

SAFEGUARDING ADULTS AT RISK POLICY

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1.0 INTRODUCTION

The aim of the Foundation of Light's Safeguarding Adults at Risk Policy is to promote good practice and to empower staff to ensure that we:

- Provide participants with appropriate safety and protection whilst in the care of Foundation of Light
- Provide relevant safeguarding guidance and training, with appropriate training providers, for staff, participants, and volunteers
- Enable staff/volunteers to make informed and confident responses to specific safeguarding issues
- Provide education and awareness-raising to participants and parents/carers to understand their role in safeguarding

2.0 PURPOSE

This policy covers all activities within the Foundation of Light and any external Foundation-managed activities. It applies to all staff, volunteers, participants, stakeholders, contractors, visitors, board members, and Trustees.

3.0 SCOPE

Any reference to 'Foundation of Light', 'FoL' or 'Foundation' includes both the Beacon of Light Ltd and Altruism Ltd.

4.0 POLICY DETAILS

Definitions and Useful Information:

Adult at Risk

A person aged 18 years or over who has care or support needs (whether or not those needs are being met by the local authority), is experiencing, or is at risk of, abuse or neglect, and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect (The Care Act 2014)

Staff or Employees

Any member of the workforce either paid or unpaid

DSO	Designated Safeguarding Officer
DDSO	Designated Deputy Safeguarding Officer
LADO / DO	Local Authority Designated Officer / Designated Officer
DBS	Disclosure and Barring Service
MASA	Multi Agency Safeguarding Arrangements (replaced the Local Safeguarding Children Boards or LSCBs)
LSAB	Local Safeguarding Adults Board
Capacity	The legal term that describes an individual's ability to make decisions at any one time. Capacity is not always fixed and can change over the course of a day in some circumstances. NB , it is not for a member of staff, volunteer or any other FoL stakeholder to make a decision about whether or not someone has capacity. It should be assumed that every adult has capacity unless proved otherwise.
MCA	Mental Capacity Act, which states that every individual has the right to make their own decisions and provides the framework for this to happen. It attempts to ensure that people over the age of 16 have the support they need to make as many decisions as possible. It also protects people who need family, friends or paid support staff to make decisions for them because they lack capacity to make specific decisions
Vital Interest	A term used in the Data Protection Act to permit sharing of information where it is critical to prevent serious harm or distress, or in life-threatening situations.

Roles and Responsibilities

The Foundation has a comprehensive safeguarding structure designed to ensure the safety and welfare of all participants who use services or take part in activities (see

appendix 1). This also demonstrates the channels of accountability within the Foundation of Light as well as the link between the Foundation and Sunderland AFC.

The Foundation Safeguarding Structure consists of: Trustee, Chief Executive Officer, Safeguarding Lead, Safeguarding Coordinator, Deputy Safeguarding Officers, and Staff/Volunteers.

Categories of Abuse

Abuse is any form of physical, emotional or sexual mistreatment, or lack of care that leads to injury or harm. Adult abuse is a generic term encompassing all ill-treatment of Adults at Risk, including cases where the standard of care does not adequately support the Adult's health or development. The Care Act (2014) recognises ten categories of abuse that may be experienced by adults:

1. Physical abuse:

This includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.

2. Sexual abuse:

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

3. Emotional/Psychological abuse:

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

4. Neglect and Acts of Omission:

This includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.

5. Self-Neglect

This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.

6. Modern Slavery

This encompasses slavery, human trafficking, forced labour and domestic servitude.

7. Domestic abuse

This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called 'honour-based' violence.

8. Discriminatory

Discrimination is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.

9. Organisational/Institutional

This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Organisational abuse can range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

10. Financial/Material

This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.

The FA also regards bullying and cyber-bullying as an additional form of abuse and incidents should be given equal importance when reporting concerns regarding an individual's welfare and safety. Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere, is usually repeated over a long period of time, and can hurt an adult both physically and emotionally.

Safeguarding issues can also manifest themselves via peer on peer abuse which is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults, and sexting.

The prevention of radicalisation and extremism will also be treated as a safeguarding concern, in accordance with Government guidance relating to 'Contest', the counter-terrorism strategy and its Prevent strand.

Foundation of Light Commitments

The Foundation of Light recognises its duty of care to safeguard and protect all participants involved in its activities.

The FoL will endeavour to ensure the safety and protection of all Adults at Risk involved in its activities through adherence to a range of policies, procedures and guidelines that should be read in conjunction with this policy. These documents are outlined in, 'Related Documents'.

The FoL acknowledges that all Adults at Risk have the right to protection and also recognises that some Adults at Risk may have additional vulnerabilities that must be considered and addressed, such as:

- Learning difficulties and disabilities
- Physical disabilities
- Mental health issues
- Identifying as LGBTQ
- Being from a BME background
- Lacking capacity

The FoL has a commitment to manage, monitor and investigate allegations of harassment, abuse, discrimination and bullying, and to work in partnership with other statutory agencies to this end, including MASA organisations, the FA and so on.

