

Green Labyrinth

Safeguarding Adults Policy 2026-2027

Review

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POLICY

This policy should be read in conjunction with the following policies and documents

- Safeguarding and Child Protection
- Behaviour
- Recruitment and Selection
- Whistleblowing
- Code of Conduct for Staff/ Staff Behaviour Policy
- Health and Safety
- GDPR – UK Data Protection 2018
- Keeping Children Safe In Education 2026 Guidance

Introduction

“Protecting an adult’s right to live in safety, free from abuse and neglect is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.” (The Care Act Statutory Guidance)

The provisions of the Care Act are intended to promote and secure wellbeing. Under the definition of wellbeing, it is made clear that protection from abuse and neglect is a fundamental part of that.

The safeguarding duties apply to an adult who:

1. has needs for care and support (whether or not the local authority is meeting any of those needs).
2. is experiencing, or at risk of, abuse or neglect.
3. as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Members of staff are advised to make referrals to members of the Green Labyrinth Safeguarding Team when their concern relates to anyone aged 18 or over. The DSL or their deputy will then ascertain from the member of staff whether there are children in the scenario who may also be at risk, before contacting the relevant external agency/agencies to seek guidance on the situation.

Staff Responsibilities

At Green Labyrinth, safeguarding is **everyone's** responsibility. Green Labyrinth recognises that we are an important part in the wider safeguarding system.

The safety and welfare of all learners and staff at Green Labyrinth is of paramount importance. Everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status. We are committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

Professional curiosity is an essential safeguarding skill.

Green Labyrinth expects staff to:

- remain inquisitive;
- respectfully question explanations that appear inconsistent;
- identify cumulative patterns;
- recognise disguised compliance;
- consider the wider context;
- seek additional information where appropriate;
- avoid assumptions;
- challenge professionally where necessary.

Professional curiosity shall always be exercised respectfully, proportionately and without discrimination.

The Aims Of Adult Safeguarding

The broad aims of adult safeguarding are to:

PREVENT harm and reduce the risk of abuse or neglect to adults with care and support needs.

STOP abuse or neglect wherever possible.

SAFEGUARD ADULTS in a way that supports them in making choices and having control about how they want to live.

IMPROVE WELLBEING for the adults concerned.

RAISE AWARENESS so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect.

PROVIDE INFORMATION AND SUPPORT in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult.

ADDRESS what has caused the abuse or neglect.

The Six Principles Of Safeguarding

First introduced by the Department of Health in 2011, but now embedded in the Care Act, these six principles apply to all sectors, and should inform the ways in which professionals and other staff work with adults.

Empowerment

People being supported and encouraged to make their own decisions and give informed consent. *"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."*

Prevention

It is better to take action before harm occurs. *"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."*

Proportionality

The least intrusive response appropriate to the risk presented. *"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."*

Protection

Support and representation for those in greatest need. *"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*

Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. *"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."*

Accountability

Accountability and transparency in delivering safeguarding. *"I understand the role of everyone involved in my life and so do they."*

All action taken by Green Labyrinth will be in accordance with these principles, current legislation and Statutory guidance.

The Types Of Abuse

The Care and support statutory guidance identifies ten types of abuse related to adults which are:

- Physical abuse
- Domestic violence and abuse
- Modern slavery
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

See Appendix 1 for more information on patterns of abuse.

Physical Abuse

Physical abuse can include:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- Inappropriate or unlawful use of restraint
- inappropriate physical sanctions

Domestic Violence and Abuse

Domestic violence and abuse can include:

- psychological
- physical
- sexual
- financial
- emotional abuse

- so called 'honour' based violence.

Modern Slavery

Modern slavery encompasses:

- slavery
- human trafficking
- forced labour and domestic servitude.
- traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory Abuse

Discriminatory abuse including forms of:

- harassment
- slurs or similar treatment:
- because of race
- gender and gender identity
- age
- disability
- sexual orientation
- religion

Organisational or Institutional Abuse

Organisational abuse can include:

- neglect and poor care practice within an institution or specific care setting such as a hospital or care home
- in relation to care provided in one's own home.
- This may range from one off incidents to on-going ill-treatment.
- through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and Acts of Omission

Neglect and acts of omission can include:

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services

- the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-Neglect

This covers a wide range of behaviour and can include:

- neglecting to care for one's personal hygiene
- neglecting own health
- neglecting surroundings
- behaviour such as hoarding.

