

Safeguarding Adults Policy

1. Introduction

- 1.1. All staff and volunteers in any role must be aware of this policy and how to raise a safeguarding concern if they become aware of signs of abuse.
- 1.2. The lead officer for safeguarding issues is George Williams, Quality Manager george@cabgwynedd.org.uk. If he is not available, issues should be raised with Tal Michael, Chief Executive tal@cabgwynedd.org.uk

2. The purpose of this policy

- 2.1. The aim of this policy is to prevent harm and respond effectively if anyone has concerns about the safety of an adult.

3. Our responsibilities

- 3.1. Someone who has concerns about an adult at risk of or experiencing abuse or neglect, or who is being abused, needs to feel that they can approach the service for help. If an adviser is told or suspects that abuse is taking place we have systems in place to act quickly.
- 3.2. The legislation governing safeguarding does not put a statutory duty on us to report concerns about an adult at risk except in specific circumstances relating to contracts or agreements. But no-one should ignore allegations or suspicions of current abuse or neglect. All staff or volunteers will take action under the safeguarding policy if they have concerns.
- 3.3. When clients visit us they should be safe, and should feel they can trust the service. All advisers are likely to advise clients who may be experiencing abuse or neglect or are at risk. Often the work involving these clients needs prolonged contact and case work. Having guidelines and procedures will ensure that advisers deal appropriately with situations in which adults may be experiencing abuse or be at risk.
- 3.4. Fundamental to these guidelines is involving the client in the decision about what should happen. If a client gives their consent to a referral we will contact the appropriate body - which will usually be the social services department of the local authority. However, it can be appropriate to report concerns without consent, regardless of the importance of client confidentiality in the advice-giving process. The decision to breach confidentiality without consent (other than where there is an immediate risk - see below) will be made by the safeguarding manager or chief officer in consultation with Citizens Advice. The local authority will consider the client's circumstances when deciding what should happen.

4. What is safeguarding?

- 4.1. Safeguarding is about protecting adults from abuse or neglect and educating those around them to recognise the signs and dangers. It includes preventing and stopping 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.

- 4.2. The Social Services and Well-being (Wales) Act puts duties on local authorities and other statutory services in relation to adult safeguarding which aim to protect adults from abuse and neglect and have regard to the individual's views, wishes and feelings.
- 4.3. Our policy recognises that the local authority and other statutory bodies in Wales have the following duties:
 - Stopping abuse or neglect wherever possible.
 - Preventing harm and reducing the risk of abuse or neglect to adults with care and support needs.
 - Safeguarding adults in a way that supports them in making choices and having control about how they want to live.
 - Promoting an approach that concentrates on improving life for the adults concerned.
 - Raising public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect.
 - Providing 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.
 - Addressing what caused the abuse or neglect.
- 4.4. We will take these duties into account in our work with clients.

5. Safeguarding principles

- 5.1. The following principles guide our safeguarding activity:
 - **Empowerment** - actions or decisions must be based on the presumption of person-led 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
 - **Partnerships** - local solutions through services working with their communities.
 - **Accountability** - accountability and transparency in delivering safeguarding.
- 5.2. These principles echo the overall approach to service delivery within Citizens Advice

6. Who is covered by this policy

- 6.1. Under the Social Services and Well-being (Wales) Act 2014 safeguarding duties apply to an adult who:
 - has care and support needs, and
 - is experiencing, or is at risk of, abuse or neglect; and
 - because of those care and support needs is unable to protect themselves from either abuse or neglect, or the risk of it.

6.2. We recognise that many policies and organisations refer to 'adults at risk' or 'vulnerable adults'. This policy adopts the broader definition introduced in recent legislation which is far-reaching and will cover many of our service users.

