



# **Safeguarding Vulnerable People**

## **Policy & Procedures**

**SUNTER LTD**  
Unit 14, Lyons Industrial Estate  
Hetton-le-hole  
Tyne and Wear  
DH5 0RH

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## Safeguarding Vulnerable People – Policy & Procedures

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## Safeguarding Vulnerable People – Policy & Procedures

### SECTION A

#### BACKGROUND

- Purpose & Aims
- Introduction
- Definitions
- Responsibilities
- Training



## Safeguarding Vulnerable People – Policy & Procedures

### PURPOSE AND AIMS

Sunter Ltd Safeguarding policy procedure aims to provide a clear direction for its entire staff, contractors and others about expected codes of behaviour in dealing with safeguarding issues and is committed to:

- Ensuring that the welfare of vulnerable people is paramount at all times
- Working in partnership with others in order to safeguard vulnerable people
- Maximising people's choice, control and inclusion and protecting their human rights
- Ensuring safe and effective working practices are in place.
- Supporting staff within the organisation.
- Minimising risk
- Providing an excellent service for all our clients and customers

### INTRODUCTION

This Policy & Procedure sets out the roles and responsibilities of Sunter Ltd in working together with other professionals and agencies in promoting the welfare of both staff and customers from abuse and neglect.

This Policy & Procedure is intended to support all staff working within Sunter Ltd (permanent, seconded or temporary) as well as all people who work on behalf of any sub contractors or agents of Sunter Ltd.

Policies linked with this will include: complaints, information sharing, disciplinary, equality & diversity and Health Safety & Welfare.

### DEFINITIONS

#### **Vulnerable Adult**

Safeguarding Adults procedures relate to the multi-agency responses made to a person aged 18 years or over: 'who is or may be in need of community care services by reason of mental or other disability, age or illness and is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' [No Secrets 2000].

For the purposes of ensuring consistent and widely understood terminology, these policy and procedures will use the phrase 'Vulnerable People' to identify those affected for interventions within the procedures.

The Safeguarding Adults Act 2005 identifies a duty of care to all adults 'whose independence and wellbeing is at risk due to abuse or neglect'.

However, it may not always be appropriate to instigate these safeguarding procedures. Sunter Ltd will ensure that appropriate links are made to all clients and partners policies.

Where a person is not vulnerable under the definition above, redirection to other services may be more appropriate, for example criminal justice process and/or domestic violence services.

#### **Vulnerable Children**

"Vulnerable children" means children -

- Who are unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for them of social care services,
- Whose health or development is likely to be significantly impaired, or further impaired, without the provision for them of social care services,
- Who have a physical or mental impairment,
- Who are in the care of a public authority, or
- Who are provided with accommodation by a public authority in order to secure their well-being.



## Safeguarding Vulnerable People – Policy & Procedures

### Abuse

A definition abuse is:-

“A violation of an individual’s human and civil rights by any other person or persons” [No secrets DH 2000] remains.

All forms of abuse have a negative emotional impact; the abused person may suffer feelings of insecurity, fear, rejection, hopelessness and loss of self-respect and self worth.

Abuse may consist of a single act or repeated acts, abuse may happen intentionally or unintentionally, and can take place in any relationship or setting.

Safeguarding Adults procedures must be instigated when the concern raised indicates **significant harm** or exploitation to the person subjected to it.

#### **An accepted definition of significant harm is:**

“Ill-treatment (including sexual abuse and forms of ill treatment that are not physical); the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, emotional, social or behavioural development”. [Law Commission 1995]

#### **Factors to be taken into consideration when assessing significant harm:**

- Impact on the individual – this should be determined by the vulnerable adult and the workers involved
- The individual’s wishes and feelings
- The impact (actual or potential) on other vulnerable adults or carers
- Evidence of physical or emotional harm
- Records of previous concerns or incidents
- Independent corroborative information
- The views of other professionals involved

It is important to remember that an accumulation of events as opposed to a single act may increase the severity of the concern

#### **Categories of Abuse**

For the purposes of Safeguarding work, data recording and monitoring abuse is categorised under the following headings. It must be noted that more than one can happen at the same time:

- **Physical:** includes hitting, slapping, pushing, kicking, and the misuse of medication, restraint, or inappropriate sanctions.
- **Psychological:** including emotional abuse, threats of harm or abandonment, forced marriage, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- **Sexual:** including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.
- **Financial or Material:** including theft, fraud, exploitation, pressure in connection with wills property or inheritance or financial transactions, or the misuse or misappropriation of property.
- **Neglect or acts of Omission:** including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Discriminatory:** including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.
- **Institutional abuse:** can be different from other forms because it is about who abuses and how that abuse comes about. Institutional abuse can take any of the other forms.