It should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Sexual Abuse

Sexual abuse can include:

- rape
- indecent exposure
- sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography
- subjection to pornography or witnessing sexual acts.
- sexual assault
- sexual acts to which the adult has not consented or was pressured into consenting.

Psychological or Emotional Abuse

Psychological or emotional abuse can include:

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion

- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks.

Financial or Material Abuse

Financial or material abuse can include:

- theft
- fraud
- internet scamming
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- the misuse or misappropriation of property, possessions or benefits.

Exploitation

In addition to the above, other categories of abuse not identified in the Care Act include:

- criminal exploitation,
- sexual exploitation,
- cuckooing,
- mate crime and hate crime, where vulnerable people are befriended with the intent to abuse and exploit,
- radicalisation.

Other Contemporary Safeguarding Risks

Green Labyrinth recognises emerging safeguarding risks that increasingly affect adult learners.

These include:

- online grooming;
- sextortion;
- image-based abuse;
- AI-generated sexual imagery;
- deepfake exploitation;
- cyberstalking;
- technology-facilitated coercive control;
- financial grooming;

- online fraud;
- recruitment into organised crime;
- exploitation through social media;
- online gaming exploitation;
- abuse through encrypted messaging platforms.

Risks Arising in an Education Context

Below are some situations which have arisen within an education specific context:

- financial exploitation connected with learner funding or loans;
- coercion by partners/family regarding education;
- sexual exploitation between learners;
- tutor/learner boundary violations;
- staff-to-learner grooming; learner-on-learner abuse;
- workplace/work-placement exploitation;
- domestic abuse affecting attendance or participation;
- stalking and harassment connected with college attendance;
- homelessness and "cuckooing";
- exploitation of adults with SEND/learning difficulties;
- county-lines involvement; forced marriage; honour-based abuse;
- Prevent/radicalisation; and online relationships originating through learner groups/social media.

Making Safeguarding Personal (MSP)

Making Safeguarding Personal (MSP) sits firmly within the Care and Support Statutory Guidance (DHSC, 2018). It ensures that safeguarding is to be done with, not to, people – ***‘no decision about me, without me’***. MSP is an initiative which aims to develop a person-centred and outcome focused approach to safeguarding work. The adult concerned must be at the centre of adult safeguarding enquiries, and their wishes and views sought at the earliest opportunity and throughout. Each individual has unique preferences, needs, and aspirations and MSP ensures that safeguarding interventions are tailored to the person's specific circumstances, promoting their choice and control over the support they receive.

MSP means that safeguarding adults:

- is person-led
- is outcome-focused
- engages the person and enhances involvement, choice and control

- improves quality of life, wellbeing and safety

Making Safeguarding Personal does not mean ‘walking away’ if a person declines safeguarding support and/or a Section 42 enquiry. That is not the end of the matter.

Empowerment must be balanced for example, with Duty of Care and the principles of the Human Rights Act (1998) and of the Mental Capacity Act (2005).

The need for balance on this issue is illustrated elsewhere within the Care Act (2014), in Section 11, where it is explicit that although the local authority duty to carry out a needs assessment may be removed if the adult does not consent, this does not apply where the adult is experiencing or at risk of abuse or neglect.

Wherever possible, the adult should be supported to recognise risks and to manage them. Safeguarding plans should empower the adult as far as possible to make choices and to develop their own capability to respond to them.

Capacity

Where there is any cause to believe that a person may lack the capacity to make a decision, a Mental Capacity Assessment should be undertaken. The more significant the decision is, the more formal the assessment should be. All Mental Capacity Assessments should be documented in the adults organisational record and should include documentation of all steps of the assessment.

Best Interest Decisions

Where an adult lacks capacity to make decisions about their safeguarding plans, then a range of options should be identified, which help the adult stay as much in control of their life as possible. Family members, carers and professionals should be consulted when a Best Interest Decision is made.

Who can Perpetrate Abuse and Neglect?

