

Insert
Club
Name
and/or Logo

EXAMPLE SAFEGUARDING VULNERABLE ADULTS PROCEDURES AND GUIDELINES FOR [INSERT CLUB NAME]

Aim of Guidelines and Procedures

[INSERT CLUB NAME] believes that every person has the right to a lifestyle that maintains personal independence, safeguards privacy, offers genuine and informed choices, provides opportunities to enjoy and contribute to society and enables them to have their social, cultural and individual needs met. They also have the right to protection from harm or exploitation.

A vulnerable adult is any person who needs extra support, for example because they are elderly or may have a learning disability, physical disability, sensory impairment, mental health problem and who are unable to protect themselves against harm and abuse. It may be someone who is usually able to manage, but at some stage may not be able to because of an accident or illness.

Our procedures will:

- Ensure those vulnerable adults attending [INSERT CLUB NAME] receive the protection and support they need if they are at risk of abuse
- Provide clear direction to staff, helpers/volunteers at [INSERT CLUB NAME] if they have any concerns that a vulnerable adult is in need of protection.

Recognising the Different Types of Abuse

Type of abuse	Signs/Indicators
<p>Physical abuse is an individual's body being injured or hurt due, for example, to assault, hitting, slapping or pushing. It can also be the wrong use of restrictive practices.</p> <p>Examples could be the misuse of medication or using inappropriate restraint such as locking someone in a room, tying them to a chair or using inappropriate physical sanctions.</p>	<p>Injuries that are unexplained or haven't been treated. There could be a number of injuries of different ages and in different places. The injury does not match the explanation.</p> <p>Examples include:</p> <ul style="list-style-type: none">  Broken bones  Bruises  Unexplained loss of clumps of hair  Bite, burn or scald marks.
<p>Domestic violence 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 includes psychological, physical, sexual, financial and emotional abuse, and so-called 'honour-based' violence.</p> <p>Under the Adoption & Children Act 2002 – the definition of "harm" also includes domestic violence.</p>	<p>Signs of domestic violence can be any of those relating to the different types of abuse or neglect that can occur in any incident.</p>
<p>Modern slavery – this encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.</p>	<ul style="list-style-type: none">  Signs of physical or psychological abuse, malnourished or unkempt, appearing withdrawn  Rarely allowed to travel on their own, seem under the control and influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work  Few or no personal belongings or documents  They avoid eye contact; appear frightened or hesitant to talk to strangers and law enforcers.

<p>Financial or material abuse is the use of a person's funds and belongings without their permission. This could be theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.</p>	<ul style="list-style-type: none">  Bills not being paid  Loss of assets such as a house being sold and the money from the sale disappearing  Expenditure higher than the living conditions suggest  Not having enough food or clothing
<p>Sexual abuse is when a person becomes involved in sexual relationships or activities that they do not want to be involved in. They may have said that they do not want to be involved or they may be unable to give consent. Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting to.</p>	<ul style="list-style-type: none">  Pain, sores and bruising around the inner thighs and genital, anal or breast areas  Bloodstained underwear  Pain and discomfort when walking or sitting  Sexually transmitted infections and pregnancy are indicators for sexual activity and can indicate abuse if the person does not have the capacity to provide consent.
<p>Neglect is also known as the 'omission to act' or 'failure to act'. It is a failure to meet the basic needs of the individual. It includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services and the withholding of the necessities of life, such as medication, adequate nutrition and heating.</p>	<p>Indicators of neglect by others and self- neglect are similar. They include:</p> <ul style="list-style-type: none">  Malnutrition  Dehydration  Bedsores  Dirty clothing and bedding  Taking the wrong dosage of medication.
<p>Self-neglect is the term used to refer to those who fail or refuse to take care of their own basic needs. Neglecting to care for one's personal hygiene, health or surroundings can include a wide range of behaviours such as hoarding.</p>	<p>Indicators of neglect by others and self- neglect are similar. They include:</p> <ul style="list-style-type: none">  Malnutrition / Dehydration  Bedsores  Dirty clothing and bedding  Taking the wrong dosage of medication.

