

Safeguarding Adults Policy

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Approved by: **Executive Director of Services**

Version	Date	Summary of changes
26	15/08/24	<p>Section 1: This policy accompanies the Safeguarding Adults Procedure and Modern Slavery procedure</p> <p>Section 6: Overview of responsibilities of DSL and DDSL. The DSL/DDSL may delegate functions to other teams and individuals while maintaining overall oversight and responsibility.</p> <p>Section 6: Responsibilities include operating within the principles of "Making Safeguarding Personal". The primary focus of decision making should be as close to the client's wishes as possible.</p>

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1. Policy statement

- 1.1. St Mungo's has ethical and legal duties to prevent abuse and neglect. This policy outlines key definitions and responsibilities that frame these duties, and accompanies the [Safeguarding Adults Procedure](#), which details the practical steps by which St Mungo's fulfils these duties.
- 1.2. St Mungo's is committed to preventing, identifying, responding, and reporting cases of abuse or suspected abuse and neglect of clients in our services.
- 1.3. If any staff member becomes aware of suspected abuse occurring in relation to a non-client, including visitors of our services, it is their duty to promptly report the safeguarding concern through the appropriate channels.
- 1.4. The nature of the services that St Mungo's provides means that staff are in a position of trusted authority. A proportion of St Mungo's clients have needs related to care and support; St Mungo's needs to ensure that this influence is not abused.
- 1.5. St Mungo's is committed to a recovery and personalisation ethos which, in the context of safeguarding, involves an outcome focussed approach that is multidisciplinary, client centred and responsive to change, to manage short and long term safety concerns.
- 1.6. St Mungo's will contribute to effective inter-agency working, effective multidisciplinary assessments and joint working partnerships, including with the Police, local authorities, the Care Quality Commission, and the NHS.
- 1.7. St Mungo's Safeguarding Adults procedure is informed by relevant legislation that St Mungo's is required to comply with in the context of safeguarding. St Mungo's is not bound by The Protection of Freedoms Act 2012, since it applies to public authorities, but acts within its principles.

- 1.8. The [Charity Commission safeguarding and protecting people guidance](#) requires St Mungo's to safeguard everyone who comes into contact with the organisation. The Safeguarding Adults procedure, along with those listed in section 8, contribute to meeting these requirements.
- 1.9. St Mungo's must follow the six principles of safeguarding that underpin all adult safeguarding work, as set out in the Care Act 2014. These are:
- Empowerment** - presumption of person led decisions and informed consent.
- Prevention** - strategies are developed to prevent abuse and harm from occurring.
- Proportionality** - a proportionate and least intrusive response is made, balanced with the level of risk presented.
- Protection** - support and representation for those in greatest need.
- Partnerships** - local solutions through services working together within their communities.
- Accountability** - accountability and transparency in delivering safeguarding.
- 1.10. This is the policy accompanying the Safeguarding Adults Procedure and [Modern Slavery Procedure](#)

2. Scope

- 2.1. This procedure is to be followed by all staff, volunteers, locums, agency workers, trustees, and students on placement. It applies when there is alleged or suspected abuse of an adult who is:
- a client of a St Mungo's service;
 - related to, or in contact with, a client of a St Mungo's service; or
 - in contact with a member of St Mungo's staff, volunteer, locum, agency worker, trustee, or student on placement as part of the work of that individual.
- 2.2. This procedure does not apply to St Mungo's clients who are accessing our services whilst they are in prison; however, St Mungo's Criminal Justice services should adhere to prison processes for safeguarding.

3. Diversity implications

- 3.1. Services provided should be appropriate to the client and not discriminate in relation to any of the nine protected characteristics defined in the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation).
- 3.2. Staff members are keenly aware that certain individuals, such as the elderly, children, individuals with disabilities, those facing mental health challenges, people in relationships, individuals undergoing gender reassignment, pregnant individuals, individuals from specific racial or religious backgrounds, women, individuals with diverse sexual orientations, and vulnerable adults, are more susceptible to experiencing abuse. Staff will be mindful of the heightened vulnerability of these groups, ensuring safeguarding.
- 3.3. The primary focus of all decision making should be as close as possible to the client's wishes, and they must be supported to make their own choices. Clients should be offered advocacy services as appropriate to their needs.
- 3.4. Clients should be given information, advice, and support in a format that they can understand. Clients should have their views included in all forums that are making decisions about their lives. All decisions taken by professionals about a person's life should be timely, reasonable, justified, proportionate and ethical.

4. Definitions

4.1. Adult Safeguarding

Adult Safeguarding is a legal framework for protecting the rights of an adult with care and support needs, to live in safety, free from abuse and neglect. Adult safeguarding is about people and organisations working together to prevent and minimise 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.

A local authority must act when it has 'reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there):

- Has care and support needs, and
- Is experiencing, or is at risk of, abuse or neglect, and
- Is unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.' (Section 42 Care Act 2014)

Within the scope of this definition are:

- All adults who meet the above criteria, regardless of their mental capacity to make decisions about their own safety or other decisions relating to safeguarding processes and activities.
- Adults who manage their own care and support through personal or health budgets.
- Adults whose needs for care and support have not been assessed as eligible or which have been assessed as below the level of eligibility for support.
- Adults who fund their own care and support.

4.2. Adults with care and support needs

Care and support needs arise from, or are related to, a physical or mental impairment or illness. This includes if the adult has a condition because of physical, mental, sensory, learning, or cognitive disabilities or illnesses, substance misuse or brain injury. The level of need is not relevant, and the adult does not need to have eligible needs for care and support or be receiving any service from the local authority, for the safeguarding duties to apply.

4.3. Abuse

Abuse is a violation of an individual's human and civil rights by any other person or persons and may consist of a single act or repeated acts. Abuse may be physical, sexual, verbal, or psychological and can occur in any relationship. Abuse may result in significant harm to, or exploitation of, the person subjected to it. Abuse which could prompt a safeguarding concern may be intentional or unintentional and should be treated in the same way regardless of the intentions of the person alleged to have caused harm, or their relationship to the adult in question.

4.4. Adult safeguarding concern

The term used to describe when there is, or might be, an incident of abuse or neglect. A safeguarding concern can be raised by anyone and can be:

- An active disclosure of abuse by the adult, where the adult tells a member of staff that they are experiencing abuse and/or neglect.
- A passive disclosure of abuse where someone has noticed signs of abuse or neglect, for example noticing unexplained injuries.
- An allegation of abuse by a third party, for example a family member, friend or neighbour who have observed abuse or neglect or have been told of it by the adult.

- A concern raised by staff or volunteers, others using the service, a carer, or a member of the public.
- An observation of an adults behaviour or of the behaviour of another.
- A complaint or concern raised by an adult or a third party who does not perceive that it is abuse or neglect.
- Patterns of concerns or risks that emerge through reviews, audits and complaints or regulatory inspections or monitoring visits.

4.5. See [B37 S9](#) for a full glossary of terms and acronyms relating to Adult Safeguarding.

5. Wellbeing

5.1. Section 1 of the Care Act 2014 outlines the general duty of local authorities to promote an individual's wellbeing. Where care and support is required, St Mungo's will prioritise the client's wellbeing and consider their views, wishes, feelings and beliefs.

5.2. Wellbeing is a broad concept and is described as relating to the following areas:

- personal dignity (including treatment of the individual with respect)
- physical and mental health and emotional wellbeing
- protection from abuse and neglect
- control over day to day life (including over care and support provided and the way it is provided)
- participation in work, education, training, or recreation
- social and economic wellbeing
- domestic, family, and personal relationships
- suitability of living accommodation
- the adult's contribution to society.

6. Responsibilities for implementation

6.1. **All staff, volunteers, locums, trustees, and students on placement must**

- Call emergency services if the abuse is currently taking place and is an indictable/either way offence, or if there is, or there is a risk of serious harm.
- Report any knowledge or suspicions of safeguarding or radicalisation concerns **within four hours** to their line manager, on-call manager (out of hours) or Service Head if neither are available and/or are implicated.
- Where a colleague or volunteer is suspected, report as above and additionally to the service's Human Resources (HR) partner.
- Local external reporting processes may apply depending on contractual agreements. This should be checked and followed at a local level.
- Contribute to whatever actions are needed to safeguard and promote the client's wellbeing.
- Be alert to indicators of abuse or neglect.
- Be alert to the risks which individual abusers, or potential abusers, may pose to adults with care and support needs.
- Implement the principles of "Making Safeguarding Personal". This involves taking a person-centred approach to safeguarding cases, taking into account the unique preferences, histories and circumstances of individuals who have experienced or are at

risk of abuse or neglect. The primary focus of all decision making should be as close as possible to the client's wishes, and they must be supported to make their own choices.

- Share and help to analyse information so that an assessment can be made of the client's needs and circumstances.
- Communicate with and participate fully in all meetings as necessary, with the client, staff, St Mungo's safeguarding leads and external agencies for example local authority, Care Quality Commission, Police.
- Ensure safeguarding (both adults and children) is discussed regularly in staff meetings.
- Undergo checks by the Disclosure and Barring Service.
- Work with clients to prevent or minimise circumstances which can lead to abuse, including isolation, unhealthy relationships, access to financial services.
- Ensure clients are provided with a copy of [B37 S13 Safeguarding Leaflet for Clients](#) and/or that they are readily available for clients within your project or service.
- Promote safeguarding conversations by displaying [B37 S16 Safeguarding Poster for Services](#).
- Empower clients to have open conversations about safeguarding, equalities, and radicalisation, while challenging unacceptable views/attitudes/behaviours.
- Ensure the client's Opal safeguarding log is updated as/when needed. All Services should record client safeguarding concerns on Opal whether they use Opal as a recording system or not. See [B37 S15 Opal Safeguarding Log Guidance](#).
- Offer clients multiple opportunities to provide feedback: email, phone, face to face and written surveys, quality audit feedback, participation in external reviews, house/resident meetings, staff appraisal feedback, client satisfaction survey, the complaints process. See [A02 Complaints, Suggestions and Comments](#).

6.2. All Managers must

- Ensure this procedure is implemented and reporting structures are adhered to.
- Ensure all staff have an appropriate level of knowledge of safeguarding, by completing training in current best practice and legislation, especially where and how it differs from practice around safeguarding children.
- Ensure relevant leaflets and information is displayed, restocked, and updated whenever necessary, including complaints leaflets and posters, contact details for the local police team and local authority safeguarding adults team.
- Ensure all clients are given safeguarding information. See [B37 S12 Safeguarding Fact Sheet for Clients](#) and [B37 S13 Safeguarding Leaflet for Clients](#).
- Promote safeguarding conversations by displaying [B37 S16 Safeguarding Poster for Services](#).
- Highlight and discuss the organisational and local safeguarding procedures with all new members of staff as part of their induction; see Induction Policy.
- Ensure safeguarding is a standing item on team meeting agendas and discussed during supervision and case management sessions.
- Be familiar with the local Safeguarding Adults Board's procedures for reporting safeguarding concerns and the process for challenging lack of action or disagreement with the local authority (often called the escalation or dissent procedure).
- Be familiar with local appeals processes and St Mungo's escalation process. See [B08 S11 Guidance Document, Advocating for Clients](#).

- Ensure all reporting and recording of safeguarding concerns is accurate, timely and client centred and recorded appropriately.
- Ensure regular checks are carried out of the Service's Opal safeguarding log to manage/monitor the progress of concerns. All Services should record safeguarding concerns on Opal whether they use Opal as a recording system or not.
- Ensure awareness of the service's local contact for Prevent, who may work for the local authority or the Police and know how to refer concerns about radicalisation to the appropriate Prevent Channel. See [B37 S3 Preventing Radicalisation and Extremism](#).
- Managers are responsible for sharing the "Safeguarding Quick Guide for Contractors" with contractors, empowering them with the knowledge and understanding of their responsibilities regarding safeguarding.

6.3. IT team

- Produce and implement staff and client IT policies so that staff and clients can use IT safely, securely, and legally, regarding safeguarding and Prevent duties.

6.4. Volunteer Services team will

- Produce a volunteer handbook which includes guidance on safeguarding and professional boundaries.
- Produce written guidance to staff who manage volunteers on local induction and volunteer supervision.
- Deliver volunteer management training to staff.
- Deliver safeguarding training appropriate to volunteers in client facing roles.

6.5. Quality, Safeguarding and Complaints Team

- Produce safeguarding policy and procedures for staff that are legally compliant, reflect best practice in the sector and update them as often as required and once a year as a minimum.
- Ensure staff are informed of new guidance or changes to existing policies and procedures via the Weekly Bulletin, staff intranet and/or Managers Digest.
- Facilitate face-to-face/webinar Safeguarding and Professional Boundaries training.
- Manage both the quality and safeguarding inbox to respond to and support with queries relating to safeguarding.
- Review safeguarding incident reports and provide advice and guidance, as required.
- Make the Safeguarding Lead or Deputy Lead aware of any serious Safeguarding incidents that include but are not limited to any child safeguarding, any allegations involving a staff member and any safeguarding of a serious nature such as sexual assault or enduring and ongoing abuse.
- Manage the complaints inbox and raise any concerns that relate to safeguarding to relevant Managers and the Safeguarding Lead or Deputy Lead where necessary.

6.6. Safeguarding Lead and Deputy Lead

- Review safeguarding incident reports and provide advice and guidance, as required.
- Support staff to make referrals to appropriate agencies regarding concerns about safeguarding, including radicalisation, as required.
- Support staff to work constructively with partners, including local authorities, police, NHS, and other providers.

- Ensure internal safeguarding and professional boundaries (both face-to-face and e-learning) is comprehensive and compliant with our safeguarding and Prevent duties.
- Monitor the most serious safeguarding incidents escalated by the Quality, Safeguarding and Complaints Team or any other person in the organisation.
- Provide a monthly report to the Chief Executive of the most serious safeguarding cases and make recommendations about whether to report to the Charity Commission.

6.7. St Mungo's Organisational Leads

- **Board Lead:** Chair of Client Services Committee
- **Safeguarding Lead:** David Fisher, Executive Director of Services.
- **Safeguarding Deputy Lead:** Claire Tuffin, Director of Governance and Compliance.
- **Governance Lead:** Claire Tuffin, Director of Governance and Compliance
- **Prevent Lead:** David Fisher, Claire Tuffin, Daniela Costa.

6.8. The role of the Designated Safeguarding Lead and any Designated Deputy Safeguarding Lead is outlined in legislation for both children and adult safeguarding. This is summarised as 6 key functions.

- To provide support and advice
- Sharing information
- Referring and Recording Concerns
- Managing Referrals and raising concerns where required
- Training and Raising Awareness
- Quality Assurance and Review

6.9. The Designated Safeguarding Lead and Designated Deputy Safeguarding Lead may delegate these functions to other teams within the organisation while maintaining overall responsibility for these functions.

7. Relevant documents, policies, and procedures

- B37 A1 [Categories and Indicators of Adult Abuse](#)
- B37 A2 [Safeguarding Adults Contact List for Services](#)
- B37 A3 [Preventing Radicalisation and Extremism](#)
- B37 A4 [Multi-Agency Public Protection Arrangements \(MAPPA\)](#)
- B37 A5 [Quick Guide to Safeguarding Adults](#)
- B37 A6 [Safeguarding Responsibility Chart](#)
- B37 A7 [Content Guide to Raising Adult Safeguarding](#)
- B37 A8 [Understanding Who Safeguarding Adult Duties Apply To](#)
- B37 A9 [Glossary of Terms and Acronyms](#)
- B37 A10 [Safeguarding Adults Quick Guide for Contractors](#)
- B37 A11 [Three Step Guide to Adult Safeguarding](#)
- B37 A12 [Safeguarding Fact Sheet for Clients](#)
- B37 A13 [Safeguarding Leaflet for Clients](#)
- B37 A14 [Streetlink Quick Guide to Safeguarding](#)

- B37 A15 [Opal Safeguarding Log Guidance](#)
- B37 A16 [Safeguarding Poster for Services](#)
- B37 A17 Safeguarding Enquiry Overview
- B37 A18 Safeguarding Risk Assessment – Staff
- [St Mungo's Code of Conduct](#) (applies to staff and volunteers)
- A02 [Complaints, Suggestions and Comments](#)
- A04 [Whistleblowing](#)
- B06 [Handling clients' money and valuables](#)
- B15 [Responding to Bullying and Harassment of Clients](#)
- B17 [Responding to Challenging Behaviour \(Accommodation Services\)](#)
- B17A [Responding to Challenging Behaviour \(Non Accommodation Services\)](#)
- B18 [Working with the Police](#)
- B20 [Visitors](#)
- B21 [Deprivation of Liberty Safeguards](#)
- B23 [Domestic Abuse](#)
- B24 [Working with Pregnant Clients and Clients with Children](#)
- B26 [Leaving Accommodation, Abandonment and Storage of Belongings](#)
- B45 [Working with Clients who Self-Injure](#)
- B46 [Safeguarding Children](#)
- B48 [Preventing and Responding to Sexual Assault](#)
- B49 [Assessing Mental Capacity and the Mental Capacity Act](#)
- B51 [Working with Clients who Hoard](#)
- J06 [Information Sharing Procedure](#)
- [Induction checklists for St Mungo's staff](#)
- [Supervision Guidance and Agenda](#)
- [Disciplinary policy](#)
- [Capability policy](#)
- [Learning and Development programme](#)
- [Volunteer Policies](#)
- [Volunteer Handbook](#)
- [Volunteer Supervisor Resources](#)
- [IT Systems Acceptable Use policy](#)
- [Client IT Acceptable Use policy and Service Level Agreement](#)

The following documents/guidance were consulted for the creation of this policy:

1. [The Protection of Freedoms Act 2012](#) N.B. St Mungo's is not bound by this legislation, since it applies to public authorities, but nonetheless acts within its principles.
2. [Public Interest Disclosures Act 1998](#)
3. [Health and Social Care Act 2012](#)
4. [The Care Act 2014](#)
5. [The Charity Commission guidance for safeguarding and protecting people for charities and trustees](#)
6. [Statement of Government Policy on Adult Safeguarding](#) (Department of Health, 2013)
7. [General Data Protection Regulation 2018](#)
8. [Equality Act 2010](#)
9. [Mental Capacity Act 2005](#)
10. [Health and Social Care Act 2008](#)
11. [Modern Slavery](#)
12. [Safeguarding Guidance for Charities](#)
13. [National Council for Voluntary Organisations – Safeguarding](#)
14. [The London Multi Agency Safeguarding Policy and Procedure 2019](#)
15. [Social Care Institute for excellence – Safeguarding and charities](#)
16. [Social Care Institute for excellence – Safeguarding Adults](#)

This policy was developed in consultation with:

- Staff and Managers from a range of client facing services
- Central Services Support teams
- The Organisational Safeguarding Group