



4. Policy

4.1 What is Safeguarding

Sheltering Arms of Yorkshire Ltd recognises the definition of safeguarding as the actions taken to keep Service Users safe from harm and neglect.

Sheltering Arms of Yorkshire Ltd and its employees understand the importance of working together in partnership to make sure that individual Service Users are safe through its collective and proactive approach to safeguarding.

4.2 What Constitutes Abuse

Employees of Sheltering Arms of Yorkshire Ltd understand that the Service Users Sheltering Arms of Yorkshire Ltd supports can be extremely vulnerable to abuse and neglect, especially if they have care and support needs.

Abuse is a violation of an individual's human or civil right by any other person. It is where someone does something to another person, or to themselves, which puts them at risk of harm and impacts on their health and wellbeing.

Abuse can have a damaging effect on the health and wellbeing of Service Users; these effects may be experienced in the short and long term and sometimes can be lifelong.

4.3 The signs of abuse are not always obvious, and a victim of abuse may not tell anyone what is happening to them - sometimes they may not even be aware they are being abused.

The robust governance processes at Sheltering Arms of Yorkshire Ltd will make sure that staff working for, and on behalf of, Sheltering Arms of Yorkshire Ltd, recognise and respond to the main forms of abuse which are set out in the Care Act 2014 Statutory Guidance Chapter 14, which is not an exhaustive list, but an illustration as to the sort of behaviour that could give rise to a safeguarding concern:

- | Physical abuse
- | Domestic violence and abuse
- | Sexual abuse
- | Psychological abuse
- | Financial or material abuse
- | Modern slavery and human trafficking
- | Discriminatory abuse
- | Organisational abuse
- | Neglect and acts of omission - failure to act
- | Self-neglect
- | Emotional and psychological abuse
- | Cyber bullying
- | Mate crime

Common signs and symptoms of abuse include:

- | Unexplained changes in behaviour or personality - such as aggression, anger, hostility or hyperactivity
- | Becoming withdrawn
- | Seeming anxious, depressed or unusual fears, or a sudden loss of self-confidence
- | Withdrawal from friends or usual activities
- | Lacks social skills and has few friends, if any
- | Poor bond or relationship with close family members
- | Running away or going missing
- | Sleep problems and nightmares

Hidden harms may also include:

- | Exploitation
- | County lines
- | Forced marriage - honour based abuse (HBA)
- | Female genital mutilation (FGM)

- | PREVENT
- | Radicalisation
- | Gang violence
- | Modern slavery

See also the 'Safeguarding - A Quick Guide for Staff' in the forms section of this policy for detailed types, signs and symptoms.

4.4 Everybody has the right to live a life that is free from harm and abuse. Sheltering Arms of Yorkshire Ltd recognises that safeguarding adults at risk of abuse or neglect is everybody's business. Sheltering Arms of Yorkshire Ltd aims to ensure that all adults at risk of abuse or neglect are enabled to live and work, be cared for and supported in an environment free from abuse, harassment, violence or aggression.

The safeguarding policies and procedures of Sheltering Arms of Yorkshire Ltd will dovetail with the East Riding Of Yorkshire Council multi-agency policy and procedures, which we understand take precedence over those of Sheltering Arms of Yorkshire Ltd. Sheltering Arms of Yorkshire Ltd will ensure that the East Riding Of Yorkshire Council policies and procedures are reflected within its own policy and procedure, that this is shared with all staff and is accessible and available for staff to follow.

4.5 Sheltering Arms of Yorkshire Ltd aims to provide services that will be appropriate to the adult at risk and not discriminate because of disability, age, gender, sexual orientation, race, religion, culture, or lifestyle. It will make every effort to enable Service Users to express their wishes and make their own decisions to the best of their ability, recognising that such self-determination may well involve risk. Sheltering Arms of Yorkshire Ltd will work with Service Users and others involved in their Care to ensure they receive the support and protection they may require, that they are listened to and treated with respect (including their property, possessions and personal information) and that they are treated with compassion and dignity.

A chaperone is always present when a vulnerable adult needs treatment, and missed healthcare appointments must be monitored to consider signs of abuse or neglect. These must be followed up with the healthcare provider and information shared in the best interests and safety of the Service User.

