

Vulnerable Adults Policy

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Section One: Introduction to the Policy

Policy aim

This policy shows how Jacksons Lane will work with other agencies and partners to recognise and manage suspicions, allegations and findings of abuse of vulnerable adults. This policy applies to anyone who is employed by Jacksons Lane as well as those who have a contractual relationship with the organisation, including freelancers, volunteers and trustees.

The aim of the Vulnerable Adults Policy is to ensure that all staff and volunteers who work with us know how to keep participants safe. This policy will allow all staff and volunteers to make informed and confident responses to safeguarding issues and disclosures.

The policy will also be shared with all those who hire studio space at Jacksons Lane to lead classes or workshops with Vulnerable Adults. This is to inform them of best safeguarding practice, our expectations of them, and the importance of safeguarding their own participants.

What is safeguarding?

Safeguarding is the term we use to describe how we protect adults and children from abuse or neglect. It is an important shared priority of many public services, and a key responsibility of local authorities.

Safeguarding is about protecting people who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions or lack of action, of another person. In these cases, it is vital that public services work together to identify people at risk, and put steps in place to help prevent abuse or neglect.

The Prevent Duty

We have due regard to the need to prevent Vulnerable Adults from being drawn into terrorism (Prevent Duty) and are aware of our duty to report such incidents and promote British Values: democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different faiths and beliefs and for those without faith.

What is a vulnerable adult?

The definition of a vulnerable adult is a person over the age of 18 years who:

- is receiving support from or may be eligible for Community Care Services by reason of mental or other disability, age, or illness;
- AND is unable to take care of themselves;
- OR is unable to protect themselves from significant harm or exploitation.

Examples of vulnerable adults may include those who fit one or multiple of the following:

- Older and frail people;
- Those with any of the following conditions:
 - a mental health need;
 - a learning difficulty;
 - a physical impairment;
 - a sensory impairment;
- Those who are substance or alcohol dependent;
- Family carers providing assistance to another vulnerable adult.

Identified Safeguarding issues at Jacksons Lane:

This police relates to the safeguarding of Vulnerable Adults at Jacksons Lane. This includes visitors to our building, those taking part in classes, courses, workshops or other events in our studio spaces, artists and company members in our artistic programmes, and participants in our Creative Engagement programmes. Many of our Artistic and Creative Engagement activities take place off site, as well as within the venue, and with support from our staff and volunteers so are therefore one of our principal safeguarding concern groups.

Mental Capacity

In order to protect those who lack capacity and to enable them to take part as much as possible in decisions that affect them, the following statutory principles apply. (5 Principles Which Underpin The Mental Capacity Act (2005):

- You must always assume a person has capacity unless it is proved otherwise;
- You must take all practicable steps to enable people to make their own decisions;
- You must not assume incapacity simply because someone makes an unwise decision;
- Always act, or decide, for a person without capacity in their best interests*;
- Carefully consider actions to ensure the least restrictive option is taken.

*How to act in someone's best interests:

- Do not make assumptions about capacity based on age, appearance or medical condition;
- Encourage the person to participate as fully as possible;
- Consider whether the person will in the future have capacity in relation to the matter in question;
- Consider the person's past and present beliefs, values, wishes and feelings.

Making safeguarding personal

The Care Act 2014 set out a requirement for 'making safeguarding personal' through which all safeguarding practices should be person-led, and outcome focused. An adult at risk should be involved in conversations about the safeguarding process relating to them, and have choice and control over this. This should also be considered as part of the safeguarding decision-making process. If a volunteer or staff member feels that an adult is at risk but that they may lack the capacity or understanding to make choices about their lifestyle, then a concern should be raised in accordance with our procedures set out in this policy.

Section Two: Forms of Abuse

Abuse is a misuse of power and control that one person has over another. Where someone is dependent on another, there is the possibility of abuse or neglect unless enough steps to safeguard the individual are put in place.

Abuse and neglect take many forms. Abuse can lead to a violation of someone's human and civil rights by another person or persons. Abuse can be physical, financial, verbal or psychological. It can be the result of an act or a failure to act. It can happen when an adult at risk is persuaded into a financial or sexual exchange they have not consented to or can't consent to. Abuse can occur in any relationship and may result in significant harm or exploitation.

Some types of abuse are illegal, and in these cases adults who lack capacity are protected by law the same as everyone else. If Jacksons Lane suspects that a crime against any adult has been committed, we refer the matter to the police. An urgent referral is then made for the safety of the adult at risk and/or to preserve evidence.

Abuse can fall into the following categories:

Physical: This includes assault, hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone.

