



Safeguarding Adults policy

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Section One: Introduction to the Policy

This policy supports staff and volunteers role in safeguarding. It shows how St Margaret's House will work with other agencies to recognise and manage suspicions, allegations and findings of abuse of vulnerable adults,

The Care Act 2014 (Section 42) requires that each local authority must make enquiries, or cause others to do so, if it believes an adult is experiencing, or is at risk of, abuse or neglect. An enquiry should establish whether any action needs to be taken to prevent or stop abuse or neglect, and if so, by whom. 'Safeguarding adults' is the name given to the multi-agency response used to protect adults with care and support needs from abuse and neglect.

St Margaret's House is committed to the following principles in all aspects of its safeguarding work

We take the responsibility to follow the 6 safeguarding principles enshrined within the Care Act 2014: Six key principles underpin all adult safeguarding work:

Principle 1 Empowerment – Personalisation and the presumption of person-led decisions and informed consent. "I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Principle 2 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."

Principle 3 Proportionality – Proportionate and least intrusive response appropriate to the risk presented. "I am sure that the professionals will work for my best interests, as I see them and they will only get involved as much as I require."

Principle 4 Protection – Support and representation for those in greatest need. “I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able.”

Principle 5 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 to get the best result for me.”

Principle 6 Accountability – Accountability and transparency in delivering safeguarding. “I understand the role of everyone involved in my life.”

What is safeguarding?

Safeguarding is a term we use to describe how we protect adults and children from abuse or neglect. It is an important shared priority of many public services, and a key responsibility of local authorities.

Safeguarding is about protecting people who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions (or lack of action) of another person. In these cases, it is vital that public services work together to identify people at risk, and put steps in place to help prevent abuse or neglect.

The Prevent Duty

At St Margaret's House we take in to account the Prevent Duty under S26 Counter Terrorism and Security Act 2015. Training staff and awareness of preventing adults being drawn in to any forms of terrorism. We are aware of our duty to report incidents and promote British Values: democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different faiths and beliefs and for those without faith.

What is a vulnerable person?

The definition of a vulnerable adult is a person over the age of 18 years who:

- is receiving or may be in need of / eligible for Community Care Services by reason of mental or other disability, age, or illness
- AND is unable to take care of him / herself
- OR is unable to protect him / herself from significant harm or exploitation

A vulnerable person may fall into any one of the following groups:

- older and frail people
- people with any of the following conditions:
 - a mental health need

- a learning difficulty
- a physical impairment
- a sensory impairment;
- people who are substance or alcohol dependent
- family carers providing assistance to another vulnerable adult.

Identified Safeguarding issues at St Margaret's House:

Vulnerable Adults attend our courses and artistic programs so are therefore one of our foremost safeguarding concern groups

Mental Capacity

The Mental Capacity Act (MCA) 2005

5 Principles Which Underpin The Mental Capacity Act: In order to protect those who lack capacity and to enable them to take part, as much as possible in decisions that affect them, the following statutory principles apply:

- You must always assume a person has capacity unless it is proved otherwise
- You must take all practicable steps to enable people to make their own decisions
- You must not assume incapacity simply because someone makes an unwise decision
- Always act, or decide, for a person without capacity in their best interests
- Carefully consider actions to ensure the least restrictive option is taken

How To Act In Someone's Best Interests:

- Do not make assumptions about capacity based on age, appearance or medical condition
- Encourage the person to participate as fully as possible
- Consider whether the person will in the future have capacity in relation to the matter in question
- Consider the person's past and present beliefs, values, wishes and feelings

Section Two: Forms of Abuse

Abuse and neglect take many forms. Abuse can lead to a violation of someone's human and civil rights by another person or persons. Abuse can be physical, financial, verbal or psychological. It can be the result of an act or a failure to act. It can happen when an adult at risk is persuaded into a financial or sexual exchange they have not consented to, or can't consent to. Abuse can occur in any relationship and may result in significant harm or exploitation.

