Trident Group

a beacon of hope

Safeguarding Vulnerable Adults

Policy and Procedure

Department: Housing, Care and Support

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1. Policy Statement

Trident Group ('Trident') are committed to the ethos that "**Safeguarding is Everybody's Business"** and that all adults that have contact with our housing, care and support services have a fundamental right to live a life free from harm and abuse. It is the responsibility of ***every*** Trident employee to play their part in ensuring this right is upheld and to promote the safety and wellbeing of individual at all times. Safeguarding involves work to protect individuals at risk and prevent abuse and neglect from occurring in the first place and also ensuring a timely, proportionate and professional response when abuse is suspected or has occurred.

This Safeguarding policy aims to ensure that Trident employees understand and fulfil their ***personal*** and ***moral*** duties and:

- have clear operational policies and procedures to follow
- understand what is expected and their personal responsibilities and accountability
- are familiar with the principles and values that underpin Safeguarding
- are trained in recognising the indicators of abuse
- are vigilant and able to respond to concerns professionally and appropriately
- work collaboratively with other staff and agencies
- have Designated Lead Officers to refer to so that Safeguarding concerns can be discussed, and action agreed to minimise or mitigate the risk of abuse and harm.
- ensure that the individual is the main focus of any safeguarding actions (their wishes and decisions should be central and inform the process);
- support the individual to identify their own desired outcomes; and that their dignity, respect and self-determination are upheld.

Trident's Safeguarding framework also consists of other associated policies and procedures to provide guidance for staff and managers to ensure a proportionate, timely, professional and ethical response to suspected or actual abuse of an adult with care and support needs. These internal procedures are compliant with and compliment the 'Adult Safeguarding; Multi-agency policy and procedures for the protection of adults with care and support needs in the West Midlands' that apply across all local authorities within that region.

2. Roles and Responsibilities

The Chief Executive is the Designated **Strategic Safeguarding Lead** and will ensure that there are policies, procedures, systems, structures, resources and personnel in place to promote the welfare and protection of children and to support vulnerable families. There is also a named Board member for Safeguarding.

Strategic Safeguarding Lead

Nigel Wilson (07985 511 447)

Named Board Member for Safeguarding

Chris Handy

There is an out of hours Safeguarding and Serious Incident on call provision enabling Trident staff to have access to a manager for support and guidance:

Safeguarding and Serious Incident On Call:

07917 652

(covered by rotation)

There are 2 Designated Lead Officers for safeguarding in Trident who are able to offer advice and guidance to managers dealing with complex concerns:

Designated Lead Officers:

Joanne Spence (07734 882236)

Helen Litherland (07584 500 563)

Due to the nature of the role and responsibilities of Group Board Members they are placed in placed in a Position of Trust and are expected to work in accordance with safeguarding policies and procedures. *Housing Association Boards must have regard to statutory guidance, under the Homes England Regulatory Framework and those providing care and support services have had to engage in adult safeguarding to comply with Care Quality Commission and Supporting People requirements* (National Housing Federation).

All Trident employees have a personal responsibility to:

- Provide customers with the best possible care and support
- Refrain at all times from any form of abusive action in relation to customers
- Focus on early intervention and prevention.
- Report immediately anything they witness which is or might be abusive or harmful to customers, to their manager or the out of hours safeguarding and serious incidents on call officer.
- Follow associated policies and procedures.
- Co-operate in every possible way in any investigation into alleged abuse/harm
- Participate in learning and development activities related to understanding what constitutes abuse and protection from harm
- Keep their knowledge, skills and practice up to date through professional discussions in supervisions and staff meetings
- Share knowledge with customers around types of abuse and adopt a collaborative approach to safeguarding and managing risk.
- Record all information accurately and in good detail including actions taken and outcomes.

All Trident managers have a responsibility and accountability for:

- Encouraging a culture and ethos that is open and accountable
- Contributing to the review of policies and procedures to minimise the risk of abuse or harm to people with care and support needs

- Implementation of Safer Recruitment, PIPOT and DBS Barred List Referrals which identify, appropriately deal with and if necessary [lawfully] exclude from practice potential or actual abusers
- Providing training for staff in all aspects of abuse, prevention and protection
- Reporting any evidence of abuse speedily and accurately
- Implementing improvements to practices if an investigation into abuse or harm reveals deficiencies in the way in which Trident operates. This includes implementing any actions and lessons learned identified in Safeguarding Adult Reviews
- Collaborating with all other agencies in preventing or taking action to stop abuse and improving the welfare and protection of customers- liaising with the relevant Local Authority teams, following their guidance and instructions where applicable.
- To support staff during and after Safeguarding incidents, providing a debrief and signposting to counselling services as appropriate.

All Trident employees, volunteers and contractors have a key safeguarding role to play. Tenants in general needs housing may have eligible care and support needs and could fall into the remit of statutory safeguarding duties and Trident Reach must fulfil its contractual responsibilities as a commissioned provider.

Trident Reach and Trident Housing employees will work together to:

- have local knowledge of anti-social behaviour or crime patterns such as distraction burglary
- become aware of an individual's emerging or changing care and support needs as a result of age, disability or illness or contextual safeguarding issues
- be aware of people with care and support needs who are not known to social services
- be in a position to detect signs of domestic abuse when visiting tenants/ customers and carry out appropriate risk assessments
- Identify concerns in relation to self-neglect or hoarding
- Ensure appropriate representation at meetings, as a key partner working closely with other agencies to prevent and protect adults with care and support needs from abuse and neglect. This may include participating in Section 42 enquiries, taking action, co-operating and sharing information in a timely way.

Employees will receive support, guidance and on-going learning opportunities to keep their knowledge up to date and to enable them to use their professional judgement to make ***informed*** and ***defensible*** decisions in relation to Safeguarding concerns. It is responsibility of all employees to ensure their safeguarding knowledge and training is up to date.

