



## **AAUK Policy - Safeguarding Adults Policy**

Designated safeguarding adults lead for AAUK - Geraldine Evans (Director)

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Appropriate Adults UK's involvement with vulnerable adults is through the provision of appropriate adult services to detained adults with care and support needs. An appropriate adults main concern should not be the guilt or innocence of the detained person, but his or her physical and emotional welfare.

Appropriate Adults UK (AAUK) will not tolerate the abuse of adults in any of its forms and is committed to safeguarding adults with care and support needs from harm.

This policy outlines the steps AAUK will make to safeguard an adult with care and support needs if they are deemed to be at risk. This policy sets out the roles and responsibilities of AAUK in working together with other professionals and agencies in promoting the adult's welfare and safeguarding them from abuse and neglect.

AAUK will ensure that decisions made will allow adults to make their own choices and include them in any decision making. AAUK will also ensure that safe and effective working practices are in place.

This policy is intended to support all AAUK staff and any parties working on behalf of AAUK to understand their role and responsibilities in safeguarding adults. All staff and representatives are expected to follow this policy.

AAUK will:

- ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- implement stringent safeguarding procedures when recruiting, managing and deploying staff and representatives
- provide training for all staff and representatives on safeguarding at a level proportionate with their role
- follow up on reports of safeguarding concerns promptly and according to due process
- capture and share information lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR)

AAUK staff and representatives will:

- contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- report any concerns or suspicions regarding safeguarding violations by an AAUK staff member or representative to the designated named person for safeguarding in AAUK

The key objectives of this policy are for all employees and representatives of AAUK to:

- have an overview of adult safeguarding
- be clear about their responsibility to safeguard adults
- ensure the necessary actions are taken where an adult with care and support needs is deemed to be at risk

This policy is based on the Care Act 2014 and the Care and Support statutory guidance.

Under the Human Rights Act 1998, everyone has the right to live free from abuse and neglect. <https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

### **What is safeguarding adults?**

*'Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.'*

*Care and Support Statutory Guidance, Department of Health, updated February 2017*

All adults should be able to live free from fear and harm. But some may find it hard to get the help and support they need to stop abuse.

An adult may be unable to protect themselves from harm or exploitation due to many reasons, including their mental or physical incapacity, sensory loss or physical or learning disabilities. This could be an adult who is usually able to protect themselves from harm but maybe unable to do so because of an accident, disability, frailty, addiction or illness.

AAUK adheres to following the six key principles that underpin safeguarding work (See Care Act guidance)

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

AAUK will not tolerate the abuse of adults and staff and representatives should ensure that their work reflects the principles above and ensure the adult with care and support needs is involved in their decisions and informed consent is obtained. AAUK should ensure that the safeguarding action agreed is the least intrusive response to the risk. Partners from the community should be involved in any safeguarding work in preventing, detecting and reporting neglect and abuse. AAUK should be transparent and accountable in delivering safeguarding actions.

AAUK will ensure that adults are involved in their safeguarding arrangements and each individual is dealt with on a case by case basis. As adults may have different preferences, histories and lifestyles, the same process may not work for all.

### **Who do adult safeguarding duties apply to?**

The Care Act sets out that adult safeguarding duties apply to any adult who:

- has care and support needs, and
- is experiencing, or is at risk of, abuse and neglect, and
- is unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.

### **What is abuse and how do you recognise signs of abuse?**

Signs of abuse can often be difficult to detect. This policy aims to help AAUK employees and representatives identify abuse and recognise possible indicators. Many types of abuse are also criminal offences and should be treated as such.

Types of abuse:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

Evidence of any one indicator from the following lists should not be taken on its own as proof that abuse is occurring. However, it should alert you to make further assessments and to consider other associated factors. The lists of possible indicators and examples of behaviour are not exhaustive, and people may be subject to a number of abuse types at the same time.

## **Physical abuse**

### Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

### Possible indicators of physical abuse

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

## **Domestic violence or abuse**

### Types of domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional.

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or 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. It

also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money • preventing the person from escaping abuse
- regulating everyday behaviour.

