# Safeguarding & Promoting the Welfare of Vulnerable adults

<table>
<thead>
<tr>
<th>NAME</th>
<th>DESIGNATION</th>
<th>DATE</th>
<th>SIGNATURE</th>
</tr>
</thead>
<tbody>
<tr>
<td>AUTHOR</td>
<td>Norman Parselle</td>
<td>24/06/16</td>
<td></td>
</tr>
<tr>
<td>APPROVALS</td>
<td>Nathan Blake</td>
<td>27/07/16</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Paul Roberts</td>
<td>27/07/16</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Revision</th>
<th>Date</th>
<th>Effect on</th>
<th>Para</th>
<th>Reason for revision and description</th>
<th>Author</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>June 2015</td>
<td>All</td>
<td>All</td>
<td>First CP Policy</td>
<td>Norman Parselle</td>
</tr>
<tr>
<td>2.0</td>
<td>June 2016</td>
<td>All</td>
<td>All</td>
<td>Annual Review</td>
<td>Norman Parselle</td>
</tr>
<tr>
<td>3.0</td>
<td>June 2017</td>
<td>All</td>
<td>All</td>
<td>Annual Review</td>
<td>Norman Parselle</td>
</tr>
</tbody>
</table>
Safeguarding: Vulnerable Adults Policy

1 BACKGROUND

1.1 What is Safeguarding?

In recent years there has been increasing concern about the safety and welfare of vulnerable adults.

“Agencies (and organisations) working with vulnerable adults must take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and where there are concerns about the welfare, of any vulnerable adults, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies.”

1.2 Who Are We Safeguarding?

For the scope of this Policy County in the Community recognise the need to ensure that vulnerable adults are protected from abuse and harm.

In the terms of this policy a “Vulnerable Adults” has the following definition:

A person who is over 18 who is or may be in need of Community Care Services by reason of mental or other disabilities, age or illness, or may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation. Examples of vulnerable adults are people with learning disabilities, mental health problems, the elderly, and people with physical disabilities. (The Welsh Assembly Guidance, In Safe Hands 2000)

This definition may include a person who:

- Has learning disabilities;
- Has mental health problems, including dementia;
- Is an older person with support/care needs;
- Has a physical or sensory disability;
- Misuses drugs or alcohol;
- Has social or emotional problems;
- Has an autistic spectrum disorder.

This may mean that they have a reduced ability to protect themselves from assault, abuse or neglect. This can be as a result of a learning or physical disability (not normally to include dyslexia); a physical or mental illness chronic or otherwise (including an addiction to alcohol or drugs); or a reduction in physical or mental capacity.

County in the Community takes pride in supporting vulnerable adults in their studies.

Adult education organisations are experiencing more contact with children through taster days, summer schools, family classes, and other out of school opportunities. At
County in the Community we also take pride in supporting vulnerable adults in their studies.

Adult Education organisations have a common law duty of care to take such steps that in the circumstances of an educational institution are reasonable to ensure that the vulnerable adult is safe, and in the absence of specific requirements, be seen to have an enhanced duty of care.

2 Statement of Policy

County in the Community is committed to safeguarding and promoting the welfare of vulnerable adults, engaged in the breadth of its activities.

At County in the Community has taken the view that in the interests of good practice there should be a clear policy and associated procedures to guide work with vulnerable adults. This policy deals with the protection of Vulnerable Adults. A separate policy covers Child Protection

The Charity recognises that it has a duty to help staff and persons recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations (where possible) where abuse or neglect might be alleged.

Processes are in place to check the suitability of staff and volunteers working directly with vulnerable adults. Some staff and volunteers within the Charity will be in regular or significant occasional contact vulnerable adults in the course of their teaching or other work. There is a commitment that such staff and persons have satisfactory Criminal Records Bureau (CRB) & DBS disclosures, at an appropriate level, before working with vulnerable adults.