Failure by any employee to comply with Trident's Safeguarding policies and procedures could result in disciplinary action and/or criminal proceedings.

There are arrangements in place to ensure of abuse are effectively managed and that Trident is fulfilling its duties. This includes the following activity:

- Safeguarding and serious incident on call resource
- Central Safeguarding log - maintained and monitored on the In-form case management system for Trident Reach and CRM for Trident Housing Association.
- Incident monitoring to ensure all incidents are recorded and acted upon
- Service audits – sampling files, evidence and actions taken.
- Debriefing/counselling for staff and victim after serious incidents
- Professional discussions relating to Safeguarding - part of one-to-one meetings, a standard agenda item in team meetings**.**
- Safeguarding Board papers- to review safeguarding data, provide assurance that the organisation is fulfilling its safeguarding duties and to undertake strategic planning.

3. Legal Framework

All members of society be assured of protection and justice through legislation and criminal justice systems in the UK. Actions in response to if they have concerns regarding potential or actual abuse and neglect of people with care and support needs members of staff should consider all options available in the UK legal system as they would with regards to any member of the public. However, there are key pieces of legislation intended to further protect adults with care and support needs which all staff members should be specifically aware of:

a. Care Act 2014

The Act sets out the legal framework for how local authorities and other statutory agencies should protect adults with care and support needs at risk of or experiencing abuse or neglect. This has placed adult safeguarding on a statutory footing with responsibilities for care, support and housing staff. Every local authority (LA) must have a Safeguarding Adult Board (SAB) made up of representatives from statutory agencies such as the Local Authority, Health and Police who oversee the duties set out in this Act.

When a safeguarding concern is progressing to a Section 42 or 'other' enquiry the local authority safeguarding team will put together an initial enquiry plan to include:

- Confirming who is undertaking what aspect of the Enquiry
- Considering what information or evidence is required to establish the facts and who is the best person to undertake those actions
- Ensuring the person/people undertaking the Enquiry understand what is required of them and that they confirm acceptance of the task.

b. Human Rights Act 1998

This Act applies to all public authorities and others providing a public function. It is Trident employee's individual and collective duty to uphold the rights protected by the Act including the duty to protect people from inhumane and degrading treatment.

c. Mental Capacity Act 2005

This Act covers England and Wales and provides a statutory framework for people who lack capacity to make decisions for themselves (16 years and above) or those with capacity giving future directives (18 years and above). The Act also outlines two criminal offences– 'wilful neglect' and 'ill treatment' of a person who lacks capacity.

The Act sets out who can make decisions, how decisions should be made and under what circumstances the decision should be make, and applies to all professionals, for example doctors, nurses, social workers, care and support staff.

The Act is designed to protect and empower individuals who may lack the mental capacity to make their own decisions about their care and treatment or elements of their care and treatment. This applies whether the decisions are life changing events or every day matters and when applied should evidence:

- Supporting people to participate in the fullest extent possible in decision making.
- Ensuring that the decision is in the persons best interests
- Finding the least restrictive option

d. The Domestic Abuse Act 2021

This Act provides a legal definition of Domestic Abuse and identifies new criminal offences including post-separation coercive control, non-fatal strangulation, and threats to disclose private sexual images.

It also places a legal duty on Local Authorities to fund support for survivors in 'safe accommodation' and that all survivors will be in deemed in priority need for housing and will keep a secure tenancy in social housing if they need to escape an abuser.

e. Deprivation of Liberty Safeguards

These additional safeguards were implemented in 2009 as an amendment to the Mental Capacity Act 2005 to ensure that any restrictions placed on an individual who lacks capacity to consent to care or treatment in a care home or hospital are lawful. The aim of the safeguards is to protect an individual's rights and ensure that the care and treatment they receive is always in their 'best interests'.

In cases where restrictions placed upon a person who lacks capacity may amount to a 'deprivation of liberty' the provider has to submit an application to the Local Authority.

f. CDoLs (Community Deprivation of Liberty Safeguards)

A 'deprivation of liberty' that is 'attributable to the state' can occur in 'community settings.' If a staff member thinks that someone who is living at home or in supported living, is receiving a package of care which deprives them of their liberty they must inform the safeguarding lead of the organisation funding their care. That organisation should then review the care plan to check if it can be delivered in a way that does not deprive the person of their liberty. If this is not possible an application must be made to the Court of Protection for an authorisation.

g. Modern Slavery Act 2015

The Modern Slavery Act provides protection against modern slavery and aims to ensure that perpetrators receive suitable punishment under the Act and that victims receive enhanced support and protection.

As part of the housing, care and support sector, Trident recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

Trident recognises that some adults with care and support needs might be particularly vulnerable as traffickers and are people known to target vulnerable people, such as those with drug and alcohol dependency, or people with learning disabilities or mental health support needs.

There are many challenges associated with measuring the scale of modern slavery in the UK. Victims of modern slavery tend to be controlled and hidden away by the perpetrators or may not come forward due to feelings of fear and shame. Some victims may not be identified by those who encounter them. Others may not view themselves as victims of exploitation.

Trident continuously raises awareness of possible indicators to ensure that staff can identify the signs of modern slavery.

The organisation is firmly committed to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chains are free from slavery and human trafficking.

4. Duty of Candour

The duty is part of the Care Quality Commission fundamental standard requirements for all registered providers who must be open and transparent with service users about their care and treatment, including

when it goes wrong. Trident employees should use all available internal procedures for reporting concerns, complaints, accidents and incidents and if necessary, utilise the Whistleblowing Policy.

5. Definitions

a. Adult at Risk

The Care Act 2014 defines the scope of statutory safeguarding responsibilities applying to an adult who:

- has needs for care and support (whether or not these needs are being met); and
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

b. Children

A child is defined as 'anyone who has not reached their 18th birthday'. Trident has a dedicated Safeguarding Children and Families Policy and Procedure.

c. Abuse

"Abuse is defined as a violation of an individual's human or civil rights by another'.