Possible indicators of domestic violence or abuse

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

### **Sexual abuse**

Types of sexual abuse

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Possible indicators of sexual abuse

Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck

Torn, stained or bloody underclothing

Bleeding, pain or itching in the genital area

- Unusual difficulty in walking or sitting
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- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

### **Psychological or emotional abuse**

#### Types of psychological or emotional abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

#### Possible indicators of psychological or emotional abuse

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger

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- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

### **Financial or material abuse**

#### Types of financial or material abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – eg. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

#### Possible indicators of financial or material abuse

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so

The person allocated to manage financial affairs is evasive or uncooperative

The family or others show unusual interest in the assets of the person

Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA

- Recent changes in deeds or title to property

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- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

## **Modern slavery**

### Types of modern slavery

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

### Possible indicators of modern slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers **Discriminatory abuse**

### Types of discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic  
Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic



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- Substandard service provision relating to a protected characteristic Possible indicators of discriminatory abuse
- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

### **Organisational or institutional abuse**

Types of organisational or institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Possible indicators of organisational or institutional abuse Lack

of flexibility and choice for people using the service

Inadequate staffing levels

People being hungry or dehydrated

- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents

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- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

### **Neglect and acts of omission**

#### Types of neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

#### Possible indicators of neglect and acts of omission

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction

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Inappropriate or inadequate clothing

### **Self-neglect**

Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety
  - Neglecting to care for one's personal hygiene, health or surroundings
  - Inability to avoid self-harm
  - Failure to seek help or access services to meet health and social care needs
  - Inability or unwillingness to manage one's personal affairs
- Indicators of self-neglect
- Very poor personal hygiene
  - Unkempt appearance
  - Lack of essential food, clothing or shelter
  - Malnutrition and/or dehydration
  - Living in squalid or unsanitary conditions
  - Neglecting household maintenance
  - Hoarding
  - Collecting a large number of animals in inappropriate conditions
  - Non-compliance with health or care services
  - Inability or unwillingness to take medication or treat illness or injury

### **Actions undertaken as an AAUK appropriate adult:**

- Be observant of the health and welfare needs of the detained person while they are at the police station and bring any concerns to the attention of the Custody Sergeant, who should record it in the custody record.
- Attend the police interview and be watchful as to whether it is conducted fairly and properly according to the Code of Practice and to intervene as appropriate, so as to minimise the risk of the detained person providing unreliable evidence or a false confession; bring any concerns to the attention of the Custody Sergeant who should record it in the custody record.
- Check the custody record to ensure the detained person has been treated properly.
- Consider whether legal advice from a Solicitor is required. If the detained person has not requested a Solicitor, the Appropriate Adult has the right to ask for one to attend if, in their opinion, this would be in the best interests of the person detained – you

cannot however, make the detained person talk to the solicitor.

### **What could arise concerns about safeguarding?**

- an active disclosure of abuse by the adult, where the adult tells an AA that they are experiencing abuse and/or neglect
- a passive disclosure of abuse where someone has noticed signs of abuse or neglect, for example an AA notices unexplained injury
- a concern raised to an AA by staff or volunteers, others using the service, a carer or a member of the public
- an observation of the behaviour of the adult at risk

Should you have **ANY** concerns about the safeguarding of a vulnerable adult, you should report them immediately and directly to the Custody Sergeant. Always ensure that your concerns are logged on the custody record.

### **How to raise concerns**

The designated safeguarding adults lead for AAUK is:

Geraldine Evans  
Tel: 07999599486 (contactable 24 hours a day)  
Email: [geraldine@appropriateadultsuk.co.uk](mailto:geraldine@appropriateadultsuk.co.uk)

If for any reason she is unavailable, the alternative contact is:

Shelley Renshaw  
Tel: 07483316405 (contactable 24 hours a day)  
Email: [shelley@appropriateadultsuk.co.uk](mailto:shelley@appropriateadultsuk.co.uk)

All staff and representatives should contact Geraldine for any concerns/queries they have regarding safeguarding adults. A log of the concern must be kept.

Geraldine will be responsible for making decisions about notifying adult social services if required and consider alternative actions, where necessary. Geraldine will also ensure that the safeguarding adults' policies and procedures are in place and up to date. They will ensure a safe environment is promoted for staff, representatives and adults accessing the service. Geraldine will ensure they are up to date with their safeguarding adults training.

The Mental Capacity Act 2005 is to be used when decisions on behalf of those adults with care and support needs who are unable to make some decisions for themselves. Refer to the Mental Capacity Act Code of Practice,

<https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>. You will need to involve an advocate if the person lacks capacity to make decisions about the safeguarding concern.