<p>Psychological abuse results in a person feeling worthless, unloved or uncared for. It includes 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.</p>	<ul style="list-style-type: none">  Anxiety  Lack of confidence  Low self-esteem  Disturbed sleep.
<p>Discriminatory abuse refers to an individual or group being treated unequally because of characteristics identified in the Equality Act 2010. It involves ignoring a person's values, beliefs and culture and includes forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.</p>	<ul style="list-style-type: none">  Poor service that does not meet the person's needs  Verbal abuse and disrespect  Exclusion of people from activities and/or services.
<p>Organisational abuse happens where services provided are focused on the needs of the organisation. For example, not providing choice over meal times or when someone can go to bed because this is easier for the organisation. It includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, processes, policies and practices of the organisation.</p>	<ul style="list-style-type: none">  Poor care standards  Rigid routines  Lack of staff learning, development and support.

Spotting signs of abuse or neglect

Workers across a wide range of organisations need to be vigilant about adult safeguarding concerns in all walks of life. Findings from serious case reviews have sometimes stated that if professionals or other staff had acted upon their concerns or sought more information, then death or serious harm might have been prevented.

Regardless of the safeguarding concern everyone should understand what to do, and where to go locally to get help and advice. It is vital that professionals, other staff and members of the public are vigilant on behalf of those unable to protect themselves. This will include:

- Knowing about different types of abuse and neglect and their signs
- Supporting adults to keep safe
- Knowing who to tell about suspected abuse or neglect
- Supporting adults to think and weigh up the risks and benefits of different options.

When Should the Club Take Action?

- Where the health, safety and well being of vulnerable adults are seriously threatened as a result of self-neglect or abuse by others, the club will make every effort to identify, prevent or minimise what is happening
- It's not the role of the club to determine whether an individual is at risk or experiencing abuse. If vulnerable persons or others are considered to be at risk of abuse, where actual abuse is suspected, or there are suggestions of serious self-neglect, the club will make a referral to the local authority's adult social care department
- It's important to remember that vulnerable people and their carers have separate rights in relation to independence, decision making and choice. It is good to help reconcile differences when the rights and responsibilities of individuals conflict, but this may not always be possible.

Procedures to Follow if Possible Abuse is Brought to Your Attention

This procedure outlines what you should do if a vulnerable adult makes a disclosure or allegation of abuse. If your club has many vulnerable adults as members it would be good practice to have a named person for safeguarding.

Talking to a vulnerable adult who has told you that he/she or another vulnerable adult is being abused

- Reassure the person that telling someone about it was the right thing to do
- Tell him/her that you now have to do what you can to keep him/her (or the adult who is the subject of the allegation) safe
- Let the person know what you are going to do next and who else needs to know about it

- Let the person tell his or her whole story. Don't try to investigate or quiz him/her, but make sure that you are clear as to what he/she is saying
- Ask the person what he/she would like to happen as a result of what he/she has said, but don't make or infer promises you can't keep
- Immediately contact your supervisor/manager to let them know what is happening.

Helping a vulnerable adult in immediate danger or in need of emergency medical attention

- If the person is in immediate danger and is with you, remain with him/her and call the police
- If the person is elsewhere, contact the police and explain the situation to them
- If he/she needs emergency medical attention, call an ambulance and, while you are waiting for it to arrive, get help from your first aider
- If the first aider is not available, use any first aid knowledge that you may have yourself to help the person
- Immediately contact your supervisor/manager to let them know what is happening
- A decision will need to be made about who should inform the person's carers and the local authority's adult social care department, and when they should be informed. If you have involved the police and/or the health services, they should be part of this decision. Consider the welfare of the vulnerable adult as the highest priority.

Issues that will need to be taken into account are:

- The person's wishes and feelings
- The carer's right to know (unless this would place someone in danger, or would interfere with a criminal investigation)
- The impact of telling or not telling the carer
- The current assessment of the risk to the person and the source of that risk
- Any risk management plans that currently exist.

Keeping a record of your concerns

- Use the Form for Reporting Concerns about a Vulnerable Adult to record the concern and how it is dealt with. The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory authorities if a referral to them is needed
- The form should be signed and dated by all those involved in its completion and kept confidentially on the vulnerable adult's file. The name of the person making the notes should be written alongside each entry.

What to do if an allegation is made or information is received

1. Is the vulnerable adult in immediate danger or does she/he need emergency medical attention?

- If the person is in immediate danger and is with you, remain with him/her and call the police
- If the person is elsewhere, contact the police and explain the situation to them
- If he/she needs emergency medical attention, call an ambulance and, while you are waiting for it to arrive, get help from your first aider
- If the first aider is not available, use any first aid knowledge that you may have yourself to help the person
- Immediately contact your supervisor/manager or named person for safeguarding, if you have one, to let them know what is happening
- The member of supervisor/manager or named person for safeguarding should also inform the person's carers if the person is in need of emergency medical attention, and then arrange to meet them at the hospital or medical centre
- The carers should be informed that an incident has occurred, that the person has been injured and that immediate steps have been taken to get help.