Those who carry out abuse or neglect are not confined to any section of society and may be people who hold a position of trust, power or authority in relation to an adult in need for care and support (from here on referred to as “adult” in this section). A person who causes harm may be: (this list is not exhaustive)

- A member of staff, proprietor or service manager
- A member of a recognised professional group
- A service user or adult at risk
- A spouse, relative or member of the person’s social network

- A volunteer or member of a community group such as a place of worship or social club
- A carer, i.e. someone who has the right to an assessment and may be eligible for services to meet their caring role independently of an adult at risk
- A neighbour, member of the public or stranger
- A person who deliberately targets adults at risk
- In the case of self-neglect the people themselves.

As well as their responsibility to the person who may have been abused or neglected, agencies may have a responsibility in relation to those alleged to have caused harm and who may themselves be in need of care and support. The agencies' powers and duties will vary depending upon the role of the person alleged to have caused harm in relation to the agency. In some circumstances, there may not be an identified alleged abuser or abusers, but the abuse may stem from organisational cultures or practices

Think Family

"Think Family" is an approach that requires all agencies to consider the needs of the whole family from working with individual members of it, making sure that support provided by children's, adults and family services is coordinated, and taking account of how individual problems affect the whole family.

All assessments undertaken by any agency must identify who is living in the same household as an adult. There is a requirement for all staff, no matter who the primary client is, to consider the welfare and needs of all those living in the household. As many service users are parents or carers, this policy should be read in conjunction with Green Labyrinth's Safeguarding Children Policy. Where there is a safeguarding enquiry for an adult and there are children in the household, the staff member investigating the concern must also consider the child's welfare and whether a referral to children's social care is required.

Responsibilities of Green Labyrinth

Any agency such as Green Labyrinth has a responsibility to ensure that safeguarding concerns are identified and acted upon appropriately.

All agencies/organisations must follow the responsibilities described below. Each agency/organisation will ensure that they:

- have a Safeguarding Lead and Deputy Lead, and sufficient Safeguarding administration to support the Safeguarding work of the organisation.

- have a Safeguarding Adults Policy (this could be included in an all-age policy) that will be reviewed on a minimum of three-year basis, and will ensure that all staff have read the policy.
- have shared this policy with their staff and put the responsibilities described in this section into effect.
- have a register of all adults under their service that they have been made aware are currently open to Adult Safeguarding under a Section 42 enquiry.
- will clearly record and flag in the organisational record for the adult that the adult is open to Adult Safeguarding (when they are made aware of this).
- have an effective process in place for the sharing of information for Section 42 enquiries, and for partaking in Caused Enquiries.
- make sure that all members of their organisation are aware of Resolution of Disagreements procedures within the relevant local authority and Green Labyrinth.
- undertake internal audit and partake in external audits and reviews to ensure that safeguarding processes in place are happening as they should be.
- recruit according to Safer Recruitment practices, and follow induction and ongoing safeguarding requirements for all staff as appropriate for their organisation.
- make appropriate referrals where a concern is raised about a member of staff.
- embed Safeguarding Supervision within their organisation.

Specific Agency Roles and Responsibilities

Local Authority Adult Safeguarding Team The overall responsibility for making enquires or causing others to do so lies with the Local Authority linked to the adult's home address. The team co-ordinate a multi-agency response to safeguarding, identifying and mitigating risks, to ensure the person retains choice and control over their life. The team lead on ensuring a multi-agency response to safeguarding referrals, gathering appropriate criteria under Section 42 (1) of the Care Act.

Health

The relevant Integrated Care Board (ICB), has a dual responsibility regarding safeguarding adults, both as a commissioner and provider of some services.

Police

The Police have a duty and a responsibility to prevent and investigate criminal offences committed against Adults at Risk and such actions should be carried out sensitively, thoroughly and professionally. The Police are committed to the sharing of information with other agencies, where it is necessary and proportionate to protect an Adult at Risk.

Other Agencies

Several other agencies / teams have a role in the safeguarding of adults. These include:

Domestic Abuse agencies

Housing Teams

Adult Social Care teams

Care Organisations

Children's Social Care (since children may be involved in the scenario)

This list is not exhaustive.

Adult Safeguarding Process

This section outlines the procedures which should be followed when responding to safeguarding concerns through to possible involvement in enquiries under Section 42 (S42) of the Care Act 2014. S42 is the environment within which local authorities and partner agencies operate when a safeguarding concern comes in to the local authority (LA). It ensures support to keep people safe who may be at risk of or experiencing abuse/neglect.