7. What are abuse and neglect?

- 7.1. This policy adopts the broader definition introduced in this legislation which is far-reaching and will cover many of our service users. However, we recognise that many policies and organisations refer to 'adults at risk' or 'vulnerable adults'. The broad definition of a vulnerable adult is: "A person who is 18 years of age or over, and who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself, or unable to protect himself against significant harm or serious exploitation."
- 7.2. Abuse and neglect take many forms. This is not an exhaustive list but a guide to the sort of behaviour which could give rise to a safeguarding concern relating to adults. It includes the issues covered by the Gender Violence and Abuse Routine Enquiry programme being rolled out across the service.
- 7.3. The circumstances of the individual case will always be considered when, for example, a local authority is deciding what to do when an issue is raised.
- 7.4. **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- 7.5. **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; and so-called 'honour' based violence. FGM (female genital mutilation) of an adult fits into this category.
- 7.6. **Sexual abuse** – including 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.
- 7.7. **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- 7.8. **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- 7.9. **Modern slavery**– encompassing slavery, human trafficking, forced labour and domestic servitude.
- 7.10. **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- 7.11. **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment.

7.12. **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

7.13. **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

What to do if you suspect that an adult is being abused or neglected or is at risk

8. Immediate risk

8.1. If there is an immediate and urgent risk to someone's safety and they are unable or do not wish to give their consent for the appropriate authority to be contacted, you should decide the best course of action, taking account of the risks and the client confidentiality policy. You should initially discuss with your supervisor but it may also be appropriate to discuss with George Williams or Tal Michael, particularly if a breach of confidentiality is under consideration.

8.2. An immediate risk has three elements:

- There is danger to the health, safety or wellbeing of any person (including members of the public)
- The danger is about to happen, or will definitely happen within a short period of time
- Urgent medical or police intervention is needed.

8.3. You have to use your judgement when assessing the risk and base your judgement on clear evidence rather than suspicions or conjecture. You should take into account:

- the credibility of the information available
- any behavioural or medical history you know about the time reasonably needed to address the threat or risk
- any other relevant factors.

8.4. Each case will be different and the factors will vary. For example, a client may start slurring their speech, begin to lose consciousness after claiming to have taken an overdose. Or a client may make threats of immediate physical violence towards someone and have the means to carry out the threat.

8.5. Where you judge there is an immediate danger it is most likely that you will need to phone the emergency services on 999. Once the situation has been resolved, ensure a full record is made and that the case is reported to Citizens Advice.

9. If you are told about abuse

9.1. If told about abuse or neglect of an adult and the person does not agree to your informing the appropriate authorities you must follow the procedure below:

- Check there is no immediate danger to an individual: the priority is their safety. This may include reporting the disclosure without their consent, thus breaching client confidentiality.

- If you are told something, record the facts, preferably in the language / words used by the person making the disclosure. Make a note of the time and date.
- Ask the person involved what they want to happen and discuss the options. If they do not want you to disclose the issue, they must be made aware that, whilst the manager will not automatically report the disclosure to the authorities, this may happen
- Record only the facts.
- Do not ask any questions which may seem to be 'leading'.
- Do not carry out any form of 'investigation' or start a process of 'fact finding'.
- In the majority of cases offer to support the person making the disclosure and make them aware of the options available i.e. contacting the local social services or police. In some cases you may offer to help them make initial contact with these agencies.
- The safeguarding manager or chief officer should contact the Bureaux Direct helpdesk before breaching confidentiality, to discuss the best option for the client.

10. If you suspect abuse

10.1. It is more common that a member of staff or a volunteer meets a client and suspects that they may be being abused or are at risk, without the person disclosing this. In these situations:

- Ensure all the information the adviser would usually collect when dealing with an advice issue is collected and recorded. This information may help a client identify whether they are being abused.
- Be clear why you think the client may be at risk of or experiencing abuse or neglect.
- Be clear who the client is if they are accompanied by a third party.
- Consider making contact with the client alone and asking them if there is anything else the local Citizens Advice could do for them, or check they understood the advice provided.
- Find out whether the client is supported by other agencies e.g. a social worker.
- Ensure that advisers discuss their concerns with a manager or equivalent.
- Contact the Bureaux Direct helpdesk to discuss the best option for the client. This discussion may include contacting the person at your local authority who is responsible for safeguarding adults for a 'what if' conversation before making a final decision to report suspicions.

