



# **Career Seekers Direct Limited Safeguarding Adults Policy**

**Version 1.1**

**Date Approved: November 2023**

**Date of next Review: November 2024**

## Policy Control Sheet

<b>Version number</b>	1.1
<b>Written / Revised by</b>	Eva Harrison Career Seekers Direct Limited CEO The policy is based on national guidance, The Care Act 2014 and Warwickshire Safeguarding Partnership Multi Agency Policy for Protecting Adults at Risk
<b>Reviewed by</b>	Yvonne Matthews
<b>Date approved</b>	29 <sup>th</sup> November 2023
<b>Approved by</b>	Yvonne Matthews
<b>Date of next review</b>	29 November 2024
<b>Policy location</b>	CSD Teams Folder CSD Resources: Physical/Policies/Safeguarding
<b>Target group</b>	<b>All employees, contractors and volunteers</b> - should know their responsibilities in terms of safeguarding vulnerable adults who connect with Career Seekers Direct

## 1. Purpose and aims

This policy has been written to ensure Career Seekers Direct (“CSD”) has put in place everything within its powers to protect and safeguard adults.

CSD believes in protecting an adult’s right to live in safety, free from abuse and neglect. This policy sets out the roles and responsibilities of CSD in working together in promoting the adult’s welfare and safeguarding them from abuse and neglect. All employees, contractors and volunteers should be made aware of how this policy can be accessed.

This policy and related procedures are applicable to the Chief Executive Officer, all employees, contractors and volunteers of CSD hereafter referred to collectively as Employees. Failure to comply with the policy and related procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

The policy will give clear direction to staff, volunteers, contractors and visitors about expected behaviours and the legal responsibility to safeguard and promote the welfare of all adults supported by CSD.

### Care Act 2014 Definition of an Adult at Risk of Abuse:

Where a local authority has reasonable cause to suspect that an adult in its area (whether ordinarily resident there)

- (a) has needs for care and support (whether the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) because of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

## 2. Safeguarding as Part of the Deal:

In the safeguarding of adults, CSD is committed to the following six key principles set out in The Care Act 2014 and Making Safeguarding Personal. CSD aims to demonstrate and promote these six principles in our work:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent
- **Prevention** – It is better to act 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.

## 3. Roles and Responsibilities

3.1 It is the responsibility of every member of staff, volunteer and regular visitor in CSD to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all adults. This includes the responsibility to provide a safe environment in which adults can learn.

3.2 CSD CEO and Chair of Governance are accountable for ensuring the effectiveness of this policy and compliance with it. Although CSD takes collective responsibility to safeguard and promote the welfare of all, there is also a Designated Safeguarding Lead (DSL) who has day-to-day responsibility for safeguarding within CSD.

3.3 The CSD CEO will ensure that:

- the Safeguarding Policy is in place and is reviewed annually, is available publicly via the CSD website and has been written in line with Local Authority guidance and the requirements of the local safeguarding partners' policies and procedures;
- CSD contributes to inter-agency working
- a senior member from CSD is designated to take the lead responsibility for safeguarding and there is also a Deputy DSL in place who is appropriately trained to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role;
- all staff receive induction in CSD safeguarding on appointment and are provided with a copy of this policy and the staff code of conduct;
- all staff undertake appropriate safeguarding training that is updated regularly, at least annually;
- appropriate procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
- safer recruitment practices are followed in accordance with CSD's Safer Recruitment Policy
- they remedy without delay any weakness in regard to safeguarding arrangements that are brought to their attention.

3.4 CSD CEO and the Chair of Governance will receive an annual safeguarding report from the DSL/Deputy DSL; this will record the training that has taken place and any outstanding training requirements for the company. It will also record a summary of all safeguarding activity and will inform CSD how it is meeting its statutory requirements.

CSD's CEO and Chair of Governance will also undertake a range of 'safeguarding visits' over the year to monitor compliance within the safeguarding agenda.

