

Co-operatives UK Safeguarding Adults Policy and Procedure

1.0 Introduction

Co-operatives UK is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of everyone with whom we may have a business relationship from time to time. Co-operatives UK takes a broad view of safeguarding and believes that anyone, at any time, could be considered 'vulnerable'. This policy therefore explains our position on safeguarding young adults at risk and vulnerable adults, but also seeks to safeguard colleagues at work and others we may come into contact with from time to time during the course of that work. Please read this policy carefully and ask your manager if you have any questions.

This policy should be read in conjunction with the Co-operatives UK Whistleblowing policy. If you have concerns relating to safeguarding or the welfare of a vulnerable adult or young adult at risk we prefer that you raise those concerns immediately using the procedure set out in this policy. If you would prefer to raise these issues anonymously you can do so using our whistleblowing policy.

This policy is applicable to all Co-operatives UK employees and any members, contractors or third parties running programmes or activities with us or on our behalf. Any failure to follow the rules set out in this policy will be investigated under our disciplinary procedure and may result in disciplinary action being taken against you, up to and including dismissal. If you are a member, contractor or third party and fail to follow the rules set out in this policy, we reserve the right to terminate our relationship with immediate effect.

2.0 Our policy

Co-operatives UK has a zero tolerance approach to abuse, unlawful discrimination and restraint. This includes, but is not limited to, physical abuse, sexual abuse, psychological abuse, financial or material abuse, neglect and acts of omission, and discriminatory abuse.

We believe that everyone, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital, gender, pregnancy or maternity status have the right to be protected from abuse and poor practice. We will always respect the rights, dignity and worth of those we come into contact with, including vulnerable adults and young adults at risk. Additionally, we recognise that ability and disability can change over time, so that some people may become additionally vulnerable to abuse, for example where they have increased dependency on others or increasing communication difficulties.

2.1 Our commitments

Co-operatives UK is committed to ensuring that we:

- Provide a safe environment for:
 - anyone accessing our services or attending our premises;
 - anyone participating in programmes or activities run by us or on our behalf; and
 - Co-operatives UK staff while they are at work or working for us.
- Identify individuals who are at risk of significant harm
- Have a clear and robust procedure for reporting concerns relating to abuse, potential abuse or mistreatment of individuals
- Have an appropriate system for responding to disclosures of abuse, potential abuse or mistreatment
- Take any concerns or allegations seriously, investigate them appropriately and take the necessary steps to remove the individual from harm's way
- Report incidents to the appropriate authorities

2.2 Responsibilities

Everyone who works for Co-operatives UK is responsible for safeguarding. You must read and understand this policy and ask your manager or a member of MT if you have any questions.

In particular, anyone who is engaged in any form of activity with vulnerable adults or young adults at risk, including anyone handling data in relation to those individuals, must read and abide by this policy.

The Lead Safeguarding Officer has responsibility for safeguarding issues within Co-operatives UK and any programmes or activities run by third party providers on the behalf of Co-operatives UK.

Co-operatives UK will take appropriate measures to check the suitability of individuals who will be working with vulnerable adults or young adults at risk and will provide appropriate support and training relating to safeguarding and spotting the signs of abuse. Where appropriate, this will include obtaining Disclosure and Barring Service (DBS) checks. A 'satisfactory' DBS check will have no unspent criminal convictions (including cautions, reprimands and final warnings) relevant to the post.

If you receive a criminal conviction after we have conducted your DBS check, you must report this to your manager and the Lead Safeguarding Officer immediately.

2.3 The Lead Safeguarding Officer

The role of the Lead Safeguarding Officer is to:

- Investigate any safeguarding concerns and take appropriate action
- Involve outside agencies, for example social services or the police, where appropriate
- Participate in relevant training and ensure that other employees receive the appropriate safeguarding training
- Challenge poor practice in the organisation
- Be aware of changes in relevant legislation, guidance and best practice

The Lead Safeguarding Officer is the **Society Secretary**.