Domestic: This includes psychological, physical, sexual, financial or emotional abuse, including controlling, coercive or threatening behaviour. It also covers so-called 'honour' based violence.

Sexual: This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn't consent to or is unable to consent to.

Psychological: This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks. And only letting someone do certain things at certain times

Financial or material: This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.

Modern slavery: This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

Discriminatory: This includes types of harassment or insults because of someone's age, race, gender or gender identity, age, disability, sexual orientation or religion.

Organisational: This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.

Neglect and acts of omission: This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.

Self-neglect: This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surrounding.

Abuse can take many forms. It might not fit naturally into any of the categories above, and it might fit into more than one. Abuse can also be carried out by one vulnerable adult towards another. This is still abuse and should be dealt with appropriately. The adult at risk who abuses may also be neglecting themselves which could also be reason for a safeguarding referral.

All of the above shows some of the signs (there can be others) that abuse might be taking place. If something on this list happens, it doesn't automatically mean someone is being abused – it just means we need to look closer at the situation.

How might we recognise abuse?

Concerns about, or evidence of, abuse can become apparent through:

- A direct disclosure by the vulnerable adult;
- A complaint or expression of concern by another member of staff, a volunteer, another service user, a carer, a member of the public or relative;
- An observation of the behaviour of the vulnerable adult by the volunteer, member of staff or carer.

Section Three: Why don't people disclose?

People often don't tell about abuse because they:

- Are scared because they have been threatened;
- Believe they are to blame;
- Feel embarrassed or guilty;
- Don't want the abuser to get into trouble;
- Have communication or learning difficulties;
- May not have the vocabulary for what happened;
- Are afraid they won't be believed.

It is for these reasons that all staff, volunteers and facilitators working for or on behalf of Jacksons Lane should be aware of how to recognise and appropriately report upon different signs and indicators of abuse.

Section Four: Jacksons Lane practise and guidelines

Code of Practice

- Jacksons Lane will ensure that all relevant staff and workers receive a copy of this policy, in house training on the policy and further safeguarding training as required as part of their role.
- Before working directly with participants, staff and facilitators will have access to the registration/referral form collected by the project leader/coordinator and will not ask participants directly for personal details or offer their own personal details.
- There should be no contact with participants that is unrelated to activities taking place, unless there is a genuine concern for the health and safety of that individual. As much as possible, communications with participants should come only from staff's work email addresses or Jacksons Lane phone numbers and not through

personal devices, networks, or social media channels. In the case that a phone call does need to be made from a personal mobile phone, the number must be withheld.

- All relevant staff working directly with Vulnerable Adults will have a full Disclosure and Barring Service check and two references. All volunteers working with vulnerable older adults will have a full Disclosure and Barring Service check.
- In the event that a previous criminal conviction evidences showing that a person is not suitable to work with vulnerable adults, they will not be hired.
- During activities led or facilitated by Jacksons Lane, participants will be invited to explore a range of topics using a variety of information and materials. Workshop leaders, staff and volunteers will consider the appropriateness of any information/material shared out to participants.
- During activities led or facilitated by Jacksons Lane, workshop leaders and staff will also check the content and appropriateness of websites, films and TV programmes before recommending them to participants and will only recommend in relation to topics of research relevant to the workshops.
- Jacksons Lane will ensure that all external parties working with Vulnerable Adults within the venue, including studio and theatre hirers, are made aware of the expectations of Jacksons Lane and the importance of safeguarding their own participants. All clients leading activities with Vulnerable Adults will be required to sign a Safeguarding Appendix confirming their understanding of these expectations and commitment to safeguarding their participants
- Jacksons Lane will ensure that public areas within the venue provide a secure and safe space for Vulnerable Adults, and that any issues or concerns recognised by venue staff are reported and acted upon in accordance with the procedures set out within this policy.

Best practice guidelines

All personnel working for Jacksons Lane are expected to demonstrate exemplary behaviour in order to promote welfare of Vulnerable Adults and reduce the likelihood of allegations being made.

Best practice means:

- Always conducting workshops in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Treating all vulnerable adults equally, with respect and dignity.
- Always putting the welfare of vulnerable adults first.
- Jacksons Lane's work will regularly entail physical contact due to the nature of circus and drama activities. Any physical touch will be done thoughtfully and with respect to each individual's boundaries on personal space, in accordance with the activity and requirements for health and safety. Staff will only make physical contact with

participants in an open planned environment with other professionals and participants present.

