

SAFEGUARDING ADULTS AT RISK POLICY & GUIDELINES FOR REPORTING ABUSE



1. Purpose

Azalea aims to create an environment where people at risk feel secure, valued and listened to at all times and a place where their welfare is promoted. Any concerns will be taken seriously and acted upon appropriately and we will pay attention to what our guests and clients say and feel.

It is appropriate to separate the safeguarding policies for children and adults at risk as they are different in key areas and in law. The framework of children's safeguarding is enshrined in law i.e., Children Act 1989. Also, children and adults may each face a different set of issues; The definitions and terms used differ; Procedures for reporting abuse and handling cases are not the same; There is difference in legislation and guidelines.

Safeguarding adults at risk is the responsibility of everyone. All Azalea staff, volunteers and trustees will be made aware of this policy and accompanying procedures to ensure that they know exactly what to do should safeguarding concerns arise and to help promote best practice. The policy also exists to inform all parties of their rights and what they should do if they have any safeguarding concerns. All staff and volunteers are obliged to take seriously and report any allegations of abuse which suggest that the individual is at risk of harm.

2. Policy statement

For Azalea Luton: Azalea engages with people at risk principally through our Encompass project and Flint project, which operate out of our premises in Luton.

Azalea engages with men through the Flint project, who could potentially be at risk, vulnerable to abuse or in contact with/aware of others at risk. Azalea recognises that its Encompass guests are themselves people at risk and could be connected to others who are at risk of harm themselves or harming others and therefore we take seriously our duty to safeguard both our guests and connected individuals.

Azalea recognises that the law in the area of safeguarding is under constant review. The interpretation of the law and professional guidance is likewise subject to continual change. We realise our obligation to keep abreast of developments in this complex area and the need to pass on information to staff and volunteers. The training, guidance and supervision of staff is key to the successful operation of sound safeguarding.

Review and partnership working

Azalea is committed to continually reviewing and monitoring our safeguarding policies and procedures. We will gain further advice and information wherever

possible in line with developments in safeguarding legislation. An Azalea safeguarding subcommittee has been established to ensure that all policies and procedures are appropriate and current. Azalea will seek mutually beneficial partnerships with organisations in the criminal justice, youth justice and rights sector to ensure that best practice is maintained.

Do not use or share Azalea policies outside of Azalea without prior permission from the CEO.

3. Who the policy covers?

This policy covers all:

- Azalea employees
- Azalea trustees
- Azalea volunteers
- Azalea guests/clients

Any elements of the policy that are specific to Azalea Luton are indicated by **For Azalea Luton**.

4. Terms and definitions

'Azalea employees/volunteers' refers to all employees and volunteers who form Azalea's primary team and includes the CEO, employees, Encompass frontline volunteer team and Flint frontline volunteer team. It excludes those who serve Azalea from a distance e.g., cake makers, prayer support, donors.

'Guests/Clients' refers to the women (guests) involved in sex trafficking and exploitation who are engaging with Encompass' services, and the men (clients) who are/have been purchasing sex and are engaging with Flint's services, whether that is a single encounter during outreach, or an ongoing relationship.

'Sex trafficking' refers to the experiences of Encompass service users who are trafficked for the purpose of sexual exploitation both locally, nationally and internationally.

'Human trafficking' as defined by the Palermo Protocol, the first internationally recognised definition of human trafficking:

"Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs."

Additional definitions for this policy include:

'Designated Safeguarding Officers' refers to Azalea employees who have been appointed as primarily responsible for coordinating and pursuing safeguarding procedures within Azalea.

'A child' refers to any person aged under 18 years and includes an unborn child when the lifestyle of a pregnant woman is thought to be detrimental to the health of the unborn child.

'Child at risk' refers to someone who is 18 years old or younger who has care and support needs and is experiencing, or is at risk of, abuse or neglect and they are unable to protect themselves from either the risk or the abuse.

'Adult at risk' refers to someone over the age of 18 who has care and support needs and is experiencing, or is at risk of, abuse or neglect and they are unable to protect themselves from either the risk or the abuse.

The term 'adult at risk' has been used throughout this policy to replace the term 'adult' (as defined by 'No Secrets' Department of Health and Social Care, March 2000). This is because the term 'adult' may wrongly imply that some of the fault for the abuse lies with the adult abused. This is in line with the current Government guidance following the introduction of the Care Act 2014.

