
SAFEGUARDING VULNERABLE GROUPS POLICY

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Policy Owner: [Customers and Communities]

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CONTENTS

- 1. PURPOSE**
- 2. SCOPE**
- 3. RESPONSIBILITIES**
- 4. POLICY DETAIL**
- 5. COMPLAINTS**
- 6. REVIEW OF DECISION**
- 7. RECORD OF REVISIONS TO THIS PROCESS**
- 8. EQUALITY AND DIVERSITY**
- 9. DEFINITIONS AND ACRONYMS**
- 10. REFERENCES**
- 11. RECORDS**
- 12. REVIEW**

1. PURPOSE

- 1.1 Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.
- 1.2 The purpose of this policy is:
 - to set out how Adra (Tai) Cyf deals with Safeguarding Vulnerable Groups which includes children and adults at risk.
 - give a clear definition of the term vulnerable groups, abuse, and neglect.
 - ensure consistency in preventing, recognising, reporting, and responding to issues of safeguarding.
- 1.3 Adra recognises its responsibility to safeguard vulnerable groups from harm. The overall aim of this policy is to protect and promote the welfare of all vulnerable groups.
- 1.4 This policy supports and reinforces Adra policies listed in section 8 and existing legislation and government guidance as embodied in the Safeguarding Vulnerable Groups Act 2006, the All-Wales Child Protection Procedures 2008, the Wales Safeguarding Procedures 2019, the Social Services and Well-being (Wales) Act 2014, and the Modern Slavery Act 2015. Adra also works with local partners to seek consistency with locally agreed frameworks and protocols.

2. SCOPE

- 2.1 This policy applies to all customers, prospective customers, and residents of properties owned by Adra or other persons reasonably suspected of being at risk. It also applies to Adra staff.
- 2.2 The policy will support Adra staff in safeguarding the welfare of vulnerable groups which include, children, young people, and adults they have contact with through their work and related activities and will also provide guidance and support to safeguard themselves personally and in the course of their duties, including guarding against allegations.
- 2.3 This Policy shall apply to Adra (Tai) Cyf (the Parent) and any of its subsidiaries (including Medra Cyf).

3. RESPONSIBILITIES

- 3.1 It is the responsibility of the Director of Customer and Communities and the Director of People & Communications to ensure that this policy is applied effectively, and that Adra staff are trained appropriately in the procedures associated with this policy. All Adra staff will complete an Online Safeguarding Awareness course developed in conjunction with North Wales Safeguarding Board Guidance every two years. All new starters will complete this as part of their Corporate Induction. Designated Safeguarding Officers will be assigned a more intensive training course to be completed every two years.

3.2 A list of supporting documents can be found in section 8 of this policy.

4.0 POLICY DETAIL

- 4.1 One of the most important principles of safeguarding is that it is everyone's responsibility. The Welsh Government expects each professional and organisation to do everything it can to ensure that children and adults at risk of abuse are protected from abuse.
- 4.2 Adra recognises that vulnerable groups to whom we provide services have a right to protection from abuse or neglect, and the highest possible standard of care.
- 4.3 Adra is committed to protecting vulnerable groups and dealing with allegations, concerns or disclosures of abuse or neglect effectively.
- 4.4 Abuse may take many different forms including:
- Physical Abuse
 - Domestic violence or abuse
 - Sexual abuse
 - Psychological or emotional abuse
 - Financial or material abuse
 - Modern slavery
 - Discriminatory abuse
 - Organisational or institutional abuse
 - Neglect or acts of omission.
 - Self-neglect

The above definitions of abuse are set by the Social Care Institute for Excellence.

- 4.5 Duty to report - If Adra has reasonable cause to suspect that a child or adult:
- is experiencing or is at risk of abuse or neglect or other kinds of harm.
 - has needs for care and support (whether the local authority is meeting these needs), and
 - (and in the case of adults only) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- 4.6 Adra will inform the relevant local authority of that fact.
- 4.7 Adra will identify Designated Safeguarding Vulnerable Groups (SVG) Leads who have responsibility for making decisions relating to Safeguarding. Designated SVG co-ordinators will support the role of the SVG Leads.
- 4.8

Designated SVG Leads	Designated SVG Co-ordinators
Director Customers and Communities - for Customer matters	Neighbourhood Services Assistant Managers

Director of People & Communications – for staff matters	Community Housing Co-ordinators
	Supported Housing Co-ordinators

