

<b>Title:</b> Safeguarding Adults	<b>Policy</b>
<b>Approved by</b> Chief Executive	<b>Issue number: 3</b> & Version number (if any): N/A
<b>Approved date</b> September 2023	<b>Review date</b> September 2025
<b>Previous Version:</b> Safeguarding Adults and Children Policy v 2	<b>Responsible Officer</b> Director Of C&SH

<b>1.</b>	<b>Aims and Objectives</b>
1.1	Hightown's policy on Safeguarding Adults at Risk applies to all activities within the Association. Our approach to Safeguarding is underpinned by the fundamental human right for all adults 'to live a life that is free from abuse and neglect'.
1.2	Hightown welcomes the placing of Safeguarding Adults at Risk on a statutory footing that requires multi-agency cooperation and activity through the Care Act 2014. The Association will operate under a duty of candour and care, recognising the need for transparency and good information sharing to protect Adults with care and support needs.
1.3	Managers must ensure that all staff are made aware of their role and responsibilities under this policy. The policy will be communicated to employees through local induction, team meetings, supervisions, job descriptions and Hightown's intranet. Managers will ensure all staff have access to associated procedures and reporting forms.
<b>2.</b>	<b>Definitions and Scope</b>
2.1	This Policy sets out the duty to safeguard and promote the welfare of Adults at Risk across the Association.
2.2	In England, The Care Act 2014 sets out the legal framework that we and the Local Authorities (LA) work to when it comes to safeguarding. Safeguarding duties apply to any adult who: - <ul style="list-style-type: none"> <li>• Has care and support needs.</li> <li>• Is experiencing, or at risk of, abuse or neglect, and</li> <li>• As result of their needs, cannot protect themselves.</li> </ul>

2.3	The LAs have the responsibility to investigate, or to get someone to investigate, or request that an investigation be carried out and to decide whether to take action, known as the section 42 enquiry.
2.4	This Policy ensures that all staff are aware of their responsibility to identify situations where they believe there is a potential risk, and to refer the concern to their manager and the Designated Safeguarding Lead (DSL).
<b>2.1.</b>	<b>Principles</b>
2.1.1	Hightown has a zero-tolerance approach to abuse. Staff are required to report all cases of suspected abuse, regardless of who the perpetrator is.
2.1.2	All allegations of abuse will be taken seriously. Hightown recognises the importance of the 'Making Safeguarding Personal' agenda which places the wishes of the individual at the centre of Safeguarding activities.
2.1.3	<p>Hightown adheres to the following six core principles underpinning safeguarding adults' work: -</p> <ul style="list-style-type: none"> <li>• <b>Empowerment</b> – People being supported and encouraged to make their own decisions and to give informed consent.</li> <li>• <b>Prevention</b> – It is better to take action before harm occurs.</li> <li>• <b>Proportionality</b> – The least intrusive response appropriate to the risk presented.</li> <li>• <b>Protection</b> – Providing support and representation to those in need.</li> <li>• <b>Partnership</b> – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.</li> <li>• <b>Accountability</b> – Accountability and transparency in delivering safeguarding.</li> </ul>
2.1.4	<p>In managing and delivering safeguarding, Hightown will work together with other agencies including but not limited to:</p> <ul style="list-style-type: none"> <li>• The Police</li> <li>• The LAs various relevant departments and professionals</li> <li>• The Probation Services</li> <li>• Health related services, agencies, and departments</li> <li>• Housing services</li> <li>• Other support providers</li> <li>• Families and Advocates.</li> </ul>
2.1.5	This policy must be read in conjunction with the relevant local authority multi – agency guidelines for Safeguarding Adults at Risk. Hightown's Safeguarding Adults Procedure is accessible on MyTown.

<p><b>2.2.</b></p> <p>2.2.1</p> <p>2.2.2</p> <p>2.2.3</p>	<p><b>SCOPE</b></p> <p>This policy applies to all members of Hightown’s staff: Trustees, Board Members, and all individuals and organisations who have a working relationship with Hightown, including volunteers, students, trainees, contractors, and temporary workers, including those working on a bank or agency contract.</p> <p>For ease of reference, all employees and workers who fall under these groups will be uniformly referred to as “staff” in this policy.</p> <p>The Policy does not form part of any employee’s contract of employment and may be amended at any time.</p>
<p><b>3.</b></p> <p>3.1</p>	<p><b>Policy Statement</b></p> <p><u>Types of Abuse</u></p> <p><u>The Care Act 2014's statutory guidance refers to ten types of abuse: -</u></p> <ul style="list-style-type: none"> <li>• <b>Physical Abuse</b> - including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.</li> <li>• <b>Domestic Abuse</b> – includes psychological, physical, sexual, financial, emotional abuse; so, called ‘honour’ based violence, female genital mutilation and forced marriage (age range in England extended to 16 and includes relationships between all family members, not just intimate partners).</li> <li>• <b>Sexual Abuse</b> – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.</li> <li>• <b>Psychological Abuse</b> – 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.</li> <li>• <b>Financial or Material Abuse</b> – 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.</li> <li>• <b>Modern Slavery</b> – 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.</li> <li>• <b>Discriminatory Abuse</b> – including forms of harassment, slurs, or similar treatment, because of race, gender and gender identity, age, disability, sexual orientation or religion.</li> <li>• <b>Organisational Abuse</b> – including neglect and poor care 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</li> </ul>

