

ADULTS SAFEGUARDING POLICY

INTRODUCTION

Safeguarding is the protection of adults at risk from abuse or neglect. This policy applies to all staff, volunteers, trustees, and anyone representing Become United (BU). We work across Greater Manchester to support adults who may be at risk, including older people and those with mental health issues. This policy is informed by the Care Act 2014, The Human Rights Act 1998, and The Data Protection and GDPR 2018.

The aim of this policy is to ensure the safety and protection of adults at risk of harm, in line with the principles of adult safeguarding.

BU makes a positive contribution to a strong and safe community and recognises the right of every individual to be safe.

We follow the six key principles of safeguarding set out in the Care Act 2014: Empowerment, Prevention, Proportionality, Protection, Partnership, and Accountability.

BU works with adults, young people, and/or adults at risk of harm through a range of community and outreach services delivered from our premises or online. BU may also come into contact with adults at risk of harm when working with outside organisations through the delivery of projects or programmes.

The types of contact with adults at risk of harm will be controlled in collaboration with our partners. BU ensures that partner organisations have appropriate and up-to-date safeguarding policies and procedures.

This policy seeks to ensure that BU undertakes its responsibilities concerning the protection of adults at risk of harm and responds to concerns appropriately. The policy establishes a framework to support paid and unpaid staff/volunteers in their practices and clarifies the organisation's expectations.

This policy covers Financial Abuse, Psychological/Emotional Abuse, Self-Neglect, Discriminatory Abuse, Institutional Abuse, Domestic Abuse, Modern Slavery, and Radicalisation to Terrorism.

A separate Child Protection Policy is in place. If there is a child living in the home of an adult at risk, a referral will be made to the local authority.

LEGISLATION

The principal pieces of legislation governing this policy are:

- Safeguarding Vulnerable Groups Act 2006
- Care Standards Act 2000
- Public Interest Disclosure Act 1998
- The Police Act CRB 1997
- Mental Health Act 1983
- NHS and Community Care Act 1990
- Rehabilitation of Offenders Act 1974



Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of adults at risk of harm wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender, or culture. It can take several forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying
- Neglect
- Financial (or material) abuse

Definition of Adults at Risk of Harm

An adult at risk of harm is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This may include a person who:

- Is elderly and frail
- Has a mental illness, including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Has a history of substance misuse
- Is homeless

Definition of Digital Safeguarding

BU carries out operations in face-to-face activities at our registered premises. We may undertake some projects and programmes online via our website, social media, and online webinars. Digital safeguarding is similar to safeguarding in any other context, where people and organisations work to prevent and stop both the risks and experience of abuse or neglect.

Online safeguarding involves a wide range of potential harms and should be assessed in relation to both the victim and the perpetrator.

We define online abuse and harassment as behaviours that constitute digital or online harm. Further behaviours that constitute digital or online harm include image-based abuse, identity fraud, and exploitation.

BU understands there are three key main categories of digital harm:

- **Content** unsuitable or illegal content, which might include pirated content or offensive language and behaviour.
- **Contact** unwanted or inappropriate contact, such as grooming or unsolicited sexual contact.
- **Conduct** oversharing personal information or bullying another person, either as a recipient or an active participant.

Where BU works directly or indirectly with adults at risk of harm, we will identify, report, and address digital safeguarding according to the definitions and guidelines within



this policy. This also applies to any instance in which our staff, partners, or users are victims or perpetrators of digital harm.

Digital Safeguarding: Data Collection, Privacy, and Online Safety

To guarantee the safety of individuals in the digital realm, BU will embed the following considerations into our ways of working: consent, anonymisation, data collection and storage, and GDPR compliance.

Ensuring the safety of individuals in the digital realm also includes using effective encryption, strong passwords, and following the requirements of the General Data Protection Regulation (GDPR).

We have expected standards of conduct across our paid and voluntary staff, including privacy and security standards. Furthermore, our staff are instructed to create strong passwords and update them regularly to prevent data breaches that may lead to digital or online harm.