3 Safeguarding Structure and Responsibilities

At County in the Community we have identified an organisation structure for safeguarding vulnerable adults. Key senior staffs with designated safeguarding responsibilities include:

- **Community Development Officer - Safeguarding Officer**: overall leadership of Safeguarding

In those areas where staff and volunteers work with vulnerable adults as part of their roles, a manager is nominated to have responsibility for safeguarding in their area:

All staff and volunteers are required to take a shared responsibility for the protection and safety of any vulnerable adults. They must be aware of and abide by the Charity’s Codes of Good Practice.

**Principles**

- Everyone has the right to live their lives free from coercion, intimidation, oppression and physical, sexual, emotional or mental harm.
• Everyone has the right to a family life and privacy.

• Everyone has a right to confidentiality in respect of personal information, where this does not infringe the rights of other people.

• Everyone has the right to receive full and comprehensive information to allow them to make informed choices about their own circumstances.

• Everyone has the right to the protection of the law and full access to the judicial process and criminal justice system.

Accordingly, adult protection should operate in the context of fully engaged citizenship, not restricted to social care, health services and the criminal justice system.

Putting these principles into practice in adult protection means:

• Protecting a vulnerable adult should be everyone’s paramount concern.

• All staff have an ethical and professional duty of care to act if they; Witness abuse; Receive information about abuse, suspected abuse or concerns about the care or treatment of vulnerable adult; or Have concerns or suspicions about possible abuse or inappropriate care.

• Vulnerable adults have the right to be fully involved throughout the adult protection process and to make decisions about their safety and welfare, unless it has been assessed that they do not have the mental capacity to make any particular decision.

• The sharing of information by professionals must be with due regard to confidentiality and information by professionals must be with due regard to confidentiality and information security, for example using secure e-mail and password-protected documents.

• The Wales Adult Protection Policy and Procedures, including criminal investigations, override other organisational procedures, such as disciplinary and complaints investigations (this is stated in Listening and Learning, Section 7: Guidance for local authorities about managing complaints).

Agencies and services taking disciplinary action should delay their own investigations until completion of action under the Adult Protection Policy and Procedures, unless a Strategy Meeting held under these Procedures agrees otherwise.

Values

The values and rights below underpin the way vulnerable adults should be supported and cared for in whatever setting or places they live in or use:

• **Independence**: to think, act and make decisions, even when this involves a level of risk.
• **Respect**: recognition that everyone is unique, with intrinsic value as a person.

• **Equality**: the right of people to be treated no less favourably than others because of their age, gender, disability, sexual orientation, religion, class, culture, language, race, ethnic origin or other relevant distinctions.

• **Privacy**: the right of the individual to be left alone or undisturbed and free from intrusion or public attention in their affairs.

• **Choice**: the right to make choices, and to have the alternatives and information that enable choices to be made.

**Putting the principles and values into practice means:**

• Adult protection is everyone’s concern.

• All staff, volunteers, paid or unpaid staff should understand the nature of abuse, how people might be at risk of harm and work to prevent it:

• When responding to referrals, the concerns raised must be believed and accepted without judgement.

• Staff have a duty to report any concerns they have about the potential abuse of a vulnerable adult.

• Careful consideration and respect of vulnerable adults’ wishes and preferences are essential to the adult protection process.

• Vulnerable adults have the right to be supported and empowered when adult protection procedures are used, and to have an independent advocate if they wish. For people assessed as lacking capacity to make decisions about how they could be protected, and Independent Mental Capacity Advocate (IMCA) must be considered and may be appointed.

**Introduction**

County in the Community wishes to ensure that all our participants have a safe and stimulating environment in which they can fulfil their potential and we wish to safeguard the welfare of our vulnerable adult learners.

**Protecting Vulnerable Adults in a Sporting Environment**

County in the Community is concerned that all its persons remain safe and free from harm and is committed to playing a full and active part in the multi-agency response to vulnerable adult’s protection concerns. This document sets out the Charity’s position in relation to all aspects of the vulnerable adult protection process.

