



Safeguarding Adults at Risk of Harm Policy

Purpose

This policy sets out how Shepherd's Star safeguards adults at risk of abuse or neglect (and applies equally to any vulnerable adult).

We have a duty of care and are committed to the protection and safety of adults at risk in all of our activities, including visitors, participants and contractors. We want to equally protect and support our staff and volunteers who work or come into contact with these groups.

This policy is to be read alongside our other policies and procedures including for Health & Safety, Anti-Harassment and Bullying, Whistleblowing, Data Protection and Equality, Diversity & Inclusion as well as our Trustees' and staff/volunteers Codes of Conduct.

As a charity our trustees have a legal responsibility to minimise the risk of harm and demonstrate through appropriate policies, and practical application of the procedures, their obligations to keep people safe whilst involved in Shepherd's Star activities. This duty of care extends to our beneficiaries, staff and volunteers, and is delivered operationally by our staff and volunteers. We will act in accordance with the legal framework provided by the Care Act 2014, the Mental Capacity Act 2005 and the Domestic Abuse Act 2021, alongside the Richmond and Wandsworth Safeguarding Adult Board local safeguarding procedures <https://sabrighmondandwandsworth.org.uk/policies-procedures-and-resources/>

About Shepherd's Star

Shepherd's Star aims to make a difference by creating opportunities to purposefully bring people together, improving the quality of life of those in need and contributing towards a healthier community. Building relationships based on shared values and respect, openness and honesty, Shepherd's Star collaborates with volunteers and partners to support social inclusion, inspiring hope and empowering individuals.

We do this through a range of activities for adults, some of whom will be adults at risk. The contexts in which we work directly with adults at risk include:

- Explore project, run in a hired venue, and set in a classroom style learning environment with visits to external organisations. Some workshops are run outdoors.
- Shine project, Barista and hospitality training run in a hired venue with workshops being delivered indoors.
- Table of Hope project, monthly communal meals provided by local businesses and community organisations e.g. churches and halls.
- Steps project, socially engaging educational activities arranged for those who would like to visit, with a small co-ordinated group, places, and activities of interest.
- Special Events, delivered at specific times of the year for a particular purpose eg. Christmas celebration fundraising event.



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Definitions

Definitions of a vulnerable adult

A vulnerable adult as described by the Care Standards Act 2000 is a person aged 18 or over who has a condition of the following type:

- A learning or physical disability.
- A physical or mental illness, chronic or otherwise including addiction to alcohol or drugs.
- A reduction in physical or mental capacity.

Adult at risk of abuse or neglect

For the purposes of this policy, adult at risk refers to someone over 18 years old who, according to paragraph 42.1 of the Care Act 2014:

- has care and support needs
- is experiencing, or is at risk of, abuse or neglect
- as a result of their care and support needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

If someone has care and support needs but is not currently receiving care or support from a health or care service, they may still be an adult at risk.

Scope

This policy applies to all staff, volunteers, trustees, contractors, service users and visitors.

Safeguarding is everyone's responsibility. All staff, volunteers and trustees will be subject to a safe recruitment process including background checks, and where required a DBS check. Any contractors or external partners we work with will be required to understand their responsibilities when involved in our activities and be familiar with our reporting procedures.

Shepherd's Star aims to foster a culture of openness and honesty. All staff, volunteers, trustees, and contractors are required to report any suspected abuse including any inappropriate behaviours they have witnessed, regardless of who is involved, and be aware of the appropriate reporting and support procedure for safeguarding. It is important that they are also aware of the Government's PREVENT strategy. The aim of this is to stop people becoming terrorists or supporting violent extremism in all its forms. This can also be a safeguarding issue but has different reporting mechanisms.

Our Safeguarding Leads will discharge their safeguarding functions in a way that ensures that adults at risk are safeguarded from harm and promotes their welfare. They are responsible for following up any suspected reports of abuse and for informing the Police or other appropriate external bodies.