Other definitions of 'adult at risk' exist in partner organisations. An 'adult at risk' *may* therefore be a person who:

- Is elderly and frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability or a sensory impairment
- Has a diagnosed mental health need, including dementia or a personality disorder
- Has a long-term illness or condition
- Misuses substances or alcohol
- Is unable to demonstrate the capacity to make a decision and is in need of care and support
- Is pregnant.

This list is not exhaustive.

Abuse is the violation of an individual's human and civil rights by any person or persons' (No Secrets DoH, March 2000). It can be a single act or repeated acts. In all forms of abuse there are elements of emotional abuse.

Physical abuse is an act by a person or persons which intends to cause feelings of physical pain, injury or other physical suffering or harm. This could include hitting, slapping, burning, pushing, restraining, or giving too much medication or the wrong type of medicine.

Psychological or emotional abuse is when one person behaves in a way which causes the other person to feel traumatised. This can include making them feel anxious or depressed. This could include being threatened with violent behaviour, being left alone, not being allowed to have something or see someone or made to feel stupid or unworthy. Psychological abuse can involve manipulation, so people suffering from psychological abuse may not be able to recognise what is happening to them – sometimes called **Gaslighting**. It can often take place in relationships, which could be spousal or between an adult and their carer or between friends, where one person has more power than the other.

Financial or material abuse is when someone steals or defrauds another person of their money or goods. It can include people directly stealing money from an adult at risk or it could be more subtle, like not giving them control over what they buy with their money. It can include theft of money, property fraud or putting someone under pressure when writing a will.

Sexual abuse is when someone forces another person to either take part in sexual activity or be the recipient of unwanted sexual attention or behaviour, without their consent. This can include rape or other forced sex acts, as well as inappropriate and intimate touching.

Neglect can be when a person who requires care is not looked after properly and their needs are not met. It can include not being given food, not having a heated home, being denied social care or being stopped from getting medical attention.

Discrimination is when a person is treated differently or unfavourably because they belong to a certain group. It can be based on race, ethnicity or gender. It can also be because a person is 'different'. It can include being made fun of, or being the subject of unkind remarks, because of religion, race, age, sex, disability or sexuality.

Modern slavery includes slavery, human trafficking and forced labour. It can include sexual exploitation (where a person is forced to perform sex acts against their will, for example as a sex worker or escort), criminal exploitation (where a person is forced to carry out criminal activity against their will) and domestic servitude (where a person is forced to carry out housework for little or no pay, their movements may also be restricted).

Organisational abuse is when people are mistreated because of poor or inadequate care and support, or when continuous poor practice affects the whole care setting. Organisational abuse occurs when staff in an individual's own home, residential home, nursing home or hospital all act in a way which benefits them and not the people they care for. This could mean very strict routines, lack of choice over food or drink or social activities and an unsafe or unhygienic environment.

Self-neglect is when people neglect their own basic needs including personal hygiene, being appropriately clothed, eating or looking after a personal medical condition. It can happen to anyone at any time but is often associated with depression, mental health issues, getting older, addiction or cognitive impairments.

Deprivation of liberty - Organisations must ensure that people have the freedom to choose how and where they live and must work to protect their liberty. Anyone who is deprived of their liberty because they are unable to make a decision for themselves must be protected against this deprivation happening illegally. There is a set piece of legislation which states that if someone is unable to make a decision, for example about moving into a care home, then any decision made for them has to be in the interest of the person and the least restrictive option. When people are deprived of their liberty, special safeguards have to be put in place to protect them. Abuse can happen when these safeguards aren't put in place or these safeguards are broken.

Cuckooing is a form of crime, termed by the police, in which drug dealers take over the home of a vulnerable person in order to use it as a base for county lines drug trafficking. The crime is named for the cuckoo's practice of taking over other birds' nests for its young.

These are just some examples of abuse. Someone may be abused in other ways. If you're not sure whether something you feel uncomfortable about is abuse, even if it is not listed above, please talk to the Designated Safeguarding Officers straight away.

Abuse can be done on purpose, because of ignorance, lack of training or understanding. Sometimes a person can be abused in more than one way at the same time.

