



BCA
BARNET CHURCHES ACTION



Barnet Churches Action,
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Barnet,
Hertfordshire,
EN5 2HR

SAFEGUARDING ADULTS' POLICY

1. General Policy Statement

- 1.1 Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect.
- 1.2 Barnet Churches Action has a moral and legal duty to ensure that it functions with a view to safeguarding and promoting the welfare of "adult at risks" / "adults at risk". We are committed to fulfilling the requirements of the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, the Care Act 2014 and other relevant legislation aimed at the protection of "adult at risks" / "adults at risk".
- 1.3 Throughout these policies and procedures, reference is made to "adults at risk". This term is used to mean: "any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support, by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation."
- 1.3.1 Where someone is over 18 but still receiving children's services and a safeguarding issue is raised, the matter should be dealt with as a matter of course by the adult safeguarding team.
- 1.4 The trustees are committed to ensuring that the organisation:
- Provides a safe environment for adults at risk.
 - Identifies and makes enquiries about adults who are experiencing, or are at risk of, abuse or neglect.
 - Establishes whether any action needs to be taken.
 - Takes appropriate action to see that such adults at risk are kept safe from harm.
 - Cooperates with relevant agencies and partners in order to protect adults experiencing or at risk of abuse or neglect.
- 1.5 The trustees will approve and annually review policies and procedures with the aim of:
- Preventing harm and reducing the risk of abuse or neglect to adults with care and support needs.
 - Raising awareness of issues relating to the welfare of adults at risk and the promotion of a safe environment for the adults at risk and young people.
 - Providing procedures for reporting concerns and dealing with allegations of abuse against members of staff.
 - Ensuring that the roles and responsibilities of individuals and organisations are clearly laid out.
 - The safe recruitment of staff.
- 1.6 The trustees accept the six safeguarding principles set out in the 2014 Care Act:
- Empowerment – Personalisation and the presumption of person-led decisions and informed consent.
 - Prevention – It is better to act before harm occurs.
 - Proportionality – Proportionate and least intrusive response appropriate to the risk presented.
 - Protection – Support and representation for those in greatest need.
 - Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
 - Accountability – Accountability and transparency in delivering safeguarding.

1.7 The trustees will nominate have nominated Safeguarding Lead Person with responsibility for safeguarding adults and special responsibility for adults at risk' protection issues. The Safeguarding Lead Person will:

- Undertake appropriate training for themselves, staff and volunteers.
- Ensure safeguarding issues are kept current and up to date.
- Be a senior member of the management team.
- Provide to trustees will receive an annual report that reviews how the duties have been discharged.

1.8 Staff and volunteers working with adults at risk will receive training adequate to familiarise them with adults at risk' protection issues and responsibilities and the organisations procedures and policies, with refresher training at least every three years. If appropriate, there will also be a member of the management team, staff or volunteer who may through their employment background have particular expertise in adults at risk' protection issues. He/she may be delegated by the trustees to assist the Safeguarding Lead Person.

2. Categories of Abuse.

Abuse and neglect can take many forms. Organisations and individuals should not be constrained in their view of what constitutes abuse or neglect and should always consider the circumstances of the individual case. The organisation recognises the following as definitions of abuse as set out in the 2014 Care Act:

2.1 Physical Abuse

– including assault hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

2.2 Sexual Abuse

– including rape and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

2.3 Psychological abuse

– including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

2.4 Financial or Material Abuse

– including theft, fraud, exploitation, 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.

2.5 Neglect and Acts of Omission

– including ignoring medical or physical care 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.

2.6 Self-Neglect

– this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surrounding and includes behaviour such as hoarding. It is important to consider capacity when self-neglect is suspected. Also consider how it may impact on other family members and whether this gives rise to a safeguarding concern.

2.7 Modern Slavery

– including criminal exploitation, domestic servitude, forced labour, sexual exploitation and other forms such as organ removal, forced begging, forced marriage and illegal adoption.

2.8 Discriminatory abuse

– including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment.

2.9 Organisational abuse

– including neglect and poor care practice within an institution or specific care setting like a hospital or care home, e.g. this may range from isolated incidents to continuing ill-treatment.

3. 'Relevant conduct' under the Safeguarding Vulnerable Groups Act 2006

3.1 In addition, the governing body accepts the following definitions of relevant conduct under Schedule 3 of the Safeguarding of Vulnerable Groups Act 2006 in relation to the barring of those who pose of a risk of harm to adults at risk. A relevant conduct is a conduct which must be referred to the DBS and which could lead to a barring decision.