In the event of any concern by any member of staff, or if any member of staff is approached by a vulnerable adult, regarding any matter concerning abuse, they must tell the person that they are bound to pass on the information to the
The person receiving the information should pass it on as a matter of urgency to ensure the matter can be dealt with as soon as possible. If the designated person is not available, the staff member should contact a member of the Senior Management Team or a Trustee. No person must be promised that anything they say will be kept confidential. It is helpful for a member of staff to tell the person they will jot down anything the person actually says to ensure an exact record as possible is kept for future reference.

**Scope of the Policy**

This Policy applies to all staff employed by the Charity, temporary staff and volunteers. All have a legal responsibility to take seriously any vulnerable adult concerns that come to their attention and follow the procedures given.

Subcontractors must be informed of this Policy and deal with any concerns reported to them by contacting the Designated Person with responsibility for Vulnerable Adult Protection in Scheme.

Persons who have concerns about other persons or the behaviour of adults towards them can use this Policy to ensure they are taken seriously.

It is not the Charity’s responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

**Prevention**

County in the Community takes seriously its duty of pastoral care and will be proactive in seeking to prevent vulnerable adults becoming the victims of abuse or neglect. It will do this in a number of ways:

- Through the creation of an open culture which respects all individuals’ rights and discourages bullying and discrimination of all kinds
- By identifying a member of the Board of Trustees and staff, who have overall responsibility for vulnerable adult matters they will receive training in this field and act as a source of advice and support to other Charity staff especially Community coaches and volunteers. Training to be delivered to staff by the Safeguarding Officer or Leading delivery agencies.
- By informing vulnerable adults of their rights to be free from harm and encouraging them to talk to Charity staff if they have any concerns
- Through the ongoing programme of support, at an appropriate level, to promote self-esteem and social inclusion and address the issue of the protection of vulnerable adults in the wider context
Responsibilities

Staff are responsible for the identification of abuse and referral to the appropriate authorities via the Charity’s nominated persons.

The Charity will operate safe recruitment procedures and ensure that appropriate checks are carried out on all new staff, trustees and volunteers.

What is Abuse?

The main categories of abuse as identified by the Welsh Assembly Government in “In safe hands” include:

- physical
- neglect
- sexual
- financial
- psychological/emotional

Abuse is defined as:

A violation of an individual’s human and civil rights by another person or persons which results in significant harm.

Abuse may be:

- A single or repeated act, or multiple acts;
- A lack of appropriate action;
- Perpetrated as a result of deliberate intent, negligence or ignorance: and/or
- An act of omission (failing to act) or neglect.

Abuse can occur in the vulnerable adult being persuaded or forced to enter into a financial or sexual arrangement of which they have not, or could not, consent.

Abuse can occur in any relationship and fundamentally is an abuse of trust, including failure to meet a duty of care.

Abuse is behaviour towards a person that either deliberately or unknowingly causes a vulnerable adult harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated.

Guidance & Procedure for staff

County in the Community recognises its legal duty to work with other agencies in safeguarding vulnerable adults and in responding to abuse. All members of staff involved with vulnerable adults (coaching and non-coaching) have a responsibility to be mindful of issues related to vulnerable adult safety and welfare and a duty to report and refer any concerns however “minor” they appear to be.

IT IS NOT THE JOB OF CHARITY STAFF TO INVESTIGATE THESE CONCERNS
In cases where it is deemed that a vulnerable person lacks sufficient understanding to make informed decisions about his/her own care and treatment, it may be in their best interest to inform and involve parents/carers about any concerns about the vulnerable person’s welfare or any action taken to safeguard and promote the vulnerable adult’s welfare, providing this does not compromise the vulnerable adult’s safety. Where there are possible concerns about a vulnerable adult’s safety, Unconditional confidentiality cannot be guaranteed and should not be offered.

County in the Community will be proactive and take positive steps to inform persons of their rights to safety and protection and the options available to express their fears or concerns.

