

Adults at Risk of Harm: Safeguarding and Prevent Policy



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Related documents	Children’s Safeguarding and Prevent Policy Safer Recruitment Policy Disclosure of Malpractice in the Workplace (Whistleblowing) Policy Dealing with Safeguarding Reports procedure Anti-Bullying and Harassment policy Complaints and Compliments Policy Lone Working Policy Code of Conduct Privacy Notice Online Safety Policy

Approval History

Version	Reviewed by	Amendment History	Approved by	Date
2.0	Alison Wright	Updated and reviewed	Andy Cobb	11/5/23
2.1	Katharine Jane	Updated and reviewed	Jane Sullivan	11/5/223
2.2	Andrew Counsell	Reviewed – DSL and Deputy DSL details updated	Katharine Jane	11/3/24

Purpose

The purpose of this policy is to protect people, particularly adults at risk of, from any harm that may be caused due to their encounters with Newton Rigg Ltd. This includes harm arising from:

- The conduct of staff or personnel associated with Newton Rigg Ltd.
- The design and implementation of Newton Rigg Ltd’s programmes and activities.

The policy lays out the commitments made by Newton Rigg Ltd and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy also covers:

- Safeguarding concerns in the wider community not perpetrated by Newton Rigg Ltd or associated personnel.

Scope

- All staff contracted by Newton Rigg Ltd.
- All associated personnel whilst engaged with work or visits related to Newton Rigg Ltd, including but not limited to the following: Trustees, consultants; volunteers; contractors; programme visitors including teaching staff, journalists, celebrities and politicians.

Policy Statement

In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect. In our sector, we understand it to mean protecting people, including children and adults at risk from harm, from harm that arises from meeting our staff or programmes.

Newton Rigg Ltd believes that everyone we encounter, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Newton Rigg Ltd will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding: adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

This policy has been developed in accordance with The Care Act 2014, Sexual Offences Act 2003, Safeguarding Vulnerable Groups Act 2006, the Human Rights Act (1998), the Equality Act 2010, the Data Protection Act 2018 and the Protection of Freedoms Bill and the Public Interest Disclosure Act 1998.

Prevent refers to the Counter Terrorism and Security Act 2015 which protects people from radicalisation and extremism in order to stop them from becoming terrorists or supporting terrorism. This includes countering terrorist ideology and challenging those who promote it, supporting individuals who are especially vulnerable to becoming radicalised, and working with sectors and institutions where the risk of radicalisation is assessed to be high.

The policy aims to:

- Promote and prioritise the safety and wellbeing of adults at risk of harm.
- Provide assurance to parents, carers and other parties that Newton Rigg Ltd takes reasonable steps to manage risks and keep adults at risk of harm safe.
- Ensure that everyone understands their roles and responsibilities in respect to Safeguarding and Prevent and is provided with the necessary information, training and support on Safeguarding and Prevent matters.

- Avoid the employment of individuals in work with adults at risk of harm where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the training provider to pose an unacceptable risk to vulnerable groups.
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to adults at risk of harm arising from contact with anyone employed by Newton Rigg Ltd and associates/contractors in relevant positions, regardless of where the harm has taken place.
- Ensure Newton Rigg Ltd has a culture of respect, free from bullying or harassment.
- Protect people from radicalisation and extremism.

The Nature of Work with Adults at risk of harm at Newton Rigg Ltd

Adults at risk of harm may attend our courses, working with staff members in small groups or one to one.

Newton Rigg Ltd is committed to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Newton Rigg Ltd responsibilities

Newton Rigg Ltd will:

- Ensure all staff, trustees and associated personnel have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their encounters with Newton Rigg Ltd. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel including enhanced DBS checks with barring checks where appropriate (see Safer Recruitment Policy).
- Ensure staff, trustees and associated personnel (where appropriate) receive training on safeguarding at a level commensurate with their role in the organisation.
- Ensure all staff and associated personnel are aware of and agree to follow the Code of Conduct Standards (Appendix A).
- Follow up on reports of safeguarding concerns promptly and according to the Dealing with Safeguarding Reports Procedure.
- Create a culture whereby staff feel safe to report concerns or complaints through formal whistleblowing channels and will be protected by Newton Rigg Ltd's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.
- Offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.
- Apply appropriate disciplinary measures to staff found in breach of policy.
- Ensure a trustee member has strategic leadership responsibility for our safeguarding arrangements and that trustee duties follow guidance from the [Charity Commission](#).
- Ensure we register annually with the Information Commissioner's Office (ZB132498)

Staff responsibilities

Adult safeguarding

Newton Rigg Ltd staff and associated personnel must not:

- Sexually abuse or exploit adults at risk of harm.
- Subject an adult at risk of harm to physical, emotional or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

Newton Rigg Ltd staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to students.
- Engage in any sexual relationships with students, since they are based on inherently unequal power dynamics.