## Safeguarding Vulnerable People – Policy & Procedures

### RESPONSIBILITIES OF SUNTER LTD AND THEIR EMPLOYEES

- Sunter Ltd has signed up and accepts the principles laid down within all our customers, partners agencies and client companies including any Safeguarding Guidelines that they may use.
- **Ensure staff has access to appropriate training.**
- **Ensure that the policy and procedures are available for all staff.**
- Ensure that the agreed procedures are applied and followed at all times, these are available from the **Health & Safety Manager**.
- Ensure staff must be aware of their responsibilities to attend training and to support everyone who plays their appropriate roles in dealing with issues that may arise.
- To take action to identify and prevent abuse from happening whenever possible.
- Respond appropriately when abuse has or is suspected to have occurred.
- Provide support, advice and resources to staff in responding to safeguarding and risk issues.
- Inform staff of any local or national issues relating to safeguarding and risk issues.
- Ensuring that the organisation has a dedicated staff member with an expertise in dealing with safeguarding and risk issues. This will be the **Health & Safety Manager**
- Ensure that all employees who require a CRB or Basic Discloser check in line with the requirements of the Independent Safeguarding Authority Vetting and Barring Scheme have one.

#### **Responsibilities of all staff**

- Follow the safeguarding and risk procedures at all times, particularly if concerns arise about the safety or welfare of a vulnerable person.
- Participate in safeguarding and risk training and maintain current working knowledge.
- Become familiar with the Guidelines.
- Discuss any concerns about the welfare of a vulnerable person with their site manager.
- Contribute to actions required including information sharing and attending meetings.
- Work collaboratively with other persons involved (e.g. managers, Police, other employees or agencies) and promote the welfare of people who use services.
- Remain alert at all times to the possibility of abuse and risk.
- Recognise the impact that diversity, beliefs and values of people who use services can have.

### TRAINING

All staff should receive safeguarding awareness training at a level according to their role. Training will be refreshed on a regular basis.



### SECTION B

#### THE PROCEDURE

- Reporting Abuse
- Key Roles
- Alerter - Referrer
- Reporter
- Investigate or Investigations
- Good Practice for Referrers
- Confidentiality & Information Sharing
- Monitoring
- Roles & Responsibilities of the Organisation
- Going Into Customer Homes
- Do's & Don't's



## Safeguarding Vulnerable People – Policy & Procedures

### PROCEDURE

When you become aware of an issue of risk, abuse or neglect, you should make sure that emergency assistance, where required, is summoned and that your concerns are reported to the **Site Manager immediately**.

Any information given directly by the vulnerable person concerned should be listened to and recorded carefully, using the person's own words.

Clarify the bare facts of the reported abuse or grounds for suspicion; do not ask leading questions e.g. suggesting names of who may have perpetrated abuse if the person does not disclose it.

If a customer or member of the public makes an allegation to you asking that you keep it confidential, you should inform the person that you will respect their right to confidentiality as far as you are able to, but, that you are not able to keep the matter secret if there is significant risk of harm.

- Do not take any actions which might alert the alleged perpetrator.
- Record all factual evidence accurately and clearly in line with your organisation's requirements and policies.
- Never prevent or persuade another person from raising concerns, suspicions or presenting evidence.
- Don't share information about the incident without agreeing this with your site manager.