2. Is the person at the centre of the allegation working with vulnerable adults now?

- If yes, the concern needs to be discussed immediately with the supervisor/manager at [INSERT CLUB NAME] and the named person for safeguarding if you have one
- One of these people, in a sensitive manner, should remove the person about whom the allegation has been made from direct contact with vulnerable adults
- It should then be explained to the person, in private, that there has been a complaint made against him/her, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with vulnerable adults. It may be best, under the circumstances, for the person to return home on the understanding that the supervisor/manager or named safeguarding person will telephone him/her later that day
- The information provided to him/her at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the local authority's adult social care department and the police
- If the person is a member of a trades union or a professional organisation, he/she should be advised to make contact with that body. Arrangements should be made for the person to receive ongoing support in line with the responsibilities the organisation has towards his/her welfare.

Reporting an allegation or concern

- If the allegation is made by a vulnerable adult or carer to a member of staff, or if a member of staff observes concerning behaviour by a colleague at first hand, this should be reported immediately to the staff member's supervisor/manager and the named person for safeguarding if you have one; [INSERT CLUB NAME]'s lead on handling the allegation
- If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to a person more senior to their manager. If the person who is the subject of the concern is a named person for safeguarding, the matter should be reported to their manager.

Conducting an investigation

If you report a disclosure about abuse that has happened elsewhere, once you report it and hand in your report then investigations may be conducted by the agencies in the second stage onwards of a Protection of Vulnerable Adults (POVA) process and without you/your club's involvement at all.

Your club is really only likely to be conducting an investigation if the allegation is made against your club, staff, helpers/volunteers and/or members.

- Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegation
- There are up to three possible lines of enquiry when an allegation is made:
 1. A police investigation of a possible criminal offence.
 2. Enquiries and an assessment by the local authority's adult social care department about whether a vulnerable adult is in need of protection.
 3. Investigation by an employer and possible disciplinary action being taken against the person in question.
- This includes implementing a plan to manage any risk posed by the individual to vulnerable adults in the workplace until the outcome of the other investigations and enquiries is known.

Dealing with a criminal offence

If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of 'significant harm' is reached), the local authority will contact the police and involve them in a similar discussion.

A representative from [\[INSERT CLUB NAME\]](#) should cooperate fully with any discussion involving the police and should ask for similar cooperation from the police in terms of the sharing of information relevant to the person's employment.

Discussions with the police should also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place, or whether disciplinary action must wait until the criminal process is completed.

Talking to carers about the allegation or concern

If the carers do not already know about the allegation, you will need to discuss with the local authority how they should be informed and by whom.

Talking to the person who is the subject of the allegation

- The person at the centre of the allegation should be informed as soon as possible after the initial consultation with the local authority. However, if a strategy discussion with adult social care or the police is needed, this might have to take place before the person concerned can be spoken to in full. The police and social care department may have views on what information can be disclosed to the person
- Only limited information should be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed or unless there is no need for involvement from these statutory agencies
- You will need to keep in close communication with the local authority and the other agencies involved in order to manage the disclosure of information appropriately.

Taking disciplinary action

- If the initial allegation does not involve a possible criminal offence, the named person for safeguarding, if you have one, and manager of the person at the centre of the allegation should still consider whether formal disciplinary action is needed
- If the local authority's adult social care department has undertaken any enquiries to determine whether a vulnerable adult is in need of protection, you should take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations
- The following timings should be kept to wherever possible, depending on the nature of the investigation:
 - If formal disciplinary action is not needed, other appropriate action should be taken within 3 working days
 - If disciplinary action is required, and can be progressed without further investigation, this should take place within 15 days