4.6 Sheltering Arms of Yorkshire Ltd will follow the six principles as set out in guidance to the Care Act 2014 and this will inform practice with all Service Users:

- | **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 delivering safeguarding

4.7 Sheltering Arms of Yorkshire Ltd understands the importance of working collaboratively to ensure that:

- | The needs and interests of adults at risk are always respected and upheld
- | The human rights of adults at risk are respected and upheld
- | A proportionate, timely, professional and ethical response is made to any adult at risk who may be experiencing abuse
- | All decisions and actions are taken in line with the Mental Capacity Act 2005
- | Each adult at risk maintains:
 - | Choice and control
 - | Safety
 - | Health
 - | Quality of life
 - | Dignity and respect

4.8 Sheltering Arms of Yorkshire Ltd is committed to the principles of 'Making Safeguarding Personal' and aims to ensure that safeguarding is person-led and focused on the outcomes that Service Users want to achieve. It will engage Service Users in a conversation about how best to respond to their safeguarding situation in a timely way that enhances involvement, choice and control as well as improving quality of life,

wellbeing and safety.

4.9 The Registered Manager's Responsibilities

- | To establish the facts about the circumstances giving rise for concern
- | To identify sources and level of risk
- | To ensure that information is recorded and that the East Riding Of Yorkshire Council Adult Safeguarding Team is contacted to inform them of the concern or harm
- | If a Service User is at immediate risk of harm, the Registered Manager will contact the Police. The CQC will also be informed
- | In all cases of alleged harm, there will be early consultation between Sarah Cullen, East Riding Of Yorkshire Council and the Police to determine whether or not a joint investigation is required. Sheltering Arms of Yorkshire Ltd understands that it may also be necessary to advise the relevant Power of Attorney, if there is one appointed. In dealing with incidents of potential harm, people have rights which must be respected and which may need to be balanced against each other
- | The wishes of the person harmed will be taken into account whenever possible. This may result in no legal action
- | Documentation of any incidents of harm in the Service User's file and using body maps to record any injuries
- | Follow East Riding Of Yorkshire Council policy guidelines where applicable
- | Report any incidents of abuse to the relevant parties
- | Work with multi-agencies
- | Advise and support staff
- | Ensure staff are trained to enhance knowledge
- | Actively promote the "Whistleblowing" policies

4.10 The Care Worker's Responsibilities

- | To be able to recognise and report incidences of harm
- | To report concerns of harm or poor practice that may lead to harm
- | To remain up to date with training
- | To follow the policy and procedures
- | To know how and when to use the Whistleblowing procedures
- | To understand the Mental Capacity Act and how to apply it in practice

4.11 General Principles

- | We will have robust recruiting and safer staffing policies in place to make sure that our staff are fit to work with adults at risk and are compliant with national, safe recruitment and employment practices, including the requirements of the Disclosure and Barring Service
- | A named safeguarding lead will be in place who is responsible for embedding safeguarding practices and improving practice in line with national and local developments. At Sheltering Arms of Yorkshire Ltd, this person is Sarah Cullen
- | Any staff member who knows or believes that harm is occurring will report it to their line manager as quickly as possible, or if they feel they cannot follow the regular reporting procedure, they must use the Whistleblowing process
- | Sheltering Arms of Yorkshire Ltd will work collaboratively with other agencies, including liaison in relation to the investigation of allegations and will ensure its procedures dovetail with the East Riding Of Yorkshire Council multi-agency procedures
- | Sheltering Arms of Yorkshire Ltd will use incident reporting, root cause analysis, lessons learned and auditing to determine themes to improve Care practice
- | We will have a learning and development strategy which specifically addresses adult safeguarding. We will provide training on the identification and reporting of harm, as well as training on the required standards in relation to procedures and processes should something need to be reported
- | Sheltering Arms of Yorkshire Ltd recognises its responsibilities in relation to confidentiality and will

share information appropriately

- | We will have zero tolerance to harm
- | We will work in partnership with other agencies to ensure that concerns or allegations of abuse are appropriately referred for investigation to the most appropriate agency
- | We will ensure that any action that is taken is assessed, proportionate and reflective of the risk presented to the people who use the services
- | We will report any incidents in line with our regulatory requirements
- | Sheltering Arms of Yorkshire Ltd will adhere to the Code of Conduct for Care Workers
- | There is a clear, well-publicised Whistleblowing Policy and Procedure in place that staff know how to use

