



The Gatehouse Safeguarding Vulnerable Adults Policy

Policy ID Number: P04

Policy Passed by Board of Trustees: October 2022 Valid until: October 2023

Introduction

The purpose of this policy is to ensure the safety and protection of adults at risk of abuse or neglect, whether they are a Guests of the project, staff members or volunteers.

- 1.1. The Gatehouse Community Drop-In Centre offers free support services for adults aged 25+ who are: homeless, vulnerably housed, on low income and/or looking for company & community. The Gatehouse offers a free cafe (six evenings a week), therapeutic workshops, bespoke one-to-one support, a shower and clothing project, a counselling service, and works in partnership to manage and support the Lived Experience Advisory Forum.
- 1.2. The nature of some individuals accessing our service is often transient and we do not currently follow a formal referral and assessment process. However, we do hold some personal details on individuals but due to the challenges of homelessness this may only be an individual's street name and they may have no access to a phone/email and are registered as 'no fixed abode.'
- 1.3. The organisation does hold personal information on volunteers and staff in line with the GDPR.
- 1.4. The Care Act (2014) has introduced a legal obligation for each local authority to have a Safeguarding Adults Board. It is now a legal requirement that agencies and professionals work together around safeguarding issues.
- 1.5. The Trustee Board and CEO will review this policy every year or when an update has been made to Safeguarding Vulnerable Adults working guidelines whichever process is sooner.
- 1.6. Safeguarding Vulnerable Adults training will be available through the Oxfordshire Safeguarding Adults Board (OSAB) for staff to attend.

Definitions of 'an adult at risk'

2. In safeguarding terms an adult at risk is defined as a person who is 18 years old or over and who:
 - Is reported as having, or appears to have, needs for care and support.
 - Is reported as, or appears to be experiencing, or is at risk of, abuse or neglect.
 - And as a result of care and support needs, and the adult is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.
- 2.1 Homelessness in itself does not make people vulnerable. However, circumstances such as homelessness may exacerbate other conditions and impact negatively upon an individual's ability to care for and protect themselves.

What is abuse?

3. All local authorities have a duty to protect vulnerable people from abuse. Types of abuse can include:
- Sexual abuse/exploitation
 - Psychological or emotional abuse
 - Physical abuse
 - Financial or material abuse
 - Neglect & acts of omission
 - Self-neglect
 - Modern slavery (see Appendix 1)
 - Domestic abuse/violence
 - Discriminatory/hate crime
 - Organisational abuse
 - Radicalisation & extremism
- 3.1. Other common safeguarding themes are medication errors, pressure ulcers, trips and falls, and incidents involving another person with care and support needs.
- 3.2. Safeguarding adults can now also include adults being groomed for, or partaking in, forms of extremism and radicalisation.

“Prevent” is part of a Government initiative to stop people becoming engaged in terrorism and terrorist activity. Oxfordshire Channel is the local support group for the Oxfordshire area and offers support packages tailored to an individual attracted to an extremist group or ideology to reduce the risk of radicalisation.

What to do when you think an adult is ‘at risk’ (Guest)

4. Make sure the person is not in immediate danger. If necessary, seek urgent medical help or ring the police (if you think a crime has been committed). Talk to the Operations Manager/CEO if you are unsure. Try and gain consent from the individual/s if it assessed as safe to do so.

Documenting the concern (all service areas EXCEPT for the Community Centre/Café)

- 4.1. Raise a ‘safeguarding alert’ in writing with the Operations Manager/CEO or the Safeguarding Trustee within 1 working day (if the person is not in immediate danger). A discussion will then take place and a decision can then be made about whether concerns about the person should be passed on to a responsible person/agency or managed internally. This decision will be made collectively.
- 4.2. Document the full details on the Lamplight System using the **Safeguarding** Work Sub-Area, found under the **Incident/risk** Work Area. **On the “Personal Info” tab of the Client’s Profile, the “Required to be kept for 50 years” box should be ticked to ensure this data is not deleted for 50 years in line with the Gatehouse insurance policy.**
- 4.3. **Once the safeguarding concern is closed/complete, print off any electronic data i.e. emails, relating to the safeguarding concern and give this to the Gatehouse CEO to ensure that it is held securely for 50 years in line with the Gatehouse insurance policy.**

Documenting the concern (for the Community Centre/Café ONLY)

- 4.4. Raise a ‘safeguarding alert’ in writing with the Operations Manager/CEO or the Safeguarding Trustee within 1 working day (if the person is not in immediate danger). A discussion will then take place and a decision can then be made about whether concerns about the person should be passed on to a responsible person/agency or managed internally. This decision will be made collectively.
- 4.5. Do not document the full details on the Lamplight System, instead tick the **“Safeguarding concern”** box on the **“What happened”** tab of the Work Record, and on the same tab record a **“Safeguarding”** Interaction. **On the “Personal Info” tab of the Client’s Profile, the “Required to be kept for 50 years”**

box should be ticked to ensure this data is not deleted for 50 years in line with the Gatehouse insurance policy.