It includes any:

- Conduct which endangers a child or adult at risk or is likely to endanger a child or adult at risk.
- Conduct which if repeated against or in relation to a child or adult at risk would endanger that child or adult at risk.
- Conduct involving sexual material relating to children (including possession of such material).
- Conduct involving sexually explicit images depicting violence against human beings.
- Conduct of a sexual nature involving a child or adult at risk (or in the case of an adult at risk
- An act that is considered inappropriate).

4. Safeguarding Lead Person (with responsibility for safeguarding adults)

4.1 The Safeguarding Lead Person (with lead responsibility for adults at risk' protection issues) is:

Mrs Mary Boland, Hope Corner Community Centre, 185 Mays Lane, Barnet, Hertfordshire, EN5 2DY. Contact: 020 8364 8756. The Safeguarding Lead Person may or may not be designated as the regulated Activity Provider and/or Manager and/or Seniors Worker(s).

4.2 The Safeguarding Lead Person has a key duty to take lead responsibility for raising awareness within the organisation of issues relating to the welfare of adults at risk and young people and the promotion of a safe environment for the adults at risk and young people.

4.3 The Safeguarding Lead Person is responsible for ensuring that exempted questions are asked on relevant volunteer and employment application forms. The question can be worded accordingly – “This post meets the requirements in respect of exempted questions under the Rehabilitation of Offenders Act 1974. Any applicants for this post who are offered employment or who become volunteers for this organisation will be subject to a criminal record check from the Disclosure and Barring Service before the appointment is confirmed. This will include details of cautions, reprimands or final warnings as well as convictions. A criminal record will not automatically bar a person from successfully taking up this post.”

4.4 The Safeguarding Lead Person will have received appropriate training and will keep up to date with developments in adults at risk' protection issues. They also have responsibility for making new staff and volunteers aware of the existing adults at risk protection policy.

4.5 The Safeguarding Lead Person will be the main contact point for adults at risk. Protection issues and will have contact details for relevant organisations available for employees and volunteers. This list will usually include contact details of relevant organisations including the local police.

5. Disclosure of Abuse and Procedure for Reporting Concerns

5.1 If an adult at risk or tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Do not interview the adult at risk, but question normally and without pressure, in order to be sure that you understand what the adult at risk is telling you.
- Do not put words into the adult at risk's mouth.

- Reassure the adult at risk that by telling you, they have done the right thing.
- Inform the adult at risk that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the adults at risk said, did and your questions.
- Staff should not investigate concerns or allegations themselves but should report them immediately to the Safeguarding Lead Person.

5.2 Reporting allegations of Abuse against Members of Staff

The reporting procedures apply to all staff, whether trustees, administrative, management or support, as well as to volunteers. The word “staff” is used for ease of description.

Reporting procedures will commence if a member of staff has:

- Behaved in a way that has harmed an adult at risk and/or
- Possibly committed a criminal offence against or related to an adult at risk, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with adults at risk – this includes behaviour taking place both inside and outside the community centre.

The organisation will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective adult at risk protection while also supporting the individual who is the subject of the allegation.

5.3 Suspension of a staff member of whom an accusation has been made will not be the default position and will only be considered in cases where there is reason to suspect that an adult at risk or other adults are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, the organisation will only suspend an individual if the trustees have considered all other options available and there is no reasonable alternative.

5.4 Because of their frequent contact with adults at risk, staff may have allegations of abuse made against them. Barnet Churches Action recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that the investigations are thorough and not subject to delay.

6. Duty to refer to the DBS

6.1 The Safeguarding of Vulnerable Groups Act 2006 makes it mandatory to refer anyone known to pose a threat of harm to a child or adult at risk to the DBS. The organisation must not knowingly employ anyone who poses a risk of harm to children or adults at risk. This includes anyone who is believed to have committed a relevant conduct while on the job or who has a record of such conduct.

6.2 The organisation has a legal duty to refer an employee or volunteer who poses a risk of harm to children or adults at risk to the DBS. Failure to do so may result in a fine and/or up to five year’s imprisonment. There must be sufficient and solid evidence that the staff member who 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 Safeguarding Lead Person (and employer) should inform the police and other relevant authorities if they believe a relevant conduct has occurred.

6.3 Referral forms can be downloaded from the DBS’s website www.gov.uk/dbs.

7. The DBS’s barring process

All concerns about DBS requirements and referral must be reported to and discussed with the Safeguarding Lead Person.

7.1 Whenever new relevant information (such as a conviction or caution) becomes known, 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.