4.12 Prevention - Providing information to support Service Users

- | Sheltering Arms of Yorkshire Ltd will support Service Users by providing accessible, easy to understand information on what abuse is and what signs to look out for. This will include Service Users' rights and how to get help and support if they need it through the Care Plan process. We will comply with the Accessible Information Standard
- | All Service Users will receive a copy of the Service User Guide, have access to the Complaints, Suggestions and Compliments Policy and Procedure and be given information on how to escalate any concerns to the Commissioner, CQC, advocacy or Local Government and Social Care Ombudsman should they not be satisfied with the approach taken by Sheltering Arms of Yorkshire Ltd

4.13 Prevention - Raising awareness

- | Staff will need to be trained and understand the different patterns and behaviours of abuse as detailed in the Care Act [Chapter 14](#) and Sheltering Arms of Yorkshire Ltd will ensure that it is able to respond appropriately
- | Sheltering Arms of Yorkshire Ltd will ensure that all staff are trained on the Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure
- | During induction training, all employees will complete the ["Understanding Abuse" workbook](#), as part of the Care Certificate



5. Procedure

5.1 Responding to Disclosure, Suspicion or Witnessing of Abuse

Where an adult at risk discloses or discusses potential abuse or harm, the staff member must be able to:

- | **Recognise:** Identify that the adult at risk may be describing abuse, even when they may not be explicit
- | **Respond:** Stay calm, listen and show empathy
- | **Reassure** them that it will be taken seriously and explain that there is a duty to report the issues internally and what may happen next
- | **Record:** Write up notes of the conversation clearly and factually as soon as possible
- | **Report** in a timely manner to the appropriate people and organisations

5.2 Responding to a Disclosure

Remember you are not investigating. Do:

- | Stay calm and try not to show shock
- | Listen very carefully
- | Be sympathetic
- | Be aware of the possibility that medical evidence might be needed

Tell the person that:

- | They did a good/the right thing in telling you
- | You are treating the information seriously
- | It was not their fault

Some people may simply be telling a story and not realise that they are subject to abuse. It is important for staff to keep this in mind and be thoughtful in their response.

Explain that you must tell your line manager and, with their consent, your manager will contact the East Riding Of Yorkshire Council Safeguarding Adults Team and/or the Police. Sarah Cullen must be informed. Sheltering Arms of Yorkshire Ltd will, in specific circumstances, need to contact the East Riding Of Yorkshire Council Adult Safeguarding Team without their consent but their wishes will be made clear throughout.

If a referral is made but the adult at risk is reluctant to continue with an investigation, record this and bring this to the attention of the East Riding Of Yorkshire Council Safeguarding Adults Team. This will enable a discussion on how best to support and protect the adult at risk. However, a professional case discussion will still need to take place and must be recorded appropriately.

5.3 Responding to Abuse or Neglect – What to do

Sheltering Arms of Yorkshire Ltd must ensure that staff:

- | Address any immediate safety and protection needs
- | Assess any risks and take steps to ensure that the adult is in no immediate danger
- | Where appropriate, call 999 for the emergency services if there is a medical emergency, other danger to life or risk of imminent injury, or if a crime is in progress. Where a crime is suspected of being committed, leave things as they are wherever possible
- | Call for medical assistance from the GP or other primary healthcare service if there is a concern about the adult's need for medical assistance or advice. Care Workers can call the NHS 111 service for medical help or advice when the situation is not life-threatening or is out of hours
- | The adult may feel frightened, so the Care Worker must ask whether they want the Care Worker to arrange for someone they feel comfortable with to stay with them
- | Sheltering Arms of Yorkshire Ltd will consider if there are other adults or children with care and support needs who are at risk of harm and take appropriate steps to protect them
- | The Care Worker will support and encourage the adult to contact the Police if a crime has been or may have been committed
- | The Care Worker will contact their line manager as soon as possible to inform them of the incident or concern
- | Sarah Cullen will be informed and contacted on Sarah Cullen 07732444004 (01964) 781249 as soon

as possible

5.4 Decision-Making Pre-referral to the East Riding Of Yorkshire Council Adult Safeguarding Team

Sarah Cullen or the Safeguarding Lead will usually lead on decision-making. Where such support is unavailable, consultation with another more senior member of staff will take place.