### REPORTING ABUSE

It is expected that all staff follow the Safeguarding and risk Guidelines agreed by Sunter Ltd for all their employees. A full set of procedures will be held by the **Health & Safety Manager**

- If staff suspects a customer is at risk of abuse or they have any concerns about anyone in the household they are expected to report concerns to the **Site Manager or Health & safety Manager within 24 hours**.
- If at the time staff have reason to believe the vulnerable person is in immediate and serious risk of harm or that a crime has been committed the police must be called.
- An Incident Report form (**see appendix 2**) must be completed where there are suspicions or allegations of abuse and sent to the **Site Manager or Health & Safety Manger**.
- If at any time staff feel the person needs urgent medical assistance, they have a duty to arrange medical care immediately by calling for an ambulance or arrange for a doctor to see the person at the earliest opportunity

All Customers need to be safe. Throughout the process the Customers needs remain paramount. This process is about minimising risk and preventing harm or abuse.

### KEY ROLES IN SAFEGUARDING AND RISK MANAGEMENT

#### **Alerter – Sunter Ltd Employee/Contractor/Partner/Agent/Member of the public**

Anyone who has contact with vulnerable customers and sees or hears disclosures or allegations, or has concerns about potential abuse, risk or neglect has a duty to pass them on appropriately. The alerter also has a role in addressing any immediate safety or protection needs and should:-

- Communicate any received information (disclosure) of abuse or any concerns about a vulnerable person to the appropriate Site Manager
- Attend the relevant training sessions.





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### Referrer – Site Manager

**WHO** will be responsible for referring concerns to either the client or directly to the Police. If a referral is made to a client the Site Manager will contact the Client by telephone before the referral is made.

- Support and advise other staff that may have information which needs to be referred.
- Be a source of expertise and co-ordination.
- Attend the relevant training sessions.

### Reporter – Health & Safety Manager

**Health & Safety Manager** is responsible for overseeing the Safeguarding and risk management on behalf of Sunter Ltd. Responsibilities include: -

- Oversee Safeguarding Policy and Procedure.
- Champion Safeguarding issues within Sunter Ltd
- Refer suspected abuse or allegations to the relevant investigating agencies.
- Monitor the referrals and outcomes.
- Act as source of support, advice, expertise, co-ordination.
- Liaise with the relevant agencies.
- Making decisions on what information will be passed on and making decisions on the need to investigate, or identifying any alternative responses.
- Consult the police when appropriate.
- Co-ordinating and monitoring investigations
- Liaison with clients and customers
- Provide information about Safeguarding issues and outcomes to **Sunter Ltd Senior Management Team**

### Reporters Referral

#### Suspected abuse of a vulnerable person

Prior to making a referral to the **Site Manager** you will need to try to gather as much information as you can about the allegation/incident, which you will be asked to provide once you contact the Health & Safety Manager.

Details of whether the alleged perpetrator is living with the vulnerable person  
Lack of access to the necessary information should **NOT** delay the referral.

The Incident Report form should be submitted via email or hard copy to the **Health & Safety Manager**.

### INVESTIGATOR / INVESTIGATIONS

**The Site Manager** will coordinate the collection of all the information relating to the incident. This may eventually include the use of criminal and/or disciplinary investigations.

**The Site Manager and Health Safety Manager** will form a view about what action is required and will ensure that agreed action does take place.

**The Health & Safety Manager** will be responsible for keeping a central record of actions and decisions and consulting with Senior Managers about the outcomes.

**The Health & Safety Manager** will identify any relevant issues and ensure that they are reported to the Senior Management Team with appropriate recommendations for further action, follow-up work or training



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### GOOD PRACTICE FOR REFERRER'S

Supply all information you can with regard to the alleged incident – this should be factual not opinion.

Investigative questioning should be avoided at this stage.

The alleged abuser should not be contacted until there is an agreed Safeguarding Assessment Strategy - unless this is part of emergency action needed to safeguard the adult or others at risk.

### Decision NOT to make a referral

- You should fully document any such decision and good practice would be to discuss and agree this action with your site manager.
- Any decision not to refer does not mean that the incident should be left or that other actions do not need to take place. Consideration still needs to be given to the needs of the vulnerable person and to any other actions such as the complaints process, training needs, disciplinary or regulatory action if appropriate.
- Details of any decisions made when not making referrals will be referred, by the **Health & Safety Manager or Project Manager**, to the Client along with any documentation. Such cases will be fully discussed with the Client.