3.5 CSD CEO will receive termly updates from the DSL and provide and share the main headlines from these with the Chair of Governance at their meetings accordingly

3.6 The CEO is responsible for:

- identifying a senior member of staff from the leadership team to be the Designated Safeguarding Lead (DSL);
- identifying a member of staff to be the Designated Deputy Safeguarding Lead (DDSL);
- identifying alternative members of staff to act as the Designated Safeguarding Lead (DSL) and/or the Designated Deputy Safeguarding Lead (DDSL) in their absence to ensure there is always cover for these roles;

- ensuring that the policies and procedures are noted by CSD, particularly concerning referrals of cases of suspected abuse and neglect, and are followed by all staff;
- ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff.

3.7 The Designated Safeguarding Lead (DSL) is a senior representative of CSD from who takes lead responsibility for safeguarding within CSD.

3.8 The DSL will provide advice and support to other staff on adult welfare and adult protection matters. Any concern for an adult's safety or welfare will be recorded in a timely fashion using internal concern forms. If this resource is not readily available at the time, then a paper record should be made and handed to the DSL and then scanned into as soon as is practical.

3.9 The DSL and/or the DSL will always be available (during CSD hours) for staff in CSD to discuss any safeguarding concerns. If, in exceptional circumstances, both of them are not available on site in person, they will be available via telephone or other means of communication.

3.10 The CSD DSL will attend adult protection conferences and core group meetings. Through appropriate training, knowledge and experience they, or other appropriately designated member of staff, will liaise with Adult Services and other agencies where necessary, and make referrals of suspected abuse to them, take part in strategy discussions and other interagency meetings and contribute to the assessment of adults.

3.11 The DSL will oversee written records and adult protection files ensuring that they are kept confidential and stored securely.

3.12 The DSL is responsible for ensuring that all staff members and volunteers are aware of the policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received relevant training.

#### **4. Recognising the signs of abuse:**

The CEO and DSL will ensure all employees are well-placed to identify abuse the adult may say or do things that let you know something is wrong. It may come in the form of a disclosure, complaint, or an expression of concern. Everyone within the organisation should understand what to do, and where to go to get help, support and advice.

##### **4.1 Types of Abuse:**

The Care Act 2014 defines the following ten areas of abuse. CSD includes self-neglect as an additional category. These are not exhaustive but are a guide to behaviour that may lead to

a safeguarding enquiry. This includes:

- **Physical abuse** - Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic Violence/ Domestic Abuse** - Including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.
- **Exploitation**- Including sexual and/or criminal exploitation
- **Sexual abuse** - Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography. Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **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.
- **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.
- **Modern slavery** - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory abuse** - Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.
- **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 long-term ill treatment. It can be through neglect or poor professional practice because of the structure, policies, processes or practices within an organisation.
- **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.
- **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.

## 4.2 Radicalisation to Terrorism:

The Government through its PREVENT programme has highlighted how some adults may be vulnerable to exploitation and radicalisation and involvement in terrorism. Signs and indicators of radicalisation may include:

- Being in contact with extremist recruiters.
- Articulating support for violent extremist causes or leaders.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing violent extremist literature.
- Using extremist narratives to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

## 4.3 Mental Capacity:

The Mental Capacity Act defines someone is lacking capacity, because of an illness or disability such as a mental health problem, dementia or a learning disability, who cannot do one or more of the following four things:

- Understand information given to them about a particular decision
- Retain that information long enough to be able to make the decision
- Weigh up the information available to make the decision
- Communicate their decision. Refer to the Mental Capacity Act Code of Practice, <https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>. CSD will need to involve an advocate if the person lacks capacity to make decisions about a safeguarding concern.

Support and guidance will be sought from the relevant Local Authorities Adult Social Care Department if anyone has concerns regarding an adult's capacity.