Responsibilities

All staff (paid or unpaid, including volunteers, contractors, consultants, and associates) have the responsibility to follow the guidelines laid out in this policy and related policies. They must pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being excellent role models, contribute to discussions about safeguarding, and positively involve people in developing safe practices.

Additional Specific Responsibilities

Staff and management have a collective responsibility to ensure:

- BU has appropriate policies and procedures in place, followed by all management, staff, volunteers, and beneficiaries.
- People are suitably checked to assess their suitability for their roles.
- Concerns are identified and handled in a full and open manner.
- There is a clear and established system of referring or reporting to relevant organisations as soon as concerns are suspected or identified.
- Risks are set out and managed in a risk register, which is regularly reviewed.
- Statutory guidance, good practice, and legislation relevant to their charity are followed, with links to main sources of information.
- Quick responses are made to concerns, and appropriate investigations are carried out.
- Failures are taken seriously, and harm is not downplayed.
- The management board is balanced and does not allow one member to dominate its work.
- Protecting people from harm is central to the organisation's culture.
- There are enough resources, including trained staff/volunteers/management for safeguarding and protecting people.
- Periodic reviews of safeguarding policies, procedures, and practices are conducted.

The **Designated Management for Safeguarding** will be appointed to lead on safeguarding matters within the Board of Management.

The **Senior Management Team** has the responsibility to ensure:

- The policy is accessible.
- The policy is implemented.
- The policy is monitored and reviewed.
- Sufficient resources (time and money) are allocated for effective implementation.



Safeguarding is promoted within the organisation, and oversight and support are provided.

The **Designated Safeguarding Lead Officer** is Dewan Choudhury and Deputy Safeguarding Lead is Mohammed Towhasir, both have received level 3 training. They have a specific responsibility to ensure:

- Promotion of the welfare of adults at risk of harm.
- Staff (paid and unpaid) have access to appropriate training.
- Staff concerns about safeguarding are received and responded to seriously, swiftly, and appropriately.
- Concerns about responses are addressed.
- They keep up to date with local safeguarding and DBS arrangements.
- Effective links with relevant agencies are developed and maintained.

Implementation Stages

The scope of this Safeguarding Policy is broad-ranging and will be implemented via various policies and procedures within the organisation. These include:

Safe Recruitment

BU ensures safe recruitment by following its recruitment policy and Equality and Diversity policy. BU will provide the following safeguarding statement in recruitment adverts or application details: 'recruitment is done in line with safe recruitment practices.'

- Job or role descriptions for all roles involving contact with adults at risk of harm will contain a reference to safeguarding responsibilities.
- Shortlisting will be based on formal application processes/forms, not CVs.
- Interviews will be conducted according to equal opportunity principles, with questions based on the relevant job description and person specification.
- Standard DBS checks will be conducted for specific roles involving contact with adults at risk of harm.
- Recruitment will require two references and two forms of ID.
- Staff and volunteers will receive Level 1 Alerters training, refreshed every three years.
- Ongoing support and a debrief system for staff/volunteers involved in safeguarding situations will be provided.

Disclosure and Barring Service (DBS) Gap Management

BU commits resources to ensure DBS checks on staff (paid or unpaid) whose roles involve contact with adults at risk of harm. Some roles with direct contact may be exempt from the Rehabilitation of Offender's Act, and appropriate enhanced checks will take place.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act (ROA) allows most convictions and cautions to be considered 'spent' after a certain period. This period, known as the 'rehabilitation period,' is determined by the sentence or disposal given, rather than by the nature of the offence. People with 'spent' convictions, cautions, reprimands, or final warnings have the legal right not to disclose them when applying for most jobs, most courses, and for all insurance purposes.

Service Delivery Contracting and Subcontracting

- Safeguarding arrangements of partner organisations will be systematically checked.
- Safeguarding will be a fixed agenda item in any relevant partnership reporting meetings.
- Contracts and memorandums of agreement for partnership work will include clear minimum requirements, safeguarding arrangements, and non-compliance procedures.



Communication, Training, and Support for Staff

BU commits resources for the induction and training of staff (paid and unpaid), effective communications, and support mechanisms for safeguarding.