### CONFIDENTIALITY AND INFORMATION SHARING

'No Secrets' [DH 2000] states that the government expects organisations to share information about individuals who may be at risk from abuse. This is also stressed by Safeguarding Adults [ADSS 2005] the framework for good practice. It is important to identify an abusive situation as early as possible so that the individual can be protected. Withholding information may lead to abuse not being dealt with in a timely manner. Confidentiality must never be confused with secrecy. Staff has a duty to share information relating to suspected abuse with the relevant agencies

The Data Protection Act 1998 allows the sharing of information in appropriate circumstances. Consent is not required to breach confidentiality (capacity issues must be considered) and make a safeguarding referral where;

- A serious crime has been committed
- Where the alleged perpetrator may go on to abuse other adults
- Other vulnerable people are at risk in some way
- The vulnerable person is deemed to be at serious risk
- There is a statutory requirement e.g. Children's Act 1989, Mental Health Act 1983, Care Standards Act 2000
- The public interest overrides the interest of the individual
- When a member of staff of a statutory service, a private or voluntary service or a volunteer is the person accused of abuse, malpractice or poor professional standards.

### Information Sharing

Information about a Vulnerable Person who may be at risk of abuse or neglect must be shared within the framework of the Data Protection Act 1998. The act allows for the exchange of information under section 59. The Crime & Disorder Act allows Local Authorities, the Police and Registered Social Landlords to exchange information for the purposes of the prevention and detection of crime (S115).

**If anyone within Sunter Ltd has any doubt about the legality of sharing information, they must in the first instance consult their manager.**

### MONITORING

The **Health & Safety Manager** will be responsible for monitoring this policy.

This policy will be reviewed annually and changes will be communicated to all relevant staff.



## Safeguarding Vulnerable People – Policy & Procedures

### ROLES AND RESPONSIBILITIES OF ORGANISATIONS

#### Best Practice in Safeguarding work is to:

- Recognise those individuals to whom the procedures apply.
- Take matters of potential abuse and risk seriously and to discuss concerns with managers.
- Actively listen to and record concerns without asking leading questions.
- Be timely, sensitive and maintain confidentiality as appropriate to each situation.
- Work in a co-ordinated way between organisations.
- Apply these procedures and practice of each organisation and this policy consistently.
- Promote human rights and every citizen's access to the law.
- Support the rights of individuals by respecting self-determination and informed choice wherever possible.
- Acknowledge risk as an integral part of choice and decision-making.
- Any action taken by any organisation to safeguard an adult should be proportionate to the perceived level of risk and seriousness.
- Ensure that risk assessments are completed and that these assessments are recorded and reviewed in order that risk can be minimised.
- Be effective in providing or negotiating solutions that are as simple and practical as possible and aim to prevent the risk of abuse recurring.
- Be sensitive to every individual's identity including culture, beliefs and ethnic background, gender, disability, age and sexuality.

### GOING INTO CUSTOMERS HOMES

All staff going into a customer's home for any reason will need to confirm in advance of entering the property that there will be **no one alone under the age of 18**.

If there is a lone person under the age of 18 in the property then an alternative appointment should be made.

If while working in a property you suspect that you may have been left alone with someone under the age of **18** you should consult with your site manager before withdrawing from the property until an adult is present.

It is recognised that there are a number of tenants under the age of 18 who may require workers within their homes while they are alone. In such circumstances the member of staff entering the property should have a Basic Disclosure or a current CRB check.

#### Do:

- Ensure you have read and understand Sunter Ltd Safeguarding Policy and Procedure.
- Be vigilant for any possible signs of abuse.
- Respect the background persons you encounter.
- Exercise caution about being alone with a child/young person. In situations where this is unavoidable, ensure another worker or Manager knows what you are doing and where you are.
- Seek advice and support from your Site Manager or appropriate officer if you have any queries.
- Ensure you communicate effectively at all times.

#### Do Not:

- Smoke in front of any Customers.
- Use any inappropriate language.
- Let allegations a child/young person makes go unrecorded or not acted upon.
- Share personal information inappropriately.
- Give personal contact details including e-mail, home or mobile numbers, unless the need to do so is agreed with senior management and the Client.