In the event that these are unavailable, advice must be taken from East Riding Of Yorkshire Council. Staff must also take action without the immediate authority of a line manager:

- | If discussion with the manager would involve delay in an apparently high-risk situation
- | If the person has raised concerns with their manager and they have not taken appropriate action (whistleblowing)

Sheltering Arms of Yorkshire Ltd will ensure that staff are aware of the East Riding Of Yorkshire Council reporting procedures and timescales for raising adult safeguarding concerns.

5.5 Referral to the East Riding Of Yorkshire Council Adult Safeguarding Team

Sheltering Arms of Yorkshire Ltd must ensure that the East Riding Of Yorkshire Council Safeguarding Adult referral process is followed and must collect the following information to assist with the referral. The referral process must be clearly visible with contact numbers, including out-of-hours, where staff can access the information.

The referral information will also be required for some of the CQC notification of abuse documentation. Sheltering Arms of Yorkshire Ltd must use any up-to-date Care Plan information where possible and have the following information available where possible:

- | Demographic and contact details for the adult at risk, the person who raised the concern and for any other relevant individual, specifically Care Workers and next of kin
- | Basic facts, focusing on whether or not the person has care and support needs including communication and ongoing health needs
- | Factual details of what the concern is about; what, when, who, where?
- | Immediate risks and action taken to address risk
- | Preferred method of communication
- | If reported as a crime, details of which police station/officer, crime reference number, etc.
- | Whether the adult at risk has any cognitive impairment which may impede their ability to protect themselves
- | Any information on the person alleged to have caused harm
- | Wishes and views of the adult at risk, in particular, consent
- | Advocacy involvement (includes family/friends)
- | Information from other relevant organisations, for example, the CQC
- | Any recent history (if known) about previous concerns of a similar nature or concerns raised about the same person, or someone within the same household
- | Names of any staff involved

5.6 Documenting a Disclosure

Sheltering Arms of Yorkshire Ltd must ensure that staff:

- | Make a note of what the person actually said, using his or her own words and phrases
- | Describe the circumstance in which the disclosure came about
- | Note the setting and anyone else who was there at the time
- | When there are cuts, bruises or other marks on the skin, use a body map to indicate their location, noting the colour of any bruising - bruising from abuse is often found on areas of the body such as the torso, ears, neck, eyes, cheeks and buttocks
- | Make sure the information the Care Worker writes is factual
- | Use a pen with black ink so that the report can be photocopied
- | Try to keep their writing clear
- | Sign and date the report, noting the time and location
- | Be aware that the report may be needed later as part of a legal action or disciplinary procedure

5.7 Informing the Relevant Inspectorate

- | By law, Sheltering Arms of Yorkshire Ltd must notify the Care Quality Commission without delay of incidents of abuse and allegations of abuse, as well as any incident which is reported to, or investigated by, the Police
- | Sheltering Arms of Yorkshire Ltd must notify the CQC about abuse or alleged abuse involving a person (s) using the service, whether the person(s) is/are the victim(s), the abuser(s), or both
- | Sheltering Arms of Yorkshire Ltd must also alert the relevant local safeguarding authority when notification is made to the CQC about abuse or alleged abuse
- | The forms are available on the CQC website
- | If a concern is received via the whistleblowing procedure, Sheltering Arms of Yorkshire Ltd must inform the East Riding Of Yorkshire Council Safeguarding Team and the CQC