Abuse can also be defined as "a lack of action occurring within a relationship where there is an expectation of trust, which causes harm or distress to a person"

Abuse is not always intentional or deliberate but is likely to occur where one person (or persons) has control and/or power over another and abuse can be committed by a range of people. It can be perpetrated by an individual, group or organisation and this could include:

- Trident staff, volunteers and contractors
- Other professionals
- Visitors, including, individuals, friends and relatives
- People who have contact with customers in the community
- Other customers

Abuse is often a crime, and employees should be aware which acts may constitute criminal offences (for example an assault, rape, theft, fraud, hate crime, wilful neglect, mistreatment, etc.) and refer these to the Police, with the victim's consent where possible.

6. Types of Abuse

The Care Act 2014 identifies the following 10 categories of abuse:

- Discriminatory
- Domestic
- Financial or material
- Modern slavery
- Neglect or acts of omission (including failure to act)
- Organisational/ Institutional
- Physical
- Psychological and emotional

- Self-neglect
- Sexual

Whilst these categories are helpful it is important to view any action that could be deemed as inhuman or degrading, including the use of inappropriate or excessive restraint as abuse. **(Appendix 3)**

7. Radicalisation

Trident recognises that adults with care and support needs might be vulnerable to becoming involved in extremist groups which aim to cause harm or commit violent acts. Employees have an important role in detecting the signs that someone may be attracted to terrorist related activity and raising concerns and supporting customers.

Employees will receive information on the Government's CONTEST strategy including the four strands: Prevent, Pursue, Protect and Prepare and also ensure that they are aware of possible indicators of radicalisation. The Designated Lead Officers for safeguarding are the organisation's named Prevent Leads and will advise and oversee referrals to the local counter terrorism unit.

Channel is a national Home Office Safeguarding project which aims to prevent children and adults from being drawn into radicalisation or becoming involved in terrorist related activity.

8. Faith, Culture and Ethnicity

Faith is a belief system which forms attitudes and behaviours but crucially informs one's identity over a period of time. It can be understood as 'spirituality' – defined as searching for purpose, meaning and morality, which can often, but not always, be expressed as a 'religion' which may include regular public worship such as church attendance'.

'Culture' can be understood as the social heritage of a group, organised community or society. It is a pattern of responses discovered, developed, or invented during the group's history of handling problems which arise from interactions among its members, and between them and their environment. It is important that Trident's employees understand that effective action to promote the welfare of customers may appear to be complex because of their ethnicity, faith, culture and nationality. This includes ensuring that staff have the expertise and confidence to recognise potential indicators of abuse and raise alerts related to honour-based violence, female genital mutilation, trafficking and exploitation of children, young people and adults with care and support needs etc..

All Trident employees must consider harm and abuse to individuals through an intersectional lens that recognises that race/ethnicity, gender, and religion can make individuals more vulnerable to oppression and abuse and can shape different experience in accessing support and services.

9. The Six Principles

The Six Principles in Safeguarding should underpin an employee's approach and are integral to this Policy and Procedure and inform the content of mandatory Safeguarding training for all Trident employees.

Empowerment	People being supported and encouraged to make their own 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.
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 safeguarding practice.

10. Prevention and Early Intervention

Prevention and Early Intervention are key principles included in Trident's commitment to Safeguarding and this includes raising awareness about safeguarding to our customers through a variety of mechanisms.

Awareness training is carried out with customers as part of our initial care and support planning and information on reporting abuse is included in Service Welcome packs or service inductions.

The Designated Lead Officers and Communications Team will identify opportunities to work with customer representatives and staff to co-produce and deliver a programme of annual events and publications in accessible formats in order to:

- Help raise customer awareness of different types of abuse and how to report concerns and how to stay safe.
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect.

11. Making Safeguarding Personal (MSP)

Making Safeguarding Personal is an approach to working with people that puts them at the centre of any consideration of their safety and well-being, so they are empowered to be included and have control over the process to the greatest extent possible in their circumstances.

Adopting an MSP approach is a Care Act requirement, made clear in the guidance.

Article 8 of the Human Rights Act says that the State cannot make decisions about people without their involvement.

12. Risk Enablement

At the heart of adult safeguarding is the tension between the duty to protect and adult from the risk of harm with the duty to support an adult to maintain as much control and choice in their own lives as possible. An

appropriate balance between managing risk and protection from harm with promoting an individual's autonomy and wellbeing should be reached.

This approach is known as Risk Enablement (or Positive Risk Taking). It is an approach that identifies a link between risk and enablement, recognising that taking carefully considered risks can enable individuals and help improve their wellbeing, whilst minimising the potential harmful outcomes.

There is an expectation that services will involve and work collaboratively with other agencies around the adult to gain a full picture, assess risk and plan a strategy to address it (this is especially important where issues are complex and/or the impact of the risk is judged very severe). This will involve sharing information appropriately and shared decisions.

13. Consent and Mental Capacity

The following principles of the Mental Capacity Act 2005 must always be applied:

- Presumption of capacity unless otherwise established.
- All practical steps should be taken to maximise someone's ability to make a decision.
- Unwise decisions do not mean someone lacks capacity.
- Least restrictive interventions to be taken [when someone lacks capacity to consent] and
- All decisions made on someone's behalf must be in their best interests.

The adult at risk should be at the centre of decision making about their own life (assuming they have the capacity to make their own choices). This might not apply in an emergency situation.

Remember that whilst an adult who has been the victim of abuse or harm and who has the mental capacity may choose to not report or take further action employees have a duty to report the Safeguarding concern internally.

There are circumstances where consent may be overridden such as level of risk, public interest, the abuser is in a PoT, it is unsafe not to do so or a crime has been committed. A senior manager or Designated Safeguarding Lead should be consulted to approve the overriding of consent.

