



Her Centre Safeguarding Vulnerable Adults Policy

1. Introduction

- 1.1 Her Centre is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults engaged in the breadth of its activities.
- 1.2 The purpose of this policy is to outline the duty and responsibility of staff, volunteers and trustees working on behalf of Her Centre in relation to the protection of vulnerable adults from abuse. Keeping staff safe is covered in our Health and Safety and Lone Working Policy.
- 1.3 The key objectives of this policy are:
 - To explain the responsibilities Her Centre and its staff, volunteers and trustees have in respect of vulnerable adult protection.
 - To provide staff with an overview of vulnerable adult protection
 - To provide a clear procedure that will be implemented where vulnerable adult protection issues arise.

2. Context

- 2.1 For the purpose of this document 'adult' means a person aged 18 years or over.
- 2.2 This policy applies to all women who use our services, from all ethnic backgrounds, countries of origin, whether able or disabled, regardless of sexuality, whether mothers or pregnant or without children. Any discrimination will not be tolerated and will be addressed according to our Equal Opportunities and Diversity policies.
- 2.3 Some adults are less able to protect themselves than others, and some have difficulty making their wishes and feelings known. This may make them vulnerable to abuse. The broad definition of a 'vulnerable adult' referred to in the 1997 Consultation Paper *Who decides?* issued by the Lord Chancellor's Department, is a person:

Who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

- 2.4 The first priority should always be to ensure the safety and protection of vulnerable adults. To this end it is the responsibility of all staff to act on any suspicion or evidence of abuse or neglect (see the Public Interest Disclosure Act 1998) and to pass on their concerns to a responsible person/agency.
- 2.5 For purposes of ensuring consistent and widely understood terminology, this policy and accompanying procedures will use the phrase 'Vulnerable Adults' to identify those eligible for interventions within the procedures.

3. Legal framework

- 3.1 This guidance reflects the principles contained within the Human Rights Act 1998, the Mental Capacity Act 2005 and Public Interest Disclosure Act 1998.
- 3.2 The Mental Capacity Act 2005, covering England and Wales, provides a statutory framework for people who lack capacity to make decisions for themselves, or who have capacity and want to make preparations for a time when they may lack capacity in the future. It sets out who can take decisions, in which situations, and how they should go about this.
- 3.3 The Human Rights Act 1998 gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR).
- 3.4 The Public Interest Disclosure Act 1998 (PIDA) created a framework for whistle blowing across the private, public and voluntary sectors. The Act provides almost every individual in the workplace with protection from victimisation where they raise genuine concerns about malpractice in accordance with the Act's provisions.
- 3.5 The Safeguarding Vulnerable Groups Act 2006 created a single barring list for children — but a separate one for vulnerable adults, as with the current Protection of Vulnerable Adults (POVA) list. The new system will be able to react to new information about an individual. If it works as planned, individuals will be barred from working with children as soon as information justifying this is available.

4. The role of staff, volunteers and trustees

a duty to promote the welfare and safety of vulnerable adults.

- 4.2 All staff will be trained in safeguarding vulnerable adults and will attend refresher courses every two years.

- 4.4 All staff will sign up to the Code of Conduct and Good Practice Agreement and ensure that they always treat staff, volunteers and clients with respect.
- 4.5 Recruitment of staff will always include a full DBS check and two references from previous employers will be required. See Recruitment policy for further information.
- 4.6 Staff, volunteers and trustees may receive disclosures of abuse and observe vulnerable adults who are at risk. This policy will enable staff/volunteers to make informed and confident responses to specific adult protection issues.

5. What is abuse?

- 5.1 Abuse is a violation of an individual's human and civil rights by any other person or persons.
- 5.2 Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it.
- 5.3 The Department of Health in its report *No Secrets: guidance on protecting vulnerable adults in care* (2000) suggests the following as the main types of abuse.
 - Physical abuse- including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
 - Sexual abuse - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented or could not consent or was pressured into consenting.
 - Psychological abuse- including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
 - Financial or material abuse- including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- Neglect and acts of omission- including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Discriminatory abuse- including racist, sexist, that based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment.

In addition, abuse includes domestic violence and abuse, based on the government definition of abuse:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members¹ regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse: • psychological • physical • sexual • financial • emotional 'Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Abuse also includes modern slavery, which is covered in our Violence against Women and Girls policies, covering how to report and support victims, and also organisational abuse, which is covered in our Complaints policy and procedure.