Additionally, Newton Rigg Ltd staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by a Newton Rigg Ltd staff member or associated personnel to the appropriate line manager or Trustee as appropriate.

Physical Contact and One to One Work

The nature of work on Newton Rigg Ltd may mean some physical contact with adults at risk of harm is unavoidable, for example in helping them change footwear or climb a stile, or in steering them away from dangers, for example the edge of a pond. Newton Rigg Ltd staff members must ensure that contact is transparent and is always done in an area which is open and where there are other people around. If staff members find themselves unintentionally alone with an adult at risk of harm, they should move to a public area as soon as possible.

Our work with adults at risk of harm means staff members may find themselves working on a one-to-one basis with them. Newton Rigg Ltd recognises that these sessions are often part of our courses and an important opportunity for people to learn. All lone working should be done in accordance with the Lone Working Policy. However, staff members should understand that this places them in a position of significant trust and responsibility and ensure that their behaviour in these situations is beyond reproach. If a situation arises that has made staff feel uncomfortable or compromised, this should be reported to the Designated Safeguarding Lead as soon as possible and a record made.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Designated Safeguarding Officer who will follow the Dealing with Safeguarding Reports procedure (Appendix B).

All staff must be aware that mental health problems can, in some cases, be an indicator that an adult has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a person that is also a safeguarding concern, immediate action should be taken, speaking to the designated safeguarding lead or a deputy. This must be done in partnership with the referral agency. See Appendix C for types of abuse

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times in accordance with Newton Rigg Ltd Privacy Policy.

Roles and Responsibilities

- The Designated Safeguarding Officer is responsible for writing and implementing this policy.
- Safeguarding incidents are reported to the Management Committee and the Board of Trustees.
- Minor and major changes to the policy will be reviewed by the Management Committee and agreed and approved.
- A policy review will take place every two years or in line with relevant changes to legislation and/or local guidance.

Equality

- Consideration is given to the protected characteristics of all people groups identified in the Equality Act 2010. The protected characteristics are gender, age, race, disability, sexual orientation, religion/belief, pregnancy and maternity, and marriage/civil partnership.
- Any activity that results in discriminatory practice will be challenged. Where children and adults face additional barriers staff at Newton Rigg Ltd will work hard to find alternative ways of addressing this.
- This policy and all other associated policies and documents take this into account.

Appendix A

Code of Conduct Standards (to be printed and signed)

Whilst working (for or on behalf of) at Newton Rigg Ltd I will:

Uphold the integrity and reputation of Newton Rigg Ltd by ensuring that my professional and personal conduct is consistent with Newton Rigg Ltd's values and standards

- I will treat all people fairly with respect and dignity
- When working in an international context or travelling internationally on behalf of Newton Rigg Ltd, I will be observant of all local laws and be sensitive to local customs
- I will seek to ensure that my conduct does not bring Newton Rigg Ltd into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed
- I will not work under the influence of alcohol or use, or be in possession of, illegal substances on Newton Rigg Ltd premises or accommodation

Not engage in abusive or exploitative conduct

- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence
- I will not exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to students
- I will not engage in sexual relationships with students, since they are based on inherently unequal power dynamics
- I will not engage in any commercially exploitative activities with children or adults at risk of harm including child labour or trafficking
- I will not physically assault a child or adult at risk of harm
- I will not emotionally or psychologically abuse a child or adult at risk of harm

Ensure the safety, health and welfare of all Newton Rigg Ltd staff members and associated personnel (volunteers, partners, suppliers and contractors)

- I will adhere to all legal and organisational health and safety requirements in force at my location of work
- I will comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines
- I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including partner organisations and communities with whom we work

Be responsible for the use of information, assets and resources to which I have access by reason of my employment with Newton Rigg Ltd

- I will ensure that I use Newton Rigg Ltd assets and resources entrusted to me in a responsible manner and will account for all money and property
- I will not use Newton Rigg Ltd IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism
- I will not use Newton Rigg Ltd IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

Perform my duties and conduct my private life in a manner that avoids conflicts of interest

- I will declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of Newton Rigg Ltd
- I will seek permission before agreeing to being nominated as a prospective candidate or another official role for any political party
- I will not accept significant gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to me as a result of my employment with Newton Rigg Ltd

Uphold confidentiality

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so

Complaints and reports

Newton Rigg Ltd staff are obligated to bring to the attention of the relevant manager any potential incident, abuse or concern that they witness, are made aware of, or suspect which appears to breach the Standards contained in this Code. Newton Rigg Ltd staff reporting concerns are protected by the Disclosure of Malpractice in the Workplace policy.