***'If in doubt SEEK ADVICE'***



**SECTION C**

**CONTACT & EMERGENCY INFORMATION**

- Useful Contact Numbers
- Referral Flowchart
- Referral Form

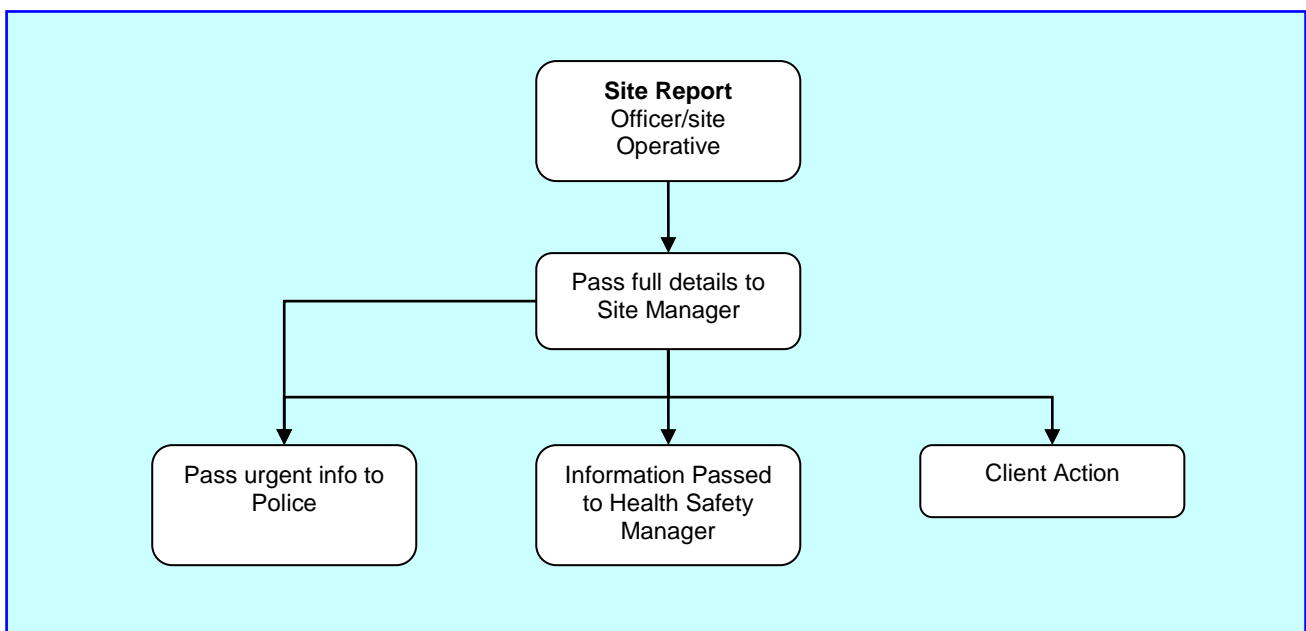
**Appendix 1**

**USEFUL CONTACT NUMBERS**

Head Office	0191 526 8106
Site Managers	
Jim Wilkinson	07891 289 211
Jim Lormor	07891 289 213
Joe Thirlaway	07891 289 216
Brian Wilkinson	07891 289 218
Michael Ayre	07891 289 224
Edward Dutson	07891 289 226
Gordon Hedley	07891 289 228
Health & Safety Manager	07891 289 235
Police	
Emergency	999
Non Emergency	101

**Appendix 2**

**REPORTING INCIDENTS FLOWCHART**





## Safeguarding Vulnerable People

### INCIDENT REPORTING FORM

INCIDENT SUMMARY	
Date of Incident:	
Time:	
Incident Reported to:	

Name of employee/witness:	
Position/Job Title:	
Contact Details:	
Activity engaged in and time when incident happened:	

WITNESSES	
Witness 1	
Name	
Address	..... ..... .....
Contact Details	
Witness 2	
Name	
Address	..... ..... .....
Contact Details	
Witness 3	
Name	
Address	..... ..... .....
Contact Details	
Witness 4	
Name	
Address	..... ..... .....
Contact Details	
Use a separate piece of paper if more witnesses were present	



DETAILS OF INCIDENT

Please give as much information as you can:

Dotted lines for text entry

OTHER RELEVANT INFORMATION

Please add any other information that you feel may be relevant:

Dotted lines for text entry

Signed..... Print..... Date.....