- 5.4 Women can be vulnerable due to self-neglect, self-harm and have suicidal thoughts, all of which can indicate risk to a vulnerable person. Her Centre will work with partner agencies in health and social services to support our clients to stay safe and look after themselves and will always disclose to adult safeguarding where a client says she is considering suicide.
- 5.5 Clients who are vulnerable can be drawn into and exploited by extremist groups. As part of the PREVENT Counter Terrorism Act it is recommended that:
- Frontline staff who engage with the public should understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. They

need to be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism

- Staff need to know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it. They need to understand how to obtain support for people who may be being exploited by radicalising influences.

Her Centre will provide training for staff to ensure this awareness and knowledge of council leads to contact on the PREVENT agenda.

6. Procedure in the event of a disclosure

- 6.1 It is important that vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously.
- 6.2 This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused. For issues that lead to consideration of whistleblowing against the organisation, please refer to our Whistleblowing policy.
- 6.3 Promises of confidentiality should not be given as this may conflict with the need to ensure the safety and welfare of the individual.
- 6.4 A full record must be made as soon as possible of the nature of the allegation and any other relevant information.
- 6.5 This should include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, and the account which has been given of the allegation.

7. Responding to an allegation

- 7.1 Any suspicion, allegation or incident of abuse must be reported to the Designated Adult Protection Officer in the Information Contact Offices at the Royal Borough of Greenwich on 0208 921 2304 that working day where possible, and also raise with our Safeguarding Lead and Services Manager, Dorothy Ghanekar.
- 7.2 Where possible the manager shall telephone and report the matter to the local adult social services duty social worker. A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported.

The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

8. Responding appropriately to an allegation of abuse

8.1 In the event of an incident or disclosure:

DO

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Listen
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your manager for support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

DON'T

- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic

8.2 It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the designated Vulnerable Adult Protection Officer.

9. Confidentiality

9.1 Vulnerable adult protection raises issues of confidentiality which should be clearly understood by all.

- 9.2 Staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and adult social services.
- 9.3 Clear boundaries of confidentiality will be communicated to all. All clients are informed at first meeting that confidentiality can be breached where there are concerns regarding Child or Adult safeguarding.
- 9.4 All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.
- 9.5 If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.
- 9.6 Within that context, the adult should, however, be assured that the matter will be disclosed only to people who need to know about it.
- 9.7 Where possible, consent should be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.
- 9.8 Where a disclosure has been made, staff should let the adult know the position regarding their role and what action they will have to take as a result.
- 9.9 Staff should assure the adult that they will keep them informed of any action to be taken and why. The adults' involvement in the process of sharing information should be fully considered and their wishes and feelings taken into account.

10. The role of key individual agencies

10.1 Adult Social Services

The Department of Health's *No Secrets: guidance on protecting vulnerable adults in care* (2000) guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of vulnerable adults at risk of abuse.

All local authorities have a Safeguarding Adults Board that oversees multi-agency work aimed at protecting and safeguarding vulnerable

adults. It is normal practice for the board to comprise of people from partner organisations who have the ability to influence decision making and resource allocation within their organisation.

10.2 The Police

The Police play a vital role in Safeguarding Adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other protocols.

11. Role of designated vulnerable adult protection officer

11.1 The role of the designated officer is to deal with all instances involving adult protection that arise within Her Centre. They will respond to all vulnerable adult protection concerns and enquiries. The designated adult protection officer is Dorothy Ghanekar, on 203 260 7772.

12. Role of line manager

12.1 The role of the line manager is to support the member of staff, trustee or volunteer involved with the incident and to ensure the correct procedures are followed.

12.2 The line manager could, if agreed with the staff member dealing with the incident, make contact with the designated Adult Protection Officer at Greenwich council in the first instance on 0208 921 2304

12.3 The line manager should ensure that all staff within their team are familiar with Her Centre's vulnerable adult protection procedures and ensure that all staff undertake training, where appropriate.

13. Complaints procedure

13.1 Her Centre has a complaints procedure available to all staff, volunteers and trustees.

14. Recruitment procedure

14.1 Her Centre operates procedures that take account of the need to safeguard and promote the welfare of vulnerable adults, including arrangements for appropriate checks on new staff, volunteers and trustees where applicable.

Updated and approved January 2026 by the trustees and staff. Review due in January 2028