Staff members who have a complaint or concern relating to breach of the Code should report it immediately to their line manager. If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member.

Staff members receiving reports or concerns are obliged to action or refer the report immediately as per the Newton Rigg Ltd Complaints Policy and Procedures.

In accepting my appointment, I understand my duties and will regulate my conduct in accordance with the requirements of this Code

Name:

Signature:

Date:

Appendix B- Dealing with Safeguarding and Prevent Reports

The purpose of this document is to provide procedures for dealing with reports of breach of Newton Rigg Ltd Safeguarding and Prevent Policy, where the Safeguarding violation or Prevent concern is:

- Against staff or members of the public,
- Perpetrated by staff, partners or associated personnel
- Concerns students

Procedure for dealing with a Safeguarding report

1.1 Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the Designated Safeguarding Officer.

1.2 If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind: • Listen • Empathise with the person • Ask who, when, where, what but not why • Repeat/ check your understanding of the situation

- Report to the Designated Safeguarding Officer
- 1.3 The person receiving the disclosure should document the following information, using an Incident Report Form: • Name of person making report • Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above • Name(s) of alleged perpetrator(s) • Description of incident(s) • Dates(s), times(s) and location(s) of incident
 - 1.4 The Designated Safeguarding Officer receiving the report should then review the information and decide on the next steps. These could be (but are not limited to) • No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit) • Investigation is required to gather further information • Immediate disciplinary action if no further information needed • Referral to relevant authorities by following the guidelines for Contacting the Cumbrian Safeguarding Hub as outlined below (or if in an emergency to the police by dialling 999).
 - 1.5 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.
 - 1.6 If the reporting staff member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report to the Safeguarding Hub directly. The staff member will be protected against any negative repercussions as a result of this report. See Newton Rigg Ltd Complaints Policy and Disclosure of Malpractice in the Workplace Policy.
 - 1.7 If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report should be filed in case it can be of use in the future and look at any wider lesson learning we can take forward.
 - 1.8 Support will be provided to the survivor where needed/requested. Support could include (but its not limited to) • Psychosocial care or counselling • Medical assistance • Protection or security assistance (for example being moved to a safe location). All decision making on support should be led by the survivor.
 - 1.9 For reports relating to serious incidents: an immediate risk assessment will be undertaken to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required. We will update the risk assessment and plan on a regular basis throughout and after the case as required.
 - 1.10 If an investigation is required and Newton Rigg Ltd does not have internal capacity, we will identify resources to conduct the investigation.
 - 1.11 All decisions made resulting from the case will be documented clearly and confidentially.
 - 1.12 All information relating to the case will be stored confidentially, and in accordance with Newton Rigg Ltd policy and local data protection law.
 - 1.13 All records will contain anonymised data to feed into organisational reporting requirements (e.g. serious incident reporting, safeguarding reporting), and to feed into learning for dealing with future cases.

Procedure for reporting and response to safeguarding concerns

Newton Rigg Ltd Designated Safeguarding Officer will take responsibility for reporting any safeguarding concerns to external agencies.

To report a crime, telephone the police:

- In an emergency telephone 999
- If the person is not in immediate danger telephone 101

To report a safeguarding concern:

Please contact your local Adult Social Care office at the following times:

Monday to Thursday: 9am to 5pm

Friday: 9am to 4.30pm

At all other times (including bank holidays) please contact the Emergency Duty Team on 01228 526690.

Allerdale and Copeland

West Cumbria House

PO Box 100

CA14 9BW

Telephone: 0300 303 3589

Email: customerserviceswest@cumbria.gov.uk

Barrow in Furness

4th Floor

Craven House

Michaelson Road

Barrow in Furness

LA14 1FD

Telephone: 0300 303 2704

Fax: 01229 404054

Email: customerservicessouth@cumbria.gov.uk

Carlisle

3rd Floor

Cumbria House

117 Botchergate

Carlisle

CA1 1RD

Telephone: 0300 303 3249

Fax: 01228 226655

Email: customerservicesnorth@cumbria.gov.uk

Eden

Adult Social Care

PO Box 224

Penrith

CA11 1BP

Telephone: 0300 303 3249

Fax: 01768 812262

Email: customerservicesnorth@cumbria.gov.uk

South Lakes

County Offices

Kendal

LA9 4RQ

Telephone: 0300 303 2704

Fax: 01539 713354

Email: customerservicessouth@cumbria.gov.uk

Procedure for dealing with a Prevent report

Prevent forms part of the government's Counter Terrorism strategy called Contest. The aim of Prevent is to stop people becoming or supporting terrorists, challenging the spread of terrorist ideology and protecting vulnerable individuals.