2.4 Regulated activity

Regulated activity is defined in law (please see Appendix 1 for the legal definition). Co-operatives UK does not believe itself to be engaging in regulated activity and it therefore has no legal basis on which to obtain enhanced DBS checks. There is also no obligation on Co-operatives UK to maintain a safeguarding contact in the local authority or to report safeguarding issues to a regulator. Nevertheless, Co-operatives UK takes its responsibilities towards its members, service users and employees seriously and will take whatever steps required to safeguard them during their interactions with the organisation.

This policy will be reviewed each time the organisation commences a new programme of activity in relation to young people or adults who may be considered to be vulnerable, to ensure that it remains fit for purpose. If, in future, Co-operatives UK does find itself entering into regulated activity in relation to vulnerable adults, the policy and procedure will be reviewed accordingly.

2.4 The principles of safeguarding

All interactions with vulnerable adults or young adults at risk through Co-operatives UK should be based on the following principles of safeguarding:

- **Empowerment** - People being supported and encouraged to make their own decisions.
- **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.
- **Accountability** – Accountability and transparency in delivering safeguarding.

3.0 Keeping yourself and others safe

All Co-operatives UK employees and third parties delivering services on our behalf must act appropriately at all times to keep themselves and others safe. Please follow the below guidelines in your interactions at work and while providing services to our clients and members.

Support

You should aim for a minimum of two colleagues to be together at all times when working with young adults at risk or vulnerable adults. If this isn't practical/possible please take other steps such as limiting the time spent alone together, or remaining in full sight of others or in highly frequented areas.

Physical contact

In general physical contact should be kept to a minimum. In particular, you should not be initiating physical contact with a young adult at risk or a vulnerable adult. If they initiate contact with you, for example a hug, keep the contact as brief as possible and speak to the Lead Safeguarding Officer if you have any concerns.

Sexual contact

You must not engage in any sexual contact, or other forms of sexual behaviour including flirting, with a vulnerable adult or young adult at risk who is accessing our services.

Social media

You must not add any young adults at risk or vulnerable adults you have come into contact with through work to your personal social media account.

4.0 The procedure to follow

There is a definition of abuse and signs to watch out for in the appendices to this policy. If you believe that a young adult at risk or a vulnerable adult with whom we have a business relationship is being, or is at risk of being, abused, you must report this immediately to your manager or to the Lead Safeguarding Officer.

If you are concerned that someone is in immediate danger, please contact the police straight away.

4.1 What to do if a concern is raised to you

There are several ways in which you might be alerted to a safeguarding concern. You may overhear or witness something yourself. Someone might tell you of their own concerns, or you might overhear them telling someone else. Sometimes someone might tell you directly that they are being, have been, or fear that they may be, abused.

If you are approached directly, you might feel panicked, angered or shocked. Please try to regulate these emotions as much as possible – appearing calm and level headed will help the other person to feel comfortable in continuing their disclosure.

Reassure the individual that they were right to bring their concerns to you and listen to what they have to say carefully. Don't rush them or put words in their mouth – you'll need to record what they told you later on.

Don't promise that you will keep their disclosure confidential; disclosures of potential safeguarding issues will need to be investigated so that the appropriate steps can be taken to remove the individual from harm or the risk of harm.

Explain what you will do (i.e. raise the issue with the Lead Safeguarding Officer) and then go back to the individual afterwards to confirm that you have done this.

If it is an emergency or you believe that someone is in immediate danger, you must contact 999 straightaway.

4.2 How to Record a Disclosure

You must record all concerns as soon as possible. Complete an incident reporting form (appendix 3).

Make a record of what has been said, using the person's own words as far as possible. Then you should raise the matter immediately with the Lead Safeguarding Officer. Describe the circumstances as fully as possible. Take care to distinguish between facts, observations, allegations and opinions; it is important that the information is accurate.