Adults must be involved in decision-making and where the adult has a "substantial difficulty" in being involved, the support of a suitable person or advocate must be offered.

However, the relevant safeguarding authority is normally the local authority responsible for adult social care in the area in which the adult is present/resident and/or in which the safeguarding concern arises, determined in accordance with applicable statutory and inter-authority arrangements. Green Labyrinth Staff must use the relevant local safeguarding pathway guided by the DSL or DDSL.

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Initial Advice Regarding a Concern

Green Labyrinth's internal safeguarding threshold is deliberately wider than the statutory Section 42 threshold. Staff must report safeguarding concerns internally concerning any adult learner, member of staff or client; the DSL determines the appropriate external pathway. A concern need not satisfy the Section 42 criteria before it is reported internally.

The first consideration must be 'does the adult require immediate support from emergency services?' ***If the person is at immediate risk of harm, it is expected that the member of staff will have taken appropriate steps to contact emergency services.*** They should then inform the DSL/DDSL.

Within Green Labyrinth, any member of staff with concerns where there is no immediate risk of harm, about an adult student, client or other member of staff should consult on a 'no names' basis with a member of the Safeguarding Team. Note this is not a promise of confidentiality but allows for the DSL or DDSL to make a judgement on how best to proceed. They should make notes as soon as is practical to transfer to the DSL. Guidance on note taking and confidentiality is covered in staff training.

The Safeguarding Team will follow the guidance below.

Establish the risks and what immediate steps to take.

If they are not at immediate risk of harm, then the DSL/DDSL needs to consider whether the three criteria have been met:

1. The adult has needs for care and support (whether or not the LA is meeting any of those needs).
2. The adult is experiencing, or at risk of, abuse or neglect.
3. The adult, as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

If these criteria have been met then a referral to the relevant local Adult Safeguarding Team should be made. Please see Appendix 2 for factors to consider and the regularly updated **Safeguarding Essentials Poster** for the contact details of the relevant local agencies.

Making a Referral:

An Adults Safeguarding Referral must be made if:

1. there is an overriding public interest reason (e.g. if there is a high risk to the health and safety of others or if gaining consent would put others at risk) OR
2. there is a risk to the vital interests of the adult (e.g. if there is a high risk to the health and safety of the adult or if gaining consent would put the adult at risk)

In these instances, consent is not required as the basis for sharing is not that of consent, but of the reason 1 or 2 above. However, it is best practice to inform the adult wherever possible and safe to do so that the referral is being made.

If the adult:

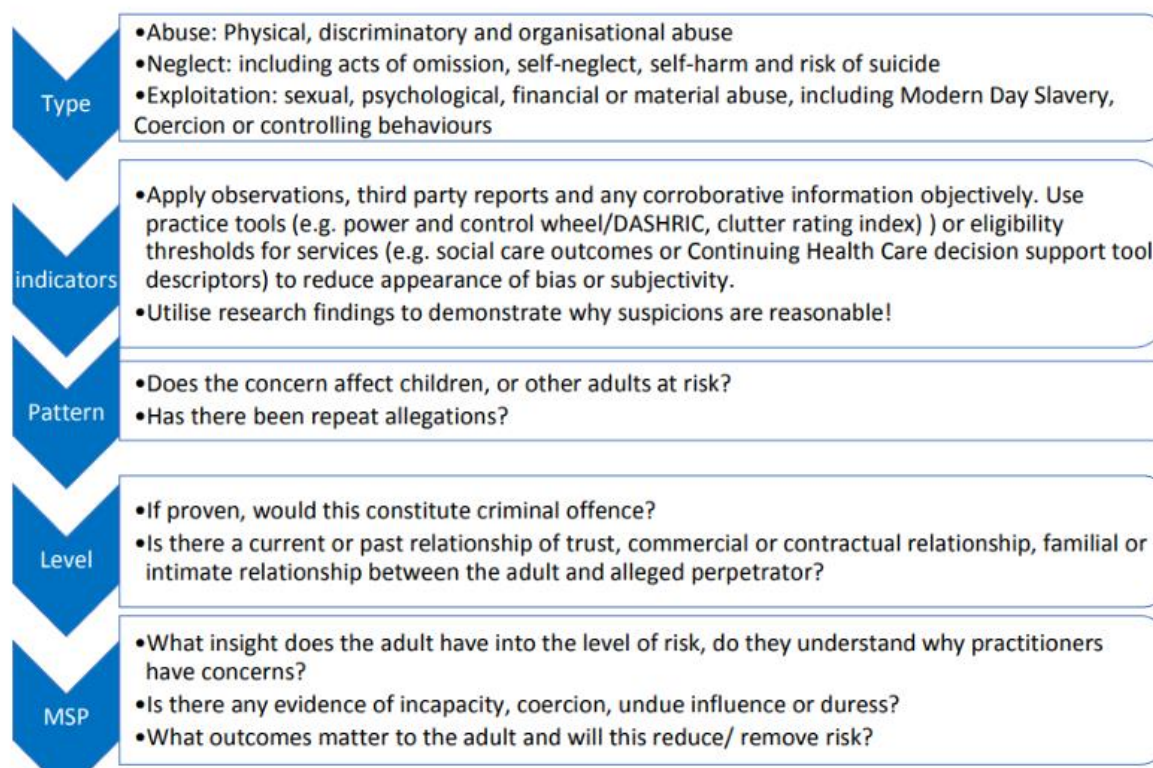
- has the mental capacity to make the decision about whether the referral is made and does not consent to a referral
- and there are no public or vital interest considerations as described above