- Building balanced relationships based on mutual trust which empowers participants to share in the decision-making process.
- Making all activities facilitated by Jacksons Lane fun and enjoyable.
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to best practice guidelines.
- Being an excellent role model to all participants, volunteers and other staff members
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Recognising the developmental needs and capacity of vulnerable and disabled adults.
- Asking permission if the need arises to administer emergency first aid and/or other medical treatment. Keeping a written record of any accident or injury that occurs, along with the details of any treatment given.

Practices that are never sanctioned

The following are **never** sanctioned. Staff and volunteers must never:

- Engage in rough, physical or sexually provocative games;
- Allow or engage in any form of inappropriate touching;
- Allow participants to use inappropriate language unchallenged;
- Make sexually suggestive comments to a participant, even in fun;
- Mock, tease or bully vulnerable persons;
- Fail to act upon and record any allegations made by a participant;
- Do things of a personal nature for vulnerable or disabled adults that they can do for themselves;
- Invite or allow participants, vulnerable or disabled adults to visit or stay at a staff member or volunteer's home unsupervised.

Photography of vulnerable adults

- Vulnerable adults will not be identified in the use of any images.
- We will seek consent prior to taking or using images and understand that consent can be withdrawn at any time. We will take down any photographs, displays, films and or social media content containing photographs if consent is withdrawn. (GDPR (General Data Protection Regulation) Data Protection Act 2018.)

Partners

Jacksons Lane will ensure we are aware of the partner venues' vulnerable adults policies and will make sure they are not in conflict. We will have an agreed protocol on how to deal

with situations of abuse and risk of harm to vulnerable adults. We will carry out risk assessments with all partners.

Section Five: Jacksons Lane Safeguarding procedures

Incidents that must be reported/recorded

If any of the following occur, you should report this immediately in writing to the appropriate Designated Safeguarding Lead and record the incident in accordance with the steps in the procedure below.

- if you accidentally hurt a vulnerable adult/participant;
- if he/she seems distressed in any manner;
- if a participant appears to be sexually aroused by your actions;
- if a participant misunderstands or misinterprets something you have done or said.
- If a participant makes a disclosure of abuse
- If you witness or recognise a sign of potential abuse

If you think abuse has or may have occurred, you should:

Act immediately, Make Safe, Inform, and Record.

Act immediately

It is the responsibility of the person that first becomes aware of a concern that a Vulnerable Adult may be subject to, or at risk of, abuse to act immediately.

Make Safe

First you should deal with the immediate needs of the person. This may mean taking reasonable steps to ensure the adult is not in risk of immediate danger and seeking medical treatment if required as a matter of urgency.

You should NOT discuss the allegation of abuse with the alleged perpetrator.

You should NOT disturb or destroy articles that could be used in evidence.

Where an assault of some kind is suspected you should not wash or bathe the person unless this is associated with first aid treatment necessary to prevent further harm.

Inform

At the first available opportunity you should contact the Designated Safeguarding Leader Natalia Cid Garcia on 07904 661367 to inform them of what has happened. They will decide what the most appropriate course of action is and get in touch with the relevant services. If the Designated Safeguarding Lead is unavailable, or implicated with the allegation, you should contact the Deputy Safeguarding Lead Andy Martin on 07908 566906

If the person you are concerned about is not in immediate risk of abuse, but you are still worried about their welfare or you think they have needs that need to be addressed, you should contact the Project Manager or Lead Practitioner on the project to make them aware. All concerns should be recorded in writing.

If you believe a crime has been committed, you should contact the Emergency Services on 999.

Record

As soon as possible, you should record accurate and factual details of the allegation or incident and ensure this information is kept secure. This should be done in writing using the Safeguarding Concern Report Form in Appendix 1 of this Policy. In your report you should include:

- The allegation or concerns, including the date and time of the incident, what the vulnerable adult said about the abuse and how it occurred or what has been reported to you.
- The appearance and behaviour of the victim.
- Any injuries observed.

Whistleblowing Policy

If a member of staff is concerned about the management of a safeguarding incident, or Staff can contact the First Response Team Haringey Social Care 020 8489 1400 or Fraudwatch on: 0330 808 4269 for financial exploitation of vulnerable adults

What to do when a Vulnerable Adult makes a disclosure.

When a vulnerable adult discloses to you, you should remember these important communication points.

You should:

- Stay calm and not express dismay or shock;
- Allow the person to express their feelings openly, including their fears;
- Try to discover what the person is afraid of and when they feel most at risk;
- Listen carefully to what the person is saying;
- Assure the person that they are being taken seriously;
- Demonstrate regret that abuse has taken place and the impact that it must have had on the person physically and emotionally;
- Reassure them that there is help available;

Summarise their account in writing, using the Vulnerable Adult's own words as much as possible, and check that you have it recorded correctly.