If there is evidence to suggest that the person with care and support needs may lack capacity then all Safeguarding concerns MUST be reported to the Local Authority Safeguarding Team.

14. Using Professional Judgement

Trident Reach expects employees to have the skills, knowledge and competence to make a ***'defensible decision'*** in relation to responding to a Safeguarding concern. The following factors should help employees when considering the steps to take to mitigate or minimise suspected or actual abuse or harm and will be case and time specific:

- The harm – always take account of the individual customer's perception.
- What impact has it had on the person?
- The individual's capacity to understand what has happened and to make decisions in relation to the Safeguarding concerns.
- Whether duress or coercion is an influence.
- Whether the incident is one of a pattern or trend in respect of the adult at risk, the person causing the harm, the location of the abuse or the nature of the abuse. Consider whether it is indicating a systemic abuse issue.
- The relationship between the adult at risk and the person causing the harm. Does it involve a person in a Position of Trust (i.e. staff member)?

- What the risk factors are and the principles of positive risk taking.
- Whether any measures or actions have been put in place to minimise risk and protect the individual or other adults at risk.
- How likely is it that the abuse may reoccur?
- Is there likelihood others were exposed or could be exposed to the harm or abuse?
- What evidence and information you have to inform your decisions?
- Has a crime been committed against the adult at risk?

Factual, detailed and legible records must be maintained, including detailing the rationale for a decision not to raise a safeguarding. Documents should evidence good practise in exercising 'professional curiosity'.

15. Safeguarding Adult Reviews (SARs)

A Safeguarding Adult Review is a multi-agency process that considers whether or not serious harm experienced by an adult, or group of adults at risk of abuse or neglect, could have been predicted or prevented. A Designated Lead Officer for safeguarding must be informed when a formal request for a SAR report and chronology is received.
The process identifies learning points which may result in improvements to services and prevents abuse and neglect in the future. The organisation will utilise the content of SARs for reflective learning and development and to underpin professional discussions.

16. Position of Trust

For the purposes of this policy a person in a position of trust (PiPoT) is someone who works with or cares for adults with care and support needs in a paid or voluntary capacity. and about whom allegations of adult abuse or neglect are made.

PiPoT breaches are cases in which there is an allegation or suspicion that a person working with adults with care and support needs has:

- behaved in a way that has harmed or may have harmed an adult with care and support needs;
- possibly committed a criminal offence against or related to an adult with care and support needs;
- behaved towards an adult with care and support needs in a way that indicates she or he is unsuitable to work with such adults;
- behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to adults with care and support needs should be reviewed;
- been subject to abuse themselves, and there is evidence that this impacts on their suitability to work with adults with care and support needs.

Adults with care and support needs can be subjected to abuse by those who work with them in any setting. All allegations of abuse, neglect or maltreatment of adults with care and support needs by a person in a PiPoT must be taken seriously and treated in accordance with employment procedures. All adults with care and support needs are entitled to the same level and standard of protection from harm, regardless of whether they are receiving statutory or other services or if they are receiving none.

The scope of PiPoT procedures applies to all cases where concern, suspicion or allegation arises in connection with:

- the PiPoT's own work/voluntary activity.
- the PiPoT's life outside work (i.e. concerning adults with care and support needs in the family or the social circle, risks to children, whether the individual's own children or other children).

- PiPoT concerns may be current or historical.

The organisation will ensure that it complies with local protocols for responding to concerns about a person in a position of trust (PiPoT) issued by relevant Local Authority/ Safeguarding Partnership in the regions of operation. The Designated Lead Officers for safeguarding are the organisation's named PiPOT lead.

17. Safer Recruitment

Trident is responsible for ensuring their employees and volunteers are confident and competent in carrying out their responsibilities, and for ensuring employees/volunteers are aware of how to recognise and respond to safeguarding concerns. Trident's ***Recruitment and Selection Policy*** ensures safe recruitment policies and practices, including enhanced Disclosure and Barring Service (DBS) checks for all staff, including agency staff, students and volunteers, working directly with children and young people and vulnerable adults.

Trident has policies and procedures in place in relation to **Recruitment, Probation and Employee Reviews** and **Training** to deter those who are unsuitable to work with children. These are as follows:

- all potential staff and volunteers must complete an application form including a self-disclosure regarding previous convictions
- checking references (at least 2 obtained and verified) and essential qualifications substantiated and verified before making appointments
- asking for reasons for gaps or inconsistencies in employment and not appointing unless satisfied with the explanation given
- a face-to-face interview with at least two people
- clarification of the requirements and responsibilities of the role
- Disclosure and Barring Service (DBS) checks (at the required level) on offer of a post and every three years for all staff and volunteers including casual or temporary agency staff. Appropriate ID is checked and verified during this process
- A DBS risk assessment meeting will take place where there are cautions, offences or 'other relevant information' listed on a DBS check prior to appointment.
- no unsupervised access to children and young people until a satisfactory DBS check has been received and references reviewed and verified.
- a comprehensive induction that includes mandatory safeguarding training- failure to complete this will result in the extension of the probationary period.

All serious incidents including any that involve staff are always reported to the Executive Team and the Local Authority. The People and Culture department is always notified of any incident (either alleged, suspected or actual) that involves a member of staff as a person in a Position of Trust.

18. Training and Professional Development

As an employer Trident is committed to ensuring resources and training opportunities are in place for staff to fulfil their duties in line with the Vulnerable Adults Safeguarding Policy and Procedure, recognising that staff and volunteers will have different training needs which will be dependent on their roles and responsibilities.

Trident recognises the importance of multi-agency working in the protection of children and young people and will commit to releasing staff to attend Local Authority safeguarding meetings and external training courses.