- 4.6. Once the safeguarding concern is closed/complete, print off any electronic data i.e. emails, related to the safeguarding concern and give this to the Gatehouse CEO to ensure that it is held securely for 50 years in line with the Gatehouse insurance policy.

Unsure if it's a safeguarding issue?

- 4.7. Review <https://www.osab.co.uk/wp-content/uploads/2021/06/OSAB-Threshold-of-Needs-Matrix-January-2021-MASTER.pdf> (sourced 22/09/22)
- 4.8. If you've encountered a concern and are still unsure if it is a safeguarding issue or not, you can call and request a consultation with the County Council's Safeguarding Triage Team. They can be reached on **01865 328232**.
- 4.9. Document the concern, any necessary additional details as the case progresses, and all decision making and actions taken.
- 4.10. Wherever possible, follow the Gatehouse Confidentiality Policy and always try and gain consent to share information from the individual involved, unless this might put that person or others at risk.

What to do when you think an adult is 'at risk' (staff/volunteer)

- 4.11. Make sure the person is not in immediate danger. If necessary, seek urgent medical help or ring the police (if you think a crime has been committed). Talk to the Operations Manager/CEO if you are unsure. Try and gain consent from the individual/s if it assessed as safe to do so.
- 4.12. Raise a 'safeguarding alert' in writing with the Operations Manager/CEO or the Safeguarding Trustee within 1 working day (if the person is not in immediate danger). A discussion will then take place and a decision can then be made about whether concerns about the person should be passed on to a responsible person/agency or managed internally. This decision will be made collectively.
- 4.13. Only the Gatehouse Operations Manager/CEO will hold staff and volunteer safeguarding data and it will not be held on Lamplight. **Once the safeguarding concern is closed/complete, electronic data related to the safeguarding concern will be printed and held securely for 50 years in line with the Gatehouse insurance policy.**

Safeguarding allegations against staff and volunteers

5. A safeguarding vulnerable adult allegation against a Person in a Position of Trust (PIPOT) whether the person is in a paid or unpaid position at the Gatehouse is very different from a complaint or grievance. Understanding the differences will ensure the correct procedures are followed. Section 3 above highlights the areas that can constitute abuse and exploitation.

Where a safeguarding concern/allegation is raised against a Gatehouse staff member or volunteer, it is the Gatehouse responsibility to assess any potential risk to adults using our services, and, if necessary, to take action to safeguard those adults.

Disclosure procedure

If the disclosure of alleged abuse or exploitation is made to a staff member or volunteer:

- Listen!
- Take notes of details if the alleged victim is happy for you to do so and let the person know that you will need to inform the Gatehouse CEO of the disclosure details. If the CEO is unavailable due to annual leave

or sick leave, the Gatehouse Chair of Trustees will be the main contact. **Do not destroy the original paper notes.**

- Do not ask leading questions, the details of the allegation must be led by the alleged victim, not you.
- Inform the Gatehouse CEO/Chair of Trustees verbally as a matter of urgency and then follow this up in writing, including as much detail about the contents of the disclosure as possible. It is essential that the concerns are appropriately reported and recorded and **marked strictly private and confidential.**
- The CEO/Chair of Trustees may delegate the management of the allegation to an appropriate Gatehouse manager but continue to oversee the process, be informed, and give advice where necessary.

If a staff member or volunteer has witnessed a safeguarding incident or wants to report that they are actually the victim of abuse or exploitation at the Gatehouse, **read and follow the Gatehouse Whistleblowing Policy.**

Managers responsibility

- Managers must always respond to and investigate a safeguarding allegation against a Gatehouse staff member or volunteer. If the allegation is against the Gatehouse CEO, then the concern must be raised with the Gatehouse Chair of Trustees instead.
- If the management of the allegation has been delegated to a manager, then the CEO must continue to be informed on the progress. If the allegation is against the CEO, the Chair of Trustees must continue to be informed.
- If the allegation means that the alleged victim is at immediate risk, then emergency services should be called.
- A Safeguarding Vulnerable Adults report may need to be submitted to the Oxfordshire Safeguarding Adults Board.
- If the Oxfordshire Safeguarding Adults Board (OSAB) action a Person in a Position of Trust (PIPOT) investigation, the Gatehouse must comply with the needs of the investigation.
- Managers must gain as much information as possible and this can include talking to the alleged victim. This must be recorded and reported to the Gatehouse Safeguarding Trustee.
- Managers must assess the risk with the information that they have and they may have a duty to report it to the appropriate authorities if a criminal offence has been alleged. Decisions on sharing information must be justifiable, proportionate and based on the potential or actual harm to adults.
- A safeguarding report plan must be devised which includes what actions have been taken, how and why, and what information has been shared, with whom and why.
- Advice must be sought from Croners Consultants on how to proceed if the allegation is against a staff member or the alleged victim is a staff member.
- If an organisation removes an individual (paid worker or unpaid volunteer) from work with an adult with care and support needs (or would have, had the person not left first) because it has been proven that the person poses a risk of harm to adults, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.
- Managers must maintain organised and appropriate detailed records of cases and in line with the GDPR 2018 requirements.

What can a staff member or volunteer expect after an allegation is made against them?