5. Procedures for safeguarding adults at risk

a. Safe recruitment procedure

All Azalea volunteers and employees, including temporary personnel and helpers who have regular contact with guests/clients, should be subject to a careful and rigorous selection and vetting process with the following elements:

- Completion of an application form or letter of application and proof of identity should be provided.
- Taking up two references.
- An interview conducted by a minimum of 2 people.
- Gaps in employment or inconsistencies in a person's application will be identified and satisfactory explanations for this will be provided.
- Carrying out police checks and checks with the Disclosure and Barring Service.
- Allowing no unsupervised access to children, young people and adults at risk until the above procedures have been completed.
- If necessary, Azalea will seek advice about recruiting someone with a criminal record.

b. Induction, training, and supervision for employees & volunteers

All Azalea employees and volunteers who have regular contact with adults at risk are provided with appropriate induction and training. This includes awareness of types of

abuse, discussion of policy issues, and guidance on individual responsibilities in handling disclosures and/or allegations of abuse.

Details regarding appropriate conduct with guests/clients within Azalea are outlined in additional policies (Employee Code of Conduct and Volunteer Code of Conduct). All teams are expected to read, understand and adhere to the necessary boundaries for the safety of all. Compulsory frontline training is provided to explore some of the complex areas within the guidelines, for example, the appropriate use of touch.

Supervision is available to employees and volunteers. Employees and volunteers are actively encouraged to access this service on a regular basis. Employees and volunteers are required to ensure that the management is aware of potential problems and that inappropriate behaviour is reported through line management arrangements. Reporting and responsibilities are outlined on the attached appendix.

In terms of working practice, all Azalea employees and volunteers are entitled to feel that they are not being put into situations where they could be at danger of malicious or mistaken claims.

Azalea, as an organisation and within our different teams owe a duty of care to each other, an obligation to support each other in working with the guests and clients met by Azalea. Volunteers will not be expected or allowed to work on their own at any time, without clear guidance and support in place.

c. Risk assessment and risk management

A risk assessment is carried out in the development phase of all our activities, and includes an assessment of team suitability, team to guest ratio, physical setting, equipment used, first aid provisions and other safety procedures. Risk management is an on-going activity and risk assessments will be reviewed annually.

d. Dealing with disclosure

All guests and clients who engage with Azalea's support will be made aware of Azalea's responsibility to break confidentiality when there is a safeguarding concern. If a guest/client comes to you with the intention of disclosing an incident, it may be possible at the beginning to remind her/him of this - that you may need to share the information further and will talk through with her/him the potential ways that this will happen. If it is not possible to explain this, due to the traumatic presentation of the guest/client, be sensitive and allow her/him to express and process as she/he needs, without interruptions.

You may hear two different categories of disclosures: information that requires immediate action and information that is historic and will need to be recorded but may not necessitate immediate action.

A guest/client may disclose information that requires immediate action or may present to you as in such a state as to require immediate action. For example, it may

be apparent that a guest has recently been attacked. If this is the case, volunteers must follow these steps:

- Call emergency services as necessary (consider: Police – is anyone still at risk? Ambulance – is anyone hurt? – using 999)
- Support the guest to the Encompass crisis room if safe to do so (**In Azalea Luton: the Oasis room/ the Sanctuary**)
- If there is a member of the Encompass staff team around, ask them to join you in the room. If there is not, call the Encompass emergency phone (07723 481027)
- Keep a mental note of what the guest is sharing with you – times, dates, names, locations, physical descriptions, detail of what happened. When you have an opportunity, write this information down as accurately as possible.
- Do not probe or ask questions. Only listen to the information that the guest is offering. They may not offer any.
- Be with the guest. See if there is another team member who could get a glass of water/cup of tea/ something sweet for the guest to eat.
- After, when you are no longer with the guest, write everything down on an Adults at Risk Safeguarding Form (**In Azalea Luton: these are stored in the purple box file in the Encompass Office**).

The Encompass employee can then:

- Offer to support the guest in reporting the incident to the Police
- If the guest declines, offer to submit the information anonymously to police intelligence
- Remind the guest that if they change their mind at any stage and want to report anything themselves, Encompass staff can support them with this
- If the attack is of a sexual nature, an Encompass staff member will chat to the guest about attending the Sexual Assault Referral Clinic (SARC)/ Luton Sexual Health.

For a Flint client, the process will be similar. If a client needs safeguarding:

- Listen well, take mental and soon after physical notes of any details – using the exact words of the client
- Consider if the emergency services need calling – is he or anyone else in immediate danger?
- Fill in an Azalea safeguarding form for frontline employees to then proceed with necessary actions.

e. **Pregnancy**

On occasion, we will become aware of pregnancy or impending parenthood of a guest. We should always understand that there may be a need for additional support and that the unborn child may be vulnerable due to the circumstances of the guest.