All employees receive ongoing learning and development opportunities that include:

- Corporate Induction

- Level 1 e-learning
- Mandatory Level 2 training
- Local Authority training opportunities
- Distance Learning
- Higher level specialist training relevant to role and responsibility
- One to ones
- Annual performance and development appraisals
- Professional discussion in team meetings
- Incident Debriefs

19. Whistle Blowing

The Public Interest and Disclosure Act 1998 provides a framework for whistle blowing across private, public and voluntary sectors and Trident Reach has its own Whistle blowing Policy for employees to follow.

All employees are assured that it is safe for them to raise concerns about malpractice (at any level within the organisation) and that they will be protected from victimisation or detriment when genuine concerns are raised.

20.Referrals to the Disclosure and Barring Service

Trident complies with its legal requirement to refer a worker, where it has evidence that the staff member in question has been guilty of misconduct by harming or putting at risk a vulnerable adult (or child), during the course of their work, to the DBS barred lists following the procedures issued by the DBS.

A HR Business Partner is the organisation's point of contact for all referrals.

21. Deaths

Following the death of a customer within a Trident Reach Service, the manager must be informed and, at an appropriate time, the Executive Lead for Housing, Care and Support.

The Notification of Death Form should be completed in full on InForm and associated documents uploaded as attachments. Actions should be agreed and carried out in line with care and support plans and with the involvement with the appropriate professionals and individuals.

Requests for information from third parties such as; Standard Direction Information from a coroner's court, Domestic Homicide Review Agency Report requests etc must be disclosed to the DLO and a response agreed prior to sending the response.
Any subsequent agency recommendations, learning outcomes or action plans must be shared with the DLO. Details of customer deaths are included in Safeguarding Board Reports including annual demographic information and quarterly data. The Safeguarding Committee are informed of any Local Authority outcomes or actions.

22. Quality Assurance and Performance Reporting

The Board meet at regular intervals throughout the year and receives quarterly and annual Safeguarding Vulnerable Adult reports including data analysis and information in relation to new and emerging issues.

Key Performance Indicators are reported quarterly to Board and are defined as follows:

No. of Safeguarding Alerts Raised to the Local Authority

No of repeat alerts made to Local Authorities

No. of Alerts raised to CQC

No. of medication errors recorded in registered services

No. of Multi-Agency Risk Assessment Conference (MARAC) referrals made in relation to Domestic Abuse

No. of Safeguarding Adult Reviews where the adult was known to Trident Group

No. of Domestic Homicide reviews where the adult/child was known to Trident Group

No. of customer deaths within Care and Support Services

23. Associated Policies and Procedures

Safeguarding is not a stand-alone policy or a separate activity, rather, it is very much part of Trident's overall approach and wider policy and operational frameworks. There are a variety of interlinking policies and procedures in place to ensure that employees fulfil safeguarding responsibilities that include:

- Care & Support Planning
- Safeguarding Children and Families
- Incident Management
- GDPR Policies and Procedures
- Domestic Abuse
- Equality & Diversity
- Management of Customers Money and Financial Affairs
- Decision Making and Mental Capacity
- Recruitment and Selection
- Probations and Employee Reviews
- Whistle blowing.
- Risk Management
- Dying and Death of Residents

This is not an exhaustive list.

24. Policy Updates

This policy is to be reviewed and updated by the Designated Lead Officer for safeguarding annually. Minor amendments to the Policy will be approved by the Executive Director of Housing, Care and Support. Significant amendments to the Policy will be approved by the Safeguarding Committee.

Version Control:

Item	Reason for change	Officer /Manager	Version	Date
1	Original Policy Adapted	Joanne Spence	12	April 2017
2	Policy Review	Joanne Spence	13	September 2018
3	Policy Review	Joanne Spence	14	November 2020
4	Policy Review	Joanne Spence	15	November 2021
5	Policy Review	Joanne Spence	16	December 2022
6	Policy Review	Joanne Spence	17	September 2023
6	Policy and Procedure Review	Joanne Spence	18	March 2025

Procedure

1. Facilitating a Positive Safeguarding Culture

Trident aims to identify any instances of actual or possible abuse or harm involving care and support customers by all possible means including:

- Fostering an open and trusting culture so that employees, customers and others feel able to discuss concerns with someone authorised to take action.
- Ensuring that all employees and customers know whom they may turn to for advice and action if they become aware of or suspect that abuse or harm is occurring.
- Encouraging employees to recognise that a commitment to the highest possible standards of care and support must, when necessary, overrule loyalty to colleagues, individually or corporately.
- Making it clear to staff that failing to report incidents or suspicions of abuse or harm is itself abusive and may lead to disciplinary or criminal proceedings.
- Operating systems of management, supervision, internal inspection and quality control that have the potential to reveal abuse or harm where it exists.

2. Identifying Potential or Actual Abuse

In the first instance the Trident employee should seek advice, guidance and support from either their own line manager or another operational manager.

If an operational manager cannot be contacted, then the appropriate Service Lead or Head of Service should be contacted and if not available a Designated Lead Officer for Safeguarding.

3. When Abuse has occurred or is alleged to have occurred

If abuse or harm is clearly occurring or is alleged to have occurred, Trident employees must take swift action to limit the damage to customers and to deal with the abuse as follows:
If a staff member witnesses a situation in which a customer is in actual or imminent danger they must use their judgement as to the best way to stop what is happening without further harm to anyone involved including themselves, either by immediately intervening personally (if safe to do so) or by summoning help.
In an emergency staff call 999 if anyone is in immediate danger, a crime is suspected, or medical treatment is needed

Any staff to whom actual or suspected abuse or harm is reported must immediately take any further action necessary to provide protection, support or additional care to a customer who has been harmed, including advice about the preservation of evidence, for example, content of phone or social media messages. A safeguarding report should be made immediately and their line manager informed.