11. Where to report allegations

11.1. If the individual is in direct danger, call the police immediately - 999. If not, telephone Social Services as soon as possible to share your concern.

- Protection of Vulnerable Adults Co-ordinator: Nerys Evans 01286 679956.
- 01286 882 888. 9am -5pm. Emergency out of hours phone: 01248 353551 (any other times and on Bank Holidays)
- These numbers are not to be given outside Citizens Advice. The public number for Social Services is 01766 772577

12. What information will I need to share?

- What is the nature of your concern and what led to it?
- What is the victim's name, date of birth, address and family details? (if known)
- Who has caused you this concern, and are there any other witnesses?

13. What happens next?

- Your call will be logged and information about the individual will be checked to see whether they are familiar to Social Services.
- Information will be collected from other agencies that might have links to the individual.
- On the basis of this information, a decision will be made whether or not to investigate your concern.
- This could lead to rigorous steps taken to safeguard the individual from suffering further harm.

14. Screening of staff

- 14.1. Citizens Advice policy is that all staff and volunteers who work in roles which are legally entitled to get a DBS check are subject to screening. It is not legally permissible to have enhanced checks on other staff and volunteers in the local Citizens Advice. However, chief officers may choose to ask some staff or volunteers to undergo a basic check.
- 14.2. If a DBS check reveals a conviction for a sexual offence against a child or vulnerable adult, whenever it was committed, that individual is not suitable for that role and must not be taken on. Any other convictions must be considered on an individual basis.

15. Supervision and training

- 15.1. Thorough induction training will be provided to ensure that staff and volunteers are aware of good safeguarding practice alongside the service's core values and confidentiality.
- 15.2. Staff and volunteers will be given regular supervision and have their training needs assessed.
- 15.3. Regular case checking will take place and any unusual or excessive contact with a vulnerable adult will be investigated.
- 15.4. Appropriate safeguarding training is available to all staff and volunteers. This may be in the form of:
- policy awareness sessions delivered internally
 - briefing sessions by local authority or other relevant authority
 - attendance at training arranged through partner agencies
 - additional training.

16. Safeguarding behaviour

16.1. All staff and volunteers will take measures to ensure that all clients are protected from any form of harm or abuse and to minimise the risk of advisers having allegations made against them.

- If the client has access to third-party support, e.g. a social worker or advocate, it is advisable for that person to attend appointments at the local office, if possible.
- An adviser must never undertake a home visit for an adult at risk of, or who is experiencing, abuse or neglect unless it is official and pre-arranged.
- Home-visiting appointments must be registered at the local office, and a member of the management team must know when and where the visit is taking place, its purpose and when the adviser is due back at the office. The office should also have a contact number for the adviser.
- If an adviser has any concerns about visiting an adult at risk of or experiencing abuse or neglect on their own, make arrangements for another staff member to go with them.
- An adviser must never transport an adult at risk in their own car, alone, unless prior arrangements have been made and approved by the safeguarding manager or in case of a medical emergency.
- An adviser must never make any comments with sexual overtones, even in humour, or partake in any 'horse play' with an adult at risk.
- An adult at risk of or experiencing abuse or neglect must never be allowed into a staff member's home.
- Advisers should not lend money to or borrow money or possessions from an adult at risk of or experiencing abuse or neglect. They should not agree to make any purchases, or undertake any financial transactions, on behalf of the client.
- We have sound recruitment practices which aim to prevent anyone considered to be a risk to adults at risk of or experiencing abuse or neglect from working within the service.
- An adviser must not engage in rough physical games - apart from structured sports activities which may be part of a community event etc.
- An adviser must not engage in sexually provocative games.
- An adviser must not allow or engage in inappropriate touching of any form.
- An adviser must not allow an adult at risk of or experiencing abuse or neglect to use inappropriate language unchallenged.
- An adviser must not make sexually suggestive comments about or to an adult at risk of or experiencing abuse or neglect, even in fun.
- An adviser must not let allegations that an adult at risk of or experiencing abuse or neglect makes go unchallenged or unrecorded.
- An adviser must not do things of a personal nature for an adult at risk of or experiencing abuse or neglect that they can do themselves.