These circumstances include (but are not limited to):

- Where concerns exist regarding the mother's ability to protect the baby
- Where alcohol or substance abuse is thought to be affecting the health of the expected baby
- Where the expectant parent(s) are very young and a dual assessment of their own needs as well as their ability to meet the baby's needs is required
- Where a previous child in the family has been removed because they have suffered harm or been at risk of significant harm
- Where a person who has been convicted of an offence against a child, or is believed by child protection professionals to have abused a child, has joined the family
- Where there are acute professional concerns regarding parenting capacity, particularly where the parents have either severe mental health problems or learning disabilities
- Where the child is believed to be at risk of significant harm due to domestic abuse.

On hearing about/seeing a confirmed or suspected pregnancy, volunteers must ensure that a child safeguarding record form is completed, and that the frontline employees are informed. Designated Safeguarding Officers will then alert the relevant authorities as appropriate.

The Designated Safeguarding Officers and Encompass Staff should refer to the 'How We Keep Children Safe' document for further information about what we do and don't do.

f. Disclosures of historic abuse

A guest/client may disclose historic information pertaining to a situation that constitutes safeguarding. This may not require any immediate action. In these situations, follow the guidance as above with regards to hearing the disclosure and respecting the guest/client in this process. Ensure you complete a safeguarding record form recording all of the information accurately. Even if a situation does not require immediate action, your observations could add to an ongoing situation. If ever there is uncertainty, the emergency phone can be called by the Team Lead.

g. Guests as female perpetrators

It is not uncommon that female guests are perpetrators of other female guests. This is a method of survival and a response to the normalisation of abuse and trauma. This might be noticeable in relationship and power dynamics that we see between guests within a session. It is good to be aware of this, but not to adjust our treatment of guests who we suspect of perpetrating. A guest who seems to be a perpetrator is just as much a survivor who is being subject to sex trafficking. If there are concerns for a particular guest who is possibly being perpetrated by another guest, the Team Lead should flag this information in the summary email which is sent to Team Leads and frontline staff at the end of a session. This information will be acknowledged and noted by the frontline staff who will record this information and monitor it. Safeguarding will be pursued if necessary.

h. Whilst someone is disclosing, follow this guidance on a positive approach to take:

- Stay calm, try not to show shock or disbelief
- Remember that they have chosen you to talk to regarding intimate details of their lives. Feel honoured that you have such a positive relationship with this individual. Express gratitude that they have shared this with you
- Explain that if they talk about a child being at risk of harm you will have to report this information
- Take a 'non-advice' approach
- Listen sensitively and carefully, reflect back what they are saying to assure that you are hearing them and taking it seriously
- Encourage them that disclosing has been the right thing to do, and that what has happened to them is not their fault
- Empathise but do not jump to conclusions or put words in their mouth.

Do not:

- Interrupt them when they may be recalling significant events – if interrupted they may not want to repeat it again
- Indicate judgment towards the perpetrator
- Probe for detail or interrogate
- Promise to keep it a secret or try to solve the problem with them
- Make promises you cannot keep, i.e., 'this won't happen again'
- Contact the alleged abuser
- Be judgmental i.e., 'why didn't you run away'.

After the guest/client has come to a natural end, or it became necessary to end the conversation to keep the guest/client safe, seek advice and support from your Team Leader.

The Team Leader may do the following:

- Phone the emergency phone for further advice; the emergency phone is held by a member of the frontline staff and is available 24/7.
- Consider calling the police on 101, or 999, if it is an emergency, or the person is in immediate danger. If they are not in immediate danger, but are at risk and warrant an emergency call, the person must grant permission before you call the police on their behalf.

i. Completing Azalea's safeguarding adults at risk and children record form

If you have a safeguarding concern, a safeguarding record form must be completed as soon as possible:

- The record must be a clear, precise and factual account of the account given to you and/or your observations.
- In cases of visible signs of abuse (bruises/cuts) please draw a diagram indicating the position of any marks on the child or adult.