5.8 Strategy Meeting / Case Conference

- | Following the investigation, or at any time during the process, a case conference with all relevant agencies may be called to make decisions about future action to address the needs of the individual
- | Any agency involved in the case may ask for a case conference to be held but the final decision to hold a conference is with the East Riding Of Yorkshire Council Safeguarding Adults Team Manager
- | Sheltering Arms of Yorkshire Ltd must ensure that it attends this meeting when invited and that all relevant information about the incident is available. A timeline of events is a useful document to prepare in complex cases

5.9 Involve the Service User Concerned Throughout the Process

- | The process of the enquiry must be explained to the Service User in a way they will understand and their consent to proceed with the enquiry obtained, if possible
- | Arrangements will be made to have a relative, friend or independent advocate present if the Service User so desires. The relative, friend or independent advocate must not be a person suspected of being in any way involved or implicated in the abuse
- | A review of the Service User's Care Plan must be undertaken to ensure individualised support following the incident
- | The Service User will be supported by the service to take part in the safeguarding process to the extent to which they wish, or are able to, having regard for their decisions and opinions. They must be kept informed of progress

5.10 Desired Outcomes Identified by the Adult

The desired outcome by the adult at risk must be clarified and confirmed at the end of the conversation(s), to:

- | Ensure that the outcome is achievable
- | Manage any expectations that the adult at risk may have
- | Give focus to the enquiry
- | Staff will support adults at risk to think in terms of realistic outcomes but must not restrict or unduly influence the outcome that the adult would like. Outcomes must make a difference to risk and, at the same time, satisfy the person's desire for justice and enhance their wellbeing
- | The adult's views, wishes and desired outcomes may change throughout the course of the enquiry process
- | There must be an ongoing dialogue and conversation with the adult to ensure that their views and wishes are gained as the process continues and enquiries re-planned if the adult change their views
- | The Service User will be informed of the outcome of any investigation, but guidance will be sought from the East Riding Of Yorkshire Council Adult Safeguarding Team before any outcome is shared

5.11 Disclosure and Barring Service (DBS) Referral

There is a statutory requirement for providers of Care to refer workers to the DBS for inclusion on the DBS Vetting and Barring scheme list if they consider that the person is guilty of misconduct such that a vulnerable adult was harmed or placed at risk of harm. This requirement covers both existing employees and those who leave their employment, and whose conduct comes to light at a later date. Please see the DBS/Disclosure Policy and Procedure for further procedures regarding initial employment and referral.

5.12 Consent

When reporting information that directly concerns the safety of an adult at risk of harm, consent from the Service User is not required. However, informing the Service User of your concerns and your referral is good practice unless it would put you or your colleagues at risk or it would put the adult at further risk. When reporting to a local authority allegations or concerns about an adult at risk of harm, the Local Authority must be informed whether the Service User is aware of the report. In reporting all suspected or confirmed cases of harm, an employee has a responsibility to act in the best interest of the Service User but still operate within the relevant legislation and the parameters of the codes and standards of their practice.

5.13 Confidentiality and Information Sharing

In seeking to share information for the purposes of protecting adults at risk, Sheltering Arms of Yorkshire Ltd is committed to the following principles:

- ┆ Personal information will be shared in a manner that is compliant with the statutory responsibilities of Sheltering Arms of Yorkshire Ltd
- ┆ Adults at risk will be fully informed about information that is recorded about them and as a general rule, be asked for their permission before information about them is shared with colleagues or another agency. However, there may be justifications to override this principle if the adult or others are at risk
- ┆ Staff will receive appropriate training on Service User confidentiality and secure data sharing
- ┆ The principles of confidentiality designed to protect the management interests of Sheltering Arms of Yorkshire Ltd must never be allowed to conflict with those designed to promote the interests of the adult at risk
- ┆ Staff will follow the policy of Sheltering Arms of Yorkshire Ltd with regard to UK GDPR, Data Protection and Confidentiality and comply with the Caldicott principles

5.14 Pressure Ulcers

Sheltering Arms of Yorkshire Ltd must follow local safeguarding reporting requirements with regards to pressure areas. Pressure ulcers are costly in terms of both Service User suffering and the use of resources. If the pressure ulcer is believed to have been caused by neglect, it must be reported as an adult safeguarding concern whether the pressure ulcer was acquired in a hospital, care setting or the Service User's own home. Sheltering Arms of Yorkshire Ltd must ensure that staff read and follow [Safeguarding Adults Protocol Pressure Ulcers and the interface with a Safeguarding Enquiry](#), seeking advice and further guidance where required.