The line manager may ask an employee to discuss with the known or suspected abused/harmed person what actions they consider to be appropriate. In some circumstances, the person might not wish any action to be taken or agree to a referral being made on their behalf. In such cases, a senior manager or a Designated Lead Officer will consider whether there are reasons for overriding the person's wishes, e.g. because it is in the public interest and to prevent further harm. This could include seeking advice on the correct action to take on an anonymous basis from a Safeguarding Adults Board.

Any 'victim' whom it is thought might lack mental capacity to give their consent for the abuse/harm to be reported will be assessed for their capacity to decide and a 'best interests' decision will be taken in line with Mental Capacity Act procedures, however, all Safeguarding concerns MUST be reported to the Local Authority Safeguarding Team in these circumstances.

When formal Local Authority Alerts are raised, the organisation will follow Local Authority guidance from that point. This may involve a strategy meeting and an action plan to be implemented.

In some instances, when there is evidence that a crime has been committed, the Designated Safeguarding Officer will advise staff to report the matter directly to the police as well as alerting the Safeguarding Adults team and take guidance from them on the measures to be taken.
All employees must take steps to ensure that there is no further risk of the victim being abused by the alleged or suspected perpetrator.
The local manager must ensure that the needs of the alleged victim of the abuse for any special or additional care, support or protection or for checks on health or wellbeing are met at the outset and subsequently throughout the proceedings.

If the person who is alleged to have caused harm is a staff member and there is sufficient evidence that abuse or harm has or might have occurred, the manager will liaise with their senior manager and the People and Culture department to place the employee on precautionary pending the outcome of a disciplinary investigation.
If the evidence is insufficiently strong to warrant placement on precautionary leave the duties of the staff member will be reviewed and amended if necessary. This may include having no further unsupervised contact with any customer until an outcome is reached.

4. Record Keeping

Trident employees are responsible for ensuring that all details associated with allegations of abuse or harm is recorded clearly, accurately and promptly. The records are to be kept securely in line with GDPR policies and procedures.

Employees must record the concern or allegation in full on the appropriate system (InForm for Trident Reach and CRM for Trident Housing).

Services not linked to either system must complete the Safeguarding Log form **(Appendix 1)** and Safeguarding Observation Record **(Appendix 2)** in permanent black ink and email to the appropriate Head of Service who will enter the information on the system.

Staff should ensure that records are objective, factual and easily understood by others and must include:

- What the person actually said
- Dates, times of discussion and observations (person's behaviour, appearance, injuries etc.)
- Details any witnesses, statements from others.
- Other relevant information
- Agreed actions taken to minimise or mitigate risk of further abuse or harm.
- Dated and signed by staff member (if a paper copy)

Records must be completed at the earliest opportunity, ideally within the same working day.

Any actions agreed must take into account the customers views, wishes and desired outcomes from the Safeguarding process.

The service manager must review follow up actions taken and outcomes and monitor open cases. When the case is closed all outcomes should be reviewed as part of Head of Service quarterly reviews.

Should a formal Safeguarding Plan be implanted this must be adhered to as agreed with partner agencies, in line with the Six Principles. The Care and Support Plan along with relevant risk assessments will need to be reviewed and updated by the Operational Manager at agreed intervals.

5. Investigation of Alleged Abuse

In many cases, an investigation will be carried out or led by a member of an external agency in line with the action plan determined by the initial strategy meeting convened by the local Safeguarding Adults Team. If a staff member is expected to carry out an investigation the following guidance should be followed:

An appointed investigating officer will usually consult the person who may have been abused or harmed to hear their account of what has occurred and their views about what action should be taken, involving the customers' relatives, friends or representatives if that is appropriate and in line with the wishes of the customer.

The investigating officer is expected to take into account in his or her conducting of the investigation:

- The fears and sensitivity of the abused person
- Any risks of intimidation or reprisals
- The need to protect and support witnesses.
- Any confidentiality or data protection issues
- The possible involvement of other agencies, including the police, local safeguarding team, commissioners, and CQC

The investigating officer will assure the person who may have been abused or harmed that they will be taken seriously, that the information they provide will, as far as possible, be treated confidentially, that they will be protected from reprisals and intimidation, and that they will be kept informed of actions taken and of the outcome.

The investigating officer will consider whether the customer needs independent help [advocacy] or representation in presenting their evidence and, in conjunction with the manager, if necessary, will arrange for the appropriate help or support to be made available.

If the customer expressly states a wish that no further action should be taken, the investigating officer will consider whether there is a danger to others from the possibility of abuse from the same source, and the customer will be informed of what is to happen.

The investigation will include interviewing the staff involved in the incident up to that point, hearing and assessing evidence from any others who might be in a position to supply information, exploring every other possible source of evidence, maintaining appropriate contact with any other agencies involved, and if necessary seeking expert advice on any technical aspects of the situation which are outside the knowledge or expertise available within the organisation.

Any staff from whom evidence is taken will be assured that they will be dealt with in a fair and equitable manner and informed of their employment, legal and procedural rights.

The alleged victim of the abuse or harm, and where appropriate their relatives, friends or representatives, will at all times be kept as fully informed as possible of what is happening regarding the suspected abuse.

The investigation will be carried out as quickly as possible and the findings presented to the local safeguarding adults strategy group, which will then decide what further action to take.

6. Following the Investigation

If it seems from the investigation that on the balance of probabilities abuse or harm did indeed take place, the manager will, if the abuser is a staff member, initiate and carry proceedings in accordance with the organisation's Disciplinary Policy or, if the abuser is not a member of staff, take action to involve other responsible bodies.

If abuse or harm is proved against a staff member the manager will initiate appropriate action:

- Other employment sanctions could apply depending on whether there might have been mitigating or extenuating circumstances, for example in some cases re-training could be appropriate.
- The customer will be informed of the outcome of the investigation and any further action and will be consulted about whether any redress or apology would be appropriate and helpful to them.
- Cases of dismissal will include a referral to the Disclosure and Barring Service, completed by a HR Business Partner, to potentially prevent them from being employed further in regulated activity if they work in Registered Services and as someone who is unsuitable to work again with vulnerable adults and children at risk.
- A PiPOT referral may be necessary to the Local Authority. The manager will receive guidance on the steps to be taken from the People and Culture department.