then they should be given information about where to get support to promote their safety and how to raise any future concerns if the abuse and/or neglect continue.

A record must be made of the concern, as well as the adult's decisions and the reasons given. A record should also be made of what information the person at risk was given. The

referrer must assure themselves that the decision to withhold consent is not made under undue influence, coercion or intimidation.

Overview of considerations in relation to a referral:



Closure of Section 42 (2) Enquiries

Safeguarding Enquiries can be closed at any stage.

Individuals should be advised on how and who to contact with agreement on how matters will be followed up with the adult at risk if there are further concerns. Closure records should note the reason for this decision and the views of the adult at risk to the proposed closure. Green Labyrinth will be given feedback if they were the referring agency.

Other processes which may continue when the Section 42 Enquiry is closed

The adult safeguarding process may be closed but other processes may continue, for example, a disciplinary or professional body enquiry. These processes may take some time. Consideration may need to be given to the impact of these on the adult and how this will be monitored. Where there are outstanding criminal investigations and pending court actions, the adult safeguarding process can also be closed providing that the adult is safeguarded and supported within the specific framework.

Caused Enquiries

The local authority cannot delegate its duty to conduct a formal S42 Enquiry, but it can cause others to make enquiries once the decision has been made by the local authority that it meets the criteria for a Section 42(2). This means that the Local Authority may ask a provider or partner agency to conduct its own enquiries, and report these back to the local authority in order to inform the local authority decision about whether and what action is required in the adult's case. In these situations, the relevant local Safeguarding Partnership Causing Enquiries Guidance should be followed.

Escalation

Where Green Labyrinth considers that a statutory agency's response does not adequately address an identified safeguarding risk, the DSL must challenge and escalate the decision using the relevant local safeguarding partnership's professional disagreement/escalation procedure. The concern shall not be treated as resolved solely because another agency has declined intervention.

Allegations, Concerns and Low - Level Concerns About Staff

Green Labyrinth recognises that safeguarding adults includes responding appropriately to concerns about the conduct of employees, agency workers, volunteers, contractors and any other individual acting on behalf of the organisation.

The fact that a learner is aged 18 or over does not remove the professional boundary, position-of-trust or safeguarding obligations applicable to staff. Adult learners, being legally capable of consenting to relationships, does not eliminate professional power imbalance or abuse-of-position concerns.

Every concern shall be taken seriously.

Concerns may arise from:

- alleged abuse;
- inappropriate behaviour;
- breaches of professional boundaries;
- criminal conduct;
- exploitation;
- neglect;
- discriminatory behaviour;
- misuse of authority;
- online behaviour;

- inappropriate relationships;
- repeated poor professional judgement;
- behaviour outside work that indicates an individual may pose a safeguarding risk.

The welfare and safety of adults shall remain the overriding consideration throughout all investigations.