Induction

The induction will include:

- Discussion of the Safeguarding Policy (with confirmation of understanding).
- Discussion of other relevant policies.
- Familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and their deputies).

Training

All staff who, through their role, are in contact with adults at risk of harm will have access to safeguarding training at an appropriate level.

Communications and Discussion of Safeguarding Issues

Effective communication of safeguarding issues will be achieved through:

- Team meetings.
- Senior Management Team meetings.
- Management meetings.

Support

Recognising that involvement in safeguarding situations can be stressful for staff, the following support mechanisms are in place:

• Debriefing support from a BU team member or the HR, Legal, and Compliance Officer, for both paid and unpaid staff, to reflect on the issues they have dealt with.

REPORTING

Safeguarding Reporting

The process for raising and reporting safeguarding concerns at BU involves the following stages:

- Communicate any safeguarding concerns with your immediate manager, BU's HR, Legal, and Compliance Officer, or Safeguarding Lead. Update BU's Complaints Logbook. Where necessary, alert the relevant authorities.
- 2. If your immediate manager is implicated, refer to their line manager or peer, who will update BU's Complaints Logbook and report to BU's Safeguarding Lead.
- 3. Communicate concerns to partner charities, matching their processes, and keep BU's Safeguarding Lead informed.
- 4. BU's Safeguarding Lead will communicate concerns with the Board of Management to identify next steps.
- 5. The Board of Management may involve designated authorities as part of BU's allegations management procedure.
- 6. Referrals to the local authority regarding safeguarding concerns will only be made with the consent of the adult at risk, unless there is immediate risk requiring emergency services.
- 7. BU complies with the Disclosure and Barring Service (DBS) for reporting unsafe practices.

Serious incidents reporting

The process for raising and reporting serious incidents at BU reflects the safeguarding reporting process outlined above.



The Board of Senior Management will make a report to the appropriate authorities if a serious incident occurs.

The Management will inform where there has been significant harm (or risk of harm) caused by BU's staff, volunteers, or operations. If BU becomes aware of significant harm (or risk of harm) caused by a partner organisation, the partner has to report it; however, if the partner organisation does not report it, BU should inform the relevant bodies.

This will usually be if any of the following occur: *

- a. Incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults) which have resulted in or risk significant harm to them and:
 - i. This happened while they were under the care of the charity
 - ii. Someone connected with the charity, for example, a trustee, staff member, or volunteer, was responsible for the abuse or mistreatment (alleged or actual). For signs of abuse see appendix 2
- b. Other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities.
- c. Breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with adults at risk.
- d. Financial misdemeanours and any serious risks to our reputation.
- e. Harm to BU's beneficiaries, staff, volunteers, or others who come into contact with our charity through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work).
- f. Loss of BU's money or assets.
- g. Damage to property
- h. Harm to the organisation's work or reputation

Allegations Management

BU recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

- Any member of staff (paid or unpaid) from BU is required to report any concerns in the first instance to a member of the Senior Management Team (Senior Management Team), Safeguarding Lead or the HR, Legal and Compliance Officer at BU The Senior Management Team or HR, Legal and Compliance Officer will then evaluate the concerns or allegations and escalate them according to their nature to BU's Board of Management.
- 2. If an allegation is about BU's staff, contact the relevant local authority. If an allegation is about a partner, contact their Safeguarding Lead or Director who will be responsible for reporting to the Local Authority Designated Officer (LADO) and seeking advice on the best course of action.
- 3. However, if the partner fails to report to the LADO or BU is so concerned as to avoid following up with the partner in the first instance, BU will report directly to the LADO of the relevant Local Authority.
- 4. Follow the advice provided by the partner charity or local authority.
- 5. In order to investigate a complaint against an employee of misconduct, BU may suspend the employee for so long as may be necessary to carry out a proper investigation and hold any appropriate disciplinary hearing.



- 6. The BU Team, Safeguarding Lead, or the HR, Legal, and Compliance Officer will contact the Board of Management or, in the event of sensitive information, the Designated Safeguarding Trustee, as soon as they become aware of a serious safeguarding incident.
- 7. In the event that a safeguarding allegation is made against a member of BU's leadership (e.g., the Safeguarding Lead), the member of staff reporting the incident will report the concerns to an impartial member of staff, the BU Team, or the Board of Management as appropriate.
- 8. BU's allegations management will follow the practices embedded into our policies.