Policy and commitments

Shepherd's Star has a zero-tolerance approach to abuse. We recognise that under the Care Act 2014 the charity has a duty for the care and protection of adults who are at risk of abuse. We are committed to promoting wellbeing, harm prevention and to responding effectively if concerns are raised. Adults will be included in swift and personalised safeguarding responses.



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We are also committed to inter agency collaboration on the development and implementation of procedures for the protection of adults at risk from abuse and have a duty and responsibility for making arrangements to ensure all our functions are discharged having regard to safeguarding and promoting the welfare of adults at risk of abuse.

The policy is about stopping abuse where it is happening and preventing abuse where there is a risk that it may occur.

There can be no excuses for not taking all reasonable action to protect adults at risk from abuse, exploitation, radicalisation, and mistreatment. All citizens of the United Kingdom have their rights enshrined within the Human Rights Act 1998. People who are eligible to receive health and community care services may be additionally vulnerable to the violation of these rights by reason of disability, impairment, age, or illness.

We follow the following key principles of safeguarding adults at risk:

- **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

Therefore, we are committed to the following:

- The welfare of the adult at risk is paramount.
- All adults at risk have the right to protection from abuse.
- Safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part.
- When planning activities and events we will always assess any risks to the safety and welfare of adults at risk and we will designate a person who will be in attendance as a safeguarding lead for that activity or event.
- All suspicions and allegations of abuse no matter who is involved must be properly reported to the relevant internal and external authorities and dealt with swiftly and appropriately.
- Processes for sharing information procedures with other professionals and with the Richmond and Wandsworth Safeguarding Adults Board.

Responsibilities

The ultimate legal responsibility for safeguarding in Shepherd's Star rests with our Trustees who delegate day to day operational responsibilities for safeguarding to staff and volunteers, overseen by a lead Trustee for safeguarding.



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Staff, Trustees, contractors, and volunteers must be clear on appropriate behaviour and responses. Where appropriate, failure to maintain standards may be dealt with under our Disciplinary Procedures.

All staff, volunteers and contractors are expected to have read and understood this policy, be aware of the signs indicators of abuse (see Appendix A) and know how to respond to a concern or disclosure.

We ensure that all staff, Trustees, volunteers and contractors are made aware of this policy through appropriate training, supervision and support and by creating an environment where they feel able to raise concerns and feel supported in meeting their safeguarding role. This includes:

- a lead Trustee to take leadership responsibility for safeguarding;
- a designated safeguarding lead (DSL);
- a mandatory induction, which includes familiarisation with safeguarding;
- ongoing supervision and regular reviews of practice to ensure clear lines of accountability, then any inappropriate behaviours are quickly identified and acted upon and that everyone improves over time in their work with adults at risk; and
- safe recruitment practices are in place, including policies on when to obtain a DBS check.

Our lead Trustee for safeguarding and DSL are expected to complete the Richmond and Wandsworth Safeguarding Adult Board Vulnerable Adults Safeguarding awareness training and renew the learning every three years. We encourage all other volunteers, staff and contractors to complete the training and we can provide the link for it to be completed online.

Reporting a concern or disclosure

The well-being of those at risk of harm will be put first and the adult will be actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to.

All staff, volunteers and contractors have the following responsibilities in helping to identify welfare concerns and indicators of possible abuse or neglect:

- **Recognise** abuse through training and implementation of this policy. If anyone discloses possible abuse, neglect or harm the person they tell should listen attentively to what is being disclosed, conduct a calm conversation, reassure that they have done the right thing and inform them that you must pass their information on but only those who need to know. You should not put the person under pressure or put words in their mouth.

This includes a disclosure about the behaviour or conduct of any member of staff, contractor or volunteer or where a member of staff, contractor or volunteer witnesses behaviours that give them cause for concern about the safety of anyone, whether they are an employee, contractor, volunteer or beneficiary.