Newton Rigg Ltd Designated Safeguarding Officer will take responsibility for reporting any Prevent concerns to the police.

How do I make a Prevent referral in Cumbria?

If you have a Prevent concern about someone please send [this referral form](#) to: prevent@cumbria.police.uk

If you don't have access to a referral form please email your concern with as much detail as possible. Please include the full name and date of birth of the person, their home address and your contact details in case we need to get back to you. All referrals are treated as being confidential.

If you are still unsure of what to do please email and we will get back to you with our advice.

What happens when I make a referral?

The information you provide will be reviewed by the Police Prevent Officer. We might need to re-contact you for further information to help us better understand the concern. If your concern does not meet the criteria for Prevent we will explain why. If the concern does meet the criteria then we will share the information with the Local Authority who will decide how best to progress the case and how they will support that person and protect others from harm. The Police Prevent Officer helps the Local Authority do this.

What happens when someone is identified at risk?

One of the main elements of Prevent work is a programme called Channel. Where people who are assessed as being vulnerable to supporting any form of violent extremism are provided with multi-agency support that is tailored for each case. It could consist of help with family problems, mental health support, mentoring, religious support and others. People who are

referred to Channel are not criminals; we are trying to stop people committing offences and getting into trouble.

Keeping children, young people, vulnerable adults and the community safe from these risks is a safeguarding matter and is approached in the same way as any other safeguarding concern.

Channel is a partnership approach to support individuals vulnerable to recruitment by violent extremists. Front line professionals from all partner agencies assess the nature and extent of vulnerability and look at ways to assist people it.

Channel is not always necessary and there may be other less intensive means of supporting a person.

Equality

Consideration is given to the protected characteristics of all people groups identified in the Equality Act 2010. The protected characteristics are gender, age, race, disability, sexual orientation, religion/belief, pregnancy and maternity, and marriage/civil partnership.

This procedure and all other associated policies and documents take this into account.

Appendix C-Types of Abuse

The categories of abuse below are produced from external guidelines. A person may abuse or neglect an adult at risk of harm by inflicting harm, or by failing to act to prevent harm. There are the main forms of abuse, common to both children and adults at risk of harm, although there are variations within these:

- **Physical Abuse**

Deliberate physical harm to adults at risk of harm or any other form of harm which causes illness in an adult at risk of harm. These include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in an adult at risk of harm

- **Sexual Abuse**

Forcing or manipulating an adult at risk of harm to take part in sexual activities, not necessarily involving violence, whether or not the person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving an adult at risk of harm in looking at, or in the production of, sexual images, watching sexual activities, encouraging people to behave in sexually inappropriate ways, or grooming a person in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect**

This involves the persistent failure to meet an adult at risk of harm's basic physical and/or psychological need, likely to result in the serious impairment of the adult at risk of harm's health or development. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

- **Emotional Abuse**

This involves the persistent emotional maltreatment of an adult at risk of harm such as to cause severe and persistent adverse effects on the adult at risk of harm's emotional wellbeing and/or development. It may involve conveying to a person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

- **Psychological Abuse**

This is a form of abuse, characterised by a person subjecting or exposing another person to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

- **Domestic Abuse**

Domestic violence (also named domestic abuse or family violence) is violence or other abuse by one person against another in a domestic setting, such as in marriage or cohabitation. Both children and adults at risk of harm may witness or be a victim of domestic violence.

- **Discriminatory Abuse**

This includes abuse that is racist, sexist, homophobic or is based on age or disability, or any forms of harassment.

Other safeguarding issues that staff need to be aware of with regard to adults at risk of harm include:

Financial or material abuse – including 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, or the misuse or misappropriation of property, possessions or benefits.

Modern slavery – slavery, human trafficking, forced labour and domestic servitude. People are bought and sold for sexual exploitation, forced labour, street crime, cannabis cultivation, grooming and pimping, domestic servitude, forced marriage or even the sale of organs and human sacrifice. [How to report Modern Slavery](#).

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

Self-neglect – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It involves no other perpetrator.

Poor Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe a person's day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where a person has suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these experiences can impact on their mental health, behaviour, and education.