- To be informed by the CEO that an allegation has been made against them, unless it is assessed that it would put the vulnerable adult in more danger.
- If you are informed, you will be asked to attend an investigation meeting which will be minuted. You will receive a copy of the minutes.

- You may be suspended on full pay, be redeployed or instructed to make adjustments to your practice until the investigation is complete (staff members) or be asked to not attend your volunteer role (volunteers). Care will be taken to ensure information is not shared at the point of suspension that may prejudice a subsequent enquiry/investigation or place any person at additional risk.
- Alongside the duty of care towards the alleged adult at risk, is the duty of care to the staff member/volunteer. The Gatehouse needs to provide support to minimise stress associated with the process, this may need to include; support to understand the procedures being followed, updates on developments, an opportunity to respond to allegations/concerns, support to raise questions or concerns about their circumstances. The support person must be separate from the person managing the allegation. There may be limitations on the amount of information that can be shared at a particular time in order not to prejudice any enquiry/investigation or place any person at risk.
- The staff member or volunteer may also wish to seek independent advice.
- If a staff member's gross misconduct or criminal activity is proven, then the Gatehouse Disciplinary Policy/Procedure will be implemented.
- If misconduct or criminal activity is proven for a volunteer, they will be asked to leave the Gatehouse indefinitely.

If any allegation information is knowingly falsely reported or made in bad faith (for instance in order to cause disruption within the Charity or to an individual), or indeed if the disclosure is made for personal gain, then a person making the allegation may become subject to action under the disciplinary procedure (staff member) including dismissal. In the case of a volunteer, you may be asked to leave. In the case of a Guest, they may be banned from using the Gatehouse services.

Modern Slavery

All concerns about Modern Slavery are deemed to be of a level requiring consultation with the County Council's Safeguarding Triage Team on **01865 328232**.

1. What is Modern Slavery?

1.1. Modern Slavery is a serious crime in which people are coerced or deceived into a situation where they are exploited, for the purpose of making a profit. The Modern Slavery Act 2015 covers the explanation and definition of modern slavery, the process for prosecution and services available for victims.

Forced Labour	Forced labour is any work or service which people are forced to do against their will, under threat of punishment.
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Forced Criminality	Forced criminality involves victims who are forced to commit a range of crimes which can include (but not limited to) county lines, forced street crime, cannabis cultivation, forced begging.
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Sexual Exploitation	Attaching the right of ownership over one or more persons with the intent of coercing or otherwise forcing them to engage in sexual activities.
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Domestic Servitude	People exploited in this way may rarely ever leave the premises and have few opportunities to escape or be noticed by someone.
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Organ Harvesting	The removal of human organs from living or deceased donors where the removal is performed without the free, informed and specific consent of the living or deceased donor, or, in the case of the deceased donor, without the removal being authorised under its domestic law.
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1.2. It is also important to also note that an individual is not always victim to just one type of exploitation.

2. Ways in which people can be recruited into Modern Slavery

2.1. Recruitment examples can include vulnerabilities, promise of work/education, promise of safety, relationships, and housing. Examples of methods of control can include threats, intimidation, finance, emotional abuse, physical abuse, isolation.

3. Spot the signs Modern Slavery

3.1. It can be challenging to identify a potential victim of modern slavery and potential victims may be reluctant or unable to come forward themselves. That is why it is important for frontline staff/volunteers to look out for signs of modern slavery. A potential victim of modern slavery may:

- Show signs that their movements are being controlled
- Show fear or anxiety
- Allow others to speak for them when addressed directly

- Look malnourished, unkempt or have untreated injuries
- Not be in possession of their passports or other travel documents, as these documents are being held by someone else
- Not have control of their own money or bank accounts
- Believe they must work against their will
- Be subjected to violence or threats of violence against themselves or against family members and loved ones
- Had their property taken over by others e.g., 'cuckooing'
- Be forced to travel, or be deceived into taking a journey under false promises of jobs, payment or safety, e.g., 'human trafficking'

4. What to do when you think an adult is 'at risk'

- 4.1. Make sure the person is not in immediate danger. If necessary, seek urgent medical help or ring the police (if you think a crime has been committed). Talk to your Operations Manager/CEO if you are unsure. Try and gain consent from the individual/s if it is assessed as safe to do so.
- 4.2. Raise a 'safeguarding alert' in writing with the Operations Manager/CEO or the Safeguarding Trustee within 1 working day. Once/if more details have been gained and the person is not in immediate danger, a discussion will then take place and a consultation with the County Council's Safeguarding Triage Team.
- 4.3. Document the concern, any necessary additional details as the case progresses, and any decision making and actions taken in emails. Always copy the CEO into any documentation. Once a case is closed, print off all documentation which will then be kept in the CEO's locked cabinet.
- 4.4. It is also important to note that an individual may take some time to fully disclose all the details of the exploitation.

5. Other useful services:

- The Salvation Army's confidential 24/7 referral helpline on 0800 808 3733 provides advice on getting support for potential victims.
- Victims First - Willow Project 01844 487 987
- The Modern Slavery Helpline on 08000 121700
- The National Referral Mechanism (with consent and only via First Responders)