Where Service Users are new to the service, any pressure ulcers must be documented on a body map and reported in line with safeguarding procedures. Treatment must also be sought from the GP.

5.15 Medication Errors

Sheltering Arms of Yorkshire Ltd must follow local safeguarding reporting procedures for medication errors and ensure that notifications are made to the CQC in line with statutory requirements. Sheltering Arms of Yorkshire Ltd will have an open and transparent approach to medication incidents and ensure that staff follow the Medication Errors and Near Misses Policy and Procedure at Sheltering Arms of Yorkshire Ltd and understand their Duty of Candour responsibilities.

5.16 Abuse of Trust

- ┆ A relationship of trust is one in which one person is in a position of power or influence over the other person because of their work or the nature of their activity
- ┆ Where the person who is alleged to have caused the abuse or neglect has a relationship of trust with the adult at risk because they are; a member of staff, a paid employee, a paid carer, a volunteer or a manager, Sheltering Arms of Yorkshire Ltd must invoke disciplinary procedures for employed staff as well as taking action in line with this policy
- ┆ Sheltering Arms of Yorkshire Ltd must ensure that a referral is made to the Disclosure and Barring Service if an employee is found to have caused harm to an individual
- ┆ If the person who is alleged to have caused the harm is a member of a recognised professional group, Sheltering Arms of Yorkshire Ltd must act under the relevant code of conduct for the profession as well as taking action under this policy
- ┆ Where the person alleged to have caused the harm or neglect is a volunteer or a member of a community group, Sheltering Arms of Yorkshire Ltd must work with adult social services to support any action under this policy

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- Where the person alleged to have caused the harm is a neighbour, a member of the public, a stranger or a person who deliberately targets vulnerable people, in many cases the policy and procedures will be used to ensure that the adult at risk receives the services and support that they may need
- In all cases, issues of consent, confidentiality and information sharing must be considered

5.17 Allegations Against People who are Relatives or Friends

There is a clear difference between unintentional harm caused inadvertently by a relative or friend and a deliberate act of either harm or omission, in which case the same principles and responsibilities for reporting to the police apply. In cases where unintentional harm has occurred, this may be due to lack of knowledge or due to the fact that the relative's own physical or mental needs make them unable to care adequately for the adult at risk. The relative may also be an adult at risk. In this situation, the aim is to protect the adult from harm, work to support the relative to provide support and to help make changes in their behaviour in order to decrease the risk of further harm to the person they are caring for. A carer's assessment will take into account a number of factors and a referral to East Riding Of Yorkshire Council will be made as part of the safeguarding process.

5.18 Whistleblowing

Whistleblowing is an important aspect of the support and protection of adults at risk of harm where staff are encouraged to share genuine concerns about a colleague's behaviour. Their behaviour may not be related to an adult at risk, but they may not be following the code of conduct, could be pushing boundaries beyond normal limits or displaying conduct which is a breach of the law, conduct which compromises health and safety or conduct which falls below established standards of practice with adults at risk.

Sarah Cullen or the Safeguarding Lead will ensure that staff receive adequate support when dealing with safeguarding adult concerns and appropriate supervision, commensurate with their role.

Sheltering Arms of Yorkshire Ltd has clear whistleblowing policies and procedures in place which staff are frequently reminded about and with which they must be familiar. They must also understand how to escalate and report concerns.

Professional disagreements must be resolved by following the local safeguarding escalation procedure. Depending on the nature and severity of the allegation, the senior person informed may escalate this allegation to the NHS England Medical Officer and local safeguarding partners, including the local authority designated officer (LADO)

5.19 Abuse by Another Adult at Risk

We recognise that we may also have responsibilities towards the person causing the harm, and certainly will have if they are both in a care setting or have contact because they attend the same place (for example, a day centre). The person causing the harm may themselves be eligible to receive an assessment. In this situation, it is important that the needs of the adult at risk who is the alleged victim are addressed separately from the needs of the person causing the harm. It will be necessary to reassess the adult allegedly causing the harm.