The FoL endeavours to provide opportunities for its participants whilst also undertaking to create a safe and welcoming culture for all. Where possible, the FoL actively listens to and seeks the views of its participants in order to ensure that opinions and wishes are accurately represented. This is particularly important when making decisions and when developing services.

The FoL is also committed to maintaining a culture of vigilance and transparency. This policy is available on the FoL website and will be made available to participants, stakeholders, and the wider public upon request should the need arise.

The FoL will adhere to safer recruitment procedures, including measures that ensure all staff will receive an appropriate level of criminal records check (DBS) and will be required to maintain the currency of their knowledge and skills, e.g. through training/CPD appropriate to their role.

The FoL is committed to empowering staff to act as role models for all participants.

Additional Considerations

Adults at Risk may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm.

Abuse can occur in a family or in an institutional or community setting. The perpetrator may or may not be known to the adult.

Abuse can happen to an adult regardless of their age, gender, race or ability.

Abusers can be adults (male or female) and young people and may be known to and trusted by the adult and family.

Special consideration will be given in the following circumstances:

- When making arrangements to work with external service providers

- When taking and storing photographs and/or digital images
- When inviting any visitors into venues
- When sharing information with relevant parties, including situations where FoL is legally obliged to do so

Information Sharing and Data Protection

The General Data Protection Regulations set out the parameters for sharing information appropriately and safely. The basic principles are that any personal information should be shared on the basis that it is necessary for the purpose for which it is being shared; it is shared only with those who need it; it is accurate and up to date; it is shared securely and in a timely fashion; and it is not kept for longer than necessary.

Informed consent should be obtained from the Adult at Risk prior to sharing any information with an outside agency. There is no requirement to obtain consent from an Adult at Risk for a member of staff to report the concern to the DSO.

If a person refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, their wishes should be respected whenever possible, except in Vital Interest circumstances.

If the only person that would suffer if the information is not shared is the subject of that information and they have capacity to make a decision about it, then sharing it may not be justified.

Duty of care can supercede the need for confidentiality if there is a risk to an Adult at Risk, so in some circumstances it is possible to report a safeguarding issue without the consent of the adult but this will be discussed on a case by case basis.

5.0 RELATED DOCUMENTS

FoL Policies, Procedures and Guidelines located in the Employee Handbook on SharePoint:

- Anti-Bullying Policy – Participants
- Challenging Behaviour Procedure
- Adult Safeguarding Report Form
- Complaints Policy and Procedure
- Dignity at Work Policy
- Discipline at Work Policy and Procedure
- Equality, Diversity and Inclusion Policy
- FA Photography Guidelines
- FA Sexting Guidance
- First Aid Policy
- Foundation Risk Assessment Guidance
- Grievance Policy and Procedure
- Health and Safety Handbook
- Lone Working Policy and Procedure documents
- Organising Activities with Participants Procedure
- Photography Procedure
- Prevent Policy and Procedure
- Recruitment Policy and Procedure
- Safeguarding Adults at Risk Procedure
- Safeguarding Children Policy and Procedure documents
- Social Networking Personal Internet Presence Policy
- Staff Behaviour Policy (Code of Conduct)
- Transporting People Guidance
- Trips Abroad with Young People
- Whistle-Blowing Policy and Procedure
- Young Persons Policy and Procedure

Legislation - the following legislation and guidance has been used to inform this policy:

- Achieving Best Evidence 2011
- Care Act 2014
- Criminal Justice Act 1988 (S. 160)
- Data Protection Act 2018
- FA RESPECT Campaign
- FA Safeguarding Rules and Regulations
- Human Rights Act 1998
- Mental Capacity Act 2005
- Premier League Guidance for Safer Working Practice
- Premier League Youth Development Rules
- Prevent Duty 2019
- Safeguarding Vulnerable Groups Act 2006
- Serious Crime Act 2015 (S.67)
- Sexual Offences Act 2003
- Sunderland Safeguarding Adults Board Procedures

Government Guidance - Broad government guidance on additional safeguarding issues listed below, can be accessed via the GOV.UK website:

- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Preventing radicalisation in:

Schools and Childcare

Work-based Learning

Relationship abuse

Sexting

Trafficking

6.0 RESPONSIBILITIES

This policy and its related procedures have been fully endorsed and ratified by the Chief Executive Officer and board of Trustees as well as the Local Safeguarding Adults Board. The Director of Finance and Support Services has responsibility for this policy. This policy is approved and amended via the following approval route: CEO/ESAC/Trustees.

7.0 EQUALITY, DIVERSITY AND INCLUSION STATEMENT

All individuals will be treated equally and fairly in the application of this policy. All reasonable requests to accommodate requirements in terms of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation will be made.

REVIEW

This policy is reviewed every year or in the light of any changes in organisation, legislation or guidance, implementation of a new service, or following any learning from incidents, concerns or allegations.

Appendix 1: Safeguarding Team Flow-Chart