7. Information Sharing

Trident is committed to sharing "the right information, at the right time, with the right people" to enable "early intervention and preventative work, for Safeguarding, for promoting welfare and for wider public protection.

It is important that all employees understand the legal requirement to do so under the Care Act 2014 s45 'supply of information' duty. This responsibility will be undertaken alongside other laws relating to GDPR, Human Rights and Crime and Disorder.

8. Debrief for Staff

There are two forms of debriefing that can contribute to employee wellbeing, learning and best practice:

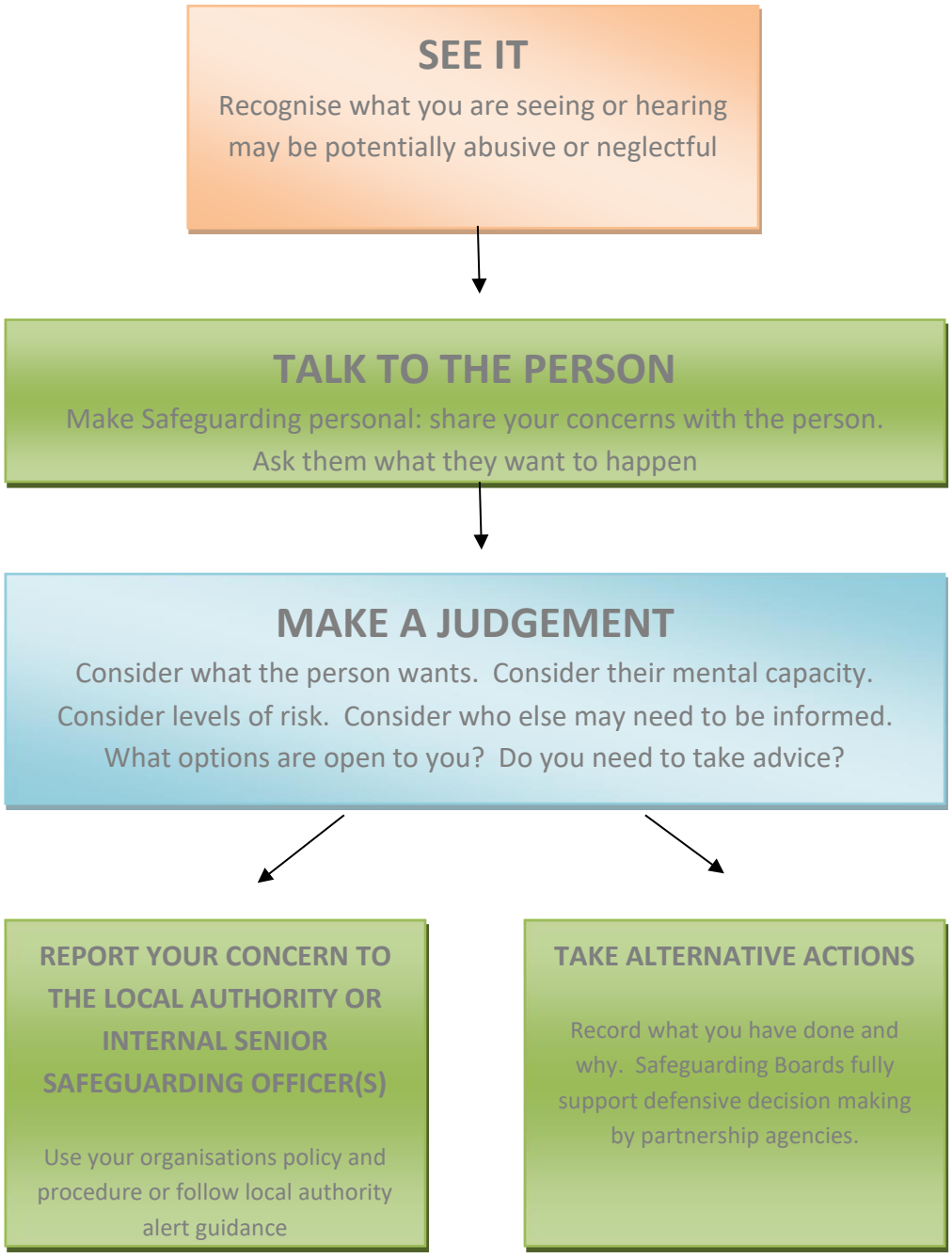
- Immediate post-incident debriefing by senior staff to ensure safety of all those involved in the incident and that a safe and calm environment is re-established.
- More formal debriefing will typically occur some days later in order to gain a deeper understanding of the critical factors that led to the incident; how similar incidents can be prevented in future; and to make sure that traumatic consequences are minimised for both service users and staff.

9. Planning Further Action

At the end of an incident involving possible or actual abuse or harm, managers and Safeguarding Officers should review what has happened with a view to assessing whether the service or its management has been in any way culpable, ineffective or negligent, learning lessons for the way the service should operate in the future, and passing on any appropriate information to other agencies.

If necessary, the organisation's policies, procedures and training arrangements should be modified in response to any material that has emerged from the incident or the investigation.

When there are system failings these will be identified and shared with commissioners and partners to challenge such failings and agree and implement wider systemic changes.



The above is intended as a quick reference guide[1] for employees to understand their responsibilities and duties - detailed procedural guidance is also included in this section.