	<p>poor professional practice as a result of the structure, policies, processes and practices within an organisation.</p> <ul style="list-style-type: none"> <li>• <b>Neglect and Acts of Omission</b> – including ignoring medical, emotional, or physical needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.</li> <li>• <b>Self-neglect</b> – this covers a wide range of behavior from neglecting to care for one’s personal hygiene, health or surroundings and includes behavior such as hoarding.</li> </ul> <p><b><u>Grooming and mate crime</u></b></p> <p>3.2 Grooming is when someone pretends to be friendly, but with intent to use or harm their victim. For example, financially or sexually. It might happen over a long period of time. The person at risk often not aware that it’s happening.</p> <p>Mate crime is a ‘catch-all’ term often used for the various crimes a ‘pretend friend’ might commit. A mate crime could be financial, sexual, physical or psychological.</p> <p>A person with a learning disability is especially vulnerable because groomers may think they will be more easily deceived than other people.</p> <p><b><u>Cyber or online bullying</u></b></p> <p>3.3 Cyber or online bullying might fall into any one of the categories listed above. But specifically, it happens through text messages, emails, or on social media platforms.</p> <p>Online grooming is very common because it’s easier to deceive someone online than in real life. Groomers often operate in gaming communities, pretending to share interests with genuine gamers as a way of getting to know them.</p> <p><b><u>County Lines</u></b></p> <p>3.4 County lines is a term used to describe gangs and organised criminal networks who deal drugs out of cities into suburban and rural areas. They are likely to recruit children and adults they can manipulate to act as ‘runners’ to avoid getting caught themselves. However, as well as drugs, county lines criminals are associated with sexual exploitation, money laundering and human trafficking.</p> <p><b><u>Cuckooing</u></b></p> <p>3.5 Cuckooing is when a drug dealer grooms the person at risk in order to use their home as a base for dealing drugs. The person at risk may be a drug user themselves, but not necessarily. Whether they are or not, once they’ve been cuckooed, they will be even more vulnerable to more types of abuse.</p> <p><b><u>Safeguarding Training</u></b></p> <p>3.6 Training plays an important role in equipping our staff members with the knowledge, skills, and confidence to effectively manage the safeguarding process to secure the health and welfare of vulnerable adults.</p>
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	<p>Hightown ensures that all staff go through an induction with relevant Health and Safety training and awareness of our policies and procedures including safeguarding.</p> <p>We provide face to face and e-learning safeguarding training for all new staff members, tailored to their specific roles and responsibilities. There are refresher courses every three years with annual competency checks conducted by managers for each staff. There is specific safeguarding training aimed for all staff in management positions to inform their instructions and guidance to staff teams.</p> <p>Hightown also works with Local Authorities and encourages its staff to attend any safeguarding training, seminars or initiatives being run at local authority level.</p> <p><b><u>Designated Safeguarding Lead</u></b></p> <p>3.7 Hightown will ensure that there is a Designated Safeguarding Lead that will act as a source of advice to staff on all safeguarding matters. The current Designated Safeguarding Leads covering all areas of Hightown are Spiros Georgiou - Head of C&amp;SH for Homelessness and Mental Health &amp; Francis Zvoma - Head of C&amp;SH for Regulated Services.</p> <p><b><u>Position of Trust</u></b></p> <p>3.8 People in a Position of Trust' (PoT) are defined as '<i>those who work with vulnerable adults, whether on a paid or a voluntary basis</i>'. Therefore, all staff working for Hightown are people in a PoT and staff should be aware that a breach of their position of trust could lead to disciplinary action and, in some instances, to criminal prosecution.</p> <p><b><u>Information Sharing</u></b></p> <p>3.9 All staff have a professional duty to share information with other agencies in order to safeguard adults. The public interest in Safeguarding adults may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by the Designated Safeguarding Lead. If an allegation is made towards another member of staff, full support will be given in line with Hightown's Whistle Blowing Policy which is available on Mytown.</p> <p><b><u>Vetting and Barring and referral to Vetting and Barring (DBS)</u></b></p> <p>3.10 Hightown will ensure all staff who work with vulnerable adults at risk have an enhanced DBS check before working alone with service users and that these DBS checks are repeated at three yearly intervals. Hightown will exercise its duty under the Safeguarding Vulnerable Groups Act (SVGA 2006), to refer employees to DBS as required. Hightown requires all staff to declare immediately if they are cautioned or convicted of any offence.</p> <p><b><u>Prevent</u></b></p> <p>3.11 Hightown will work with partner organisations to contribute to prevention of terrorism, by Safeguarding and protecting vulnerable individuals and making safety a shared endeavor and providing appropriate training as necessary. Any concerns that an individual may be at risk of radicalisation or supporting terrorism will be dealt with in line with the Prevent Program, details are included within Hightown's</p>
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<p>3.12</p> <p>3.13</p>	<p>Safeguarding Adults Procedures.</p> <p><b><u>Adults and Mental Capacity</u></b></p> <p>Hightown recognises that capacity and consent are key themes in Safeguarding practice and that every adult has the right to make their own decisions. A person is assumed to have capacity to do so unless it is proven that they do not.</p> <p>If a service user does not have the capacity to make a decision relating to a Safeguarding concern, staff then have a duty to report the matter following the Association’s Safeguarding Procedures.</p> <p>There is separate policy, procedural guidance and training in order for all staff to understand how to apply the Mental Capacity Act, 2005 to their duties and acting in the service users ‘best interests’. The policy and procedure can be found on MyTown.</p> <p><b><u>Deprivation of Liberty Safeguards</u></b></p> <p>Staff have a duty to raise a concern if they believe someone is being deprived of their liberty, regardless of whether the service user complies, or it is deemed an appropriate intervention. Only the local authority can authorise whether a deprivation of liberty can be applied in a care home (or the Court of Protection for other ‘supported living services’).</p> <p>Concerns about deprivation of liberties should initially be raised with line managers, but if staff still do not feel appropriate actions are being taken and liberty is being deprived, they should contact the Designated Safeguarding Lead.</p>
<p>4.</p>	<p><b>Legal/Regulatory Background</b></p> <p>The following legislation is relevant to the policy: -</p> <ul style="list-style-type: none"> <li>• Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2015</li> <li>• The Care Act 2014</li> <li>• Regulation and Inspection of Social Care (Wales) 2016</li> <li>• Mental Capacity Act 2005</li> <li>• Human Rights Act 1998</li> <li>• Counter-Terrorism and Security Act 2015</li> <li>• Data Protection Act 2018</li> <li>• General Data Protection Regulations (UK-GDPR)</li> <li>• The Equality Act 2010</li> </ul>
<p>4.</p>	<p><b>Other considerations:</b> <b><u>Equality and Diversity</u></b></p> <p>All adults will have the same protection, regardless of age, disability, gender, gender reassignment, race, religion or belief, sexual orientation, or identity. Hightown is committed to anti-discriminatory practice and recognises that some of our service users may have additional needs and communication barriers.</p>