17. Capacity and self determination

- 17.1. If a report of abuse or suspected abuse is to be made (sometimes known as a safeguarding referral), where possible the client needs to feel in control of the decision. This principle applies whether or not the client has capacity to make the decision.
- 17.2. Legally, the starting assumption is that an individual has the capacity to make a decision, unless it can be established that they lack that capacity. Where a client is able to make an informed choice in relation to a particular decision, they have a right to self-determination.
- 17.3. In practice, one way in which it may come to light that a client doesn't have capacity to make informed choices about their own situation is if a client attends their appointment with someone who takes care of them in one or more areas of their affairs. If there is reason to suspect that the client is being abused, neglected or exploited by the person they attended with, it will be difficult to have a conversation with the client alone.
- 17.4. If it is not clear whether or not an individual has the capacity to make an informed choice about reporting a safeguarding concern, you should contact the Bureaux Direct helpdesk to discuss the best option for the client.
- 17.5. Factors which will be relevant in determining whether a safeguarding concern should be reported about a person who lacks capacity to make the decision themselves are if the person can't:
 - understand information about the decision to be made on whether or not to report a concern because of a safeguarding reason, or
 - retain that information in their mind, or
 - use or weigh up that information as part of the decision-making process, or
 - communicate their decision (by talking, using sign language or other means).
- 17.6. Bureaux Direct will discuss these factors with you. If it's agreed that it is appropriate to make a safeguarding referral, the client confidentiality policy will be followed.

18. Local statutory agencies

- 18.1. The Social Services and Well-being (Wales) Act 2014 sets up a National Independent Safeguarding Board which will set up area based Safeguarding Boards. These will include representatives from local authorities and other statutory bodies and partner agencies. The role of this Board in leading statutory adult safeguarding arrangements is to prevent abuse and neglect through oversight and co-ordination.
- 18.2. Safeguarding Boards may carry out reviews or investigations and may require us to supply information. We will do so if the following conditions are met:
 - The information must be requested for the purpose of enabling the Board to perform its functions.
 - The person or body requested to supply the information must have functions or engage in activities such that the Board considers it likely to have information relevant to a function of the Board. This would potentially encompass Citizens Advice.
 - In general, there is no bar to the local Citizens Advice taking part in a safeguarding adults' review, a criminal investigation or a Serious Case Review if required to. This is

in the context of our policy on client confidentiality, and safeguards, if required, will be discussed.

19. Sources of advice and help

19.1. If someone is in direct danger, call the police immediately - 999. If not, telephone Social Services as soon as possible to share your concern.

- Protection of Vulnerable Adults Co-ordinator: Nerys Evans 01286 679956.
- 01286 882 888. 9am - 5pm. Emergency out of hours phone: 01248 353551 (any other times and on Bank Holidays)
- These numbers are not to be given outside Citizens Advice. The public number for Social Services is 01766 772577

19.2. Housing Cartrefi Cymunedol Gwynedd Tel: 0300 123 8084

19.3. North Wales Housing 01492 572727 or 01248 388903

19.4. **Live Fear Free Wales Helpline.** If you or someone you know are abusive or violent towards their partner or family member you can get confidential help and support by calling 0808 802 4040 or email info@respectphonenumber.org.uk (Calls are free from landlines and most mobile phones. Lines are open Monday-Friday 9am-5pm).

19.5. The man helpline for people needing immediate help and support is 0808 8010 800 (lines are open 24 hours a day, 7 days a week), email info@livefearfreehelpline.wales or go to livefearfree.gov.wales

19.6. The non-emergency police number is 101.

20. Review of policy

20.1. The bureau's adult protection policies and procedures will be reviewed annually. Necessary changes that are identified as a result of amendment to legislation, will be made as required.

This policy was adopted by the Trustee Board on 26 July 2016