Lead within 24 – 48 hours.*

Date:

Time:

Name of individual cause for concern is about:

Age (if known):

Address (if known):

Describe your concern and action taken:



Observations to support cause for concern:

Description and location of any visible marks, bruising etc:

.....

Name of alleged abuser, relationship with vulnerable adult (if known):

Name of person completing form:

Signature:

Date:

Name of Line Manager:

Signature:

Date:

Name of Safeguarding lead or Senior Manager:

Signature:

Date: