



**Southeast and East Asian Women's Association (SEEAWA) Policy Document:
Safeguarding Vulnerable Adults Policy and Procedure**

Policy Name	Safeguarding Vulnerable Adults Policy and Procedure
Date Created	25 September 2024
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Next Review Date	25 September 2025
Trustee Champion	Sarah Yeh

**Who is covered
by the policy:**

This policy and procedure document applies to all SEEAWA trustees and volunteers, staff, committee members, senior management, and/or students on work placements.

This document will be reviewed annually.

All trustees and volunteers, staff, committee members, senior management, and/or students on work placements should read and familiarise themselves with the contents of this policy and procedure document, and explore relevant resources referenced in the policy & procedure document.

The Nominated Safeguarding Person (Role and Responsibilities)

It is the responsibility of the Nominated Safeguarding Person and his/her Deputies to support all staff and volunteers in understanding this policy and procedure document and applying it in their everyday work and ensuring safe working practice guidance which all staff/volunteers have read and understood.

The Nominated Safeguarding Person is the lead person to whom all safeguarding concerns and suspicions should be reported and from whom advice should be sought on all safeguarding matters.

The Nominated Safeguarding Person is currently **Sarah Reid**, Development and Fundraising Manager.

**The policy:
(what we do,
when & where)**

Having policies and procedures to safeguard adults is a legal requirement under the Care Act 2014.

The aims of Safeguarding Vulnerable Adults Policy are to:

- Stop abuse wherever possible.
- Prevent harm and reduce the risk of abuse to adults.
- Safeguard adults in a way that supports them in making choices and having control about how they want to live.
- Promote an approach that concentrates on improving life for the adults concerned.
- Raise public awareness so that communities as a whole play their part in identifying and preventing abuse and neglect.
- Provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult.

All safeguarding work with adults should be based on the following principles (Care Act 2014):

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
- **Accountability** – Accountability and transparency in delivering safeguarding.

This means that:

- individuals have the right to make choices about their care and treatment – this includes making decisions about their safety, even where those decisions may seem to others to be unwise;
- individuals are enabled to control decisions about their care to the extent they are able;
- any actions that do not have the person's full and informed consent must have a clear justification, be permissible in law and the least restrictive of the person's rights to meet the justifiable outcome.

**The policy:
(what we do,
when & where)**

SEEAWA should always promote the person's wellbeing in their safeguarding arrangements.

Prevention is a key aspect to the safeguarding agenda.

Adult safeguarding means:

Our duty is to protect 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.

An Adult at Risk is a term that refers to any adult aged 18 years or over who:

- has needs for care and support (whether or not the authority is meeting any of those needs)
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

An adult at risk may therefore be a person who, for example:

- is an older person who is frail due to ill health, physical disability or cognitive impairment
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is an unpaid carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- lacks mental capacity to make particular decisions and is in need of care and support

Further definition can be found in the definitions section of this policy.

All staff need to recognise that safeguarding is everyone's responsibility, irrespective of the role they undertake.

**The policy:
(what we do,
when & where)**

There are two key parts to this process:

Preventing abuse from happening. This includes safe recruitment, to ensure that unsuitable people are not employed, and an organisational culture in which all staff and volunteers are empowered to play a part in preventing and ending abuse.

Protecting people who may be experiencing, or at risk of, abuse. This includes empowering people to know their rights and to access the right support to enable them to achieve the outcomes they want.

Forms of Abuse

Abuse can take many forms. It can be physical, psychological, sexual, neglect, discriminatory, organisational and financial. Further details on these definitions can be found in the definitions section of this policy.

Abuse also includes domestic abuse, modern slavery, and self neglect. Exploitation is noted as a common theme.

Abuse is a violation of an individual's human and civil rights by any other person. Examples of abuse are:

- Hitting, slapping, rough handling.
- Giving medication incorrectly.
- Deprivation of warmth, food, clothing, health care, etc.
- Any kind of sexual activity that the person has not consented to or cannot consent to.
- Misuse or theft of money or property.
- Shouting, swearing
- Neglect of medical or physical need
- Discrimination or harassment

Duty to Report

However difficult it may seem, all staff and volunteers have a duty to make known their suspicions of abuse. Failure to do so is a failure in our duty of care. Remember, an individual may not be able to alert anyone themselves, perhaps through failure to understand that the activity is abusive or through poor communication skills or through fear.

<p>The policy: (what we do, when & where)</p>	<p>Reporting is not easy and often takes a great deal of personal strength and courage. Staff and volunteers who have reported incidents have already been exposed to disturbing information that could leave them feeling a range of emotions from sadness to anger and even guilt that they could not prevent the alleged abuse. Managers must be aware of these issues when receiving a report and ensure that staff are appropriately supported according to their individual needs.</p>
<p>Relevant legislation and/or key definitions:</p>	<p>Definitions of Abuse:</p> <p>Abuse – a violation of an individual’s human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.</p> <p>Discriminatory abuse – abuse motivated by a vulnerable person’s age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.</p> <p>Financial or material abuse – including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.</p> <p>Neglect – the persistent failure to meet a vulnerable person’s basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person’s basic emotional needs.</p>

Relevant legislation and/or key definitions:

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse – includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person’s developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse – involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Child – SEEAWA regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable person/people – for the purposes of this policy this is an umbrella term which covers children, young people and vulnerable adults.

Vulnerable adult – a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

<p>Relevant legislation and/or key definitions:</p>	<p>Youth or young people – individuals aged 15 to 25 (15 to 35 in some countries). SEEAWA recognises that this group spans the categories of ‘children’ and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.</p> <p>Legislation The Care Act (2014) Safeguarding Vulnerable Groups Act (2006) Mental Capacity Act (2005) Equality Act (2010) Modern Day Slavery Act (2015)</p>
<p>Other relevant SEEAWA policies:</p>	<p>This policy and procedure document should be used in conjunction with:</p> <ul style="list-style-type: none">● Ending Violence Against Women & Girls (VAWG) Policy,● Health & Safety Policy,● Equality, Diversity, and Inclusion Policy and● Data Protection Policy.

Safeguarding procedures:

It is the responsibility of everyone working on behalf of SEEAWA (staff/volunteers), to understand SEEAWA's Safeguarding policy & procedures.

To achieve good practice in our setting we will ensure the following areas are clear and put into practice:

1) Safer Recruitment & Selection

All staff/volunteers will go through the following process prior to delivering/supporting activities/services to vulnerable adults.

We have a policy and procedure which ensures that all paid staff and volunteers:

- Complete an application form or a letter of application. This includes: address, evidence of relevant qualifications, the reasons why they want to work with vulnerable adults, paid work and voluntary work experience and all criminal convictions.
- Provide two pieces of identification which confirm both identity and address.
- Undergo an interview (formal or informal) involving at least two interviewers.
- Provide at least two references which are followed up before a post is offered. One reference is from the last employer or an organisation that has knowledge of the applicant's work or volunteering with vulnerable adults. If the applicant has not worked with vulnerable adults before, then they should confirm this and give an alternative referee.
- Consent to a Disclosure and Barring Service check (formal CRB check) at the appropriate level (standard or enhanced). Agree to sign up to the DBS update service.

Furthermore, the organisation complies with all other safeguarding regulations:

- We understand that a person who is barred from working with vulnerable adults is breaking the law if they work, volunteer, or try to work or volunteer with these groups.
- We understand that an organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law.
- We understand that if our organisation dismisses a member of staff or volunteer because they have harmed a vulnerable adult, or would have done so if they had not left, we must complete a DBS

Safeguarding procedures:

referral form.

- SEEAWA will have an induction process including access to policies, procedures and code of conduct expected to be followed by all those delivering services on behalf of SEEAWA to support their work.
- An appraisal system in place to identify any concerns or issues.

2) Management & Support of Paid Staff & Volunteers

- All staff and volunteers will be provided with a job description (paid staff) or a role profile (volunteers) outlining their main responsibilities. This includes a requirement to comply with our Safeguarding Policy and procedures and ground rules for appropriate behaviour.
- All staff and volunteers are supported through an induction process in which safeguarding procedures are explained and training needs identified.
- All paid staff and volunteers complete a role review at the end of their induction period before being confirmed in post. Inductions will be completed within 6 months.
- All paid staff are given supervision at least every 8 weeks by the designated authorised person of the organisation.
- All volunteers are given regular support sessions. (This may include one to one or group support, mentoring or shadowing opportunities).
- Implements disciplinary and grievance procedures for all paid staff and volunteers.
- All paid staff and volunteers attend regular ongoing safeguarding training appropriate to their role.
- All paid staff and volunteers receive an induction, which includes information on all the organisation's policies and procedures.

3) Safer working practice:

We will ensure that adequate staff and/or volunteers are supporting activities that SEEAWA runs.

All activities are properly planned and organised. Planning ensures that the activities are age-appropriate, appropriately supervised, take staff ratios into account and use qualified instructors.

- Risk Assessments for activities are carried out prior to delivering activity sessions.
- All activities are risk assessed to ensure that all reasonable steps are taken to prevent vulnerable adults being harmed whilst

Safeguarding procedures:

- participating in the organisation's activities.
- We will regularly assess and review safety risks which arise from premises, activities, equipment and travel arrangements, as outlined in the organisation's Health and Safety Policy.
- Ground rules are set for appropriate behaviour for vulnerable adults, staff, volunteers, parents and carers. Systems are in place and implemented if the ground rules are broken.
- We will ensure that images of vulnerable adults and families are only used after written permission has been obtained, and only for the purpose for which consent has been given.

4) Providing Safer Activities and Trips

Necessary arrangements:

- People whose suitability has not been checked, including through a DBS check, must not be allowed to have unsupervised contact with vulnerable adults.
- All paid staff and volunteers undertaking specialist roles are provided with appropriate training.
- Employer's liability and/or public liability insurance has been taken out to ensure that all activities and services and all people taking part, are covered.

5) Responding to concerns

If any member of staff/volunteer is concerned about an adult at risk, they must inform the nominated safeguarding lead person (NSP) or deputy NSP immediately.

- The written record must be clear, precise and a factual account of observations or what has been said.
- The NSP will decide on the most appropriate course of action and whether the concerns should be referred to other social service providers. If it is decided that a referral needs to be made, this will be discussed with the adult at risk. All concerns, discussions and decisions will be recorded in writing.
- If a member of staff disagrees with the level of concern and feels that an adult at risk has not been protected, then any member of staff can make a direct referral.

Disclosure by a vulnerable adult:

SEEAWA recognises that an adult at risk may seek you out to share information about abuse or neglect, or talk spontaneously, individually or in groups when you are present.

In these situations, YOU MUST:

- Listen carefully to the vulnerable adult. You can seek clarification but DO NOT ask direct questions or start to investigate the matter.
- Give the adult at risk time and your full attention.
- Allow the adult at risk to give their account; do not stop an adult at risk who is freely recalling significant events.
- Make an accurate record of the information you have been given, taking care to record the timing, setting and people present. Make a record of the adult at risk's presentation as well as what was said. Do not throw this away as it may later be needed as evidence.
- Use the adult at risk's own words where possible.
- Explain that you cannot promise not to speak to others about the information they have shared – do not offer false confidentiality.

Reassure the Vulnerable Adult that:

- They have done the right thing in telling you.
- They have not done anything wrong.
- Tell the adult at risk what you are going to do next and explain that you will need to get help to keep him/her safe.
- DO NOT ask the adult at risk to repeat her account of events to anyone.
- You must log and record information regarding concerns on the same day.

<p>Allegations against adults who work with vulnerable adults:</p>	<p>If you have information which suggests an adult who works with vulnerable adults (in a paid or unpaid capacity) has:</p> <ul style="list-style-type: none"> • Behaved in a way that has harmed or may have harmed a vulnerable adult. • Possibly committed a criminal offence against, or related to, a vulnerable adult. • Behaved towards a vulnerable adult in a way that indicated s/he is unsuitable to work with vulnerable adults. <p>You should speak immediately with the Nominated Safeguarding Lead Person (NSP) or your manager who has responsibility for managing allegations. The NSP will consult with/make a referral to the LADO (Local Authority Designated Officer) via the MASH (Multi-agency Safeguarding Hub) Team. If one of those people is implicated in the concerns you should discuss your concerns directly with the LADO (Local Authority Designated Officer) via the MASH Team.</p>
<p>Making a referral:</p>	<p>A referral will involve providing information of concern to the Nominated Safeguarding Lead Person (NSP) (unless the concern is about the Nominated Safeguarding Person) about an Allegation against a staff/ volunteer.</p> <p>The MASH will need to be contacted in order for the Local Authority Designated Officer (LADO) to be informed. The LADO will make enquiries and take appropriate action, provide guidance and may request for further information to be submitted. You may be called for a meeting with the LADO. The LADO may have to speak to the Police to decide if a criminal act has taken place, in serious cases the Police may be informed and may investigate.</p> <p>You will be informed of the action that will be taken by the LADO.</p> <p>YOU SHOULD NOT:</p> <ul style="list-style-type: none"> • Call a staff meeting and discuss the matter with staff/volunteers. The LADO will guide you on what needs to be done. • You should not try and bring the perpetrator of the alleged abuse in contact with the victim to discuss concerns. • Do not delay your response.

<p>Making a referral:</p>	<p>There are some cases that require an urgent response. If a vulnerable adult is in immediate danger or is at harm or risk you should refer to the social care and/or the police.</p> <p>If you suspect a serious criminal act has taken place, telephone 999. Tell them if you think it might be adult abuse.</p> <p>If the individual is injured, seek immediate medical treatment. Tell the ambulance personnel or A&E staff that this is a potential adult abuse situation.</p> <ul style="list-style-type: none"> • In emergency dial 999 • Multi-Agency Safeguarding Hub (MASH): <p>Email: enquiry@towerhamletsconnect.org Tel: 0300 303 6070 (weekdays 9am to 5pm) We recommend also emailing a safeguarding alert form to enquiry@towerhamletsconnect.org. Tower Hamlets Connect staff will send this directly to the local authority/initial assessment team. Out of hours emergency duty team: Tel: 020 7364 4079 (5pm to 9am including weekends). https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_safety_crime_preve/domestic_violence/Domestic-abuse.aspx</p> <p>Action To Be Taken Following the Referral:</p> <p>SEEAWA will ensure that you keep an accurate record of your concern(s) made at the time. SEEAWA puts concerns in writing to the social care team following the referral within 48 hours duty.</p> <p>SEEAWA will accurately record the action agreed or that no further action is to be taken and the reasons for this decision.</p>
<p>Confidentiality:</p>	<p>SEEAWA will ensure that any records made in relation to a referral are kept confidentially and in a secure place.</p> <p>Information in relation to adult safeguarding concerns should be shared on a "need to know" basis. Note: The sharing of information is vital to adult protection and, therefore, the issue of confidentiality is secondary to the need for protection.</p>

Challenges & Escalation:	<p>All staff and volunteers need to be robust in constructively challenging colleagues when necessary, to achieve the best outcome for vulnerable people.</p>
Whistle blowing:	<p>This is the confidential disclosure by any individual of any concern encountered in the workplace related to a perceived wrongdoing. SEEAWA considers such wrongdoing to include:</p> <ul style="list-style-type: none">• General malpractice, such as immoral, illegal or unethical conduct• Conduct where someone's health and safety has been put in danger.• Gross misconduct. <p>If individuals have concerns relating to their employment with SEEAWA these should be raised under SEEAWA's grievance policy. Where it is felt that the organisation has not or will not address the concerns appropriately, there are several services available:</p> <ul style="list-style-type: none">• Whistleblowers UK - https://www.wbuk.org/help• Care Quality Commission - 03000 616 161• Action on elder abuse 0808 808 8141 – (Hourglass)