BU recognises its legal duty to report any concerns about unsafe practices by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the <u>ISA referral guidance</u> document.

BU's Management recognise their duty to oversee this Safeguarding Policy and engage with the Safeguarding Lead in identifying best practices on safeguarding.

Appendix 1 has the BU Form for reporting Safeguarding concerns

BU Management are:

- Helena Khatun
- Tohura Bibi
- Mohammed Siddique

MONITORING

The HR, Legal, and Compliance Officer, with the support of BU's Senior Management Team, will monitor the following safeguarding aspects on a rolling basis:

- Safe recruitment practices
- DBS checks undertaken for relevant roles
- References applied for new staff
- Training register/record of staff training on child/adults at risk of harm protection for those relevant roles
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant
- Reviewing the current reporting procedure in place
- Ensuring a Designated Senior Manager responsible for Safeguarding is in post
- Ensuring that paid and voluntary staff are aware of their safeguarding responsibilities and are comfortable reporting safeguarding concerns where necessary.

Findings concerning the above safeguarding aspects will be reported to the Senior Management Team and the Board of Management as part of the latter's oversight duties.

Monitoring and Reporting for our Partners

With projects commissioned and/or funded by BU, we may require our partners to provide redacted safeguarding reports in the event of serious incidents. The purpose of obtaining such reports will be to ensure that the appropriate steps are taken to address safeguarding concerns/incidents and to avoid negative impacts on BU's reputation due to unsatisfactory allegation management by our partners.

USEFUL RESOURCES

Support for Adults



Family Lives: www.familylives.org.uk

Crime Stoppers: www.crimestoppers-uk.org
Victim Support: www.victimsupport.org.uk
The Samaritans: www.samaritans.org

MIND: www.mind.org.uk

NAPAC (National Association for People Abused in Childhood): www.napac.org.uk

Action Fraud: www.actionfraud.police.uk

<u>Support for Learning Disabilities</u> Respond: <u>www.respond.org.uk</u> Mencap: <u>www.mencap.org.uk</u>

Domestic Abuse

Refuge: www.refuge.org.uk

Women's Aid: www.womensaid.org.uk

Sateda (local charity addressing domestic abuse): www.sateda.org

Men's Advice Line: www.mensadviceline.org.uk
Mankind: www.mankindcounselling.org.uk

Honour-based Violence

Forced Marriage Unit: www.gov.uk/guidance/forced-marriage

Online Safety

UK Safer Internet Centre: www.saferinternet.org.uk

Net Aware: www.net-aware.org.uk
Get Safe Online: www.getsafeonline.org

Radicalisation and Hate

Counter-Terrorism Internet Referral Unit: www.gov.uk/report-terrorism

True Vision: www.report-it.org.uk

Oldham Local Safequarding Children Partnership

Procedures

https://www.olscb.org/

Bolton

https://www.boltonsafeguardingchildren.org.uk/

Bury

https://buryscp.org.uk/

Manchester

https://www.manchestersafeguardingpartnership.co.uk/

Oldham

https://www.oldham.gov.uk/lscb/

Rochdale

https://rochdalesafeguarding.com/

Salford



https://safeguardingchildren.salford.gov.uk/

Stockport

https://www.stockport.gov.uk/stockport-safeguarding-children-partnership

Tameside

www.tamesidesafeguardingchildren.org.uk

Trafford

https://www.traffordsafeguardingpartnership.co.uk/

Wigan

https://www.wigan.gov.uk/WSCB/index.aspx

Disclosure and Barring Service
DBS Communications - PO Box 110, Liverpool, L69 3EF, United Kingdom www.gov.uk/dbs

NSPCC Child Protection Helpline 0808 800 5000 0800 056 0566 – deaf or hard of hearing 0800 096 7719 – Asian Child Protection Helpline help@nspcc.org.uk

The Churches' Child Protection Advisory Service, Part of PCCA Christian Child Care PO Box 133, Swanley, Kent BR8 7UQ www.ccpas.co.uk

MANAGING INFORMATION

Information will be gathered, recorded, and stored under BU's Data Protection Policy.