Any allegation that a member of staff may have:

- harmed an adult;
- committed a criminal offence;
- behaved in a way that indicates they may present a safeguarding risk;
- abused a position of trust;
- exploited an adult learner;
- breached professional boundaries;

must be reported immediately to the **Chief Executive Officer** and the **Designated Safeguarding Lead**.

Where the allegation concerns either the Chief Executive Officer or the Designated Safeguarding Lead, the matter shall be reported directly to the other who shall ensure that appropriate external safeguarding advice is obtained without delay.

No member of staff shall attempt to investigate allegations independently.

Response to an Allegation

Following receipt of an allegation, Green Labyrinth shall undertake an immediate safeguarding risk assessment.

Green Labyrinth will apply the relevant local authority/Safeguarding Adults Board, Person in a Position of Trust (PiPoT) or equivalent allegations management framework applicable to the locality in which the concern arises, together with Green Labyrinth's own disciplinary, safeguarding and safer recruitment procedures.

This assessment shall determine:

- whether immediate protective action is required;
- whether statutory agencies should be notified;
- whether criminal offences may have occurred;
- whether suspension or alternative duties should be considered;
- whether professional regulators require notification;
- whether referral to the Disclosure and Barring Service (DBS) may be required;
- whether legal advice should be sought.

Protective measures shall always be proportionate.

Suspension shall not be regarded as an automatic response. Alternative arrangements should be considered wherever appropriate and consistent with safeguarding.

Low - Level Concerns

Green Labyrinth recognises that significant safeguarding failures are often preceded by patterns of lower-level inappropriate behaviour.

Accordingly, staff are expected to report behaviour that:

- falls short of abuse;
- may indicate poor judgement;
- breaches professional boundaries;
- causes discomfort;
- undermines the safeguarding culture.

Examples include:

- inappropriate language;
- unnecessary physical contact;
- favouritism;
- excessive personal disclosure;
- private messaging;
- accepting inappropriate gifts;
- failing to maintain professional boundaries;
- repeated breaches of safeguarding procedures.

Low-level concerns shall be:

- recorded;
- reviewed;
- monitored for patterns;
- addressed proportionately.

Repeated low-level concerns may indicate an escalating safeguarding risk.

Quality Assurance

Safeguarding quality assurance provides assurance that safeguarding arrangements remain effective.

Green Labyrinth shall implement a structured programme of safeguarding quality assurance.

This shall include:

- safeguarding audits (internal and external);
- case file audits;
- referral audits;
- learner feedback;
- staff surveys;

- observation of practice;
- policy compliance reviews;
- training compliance monitoring;
- governance reporting – see Appendix 3.

Quality assurance shall seek continuous improvement rather than simple compliance.

Staff Training

Green Labyrinth recognises that safeguarding competence requires continuous learning, reflective practice and regular professional development.

All individuals working on behalf of Green Labyrinth shall receive safeguarding training appropriate to their role and level of responsibility.

DSLs and DDSLs will undertake advanced safeguarding training in their locality and should have access to training and key updates at least annually.

Training shall include:

- Care Act responsibilities;
- Mental Capacity Act;
- Making Safeguarding Personal;
- domestic abuse;
- exploitation;
- complex safeguarding;
- information sharing;
- multi-agency working;
- safeguarding leadership;
- safeguarding quality assurance;
- learning reviews.

All new members of staff shall complete safeguarding induction before undertaking unsupervised duties.

Safeguarding training is mandatory.

Appendix 1

Patterns of Abuse

Patterns of abuse vary and reflect very different dynamics. These include:

- Predatory abuse involving a person intending to cause harm, seeking out and 'grooming' individuals over a period of time. Sexual abuse can fall into this pattern as do some forms of financial abuse and psychological abuse
- Long term abuse in the context of an on-going family relationship such as domestic abuse between spouses or generations of family members (e.g. older relatives, or children where children's safeguarding procedures may be required) this could also include Honour Based Violence where an adult is subjected to controlling behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour
- Situational abuse, which arises because pressures have built up and/or because of difficult or challenging behaviour
- Neglect of a person's needs because those around him or her are not able to be responsible for their care, e.g. the carer has difficulties attributable to debt, alcohol, mental health problems or learning disabilities or has not got the required skills to fulfil the caring role
- Organisational abuse as a result of poor care standards, lack of positive responses to needs, rigid routines, inadequate staffing and insufficient knowledge base within the service
- Restrictive care planning in a hospital or care home setting with or for people who lack capacity to consent to these arrangements without appropriate reference to the legal requirements. These may be in their best interests but may deprive them of their liberty and require further action; for example, Deprivation of Liberty Safeguards
- Unacceptable 'treatments' or programmes which include sanctions or punishments such as withholding food and drink, seclusion, unnecessary and unauthorised use of control and restraint or over medication
- Prevention or failure to allow access to healthcare, dentistry, prostheses
- Misappropriation of benefits and/or use of a persons' money by other members of the household
- Fraud or intimidation in connection with wills, property or other assets
- Failure of agencies to address racist and discriminatory attitudes, behaviour and practice
- Violence
- Online and other digital risks that can include cyber bullying, "grooming" or harm that can result from malicious use of social networking sites by those who intend to cause harm, online risks resulting in fraud and financial abuse and misuse of other digital media that is intended to cause harm; for example, malicious use of mobile phones, text messaging etc.

- Intimidation, coercion or exploiting the vulnerability of an adult to become involved in acts of terrorism or actions that may contribute to acts of terrorism 26
- Controlling behaviour that leads to an adult becoming subordinate and unnecessarily dependent and isolated from support. Exploiting the adult for personal gain, depriving them of the means needed for independence, resistance and escape and directing their everyday behaviour that is detrimental to their wellbeing
- Coercion of an adult at risk to carry out actions they would not otherwise undertake (for example, slavery, human trafficking, forced labour and domestic servitude)
- Being forced into a marriage the adult at risk cannot, or does not, consent to.

(Please note this list is not exhaustive)

Appendix 2

Factors to consider when making a referral:

- The ability of the person to protect themselves during the referral process
- The ability of the person to make their own decisions about their safety, to understand the safeguarding process, and/or for any other specific decisions relevant to the concern
- Communication needs, whether an interpreter or other support is needed
- Whether it is likely that advocacy may be required
- What the adult at risk would hope to achieve as outcomes from the safeguarding process – or in general
- Personal care and support arrangements
- Remember the five principles of the Mental Capacity Act 2005 and that the capacity to make one's own decisions can be undermined by the experience of abuse, exploitation, grooming, coercion, and/or undue influence or duress
- The extent of the person's vulnerability due to personal, environmental and social factors
- The nature and extent of the abuse including whether it is criminal
- Whether the situation poses a risk to the public or other people, including children under 18 years
- Whether the person alleged to have caused harm (PACH) is a person in a 'position of trust' and a potential risk to other people
- The length of time the abuse has been occurring and whether it is a one-off incident or a pattern of repeated actions
- The impact of the abuse on the adult and the physical and/or psychological harm being caused and whether the abuse is having an impact on other people
- The extent of premeditation, threat or coercion
- The immediate and likely longer-term effects of the abuse on their independence, well-being and choice
- The risk of repeated or increasingly serious acts by the person causing the harm.
- Information the Safeguarding Referral / concern might contain

Organisations that refer to the Local Authority should include the following information (the list is not exhaustive):

- Demographic and contact details for the adult at risk, the person who raised the concern and for any other relevant individual, specifically carers and next of kin

- Factual details of what the concern is about; what, when, who, where
- Basic facts, focusing on whether or not the person has care and support needs including communication and on-going health needs and how as a result of these they are not able to protect themselves from abuse and/or neglect
- Immediate risks and any actions 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 Care Quality Commission
- Any recent and long-term history (if known) about previous concerns of a similar nature or concerns raised about the same person, or someone within the same household.

Appendix 3

Governance Reporting

The DSLs from each centre within Green Labyrinth will contribute to a quarterly Safeguarding Report to the Board. This will be coordinated and delivered by the Swindon DSL. The Report will not contain names or other identifiers of any alleged victims.

The Report will provide numerical data by delivery location on:

- The Number of Concerns reported
- Section 42 (S42) Referrals
- S42 Referrals accepted / not progressed
- Caused Enquiry contributions
- Allegations against staff
- Low - level concerns
- Abuse categories including Prevent / Channel Referrals
- Outstanding and closed cases
- Staff training compliance
- Safeguarding Supervision sessions
- Themes including locality specific issues
- Audits undertaken with Action Points
- Learning from internal and external audits