Please be mindful of the need to keep this information confidential as far as possible. The information should only be shared with the Lead Safeguarding Officer at this stage.

4.3 How we will act if we are made aware of a safeguarding issue

If we are made aware of a safeguarding issue, or a potential safeguarding issue, the Lead Safeguarding Officer will make an immediate assessment regarding whether or not an individual is at immediate harm. They will act immediately to remove the individual from harm's way and will contact any relevant authorities as necessary.

The Lead Safeguarding Officer will investigate any allegations of abuse or malpractice made against any employee or third party providing services on our behalf. Depending on the circumstances, we may consider it to be appropriate to suspend on full pay while we carry out our investigations.

If, following the conclusion of our investigation, we conclude that there is a case to answer, we will invite the alleged perpetrator to a disciplinary meeting, the outcome of which may include dismissal. If at any point before, during or after our investigation we

believe that a criminal offence has or may have been committed we will refer this to the police at the earliest opportunity.

4.4 Review and improvement

At the conclusion of any safeguarding investigation, whether or not we conclude that a breach of this policy has occurred, the Lead Safeguarding Officer will lead a review, together with relevant employees and/or third parties. This review will consider the circumstances that led to the breach, or alleged breach, of this policy and will determine what, if any, steps need to be taken to avoid a repeat.

Following the review, the Lead Safeguarding Officer will report their findings and conclusions to the Management Team and the Board.

Appendix 1 – Glossary of terms

Abuse – abuse is any action that intentionally harms or injured another person. There are many types of abuse:

- **Physical abuse** – any form of physical violence, including hitting, punching or kicking. This may also include misuse or withholding of medication, inappropriate holding or restraint, or rough handling.
- **Sexual abuse** – any form of non-consensual sexual conduct including rape, indecent exposure, inappropriate touching or looking, sexual harassment, or otherwise exposing the individual to sexual advances, images or conduct to which they have not consented or were pressured into.
- **Financial abuse** – taking a person's property or money without their permission, including theft, fraud, scamming, coercion in relation to an adult's financial affairs, or misuse of benefits.
- **Discriminatory abuse** – hate crimes, derogatory comments, harassment or discrimination on the grounds of a person's characteristics, often in relation to their age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status.
- **Emotional/psychological abuse** – this can include name calling, threats and manipulation, 'gas lighting' or blaming the victim for the abuse, blackmail, humiliation and ridicule, intimidation or harassment.
- **Neglect and acts of omission** – not providing the appropriate level of care and support for the individual, including ignoring their medical, physical or emotional needs, failing to access appropriate health, care or educational services or withholding the necessities of life including medication, adequate nutrition and heating.
- **Self-neglect** – this can occur where an individual's choice of lifestyle means that they neglect to care for their own physical needs, or their surroundings, including personal hygiene, health, nutritional needs (under or over eating to the extent that their physical or mental health could be impaired), or living in grossly unsanitary conditions. In these cases there is no abuser.
- **Organisational/institutional abuse** – this is neglect or poor practice in relation to an individual's care within an institution such as a care home or hospital.
- **Domestic abuse** – The Government has defined this as *any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members.*
- **Modern slavery** – this includes slavery, human trafficking, forced labour and domestic servitude.

Regulated Activity – A person is defined as being in Regulated Activity' with adults at risk if:

- **The individual is in contact with the person by providing healthcare.** This only includes first aid when it is provided on behalf of an organisation dedicated to providing first aid, such as St. John's Ambulance Service.
- **The individual is in contact with a person by providing personal care.** This can include physical assistance with eating, drinking, going to the toilet, washing, bathing, dressing, oral care, or care of the skin, hair, or nails because of the adult's age, illness, or disability.
- **The individual is in contact with the person in providing social work.**
- **The individual is in contact with the person in assisting with general household matters.** Examples including managing the person's cash, paying the person's bills, or shopping on their behalf.
- **The individual is in contact with the person in assisting in the conduct of their affairs.** This can be as a result of:
 - a) Lasting power of attorney under the Mental Capacity Act 2005
 - b) Enduring power of attorney within the meaning of the Mental Capacity Act 2005
 - c) Being appointed as the adult's deputy under the Mental Capacity Act 2005
 - d) Being an Independent Mental Health Advocate
 - e) Being an Independent Mental Capacity Advocate
- **The individual is in contact with the person in conveying.** Any drivers and any assistants are in Regulated Activity if they transport an adult because of their age, illness or disability to or from places where they have received, or will be receiving, health care, relevant personal care, or relevant social work. However, "conveying" does not include licensed taxi drivers or licensed private hire drivers, and it does not include trips taken for purposes other than to receive health care, personal care, or social work. Pleasure trips, for example, are excluded.

Safeguarding – The NHS defines safeguarding as *"protecting a citizen's health, wellbeing and human rights; enabling them to live free from harm, abuse and neglect"*.

Vulnerable Adult – The UK Department of Health defines a 'vulnerable adult' as a person who is 18 or over and *"who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of*

him or herself, or unable to protect him or herself against significant harm or exploitation”.

Young Adults at Risk – There is no legal definition of a young person in UK law. For the purposes of this policy a young adult is defined as someone who is aged between 18 and 25.

Appendix 2 - Signs and indicators of abuse and neglect

There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Frequent injuries or unexplained falls.
- Subdued or changed behaviour in the presence of a particular person.
- Person has belongings or money going missing.
- Someone significantly losing or gaining weight / an unkempt appearance.
- Always wearing the same clothes.
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers.
- Poor concentration, withdrawal, sleep disturbance.
- A change in the behaviour or confidence of a person.
- Uncooperative and aggressive behaviour.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.
- You may witness abuse or harm, for example unnecessary restraint or use of force.

Appendix 3 – Incident reporting form

If someone has disclosed information to you then you should keep a record of their exact words. The sooner you can write down information about what you heard and saw, the better your memory of the event will be. Use this form to record the information and then send it to the Lead Safeguarding Officer.

Their details

Name:		
Date of birth:	Gender:	Ethnicity:
Contact with Co-operatives UK: (e.g. member, service user, employee, project user)		
If applicable, details of person with caring responsibility:		

Your details:

Name:
Position:
How do you know the person detailed above?
Date and time you found out about the incident:
Date and time you completed this form:

Person collecting the report (usually Lead Safeguarding Officer)

Name and position:
Date and time disclosure received:

The Incident

Describe briefly the facts of the incident or concern that has been raised. Please record as many specifics as possible, including direct quotes from the individual(s) concerned. Think about the following (this list is not exhaustive):

- Details of the incident, including any injuries or abuse
- Date and time of the incident and/or the disclosure
- Who was involved or present at the time (both of the incident and of the disclosure)

- Details of who raised the concern – was it the individual the concern relates to or another, concerned individual?
- What you were doing before/during the time that the concern was raised
- What the individual was doing before/during the time that the concern was raised
- Who said what, plus their exact words
- Details of any immediate action taken
- Any conclusions that were drawn from the incident or disclosure (try to be factual rather than giving an opinion)

(Continue on additional sheets if necessary)

You are reminded that this should be a clear and factual account of your concerns and includes information on what happened and how you responded. Opinions are not necessary – you are simply recording facts about what you have seen or heard.

Lead Safeguarding Officer Report

What action has been taken internally to support all parties involved – e.g. the individual and/or the colleague?

What actions have been taken internally?

Who is maintaining contact with the parties involved? And how frequently?

Does the Board need to be informed?

Yes / No

Explain:

Have any external agencies been informed?

Yes / No

Explain:

Ongoing Review/Updates

The Lead Safeguarding Officer is to use this space to record any updates to the Incident Report – e.g. conversations with others, additional reports to reference, meeting dates/details/actions etc.

A large, empty rectangular box with a thin black border, intended for recording updates to the Incident Report. The box is currently blank.