## 5. Procedure for Managing & Reporting Concerns:

Any employee who becomes aware that an adult is or is at risk of, being abused must raise the matter immediately with their supervisor/or with the organisation's designated safeguarding lead or deputy. Appendix A provides guidance on Referral Pathways for Safeguarding Alter. **If the adult requires immediate protection from harm, contact the police and Adult Social Care.**

Early sharing of information is the key to providing an effective response where there are emerging concerns. To ensure effective safeguarding arrangements no one should assume that someone else will do it.

## 6.0 Safe Recruitment & Selection:

CSD is committed to safe employment and safe recruitment practices, that reduce the risk of harm to adults with care and support needs from people unsuitable to work with them.

CSD has policies and procedures that cover the recruitment of all employees. These are CSD's Safer Recruitment Policy and CSD's Code of Conduct.

### **7.0 Is there a Person in a Position of Trust Involved?**

In any instance of safeguarding, consideration must be given as to whether an allegation has been made against a person in a position of trust (PiPoT) and who may be a risk to others. This can be anyone from a formal employee or volunteer. CSD have a process in place for relevant information sharing and for reporting individuals.

### **8. Training and Awareness:**

CSD will ensure an appropriate level of safeguarding training is available to its Employees and any relevant persons linked to the organisation who requires it (e.g., contractors).

For all employees who are working or volunteering with adults at risk this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in Safeguarding Adults.
- Recognise an adult potential in need of safeguarding and act.
- Understand how to report a safeguarding alert.
- Understand dignity and respect when working with individuals.
- Have knowledge of the Safeguarding Adults Policy.

### **10. Confidentiality and Information Sharing:**

CSD expects all employees to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and CSD's Data Protection Policy.

However, information should be shared with the relevant Local Authority if an adult is deemed to be at risk of harm or **contact the police if they are in immediate danger, or a crime has been committed**. For further guidance on information sharing and safeguarding see CSD's Data Protection Policy.

### **11. Recording and Record Keeping:**

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made. All concerns should be passed to the DSL without delay.

All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR) and CSD's Data Protection Policy.

### **12. Managing allegations against staff and volunteers**

12.1 CSD aims to provide a safe and supportive environment which secures the wellbeing and the very best outcomes for adults; it recognises that sometimes the behaviour of CSD employees may lead to allegations of abuse being made.

12.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. CSD recognises that many



allegations are genuine and there are some adults who deliberately seek to harm or abuse vulnerable adults.

12.3 CSD will take all possible steps to safeguard adults and to ensure that adults in CSD are safe to work with adults; it will always ensure that the procedures outlined in the local procedures are adhered to.

### **13. Relevant Policies**

To underpin the values and ethos of CSD and to ensure that adults supported by CSD are appropriately safeguarded, the following policies are also included under the safeguarding umbrella:

- Staff Code of Conduct
- Anti-bullying Policy
- Positive Handling and Restraint Policy
- Safer Recruitment Policy
- Online Safety Policy
- Whistle Blowing Policy
- Data Protection Policy

### **Important Contacts:**

#### **Designated CSD Senior Lead for Safeguarding**

Name: Eva Harrison

Email address: [eva@careerseekersdirect.co.uk](mailto:eva@careerseekersdirect.co.uk)

Telephone number: 07901 517012

#### **Deputy CSD Senior Lead for Safeguarding**

Name: Yvonne Matthews

Email address: [yvonne@careerseekersdirect.co.uk](mailto:yvonne@careerseekersdirect.co.uk)