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- **Report** when they observe or have concerns about an adult at risk to:
 - the DSL – Desiree Shepherd, 0780383 2339 or desiree@shepherdsstar.org, or in their absence or if the DSL is involved in the issue causing concern,
 - the lead Trustee for Safeguarding, Judith King judy@shepherdsstar.org; or to
 - social services, at https://richmond.gov.uk/services/adult_social_care/safeguarding_adults/report_adult_abuse or by email to adultsocialservices@richmond.gov.uk or by calling 0208 891 7971

ALWAYS PHONE 999 IF AN ADULT AT RISK IS IN IMMEDIATE DANGER

- **Record** in writing basic information including
 - name and contact of the adult risk;
 - details of the allegation or the grounds for suspecting abuse;
 - the date and time of the incident;
 - the people involved and details of any observed injuries/their appearance and behaviour and what they have said.

Do not delay reporting the incident because the record has not been made– report as soon as is practically possible, and then forward the record to the DSL or the lead Trustee for Safeguarding who will make any required referral.

Shepherd's Star will always cooperate with the Police and the relevant Local Authorities in taking action to safeguard an adult at risk.

This policy, the contact details for our DSL and lead Trustee for Safeguarding will be clearly available on the charity's website.

Shepherd's Star Whistleblowing Policy commits to an open, honest, and supportive culture in its dealings between trustees, employees, and volunteers. Those involved in our services are encouraged to voice their concern about the behaviour of another member of staff or volunteer towards a beneficiary.

The Whistleblowing Policy is clear on procedures enabling issues about safeguarding and promoting welfare to be addressed. The aim is to help any person raising a serious concern they may have about a colleague or their employer with confidence and without having to worry about being victimised, discriminated against, or disadvantaged in any way as a result.

Recruitment

Shepherd's Star recognises that it is our responsibility to recruit safely, to achieve this we will

- Never allow anyone to work for us if they have been barred from working with adults at risk and we will refer to the police if anyone seeks to get involved with us who is on the barred list.



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Our activities can be delivered by staff, volunteers and/or contractors who may, from time to time work unsupervised with adults at risk or undertake other regulated activities.

- Require evidence of a current valid DBS check (or we will obtain one before they can work unsupervised with adults at risk or undertake any other regulated activity).
- Where appropriate, take up references and make other relevant enquiries on the behaviour and suitability of the candidate for the role they are seeking to involve themselves.
- Require all prospective staff and volunteers to self-report any past convictions, cautions reprimands and final warnings as well as pending cases. On spent convictions a decision to recruit will be made on a case-by-case basis. Final decision making process to recruit a volunteer with a spent conviction should be kept on record.
- For overseas volunteers a requirement of two references and proof of ID is necessary. Overseas volunteers may require additional support, we will address this on a case-by-case basis and identify the individuals need on recruitment. Plans for regular supervision and review meetings to be agreed.
- Expect all volunteers to read and sign this policy as part of their induction and be aware of their role and responsibilities with regards to confidentiality and safeguarding issues.

Information security and sharing

We have systems in place to ensure personal information (including photographs and videos) is stored and processed securely and safely and is compliant with data protection and confidentiality legislation, as set out in our Data Protection Policy.

We work with several community partners to deliver our activities. As the lead agency we recognise our responsibility for safeguarding and reporting, and we will ensure that appropriate information sharing agreements are in place to ensure the safe management of personal data, and that everyone is clear what their responsibilities are.

Outside of the purposes for which we have collected the participant's information, sharing of personal data is not permitted, other than where it would be necessary to share it with agencies for safeguarding purpose or where explicit, informed consent has been obtained. Photographs and videos will only be used (e.g., in our reporting and publicity materials or on social media) where we have agreed consent and written permission to do so from those shown in the picture/footage. Where there is a photograph or video identifying an adult at risk informed consent to use the photo needs to be obtained, taking into account the capacity of the adult at risk to give their consent, and other factors might that person be at risk.