You should not:

- Promise to keep the disclosure a secret;
- Ask investigative or leading questions;
- Offer personal opinions or judgements.

It is the responsibility of the Designated Safeguarding Officers to:

1. Decide without delay on the most appropriate course of action once the allegation or suspicion of abuse has been raised.
2. Deal with any immediate needs:
 - Ensure that the victim of the alleged abuse is safe.
 - Ensure that any necessary emergency medical treatment is arranged.
 - Ensure that no forensic evidence is lost.
 - If the alleged perpetrator is also a vulnerable adult, ensure that a member of staff is allocated to attend to their needs and ensure that other participants are not put at risk.
3. Clarify the facts stated by the member of staff but do NOT in any circumstances discuss the allegation of abuse with the alleged perpetrator or, if possible, the victim.
4. Check that the circumstances fall within the safeguarding adults' procedures i.e. meeting the definition of abuse as defined in this Policy. If at all uncertain a referral should be made to the Haringey Safeguarding Team
5. Address issues of consent and confidentiality.
6. A formal referral must be made on the same day as the alert is raised wherever:
 - A crime has been, could have been, or is yet to be committed.
 - There is a suspicion that an abuse has taken place.
 - The allegation involves a member of staff or paid carer.
 - Other vulnerable adults are at risk.
 - The alleged perpetrator is a Vulnerable Adult, therefore they are unsure if abuse has taken place.
7. Where a decision is made NOT to refer, the alert must still be recorded, with the record including the reason(s) for the decision not to refer

Section Six: Contact details and other services

Safeguarding team at Jacksons Lane

Natalia Cid	Designated Safeguarding Lead	020 8340 5226 07904 661367	natalia@jacksonslane.org.uk
Andy Martin	Deputy Safeguarding Lead	020 8340 5226	andy@jacksonslane.org.uk

		07908566906	
Nathan Curry	Safeguarding Champion (Board of Trustees)	07986 300727	

Emergency Services:

If the danger is immediate, always call the police on their emergency number: 999

If the danger is not immediate, but you need support of Emergency Services, telephone 101

Other services and support:

Below are just some of the other service providers available to contact when support is required with a referral or safeguarding concern. When contacting these organisations it is helpful to have the below information. The responsibility for contacting these organisations falls to the Designated Safeguarding Officers.

- Why you are concerned;
- The name, age and address of the adult at risk;
- If anyone lives with them;
- If they're getting help from any organisation;
- Who may be doing the abuse.

You should not delay in reporting abuse if you're not sure about some of these details.

Haringey Safeguarding Adults Team (Adult Social Services)	020 8489 1400	Safeguardingadultduty@haringey.gov.uk
Haringey Out of Hours Emergencies (5pm to 9am Monday to Fridays, and all day at weekends and bank holidays)	020 8489 0000	
Haringey Police Community Safety Unit	020 8345 1939 (Mon-Fri 8am-6pm, Sat & Sun 8am-4pm)	
Criminal Investigation Department (Police)	020 8345 0832 (Evenings and Weekends)	

If you wish to raise a safeguarding concern, download the [Safeguarding Alert Form \(Word, 46KB\)](#). If you have any trouble completing the form, please contact: Safeguardingadultduty@haringey.gov.uk and they will help you.

This policy was last updated on 21/11/2023 and will be reviewed again on 21/11/2024

JACKSONS LANE

Appendix 1

Disclosure Form / Safeguarding Concern Form (Vulnerable Adults)

Jacksons Lane have a duty of care to safeguard all children and adults involved in its projects from harm. This form is to be used to record any incidents which may have threatened a person's welfare during an activity/workshop. This form should also be completed in the instance of a workshop facilitator, staff member or volunteer having been alerted to the potential of some external/ indirect danger to the person in question.

Please notify Natalia Cid (Designated Safeguarding Officer) on 0790 466 1367 as soon as possible on the same day as the concern has arisen. If Natalia is not available call Andy Martin (Deputy Safeguarding Lead) on 07908 566906. The Safeguarding Officer will be responsible for any further action to be taken.

Date and time of session / incident:	Venue / place where the incident or disclosure took place:
Staff/ volunteers present:	
Name of person concerned:	
What happened? (Please describe exactly what you witnessed as clearly as possible):	
What did the person say happened? Please use the person's words:	

<p>Signature of staff/volunteer filling the disclosure form:</p> <p>Signature of person disclosing:</p> <p>Date:</p>