5.20 Exploitation by Radicalisers who Promote Violence

Individuals may be susceptible to exploitation into violent extremism by radicalisers. Staff will be expected to follow the Protecting Vulnerable People from Radicalisation Policy and Procedure in place at Sheltering Arms of Yorkshire Ltd.

5.21 Self-Neglect and Refusal of Care

Sheltering Arms of Yorkshire Ltd must ensure that staff understand the importance of delivering care as detailed in the Care Plan. Where a Service User refuses Care, this must always be documented. Where refusal occurs repeatedly, it must be escalated by Sheltering Arms of Yorkshire Ltd as a safeguarding concern and a request for a review of the Service User's Care will be instigated.

5.22 Abuse and Sexual Safety

We recognise that culture, environment and processes support a Service User's sexuality and keep them and staff safe from sexual harm. As such, Sheltering Arms of Yorkshire Ltd will ensure that sexuality is discussed as part of the care planning process and is addressed positively to support people to raise concerns where necessary.

The recent [CQC publication](#) on sexuality and sexual safety can be referred to for further guidance in this area.

5.23 Mandatory Reporting of Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ('the 2003 Act'). Sheltering Arms of Yorkshire Ltd has a mandatory duty to report known cases of FGM in under 18-year-olds to the police via the non-emergency number 101. 'Known' means that you have either visually identified that FGM has been carried out, or you have had direct verbal disclosure from the person

affected.

Other ways to report FGM include:

- | The national FGM helpline on 0800 028 3550
- | The social care team at your local council
- | Crimestoppers, confidentially and anonymously

5.24 Self-Funding Service Users

People who fund their own Care arrangements are legally entitled to receive support if subject to abuse or neglect in exactly the same way as those supported or funded by the Local Authority. They are also entitled to the protections of the Deprivation of Liberty Safeguards Court of Protection for authorisation of deprivation of liberty for people living in their own homes.

5.25 Risk Assessment and Management

Achieving a balance between the right of the individual to control their Care package and ensuring that adequate protections are in place to safeguard wellbeing is a very challenging task. The assessment of the risk of abuse, neglect and exploitation of Service Users will be integral in all assessment and planning processes. Assessment of risk is dynamic and ongoing, especially during the adult safeguarding process, and must be reviewed throughout so that adjustments can be made in response to changes in the levels and nature of risk.

5.26 Audit and Compliance

It is essential that the implementation of this policy and associated procedures is audited to ensure that Sheltering Arms of Yorkshire Ltd is doing all it can to safeguard those people receiving its services. The audit of this policy will be completed through a systematic audit of:

- | Recruitment procedures and Disclosure and Barring Checks
- | Audit of incident reporting, frequency and severity
- | Audit of training processes, including reviews of uptake of training and evaluations

Safeguarding concerns and incidents will be reviewed by the Senior Management Team as part of a root cause analysis with the following terms of reference:

- | Review incident themes
- | Reports from the lead responsible for Safeguarding within Sheltering Arms of Yorkshire Ltd
- | Look in detail at specific cases to determine learning or organisational learning
- | Ensure implementation of the Safeguarding Policy and Procedure

5.27 Training and Competencies

Sheltering Arms of Yorkshire Ltd will ensure that staff receive training in recognising and responding to incidents, allegations or concerns of abuse or harm as part of their induction programme. Sheltering Arms of Yorkshire Ltd will benchmark its training and competencies within the service with the framework outlined in [Adult Safeguarding: Roles and Competencies for Healthcare Staff](#) which it recognises applies to social care staff also and does not replace any local or contractual requirements but acts as a minimum benchmark.

Sheltering Arms of Yorkshire Ltd will also refer to the [NHS Prevent training and competencies framework](#) for more specific training requirements in relation to the Prevent strategy.

Sarah Cullen will cascade safeguarding information about vulnerable adults to appropriate staff members. Sarah Cullen will undertake and provide internal training and attend local safeguarding partnership updates, education and development sessions including regular group-based supervision.