<p><b>5.</b></p> <p>5.1</p> <p>5.2</p> <p>5.3</p> <p>5.4</p>	<p><b>Role and Responsibilities/Authority</b></p> <p>All staff have clear roles and responsibilities to ensure, as far as possible, that service users are effectively safeguarded against all forms of abuse, neglect, discrimination, embarrassment, or poor treatment. All staff should act competently, confidently, and promptly when responding to concerns about the safety and wellbeing of service users.</p> <p>Everyone working for Hightown including frontline staff, managers and members of the senior management team needs to understand their own responsibilities for the safety of the people we support and must have the right skills and knowledge to recognise and respond effectively to potential abuse or neglect. Staff must book and attend safeguarding training and managers need to ensure that safeguarding competency checks are completed for each member of staff'.</p> <p>Hightown is committed to providing high quality services and has a number of monitoring arrangements in place to validate this. Processes and tools used for monitoring, evaluation and review are detailed within associated procedures and guidelines.</p> <p>Hightown's Human Resources department ensures staff files are maintained in line with current employment practice, these are audited and evidence that safe recruitment practices have been applied.</p>
<p><b>6.</b></p>	<p><b>Policy/document References:</b></p> <p>This policy should be read in conjunction with:</p> <ul style="list-style-type: none"> <li>• Safeguarding Adults Procedure.</li> <li>• Safeguarding Children Policy and Procedure.</li> <li>• Mental Capacity Policy and Procedure.</li> <li>• Deprivation of Liberty.</li> <li>• Professional Boundaries.</li> <li>• Positive Risk-Taking Policy.</li> <li>• Disclosure and Barring Service.</li> <li>• Recruitment and Selection.</li> <li>• Learning and Development.</li> <li>• Confidential Reporting/Whistleblowing Policy.</li> <li>• Complaints Policy/Procedure.</li> <li>• Equality and Diversity Policy.</li> <li>• Health and Safety Policy.</li> <li>• Anti-Social Behavior Procedure.</li> <li>• LA's Inter Agency Safeguarding Policy or Procedure Protocol (<i>see links below.</i></li> </ul> <p><a href="#">Multi-Agency-Policy-and-Procedures-2021.docx (live.com)</a></p> <p><a href="#">hcs-666-issue-august-2022.docx (live.com)</a></p> <p><a href="#">Bracknell Procedures (berkshiresafeguardingadults.co.uk)</a></p> <p><a href="#">Wokingham Procedures and Appendixes (berkshiresafeguardingadults.co.uk)</a></p> <p><a href="#">download (bedford.gov.uk)</a></p> <p>All of the these are available on MyTown.</p>