- 4.9 Each case will be assessed on its individual merits, as a person's vulnerability will depend on their circumstances and environment. Regard will be given to the:
- stated views, wishes, feelings of, and preferred outcomes for the individual.
 - frailty or vulnerability of the person at risk.
 - extent of abuse or neglect.
 - length of time and frequency of the occurrence.
 - impact on the individual.
 - risk of repeated or escalating acts involving this or other groups at risk.
- 4.10 Adra will make its staff aware of their duty to report and the requirement that they report any concerns they have according to HSp54 – Process for Reporting Suspected Abuse of Vulnerable Groups.
- 4.11 Indicators of abuse and neglect are set out in [Social Care Institute of Excellence](#). Adra acknowledges that the indicators of abuse might not definitely mean that abuse has taken/is taking place. However, Adra requires its staff, if they have reasonable cause to suspect that a child or adult is at risk, to share their concerns internally.
- 4.12 **Guidance about children and adults at risk** - Adra will give regard to any relevant guidance and protocols provided by Welsh Government, Safeguarding Boards, and relevant local authorities.
- 4.13 **Confidentiality** - Adra will maintain confidentiality when dealing with issues of safeguarding but may share information with partner agencies in accordance with relevant legislation and agreed protocols. Effective sharing and exchange of relevant information between professionals is essential to safeguard vulnerable groups.
- 4.14 Normally, Adra will not share personal information without the consent of the person or their guardian as appropriate (unless 5.13 applies). A record will be kept of all personal information shared for safeguarding purposes. This record will include how the consent to share information was given, with who the information is shared, and how the information has been shared.
- 4.15 There may be some circumstances in which sharing confidential information without consent will be justified in the individual's and the public's interest. For example, where there is reasonable cause to believe a child or adult is at risk of suffering significant harm, or to prevent significant harm. Also, where a third party is placed at risk, and where a crime is suspected / has been committed.
- 4.16 **Supply of information requested by Safeguarding Boards** - Adra will comply with a request made by a Safeguarding Board to supply specified information unless doing so would:
- Be incompatible with the duties of Adra, or
 - Otherwise have an adverse effect on the exercise of the functions of Adra

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- 4.17 If Adra decides not to comply with a request for information, it will give the Safeguarding Board written reason(s) for the decision.
 - 4.18 Adra will co-operate fully with other agencies and partners in dealing with safeguarding issues.
 - 4.19 Adra is represented at MARAC (Multi Agency Risk Assessment Conference) meetings and attend Social Services case conferences and meetings when required.
 - 4.20 **Recruitment** – Full details on recruitment are included in Adra’s Recruiting and Selection policy.
 - 4.21 Any appointment to a post who has regular contact, with vulnerable groups will be subject to a Disclosure Barring Service (DBS) disclosure. Any appointment placing an individual in a role which is defined as regulated activity by the DBS will be subject to a DBS check and a barring list check appropriate to the age group with whom they will work. Guidance on this can be found in a separate document titled Guidance for carrying out Disclosure and Barring Service checks HRg01.
 - 4.22 If a prospective employee has a criminal record, Adra will adopt a risk-based approach when deciding whether to appoint the individual. The seriousness of the offence and the length of time that has passed since the offence was committed will be considered in accordance with the Rehabilitation of Offenders act 1974.
 - 4.23 Once appointed, Adra will update an employee’s DBS check every 3 years, unless concerns and circumstances require this to take place more frequently with the employees’ consent. In line with GDPR regulations, DBS certificates will only be retained for 6 months.
 - 4.24 **Training** - Staff dealing with vulnerable groups will receive regular training updates on dealing with allegations of abuse. All training will be in accordance with national guidance and training requirement for staff in relation to Safeguarding Vulnerable Groups at the identified training levels. In addition, regular Staff Bulletins are sent to all staff to raise awareness of potential safeguarding issues and how to report any concerns.
 - 4.25 Further awareness training will be carried out by SVG co-ordinators through forums such as toolbox talks etc.
 - 4.26 **Staff** - Adra has procedures in place for dealing with allegations against staff, and to protect staff who raise serious concerns about potential mal-practice (whistle blowing).
 - 4.27 **Suppliers** - All procurement projects will be assessed for safeguarding risks, and Adra will encourage safeguarding standards in our suppliers to ensure the protection of vulnerable groups, in accordance with Adra’s standards and expectations. Where services are provided by third parties, Adra expects third parties to comply with our internal policies and all relevant legislation in relation to safeguarding vulnerable groups.. Basic safeguarding contract clauses are included in contracts where appropriate.

- 4.28 Where relevant, suppliers will be required to have in place appropriate safeguarding policies, procedures (including staff and sub-contractor recruitment, selection, and vetting procedures) and systems prior to awarding a contract to them.
- 4.29 Where, through the provision of services to Adra, a supplier's employee has serious concerns in relation to the protection of vulnerable groups, they must raise their concern in accordance with any internal procedures put in place by their company. If no such procedures exist, the service provider is expected to notify the relevant Local Authority.

5. COMPLAINTS

- 5.1 Adra recognises your right to bring forward a complaint in relation to the exercise of this policy. Any such complaint will be dealt with under the CCpol01 – Complaints and Concerns Policy.
- 5.2 Adra will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation.

6. REVIEW OF DECISION

- 6.1 Adra recognises the right to request a review of any decision relating to this policy. Any such review will be dealt with following our CCp04- Review of Decision process.
- 6.2 Adra will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation.