All staff must be aware that they have a professional duty to share information with other agencies to safeguard adults at risk of harm. The public interest in safeguarding adults at risk of harm may override confidentiality interests. However, the information will be shared on a need-to-know basis only, as judged by the Safeguarding Lead.

All staff must be aware that they cannot promise service users or their families/carers that they will keep secrets.

Conflict Resolution and Complaints

Conflicts in respect of the safety of adults at risk of harm will be taken forward by our Safeguarding Lead. Alternatively, it is possible to either raise a complaint through our External Complaints Procedure or our internal Grievance Policy and Procedure.

Communicating and reviewing the policy

This policy will be reviewed by the Senior Management Team and agreed upon by the BU management every two years and when there are changes in legislation.



Appendix 1- Reporting Suspected Abuse

Organisation
Name of person reporting
Age and date of birth
Ethnicity
Religion
First Language
Disability
Parent's/carer's name (s)
Home address/Tel. No.
Are you reporting your concerns or reporting someone else's? Please give details.
Brief description of what has prompted the concerns: including date, time, and specifics.
Any physical signs? Behaviour signs? Indirect signs?
Have you spoken to the child/young person? If so, what was said?
Have you spoken to the parent(s)/carer(s)? If so, what was said?
Has anybody been alleged to be the abuser? If so, please give details.
Have you consulted anybody else? Please give details.
The person reported to and date of reporting.
Signature of person reporting
Date
Internal Use Only Action taken
Notes



To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure or concern. In the recording, you should confine yourself to the facts and distinguish what is personal knowledge and what others have told you. Do not include your own opinions.

Appendix 2- Recognising and Responding to Abuse

The following signs may not be indicators that abuse has taken place, but the possibility should be considered.

Physical Signs of Abuse

Physical signs of abuse may include:

- Any injuries not consistent with the explanation given for them
- Injuries that occur to the body in places that are not normally exposed to falls or games
- Unexplained bruising, marks, or injuries on any part of the body
- Bruises that reflect hand marks or fingertips (from slapping or pinching)
- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Injuries that have not received medical attention
- Neglect, undernourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care
- Repeated urinary infections or unexplained stomach pains

Changes in behaviour which can indicate physical abuse

- Fear of parents/carers being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed; for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

Emotional Sign of Abuse

Emotional signs of abuse may include:

- A failure to thrive or grow, particularly if a child/young person puts on weight in other circumstances e.g. in a hospital or away from their parents/carers
- Sudden speech disorders
- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behaviour that can also indicate emotional abuse include:

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play
- Attention- seeking behaviour
- · Fear of making mistakes
- Self-harm
- Fear of parent/carer being approached regarding their behaviour



Sexual Abuse

Physical signs of sexual abuse may include:

- Pain or itching in the genital/anal areas
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour that can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawing or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to a suicide attempt
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults

Neglect

Physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other young people
- Being constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions

Changes in behaviour that can also indicate neglect include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

Bullying

Signs of bullying include:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training or competitions
- An unexplained drop off in performance
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol, or cigarettes
- A shortage of money or frequents loss of possessions



It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is **NOT** the responsibility of those working in BU to decide that abuse is occurring. It **IS** their responsibility to act on any concerns.

Policy Name and Number	Safeguarding Policy
Effective From	01/06/2025
Version Number and Date	Version 4 & 2 June 2025
Review date	1 June 2026
Designated Person	Dewan Choudhury (with DBS)
Second Designated Person	Mohammed Towhasir (with DBS)

Revisions

Version Number	Date	Changes	Author (Name and Job
			Title)
Version 1	01/06/2022	First Written	Dewan Choudhury
			Project Manager
Version 2	01/06/2023	Review	Dewan Choudhury
			Project Manager
Version 3	01/06/2024	Review	Dewan Choudhury
			Project Manager
Version 4	01/06/2025	Review	Dewan Choudhury
			Project Manager