Social media

Whether messaging from a personal account, or an official Shepherd's Star social media channel, staff/volunteers should always act responsibly avoiding opportunities for



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exploitation and sharing of personal data that could put both beneficiary and staff/volunteer at risk.

There are no circumstances where personal mobiles or social media contacts such as Facebook/Instagram/Snapchat should be shared between staff (including volunteers and beneficiaries).

If a member of the public engages with staff/volunteer/contractor online in a concerning or inappropriate way, this should be reported to the DSL. If the message or post is believed to relate to a Child or Adult at Risk, this should also be reported to the DSL including screenshots if appropriate.

Review and Nominated Safeguarding Persons:

Designated Safeguarding Lead: Mrs Desiree Shepherd, Director

Email: desiree@shepherdsstar.org

Mobile: 07803832339

This policy statement came into force on 7th November 2022

Shepherd's Star are committed to reviewing this policy annually.

This policy is reviewed on an annual basis by the DSL and Board of Trustees.



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Appendix A: Signs and Indicators of Abuse and Neglect

Abuse can include physical, financial, material, sexual, psychological, discriminatory, emotional abuse and neglect. It can take place in any setting and can be perpetuated by anyone.

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship, and it may result in significant harm to, or exploitation of, the person subjected to it. The main types of abuse are:

- Physical abuse - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- Sexual abuse - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, could not consent 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, isolation or withdrawal from services or supportive networks.
- Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- Neglect and acts of omission - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating.
- Discriminatory abuse - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment and hate crime.
- Institutional abuse - requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level.
- Multiple forms of abuse - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of



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abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

Domestic abuse is 'Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.'. It may include a range of abusive behaviours. It occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class or educational level. It includes incidents where extended family members may condone or share in the pattern of abuse e.g. forced marriage, female genital mutilation and crimes rationalized as punishing women for bringing 'dishonour' to the family. It is important to recognise that vulnerable adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

Possible signs of abuse include:

Physical abuse signs

- A history of unexplained falls or minor injuries
- Bruising in well protected areas, or clustered from repeated striking
- Lack of medical attention when an injury is present
- Finger marks
- Burns of unusual location or type
- Injuries found at different states of healing
- Injury shape similar to an object
- Injuries to head/face/scalp
- History of GP or agency hopping, or reluctance to seek help
- Accounts which vary with time or are inconsistent with physical evidence
- Weight loss due to malnutrition, or rapid weight gain
- Ulcers, bed sores and being left in wet clothing
- Drowsiness due to too much medication, or lack of medication causing recurring crises/hospital admissions

Sexual abuse signs

- Disclosure or partial disclosure (use of phrases such as 'It's a secret')
- Medical problems, e.g. Genital infections, pregnancy, difficulty walking or sitting
- Disturbed behaviour e.g. depression, sudden withdrawal from activities
- Loss of previous skills, sleeplessness or nightmares, self-injury
- Showing fear or aggression to one particular person
- Inappropriately seductive behaviour
- Loss of appetite or difficulty in keeping food down
- Behaviour of others towards the vulnerable adult
- Circumstances – e.g. two service users found in a toilet area, one in a distressed state



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Psychological/emotional signs

- Isolation
- Unkempt, unwashed, smell
- Over meticulous
- Inappropriately dressed
- Withdrawn, agitated, anxious or not wanting to be touched
- Belongings or money going missing
- Tearfulness
- Unexplained paranoia, or excessive fears
- Low self-esteem
- Untreated injuries or medical problems
- Poor personal hygiene
- Not attending / no longer enjoying their activities/events
- Change in the behaviour or confidence
- Fear of a particular group of people or individual
- Someone else ways speaks for the person and doesn't allow them to make their own choices

Discriminatory abuse signs

- Lack of respect shown to an individual
- Signs of substandard service offered to an individual
- Exclusion from rights afforded to others, such as health, education, criminal justice