- If [INSERT CLUB NAME] decides that further investigation is needed in order to make a decision about formal disciplinary action, the named person for vulnerable adults/club leader should discuss with the local authority the possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to the named person within 10 working days
 - Having received the report of the disciplinary investigation, the club manager/named person for safeguarding should decide within two working days whether a disciplinary hearing is needed
 - If a hearing is needed, it should be held within 15 working days
 - The named person should continue to liaise with the local authority during the course of any investigation or disciplinary proceedings, and should continue to use them as a source of advice and support.
- While criminal proceedings are underway, or while an investigation is ongoing, there should be no decisions made about the person's future work arrangements until this is concluded. The police are required to complete their work as soon as reasonably possible and to set review dates, so the named person should either liaise with the police directly or via the local authority to check on the progress of the investigation and criminal process
 - The police are also required to inform the employer straight away if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge him/her with an offence or to administer a caution. In any eventuality, once the outcome is known, the named person should contact the local authority to discuss the issue of disciplinary proceedings
 - If the allegation is substantiated and if, once the case is concluded [INSERT CLUB NAME] dismisses the person or ceases to use their services, or the person ceases to provide his/her services, the named person should consult with the local authority about referral of the incident to the Independent Safeguarding Authority (ISA). This should take place within a month.

Managing risk and supporting the person at the centre of the allegation

- The first priority of [INSERT CLUB NAME] must always be the safety and welfare of vulnerable adults. However, as an employee or volunteer, the person who is the subject of the allegation has a right to be treated in a fair, sensitive and non-judgmental manner and to have his or her privacy respected as far as this ensures the safety of vulnerable adults
- Information about the allegation must only be shared on a need to know basis with those directly responsible for supervising and managing the staff member or volunteer. Any other information (for example, explanations to other staff members as to why the person is not at work or working to different arrangements) should be agreed and negotiated with the individual concerned
- If the person is a member of a trades union or a professional organisation, he/she should be advised to make contact with that body as soon as possible after being informed that he/she is the subject of an allegation. Arrangements should also be made for him/her to receive ongoing support and information about the progress of the investigation
- The possible risk of harm to vulnerable adults presented by the person who is the subject of an allegation needs to be carefully managed, both during and after any conclusion to the investigation processes following the allegation. This means that [INSERT CLUB NAME] may need to consider suspending the person if there is cause to suspect that a vulnerable adult may be at risk of significant harm, or if the allegation is serious enough to warrant investigation by the police, or if it is so serious that it could lead to dismissal. However, a decision to suspend should not be taken automatically, as there may be other ways of managing any risk presented by the person
- The situation should be discussed fully between the named person for safeguarding (if you have one), the individual's manager/supervisor and the local authority, who will seek the views of the police and the adults social care department on the question of possible suspension. The conclusions of the discussion should also be carefully documented. Grounds for suspension should be clearly set out if this is the conclusion. If suspension is not the conclusion, then a clear plan should be made as to how any possible risk posed by the individual is to be managed. This could involve, for example, changes to the person's duties so that they do not have direct contact with vulnerable adults, and/or increased levels of supervision whilst at work

- If it is decided, once the case has been concluded, that a person who has been suspended or who has taken sick leave due to the stress induced by the allegation, is able to return to work, the named person/the manager/supervisor of the person who has been the subject of the allegations should consider how best to support the individual in this process. A plan to facilitate a return should be drawn up in consultation with the individual him/herself, and should take into account the need to manage any remaining risks to vulnerable adults and also to support the person concerned after what will have been, and will remain, a very difficult experience
- If the decision is that the person cannot return to work and has to be dismissed or chooses to resign, club leader and the local authority should discuss the need for the matter to be referred to the Independent Safeguarding Authority (ISA) and/or to any professional body to which the person may belong. [INSERT CLUB NAME] does not enter into compromise agreements with individuals who resign following the conclusion of investigations into allegations made against them, and will always comply with its statutory obligations to share information about the individual in the interests of protecting vulnerable adults
- If an allegation made by a vulnerable adult is found to be without substance or fabricated, [INSERT CLUB NAME] will consider referring the vulnerable adult in question to the adult social care department for them to assess whether he/she is in need of services or whether he/she may have been abused by someone else. If it is felt that there has been malicious intent behind the allegation, [INSERT CLUB NAME] will discuss with the police whether there are grounds to pursue any action against the person responsible.

Keeping a record of the investigation

- All those involved in dealing with the allegation should keep clear notes of the allegations made, how they were followed up, and any actions and decisions taken, together with the reasons for these
- These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside
- The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the local authority to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual

- The notes should be held on file for a 10-year period, whether or not the person remains with [\[INSERT CLUB NAME\]](#) for this period.

N.B. Our guidelines provide a brief introduction, a description of the key issues to adhere to and an example policy. The documents are not comprehensive and do not constitute legal advice.