- If more than one person was present when the safeguarding concern arose, one person should fill the form in, and then ask the other team members who were present to add any additional information or details that they remember
- Use a pen or a biro, preferably with black ink (for photocopying) – do not use a computer as this cannot be recognised as your personal account
- If you make a mistake, put a line through it – do not use Tippex
- Write down exactly what the person said – for example, if a female guest said, 'he touched me down there', write this down. Don't make assumptions about what this might mean.
- Write down the setting and whether anyone else was present.
- Write it down as soon as possible after the disclosure – this will ensure as much information as possible is remembered and recorded.
- Sign, date and include the time on the record.

You are not being asked to investigate, verify or prove that information is true. You are being asked to log your concerns and report them to the appropriate person

j. Reporting abuse

All employees and volunteers have a duty to work within the policies of Azalea. Should a member of staff or a volunteer suspect a guest, client or a person known to Azalea is being abused the above guidance must be followed. In summary, alerting or raising a concern about abuse means:

- Recognising signs of adult/child abuse
- Responding to disclosures
- Recognising bad practice
- Reporting a concern, disclosure or allegation
- Collating and recording initial information

Alerting is a necessary first stage in the process of keeping people safe. Alerting through formal channels will enable a proper assessment and investigation to be subsequently carried out.

For Azalea staff and volunteers the Designated Safeguarding Officers to report concerns to are:

- Hollie Stone DESIGNATED SAFEGUARDING LEAD
- Jayne Sinclair DESIGNATED SAFEGUARDING OFFICER

The key principles to be adhered to in all circumstances are as follows:

- Any disclosures or allegations of abuse must be reported to the Designated Safeguarding Officers or to a member of the Senior Leadership Team.
- If the child or adult at risk is in immediate danger CALL the Police or ambulance services immediately on 999.

k. Allegations against a member of staff

- If any of our guests or clients makes a complaint of abuse against an Azalea employee, the person receiving the complaint **must report it immediately to a member of the SENIOR LEADERSHIP TEAM.**
- Any Azalea employee who has reason to suspect that a colleague may have abused a child or adult at risk must immediately report concerns to a member of the Senior Leadership team. A record must also be made of these concerns, noting any witnesses to the said incident/allegation. Please be familiar with Azalea's whistle blowing policy.

l. Employees and volunteer's self-protection

Because of concerns about abuse and in particular sexual abuse, it is important that all adults working with adults at risk, have guidelines for self-protection to avoid instances of false allegations about them. Sometimes, a person can be wrongly accused. Steps that can be taken to avoid or resolve issues:

- Ensure you are familiar with all risk assessments for each aspect of Azalea's work.
- In the event of any injury - accidental or otherwise, ensure that it is recorded and witnessed by another Azalea team member on the accidents/incidents/near-miss form.
- Keep written records of any false allegations/comments an adult makes against you and inform the Team Lead of your session/your line manager if you feel that a guest/client has taken a strong dislike to you. The Team Lead will then communicate this to frontline staff who will monitor developments of the same behaviour.
- If a guest/client touches an Azalea employee/volunteer inappropriately, record what happened immediately and ensure that the Team Lead of the session/your line manager is informed immediately. The Team Lead will then communicate this to frontline staff.
- Do not meet the person making the allegation against you on your own.
- Keep calm. Do not get involved in an argument that is likely to make the situation worse.
- Immediately inform your Team Leader/line manager. The quicker that action is taken to investigate the allegations, the sooner the situation will be resolved.
- Record the facts as you understand them.
- Ensure that no-one is placed in a position which could cause further compromise.
- Do not contact another agency involved with the guest/client or the person concerned.
- Await further contact from the Senior Leadership Team.

m. Allegations against a member of the Senior Leadership Team

When a disclosure is made against a member of the Senior Leadership Team, the person receiving the disclosure must report it to the Chair of Trustees and the

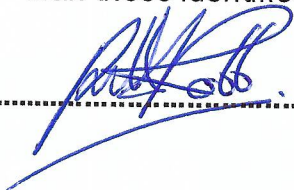
Safeguarding Trustee. In the absence of the Safeguarding Trustee, another trustee must be informed.

- *SAFEGUARDING TRUSTEE – Gerard Van Der Westhuyzen
- *CHAIR OF TRUSTEES – Martyn Shea

n. Confidentiality

- Whatever the nature of the issue, it must be kept confidential. Only speak to your Team Lead/line manager and the Senior Leadership Team about these matters.
- You must not discuss the disclosure with any individual or party other than those identified in the above procedure.

Signed



APPENDIX

Lines of Responsibility and Reporting within Safeguarding in Encompass