32. Do's and Don'ts

DO	DON'T
Call 999 if anyone is in immediate danger, a crime is suspected or medical treatment is needed	**Do nothing**
Listen to the person, take all concerns seriously and be objective	Make judgements or jump to conclusions
Treat the person with dignity and respect, keeping then informed throughout	Assume the person lacks capacity to make their own decisions
Ask the person (alleged victim) what they want to happen if it is safe and appropriate to do so	Make promises that can't be kept
Seek the person's consent for any action to be taken but advise the person that the concern will always be disclosed to the Designated Safeguarding Officer(s)	Agree to keep something secret
Establish basic facts, clarify information and preserve evidence	Interrogate the person (as this may prejudice any criminal investigation later)
Seek advice and guidance from a line manager, operational manager or the out of hours Safeguarding and Serious Incident on call: 07917 092 652	Discuss with others not involved or alert the alleged perpetrator
Continually assess the risk of harm and take steps to mitigate these risks	Leave it to someone else to act
Record what you have been told, heard or seen and the agreed actions	Speculate or add subjective personal opinions
Be aware of other related policy and procedure that are part of the Safeguarding Framework	Take action without support and guidance from a manager
Work in line with the West Midlands multi – agency guidelines	Deviate from Trident Reach policy and procedural guidance
Reassure the person, discuss what will happen next and how they will be involved in decisions	Take action without consent of the person

SAFEGUARDING LOG (Appendix 1)

Customer Name:		**Address:**			
Date:		**Time:**		**Staff Name Completing Form:**	
Describe Safeguarding Matter **(Please be as specific as possible)**				**What outcomes does the customer (victim of abuse or harm) want?**	**What actions have been agreed and with who?**

Has Senior On Call Officer been informed:	Yes	No	**Date, time and name of Senior Officer:**		**Has CQC been informed (Registered Services only)**	Yes	No	**Date and Time**	
Has a Local Authority Safeguarding referral form been completed	Yes	No	**Date, time and name of person forwarded to:**		**Signature:**				
					Date:				

SAFEGUARDING OBSERVATION RECORD (Appendix 2)

Customer Name:		Address:	

Date & Time	Staff Name:	Comments (Please detail your observations – no matter how small or insignificant you think they are:	Action taken and staff signature	Operational Managers Response and signature

Types, Examples and Indicators of Abuse (Appendix 3)

Type of abuse	Examples of this form of abuse	Possible signs and signals (indicators)
Physical	Hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate physical sanctions	Bruising, finger marks, burns, cuts or laceration, fractures, weight loss, drowsiness, hair loss in 1 area, cowering, flinching.
Domestic	The behaviour of a person (A) towards another person (B) is 'domestic abuse' if A and B are 16 or over and are personally connected to each other and the behaviour is abusive, consisting of any of the following: • Physical or sexual abuse • Violent or threatening behaviour • Controlling or coercive behaviour • Economic abuse- behaviour that has a substantial adverse effect on B's ability to use or maintain money or other property; or obtain goods or services. • Psychological, emotional or other abuse It does not matter if behaviour consists of a single incident or a course of conduct.	All potential signs and indicators for each of the types of abuse in "examples" column.
Sexual	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing and 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.	Self-harm, pregnancy, STD, withdrawal, overtly sexual behaviour or language, bleeding and bruising around genitals, changes in mood, behaviour, dress, hygiene, 'attention seeking', uninhibited sexual behaviour / language, infection, injury, pregnancy
Psychological / Emotional	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	Isolation / withdrawal, personal appearance, change in appetite, paranoia, insomnia, changes in behaviour, mood, responsiveness, appetite, sleep patterns, continence, eye contact.

Financial or Material	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 and misappropriation of property, possessions or benefits.	Unexplained debt, increased or unusual cash withdrawals, standard of living and appearance
Neglect and Omission	Ignoring medical or physical needs, misuse of medication, inadequate nutrition, heating.	Appearance, weight loss, repeated ill health, drowsiness or agitation
Modern Slavery	Slavery, human trafficking, forced labour and domestic servitude.	Physical appearance, isolation, poor living conditions, few or no personal effects, restricted freedom of movement, unusual travel times, reluctant to seek help
Discriminatory	Racist, sexist, that based on a person's disability harassment, slurs or similar treatment	Oppressive practice or discriminatory language, nicknames, stereotyping of groups, offensive graffiti,
Organisational / Institutional	Neglect, poor practice as a result of structure, policies, procedures, and practises within an organisation. Rigid, imposed routines, lack of training and guidance	Poor standards, inadequate staffing, lack of trained staff, inappropriate culture, non-adherence to organisational value base and ethos, frequent apparent non related low level incidents (medication errors, bruise records etc).
Self-Neglect	Neglecting to care for self in the areas of personal hygiene, personal health or surroundings (environment) and includes behaviour such as hoarding.	Appearance, weight loss, repeated ill health, deterioration of health, health & safety risk in property, hoarding

These lists are not exhaustive; some indicators of abuse can apply across any of the types of abuse. The purpose of these examples is for delegates to consider the widest possible range of signs and signals that can be physical, behavioural, verbal or environmental.

Remember, any of the types of abuse above can be perpetrated as a result of deliberate intent, negligence or ignorance.

Local Authority Contact Points (Appendix 4)

Birmingham Safeguarding Adults Board **0121 303 1234** **www.bsab.org/how-to-report-abuse**
Coventry Adult Social Care Direct **024 7683 3003** Worried that someone you know is being harmed or neglected? – Coventry City Council
Call Derbyshire **01629 533190**
Dudley Access to Adult Social Care Team **0300 555 0055** Tell us | Dudley Council
Sandwell MBC 0121 569 2266 Homepage - Sandwell Safeguarding Adults Board
Shropshire First Point of Contact Team 0345 678 0944 Concerned about someone? | Shropshire Council
Telford and Wrekin Safeguarding Partnership 01952 385385 How to report abuse - Adult safeguarding - Telford & Wrekin Council

Please note that this information is correct at the time of policy review, however please refer to Local Authority websites for up to date information and to download referral forms directly or use the online link

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