Some types of abuse are illegal, and in these cases adults who lack capacity are protected by law the same as everyone else. If St Margaret's House suspects that a crime against an adult within our work has been committed, we refer the matter to the police. An urgent referral is made for the safety of the adult at risk and/or to preserve evidence.

Abuse is a misuse of power and control that one person has over another. Where someone is dependent on another, there is the possibility of abuse or neglect unless enough safeguards are put in place.

Abuse can fall into the following categories:

Physical This includes assault, hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone.

Domestic This includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.

Sexual This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn't consent to or is unable to consent to.

Psychological This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks. And only letting someone do certain things at certain times

Financial or material This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.

Modern slavery This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

Discriminatory This includes types of harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation / LGBTQ or religion.

Organisational This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.

Neglect and acts of omission This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.

Self-neglect This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surrounding

Female genital mutilation

Female genital mutilation (FGM) is when a woman or girl's genitals are deliberately cut, injured or changed for no medical reason. It is also known as female circumcision or cutting. It is usually carried out on young girls between infancy and 15 years old, most commonly before puberty starts. It can also be carried out during adolescence or before a young woman gets married. **It can also happen to adult women.** FGM is a crime and must be reported to the police. If someone is in immediate danger of FGM, call the police. If you know a British national who has been taken abroad for FGM, contact the Foreign and Commonwealth Office on 020 7008 1500.

How Might We Notice Abuse?

Concerns about or evidence of abuse can come to us through:

- a. A direct disclosure by the vulnerable adult.
- b. A complaint or expression of concern by another member of staff, a volunteer, another service user, a carer, a member of the public or relative.
- c. An observation of the behaviour of the vulnerable adult by the volunteer, member of staff or carer.

Section Three: Why don't people disclose?

People don't tell about abuse because they:

- Are scared because they have been threatened
- Believe they are to blame
- Feel embarrassed or guilty
- Don't want the abuser to get into trouble
- Have communication or learning difficulties
- May not have the vocabulary for what happened
- Are afraid they won't be believed

Section Four: St Margaret's House practise and guidelines

Policy aim

The aim of the Vulnerable Adults Policy is to ensure that all staff/volunteers who work with us know how to keep participants safe.

This policy will allow all staff /volunteers to make informed and confident responses to safeguarding issues.

Code of Practice

- St Margaret's House will ensure that all relevant staff and workers receive a copy of this policy, in house training on the policy and where possible further training from Tower Hamlets SAB (Tower Hamlets Safeguarding Adults Board) or other relevant training provider.
- Before working with participants staff/volunteers will be aware of the relevant registration forms and signing up methods available from the project leader/coordinator of St Margaret's House and will not ask participants directly for personal details or offer their own details.
- No contact outside of activities with participants except by agreed telephone or email methods of communication or in exceptional cases, for reasons of health and safety.
- All relevant staff/volunteers will have a full Disclosure and Barring Service check and two references.
- In the event that a previous criminal conviction evidences they are not suitable to work with vulnerable adults they will not be hired.
- Participants will be invited to explore a range of topics using a range of information and materials. Workshop leaders/staff and volunteers will consider the appropriateness of any information/material shared out to participants. *(It is acknowledged that for events and artistic programming attendees and service users will experience a range of topics that may on occasions challenge and reflect a difference of opinion. We acknowledge this can be part of an arts experience and we encourage artistic freedom. However all practitioners/artists will take care to ensure that material that could have the risk to offend or cause distress will be discussed and agreed with the Arts and Wellbeing team before being displayed or performed.)*
- Workshop leaders and staff will check the content and appropriateness of websites, films and TV programmes before recommending them to participants and will only recommend in relation to topics of research relevant to the workshops. *(As above it is acknowledged that for events and artistic programming attendees and service users will experience a range of topics that may on occasions challenge and reflect a difference of opinion. We acknowledge this can be part of an arts experience and we encourage artistic freedom. However all practitioners/artists will take care to ensure that material that could have the risk to offend or cause distress will be discussed and agreed with the Arts and Wellbeing team before being displayed or performed.)*
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Good practice guidelines

All personnel are encouraged to demonstrate exemplary behaviour in order to promote welfare and reduce the likelihood of allegations being made.