When persons make allegations about abuse or neglect, they should always be listened to, have their comments taken seriously and, where appropriate, the allegations should be investigated thoroughly.

If you suspect that a person is going to discuss abuse, either towards themselves or another vulnerable adult, establish GROUND RULES CONCERNING CONFIDENTIALITY. This information must be shared with a nominated person for safeguarding adults.

The designated person will then contact the Local Authority Safeguarding Adult Team in order to discuss appropriate action. The Local Authority Adult Protection Unit is responsible for coordinating action in vulnerable adult cases, including liaison with police.

Note: It is important to convey that the Safeguarding Adult Team will need to assess the situation and would want to work with the vulnerable adult in determining what could/should happen next. They would wish to respect the vulnerable adult’s wishes and feelings provided no one is at immediate risk of harm.

If the person is fully aware of what could happen, they can:

- choose whether they want to speak now or have time to think about it
- be as informed as possible regarding the implications of passing on this information.

If the complainant is the vulnerable adult him/herself, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

Procedure for staff dealing with suspicions or allegations of abuse to a vulnerable adult

Any suspicion, allegation or incident of abuse must be reported to the designated member of staff with responsibility for the protection of vulnerable adults as soon as possible and in any event within 2 hours. If this is not possible, a member of the Senior Management Team must be notified. The nominated member of staff must immediately discuss the matter with the Safeguarding Adult Team to determine whether it is a protection of vulnerable adult matter.

(NB: The Local Authority Safeguarding Adult Team is responsible for coordinating action in vulnerable adult cases, including liaison with police).
If it is agreed that it meets the threshold for a Vulnerable Adult referral a decision which can only be made by the Safeguarding Adult Team, 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 local authority Adult Protection Unit within 24 hours. If the consent has not been gained from the vulnerable adult, the nominated member of staff should discuss with the Local Authority Safeguarding Adult Team what action will be taken to inform the parents / carers of the vulnerable adult and a note of that conversation should be made. The nominated member of staff must notify the Safeguarding Manager of the Charity as soon as practicable and in any event within 2 hours of the initial concern arising.

Responding to an Allegation

A full record shall be made as soon as possible on Form VA1/Appendix 3 of the nature of the allegation and any other relevant information including:

- The date
- The time
- The place where the disclosure of information took place
- 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 vulnerable 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

Responding to an allegation about a member of staff

Any suspicions, allegations of actual abuse of a vulnerable adult by a member of staff must be reported to the lead designated member of staff and the Chair of Trustees immediately. On being notified of any such matter, the designated member of staff shall:

**Notify** the Chair of Trustees. N.B. No investigation by the organisation is to take place unless they have had the necessary training and been provided with an Investigation remit from the Safeguarding Adult Team.

**Take** such steps as he/she considers necessary to ensure the safety of the person in question and any other person who might be at risk.

**Report** the matter to the Club Safeguarding Officer 01633 670690 in accordance with the procedure set out in the previous paragraph.

**Ensure** that a report of the matter is completed by the person who reported the original concern. If the complaint is made against any member of the Senior Management Team or a designated safeguarding officer, then the person dealing with the complaint must be either a Trustee of County in the Community or The Football League Trust regional manager should be immediately notified.
Written Records

The lead designated officer for the protection of vulnerable adults will retain the central record of all allegations and actions taken. This will include:

- The formal report on form VA1
- Any notes, memoranda or correspondence dealing with the matter
- Any other relevant material

Copies of reports, notes etc will be kept securely locked at all times, but will be shared in accordance with the Data Protection Act 1998.

Training – Staff Development

All staff within the Charity will undergo training so that they are fully aware of this policy and their responsibilities. Designated Protection of Vulnerable Adults Officers will receive additional training so that they can effectively fulfil their responsibilities to the protection of vulnerable adults at County in the Community.