7. RECORD OF REVISIONS TO THIS PROCESS

7.1

Issue	Date	Comments (What has been revised?)	Written By	Approved for content
1	2017	New policy	ER	SLT
2	09/18	GDPR, and to comply with Welsh Government Guidance	ER	-
3	09/19	Update policy to refer to Adra and subsidiary company	ER	-
4	10/19	Description of posts that require DBS check	DW	-
5	11/19	Further update following SLT consultation	DW	SLT
6	12/19	Incorporation of comments received by safeguarding officer at Wales Council for Voluntary Action	DW	-
7	12/22	3 year review of policy	GJ	SLT
8	12/23	Incorporation of Training frequency as per Audit recommendation	GJ	-

9	07/24	Updated named Job Roles in terms of Responsibilities	GJ	Grŵp Diogelu
10	09/24	Correction in section 4.21 – removal of ‘enhanced’ DBS disclosure	GJ	GJ

8. EQUALITY AND DIVERSITY

- 8.1 In applying this policy, Adra will be committed to treating all persons fairly and with regard to its Equality, Diversity and Inclusion policy.
- 8.2 We aim to respond promptly and sensitively to the needs and rights of an individual, taking account of his/her racial and cultural background, gender, religious belief, sexuality, age and disability.

9. DEFINITIONS AND ACRONYMS

- 9.1 Adra provides the following as definitions of persons that are within **vulnerable groups**:
- A **vulnerable adult** is defined as someone who is aged 18 or over who is or may need community care services by reason of mental health problems, learning difficulties or other disability, age, or illness; and who is or may be unable to take care of themselves or unable to protect themselves against harm or exploitation.
 - A **child or young person** is used to refer to anyone under 18 years of age.
- 9.2 The term ‘**staff**’ applies to all full time and part time, permanent or temporary Adra employees and covers agency staff, volunteers, and those on placement with Adra.
- 9.3 “**abuse**” means physical, sexual, psychological, emotional, coercive behaviours or financial abuse (and includes abuse taking place in any setting, whether in a private dwelling, an institution, or any other place), and “financial abuse” includes:
- having money or other property stolen.
 - being defrauded.
 - being put under pressure in relation to money or other property.
 - having money or other property misused.
- 9.4 “**neglect**” means a failure to meet a person’s basic physical, emotional, social, or psychological needs, which is likely to result in an impairment of the person’s well-being (for example, an impairment of the person’s health or, in the case of a child, an impairment of the child’s development).
- 9.5 **MARAC** – Multi Agency Risk Assessment Conference

10. REFERENCES

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- 10.1 The following publications and legislation have been referenced during the drafting of this Policy:
- 10.2 Public Interest Disclosure Act 1998.
- 10.3 Safeguarding Vulnerable Groups Act 2006.
- 10.4 All Wales Child Protection Procedures 2008.
- 10.5 <http://www.northwalessafeguardingboard.wales/policies-and-procedures/>
- 10.6 Equalities act 2010.
- 10.7 Protection of Freedoms Act 2012.
- 10.8 Social Services and Well-being (Wales) Act 2014.
- 10.9 The Modern Slavery Act 2015.
- 10.10 Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.
- 10.11 Working Together to Safeguard People Volume 1 – Introduction and overview also volumes 5 and 6 Handling Individual Cases <https://socialcare.wales/hub/statutory-guidance>
- 10.12 NSpol03- Domestic Abuse Policy.
- 10.13 NSpol01 - Anti-social behaviour & Hate Crime policy.
- 10.14 HRp04 - Recruitment Management
- 10.15 LDpol01 - Learning and Development Policy.
- 10.16 HRp07 – Disciplinary and Grievance Procedure.
- 10.17 HRpol11 -Code of Conduct.
- 10.18 HRpol18 – Whistle Blowing Policy.
- 10.19 CCpol01 – Complaints and Concerns Policy.
- 10.20 EDpol01 – Equalities and Diversity Policy.
- 10.21 HSp54 – Process Map for Reporting Suspected Abuse of Vulnerable Groups.
- 10.22 Rehabilitation of Offenders Act 1974Offender Rehabilitation Act 2014.
- 10.23 Regulated Activity and DBS checks.
- 10.24 Social Care Institute of Excellence
<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>
- 10.25 Wales Safeguarding Procedures
http://www.myguideapps.com/projects/wales_safeguarding_procedures/default/
- 10.26 Guidance for carrying out Disclosure and Barring Service checks HRg01.
- 10.27 Renting Homes (Wales) Act 2016.

11. RECORDS

- 11.1 It is important that records relating to allegations of abuse is stored securely. Electronic records will be saved in our housing management system.

12. REVIEW

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- 12.1 This procedure will be reviewed every 3 years, or in response to changes in legislation, regulatory guidance, good practice, or changes in other relevant Adra (Tai) Cyf Policy.