Telephone number: 07496 875238

#### **Police**

Emergency – 999

Non-emergency – 101

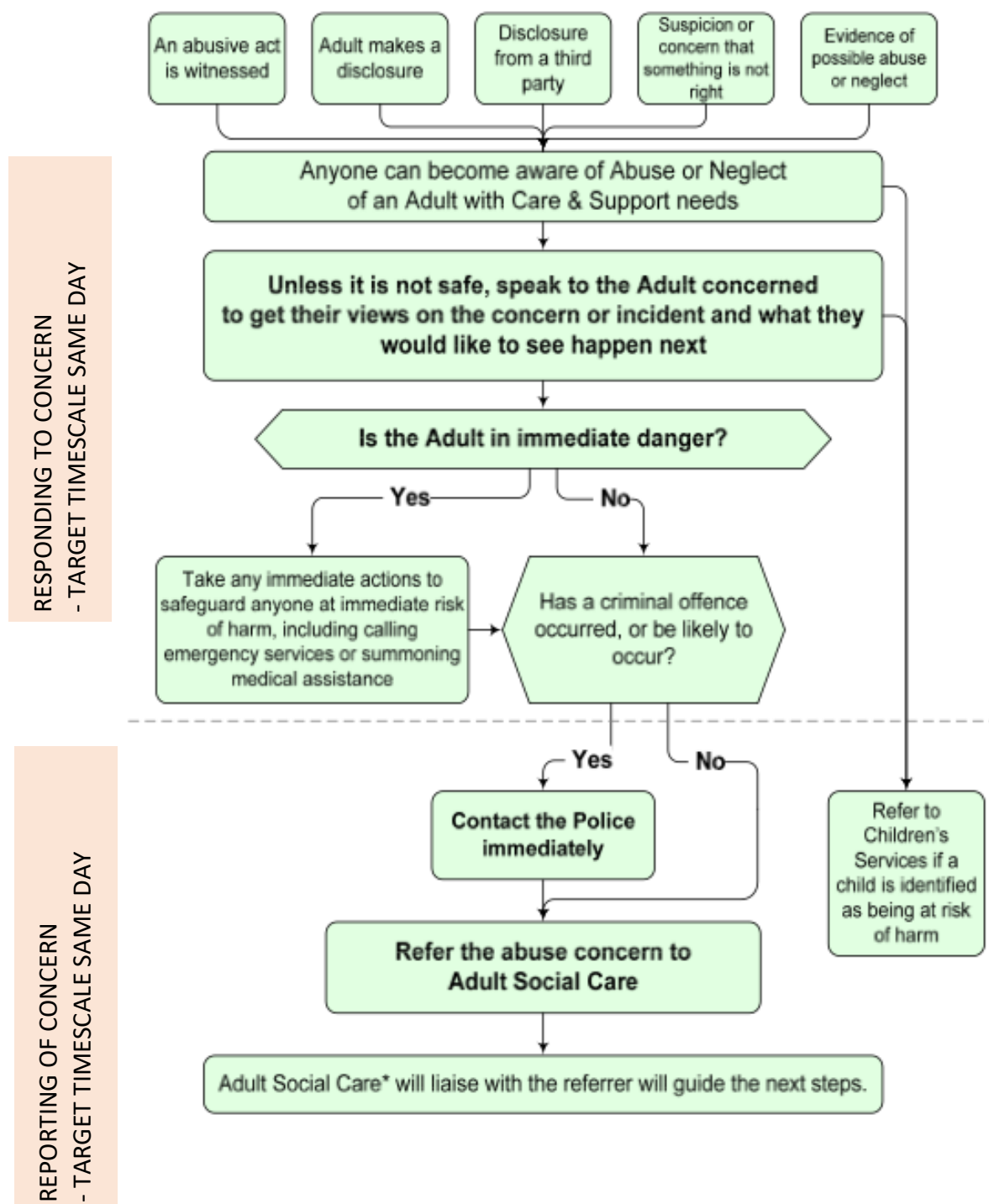
Telephone: 0808 2000 247

<https://www.nationaldahelpline.org.uk/>

CSD deliver their services across the West Midlands and before delivery, ensure they are familiar with local practices, contacts and procedures.

## Appendix A – Referrals Flowchart

This flowchart gives an overview summary of referral pathways. Please note it does not include other responsibilities which need to be considered through this process, such as preserving evidence and providing appropriate support to victims.



\*For certain groups of adults with mental health needs, the Coventry & Warwickshire NHS Partnership Trust Integrated Mental Health Services will lead the response to Adult Safeguarding Concerns.