Review and Monitoring of the Policy and Procedures

The Safeguarding Officer & Safeguarding Manager will review and monitor the policy and procedures on an annual basis and will recommend and implement approved changes where necessary. A revised version of the policy will be submitted to the Board of Trustees on an annual basis to ensure that any identified deficiencies or weaknesses have been dealt with without delay.
APPENDIX 1

SUMMARY – Protection of Vulnerable Adults Policy

This procedure must be followed whenever any member of Charity’s staff hears an allegation from a vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a child may be abused:

RECEIVE

- What is said
- Accept what you are told – you do not need to decide whether or not it is true
- Listen without displaying shock or disbelief

REASSURE

- The person
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that “everything will be alright now” (it might not be)

REACT

- Respond to the person but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- Explain what you will do next, i.e. inform a Designated Person - The Safeguarding Officer - A Trustee - The Football Trust Regional Manager

RECORD

- Make notes as soon as possible – during the interview if you can comprehensively complete form VA1/Appendix 3
  - Include: time, date, place, the person’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Describe observable behaviour and appearance
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

SUPPORT

- Consider what support is needed for the person – you may need to give them a lot of your time or they may need to be referred
- Ensure you are supported – such interviews can be extremely stressful and time consuming
• Once reported to them, the Designated Person will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask

APPENDIX 2

Definitions of Abuse (Vulnerable Adults)

Physical Abuse
Physical abuse is the physical ill treatment of an adult, which may or may not cause physical injury and causes harm to the individual’s person. It may involve pushing, slapping, pinching, punching, hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, force feeding, improper administration of medicines or denial of prescribed medicines, forced isolation and confinement, including a person being locked in a room or inappropriate sanctions or restraint, or inappropriate manual handling. It may be the result of a deliberate failure to prevent injury occurring.

Psychological and Emotional Abuse
Psychological abuse may involve the use of harassment, bullying, intimidation, indifference, hostility, rejection, threats, humiliation, name-calling, other degrading behaviours, shouting, swearing, discrimination or the use of oppressive language, mobile phone texting abuse, email, emotional abuse and all forms of cyber abuse. It can result in feelings of low self-worth. Some level of psychological or emotional abuse is present in all forms of abuse.

Sexual Abuse
Sexual abuse involves a vulnerable adult participating in, or watching, sexual activity to which they have not consented or were pressured into consenting, or to which they cannot give informed consent. It is not necessary for the individual to be aware that the activity is sexual. The activities may include: physical contact, including penetrative or non-penetrative acts, e.g. rape, buggery, indecent assault or inappropriate touch, incest, and situations where the perpetrator touches the abused person’s body (e.g. breasts, buttocks, genital area); Non-contact activities, e.g. exposing genitals to the abused person, or coercing the abused person into participating in or watching pornographic videos or photographs.

Neglect
Neglect is the deliberate withholding or unintentional failure to provide help or support, which is necessary for the adult to carry out activities of daily living. It also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk. Neglect may involve: failing to provide adequate food, shelter and clothing; failure to ensure access to appropriate medical care or treatment; neglect of basic emotional needs.

Financial/Material Abuse
Financial/Material Abuse is the exploitation, inappropriate use or misappropriation of a person’s financial resources or property. It occurs when the individual is deprived of their own financial assets, for example, by holding money back from the individual, obtaining money by deception, or stealing money. It includes the withholding of money or the improper use of a person’s money or property, usually to the disadvantage of the person to whom it belongs.
The following definitions of abuse are not categories of abuse in themselves but are different aspects of abuse.

**Institutional Abuse**
Institutional abuse can be defined as abuse or mistreatment by a regime as well as by individuals within any building where care is provided. Examples include lack of flexibility and choice, lack of consultation, public discussion of personal matters, inadequate or delayed responses, staff overly controlling service users’ relationships and activities.

**Discriminatory Abuse**
Repeated, ongoing or widespread discrimination on the grounds of age, race, disability, religion, sexual preference or gender, slurs, harassment, name-calling, breaches in civil liberties, unequal access to health or social care.

**Significant Harm**
Sometimes, a single traumatic event may constitute significant harm, eg violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the adult's physical and psychological development.