AAUK staff and representatives who have any adult safeguarding concerns should:

### **Respond**

- Take emergency action if someone is at immediate risk of harm/in need of urgent medical attention. Dial 999 for emergency services.
- Get brief details about what has happened and what the adult would like done about it, but do not probe or conduct a mini investigation.
- Seek consent from the adult to take action and to report the concern. Consider whether the adult may lack capacity to make decisions about their own and other people's safety and wellbeing. If you decide to act against their wishes or without their consent, you must record your decision and the reasons for this.

### **Report**

- Report concerns to Custody Sergeant and the designated safeguarding person for AAUK.

### **Record**

- Ensure concerns are added to the custody record. The designated safeguarding person will also record the concerns in the secure/confidential incident log.

### **Refer**

In deciding whether to refer or not, the designated safeguarding person should consider:

- the adult's wishes and preferred outcome
- whether the adult has mental capacity to make an informed decision about their own and others' safety
- the safety or wellbeing of children or other adults with care and support needs
- whether there is a person in a position of trust involved
- whether a crime has been committed

The designated safeguarding person should keep a record of the reasons for referring the concern or reasons for not referring.

Incidents of abuse may be one-off or multiple and may affect one person or more. Staff and representatives should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

As soon as Adult Social Services becomes involved, a 4-stage safeguarding adults process is followed.

## **Roles and responsibilities**

All staff, management and representatives at AAUK are expected to report any concerns to the named person for safeguarding. If the allegation is against one of AAUK's staff members, representatives or directors, seek advice from Geraldine Evans. If the allegation is against the safeguarding lead, seek advice from your local councils Adult Social Care team.

The designated safeguarding adults lead should be responsible for providing acknowledgement of the referral and brief feedback to the person raising the original concern. Feedback should be given in a way that will not make the situation worse or breach the Data Protection Act. If the police are involved, they should be consulted prior to giving feedback to the referrer to ensure any criminal investigation is not affected.

The local authority will decide on who will lead on a safeguarding enquiry should it progress to that stage. AAUK will not conduct its own safeguarding enquiry unless instructed to do so by the local authority.

Staff and representatives should ensure that the adult with care and support needs is involved at all stages of their safeguarding enquiry ensuring a person-centred approach is adopted.

## **Complaints procedure**

AAUK have a discreet complaints procedure in place, dealt with by the designated safeguarding adults lead. Any complaints in relation to AAUK staff or representatives will be dealt with at the highest importance.

AAUK is committed to ensuring that staff and representatives who in good faith whistle-blow in the public interest, will be protected from reprisals and victimisation.

## **Confidentiality and information sharing**

AAUK expect all staff, management and representatives to maintain confidentiality at all times. In line with Data Protection law, AAUK does not share information if not required.

It should however be noted that information should be shared with authorities if an adult is deemed to be at risk of immediate harm. Sharing the right information, at the right time, with the right people can make all the difference to preventing harm. For further guidance on information sharing and safeguarding see: <https://www.scie.org.uk/care-act2014/safeguarding-adults/sharing-information/keymessages.asp>

## **Recruitment and selection**

AAUK is committed to safe employment. Safe recruitment practices, such as Disclosure and Barring checks reduce the risk of exposing adults with care and support needs to people unsuitable to work with them.

## **Training, awareness raising and supervision**

AAUK ensures that all staff and representatives receive basic awareness training on safeguarding adults as they may come across adults with care and support needs who may be at risk of abuse. Those adults may report things of concern to staff or representatives who should be equipped with the basic knowledge around safeguarding adults and be confident to identify that abuse is taking place and action is required. All staff and

representatives should be clear about the core values of AAUK's commitment to safeguarding adults.

Similarly, staff and representatives may encounter concerns about the safety and wellbeing of children. AAUK has a separate policy for safeguarding children available to all staff and representatives.

## **Prevent**

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.

All AAUK are asked to complete the home office prevent training:

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

## **Useful links**

Care act- <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

Safer recruitment-

<http://www.islingtonscb.org.uk/SiteCollectionDocuments/Safer%20recruitment%20%20safeguarding%20children%20and%20adults%205%20August%2013.pdf>

Carer and support statutory guidance-

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/506202/23902777\\_Care\\_Act\\_Book.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506202/23902777_Care_Act_Book.pdf)

Prevent-

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

sharing-

<https://www.scie.org.uk/care-act-2014/safeguarding-adults/sharinginformation/keymessages.asp>