7.2 All applicants should be advised by the Safeguarding Lead 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 Adults at Risk Barred List or both depending on the offence. The applicant must then be removed from regulated activity.

7.3 The applicant has the right of appeal to a tribunal and must be advised of this right. Serious offences committed against adults at risk will lead to automatic barring and the applicant will have no right to make representations or to appeal against a barring decision.

8. Information sharing

Where there are safeguarding concerns, staff have a duty to share information. It is important to remember that in most serious case reviews, lack of information sharing can be a significant contributor when things go wrong. Information should be shared with consent wherever possible.

8.1 A person's right to confidentiality is not absolute and may be overridden where there is evidence that sharing information is necessary to support an investigation or where there is a risk to others e.g. in the interests of public safety, police investigation, implications for regulated service.

8.2 The Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so. Advice will be sought if there is any doubt, without disclosing the identity of the person where possible.

8.3 Consent will be shared where appropriate and, where possible, will respect the wishes of those who do not consent to share confidential information. Information may still be shared without consent if, in the Safeguarding Lead Person's judgment, that lack of consent can be overridden in the public interest. Judgment will need to be based on the facts of the case but will consider safety and well-being – i.e. Information sharing decisions will be based on considerations of the safety and well-being of the person and others who may be affected by their actions or the actions of the perpetrator.

8.4 Sharing should be necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information shared is necessary for the purpose for which it is being shared, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion and is shared securely. Keep a record of the decision and the reasons for it – whether shared or not. Shared information must be recorded, stating what has been shared, with whom and for what purpose. Any information disclosed should be:

- clear regarding the nature of the problem and purpose of sharing information.
- based on fact, not assumption.
- restricted to those with a legitimate need to know.
- relevant to specific incidents.
- strictly limited to the needs of the situation at that time.
- recorded in writing with reasons stated.

8.6 Sharing data when someone lacks mental capacity.

In some instances, the individual will not have the capacity to consent to disclosure of personal information relating to them. Where this is the case, any disclosure of information needs to be considered against the conditions set out in the Data Protection Act and a decision made about whether it is in their best interests to be shared. See: <https://www.gov.uk/government/collections/mental-capacity-act-making-decisions>

8. Safer recruitment and selection

8.1 Barnet Churches Action will already have recruitment and selection procedures. These should be reviewed in order to ensure that they take account of the following:

- They should apply to staff and volunteers who may work with adults at risk.
- The post or role should be clearly defined.
- The key selection criteria for the post or role should be identified.
- Vacancies should be advertised widely in order to ensure a diversity of applicants.
- Obtain professional and character references.
- Verify previous employment history.
- Disclosure and Barring Service disclosure/List 99 checks (maintain sensitive and confidential use of the applicant's disclosure).

The organisation uses a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).

9.0 Online Safety

9.1 Barnet Churches Action recognises the importance of safeguarding adults from potentially harmful and inappropriate digital material and criminal activity such as online scams and fraud. We understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, we aim to:

- ♦ Have robust processes in place to ensure the online safety of children, staff, volunteers and trustees.
- ♦ Protect and educate the Hope Corner community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- ♦ Set clear guidelines for the use of mobile phones, tablets, laptops, computers and other electronic devices at Hope Corner Community Centre.
- ♦ Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

9.2 The four key categories of risk to online safety are based on:

- ♦ Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, HSB, suicide, anti-Semitism, radicalisation and extremism.
- ♦ Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and online criminals with the intention to exploit them for sexual (HSB), criminal, financial or other purposes.
- ♦ Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images, (HSB), (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- ♦ Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

This document updated September 2023, effective from September 19, 2023.

Review date: September 2024.

TRUSTEES DECLARATION

I have read and been informed about the content, requirements and expectations of this Policy for the Trustees at Hope Corner Community Centre. I have received a copy of the policy and agree to abide by the policy guidelines as a condition of my role as Trustee of Barnet Churches Action.

I understand that if I have questions, at any time, regarding the policy, I will consult my manager and/or human resources manager.

Please read the policy carefully to ensure that you understand the policy before signing this document.

Trustee Signature

Trustee Printed Name

Date

STAFF / VOLUNTEERS DECLARATION

I have read and been informed about the content, requirements and expectations of this Policy for the Staff at Hope Corner Community Centre. I have received a copy of the policy and agree to abide by the policy guidelines as a condition of my role as an employee / volunteer of Barnet Churches Action.

I understand that if I have questions, at any time, regarding the policy, I will consult my manager and/or human resources manager.

Please read the policy carefully to ensure that you understand the policy before signing this document.

Employee / Volunteer Signature

Employee / Volunteer Name

Date