Good practice means:

- Always conducting workshops in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).

- Treating all adults equally, with respect and dignity.
- Always putting the welfare of adults first.
- Our work could entail physical contact due to the nature of arts and wellbeing activities. Touch will be done thoughtfully respecting people's personal space in accordance with the activity. Staff/volunteers will only make physical contact with participants in an open planned environment with other professionals and participants present.
- Building balanced relationships based on mutual trust which empowers participants to share in the decision-making process.
- Making our activities fun and enjoyable.
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to best practice guidelines.
- Being an excellent role model.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Recognising the developmental needs and capacity of vulnerable and disabled adults.
- Asking permission if the need arises to administer emergency first aid and/or other medical treatment.
- Keeping a written record of any accident or injury that occurs, along with the details of any treatment given.
- Pregnancy- We acknowledge that adults may want to take part in activities. For most SMH activity we ask that the woman concerned speak with her GP first to get advice depending on the activity. For activities in the Yoganest we ask that our Pregnancy Policy is followed. *Please see appendix two.*
- When conducting workshops on a platform such as Zoom staff will apply good practise ensuring there is clear guidance in place for participants on how sessions will be managed, behaviour agreements and code of conducts in place to ensure participants have a positive experience and that anyone delivering a session online has training in this.
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Practices that are never sanctioned

The following are **never** sanctioned. Staff/volunteers must never:

- engage in rough, physical or sexually provocative games, including horseplay
- allow or engage in any form of inappropriate touching
- allow participants to use inappropriate language unchallenged
- make sexually suggestive comments to a participant, even in fun
- fail to act upon and record any allegations made by a participant

- do things of a personal nature for vulnerable or disabled adults, that they can do for themselves
- invite or allow participants, vulnerable or disabled adults to stay with you at your home unsupervised.
- Invite vulnerable or disabled adults onto any form of personal social media.

Photography

- Vulnerable adults will not be identified in the use of any images.
- **GDPR (General Data Protection Regulation) Data Protection Act 2018.** We will seek consent prior to taking photographs/storing images of participants and understand that consent can be withdrawn at any time. We will take down any photographs, displays, films and or social media content containing photographs if consent is withdrawn.

Incidents that must be reported/recorded

If any of the following occur you should report this immediately to the appropriate designated adult safeguarding lead and record the incident (See Appendix One)

:

- if you accidentally hurt a vulnerable adult/participant
- if he/she seems distressed in any manner
- if a participant appears to be sexually aroused by your actions
- if a participant misunderstands or misinterprets something you have done or said.

If you think abuse has or may have occurred:

Act immediately

It is the responsibility of the person first becoming aware of a situation where there may be a vulnerable adult subject to, or at risk of, abuse to:

Make Safe

Deal with the immediate needs of the person. This may mean taking reasonable steps to ensure the adult is in no immediate danger and seeking medical treatment if required as a matter of urgency.

Do NOT discuss the allegation of abuse with the alleged perpetrator.

Do NOT disturb or destroy articles that could be used in evidence.

Where an assault of some kind is suspected do not wash or bathe the person unless this is associated with first aid treatment necessary to prevent further harm.

Inform

Tell the Designated Safeguarding Officer (Stuart Cox 07718913860) or the Deputy Designated Safeguarding Officer (Tony Hardie 07926259402) if the Designated Safeguarding Officer is unavailable or is implicated in the allegation.

Contact the police if it is thought a crime has been committed.

Record

Record details of the allegation as soon as possible somewhere that can be kept secure. Include:

- a. The allegation or concerns, including the date and time of the incident, what the vulnerable adult said about the abuse and how it occurred or what has been reported to you.
- b. The appearance and behaviour of the victim.
- c. Any injuries observed.

Whistleblowing Policy

Staff can contact the Tower Hamlets safeguarding adults hotline on 020 7364 6085 or towerhamletsMASH@met.police.uk.

Communication Points

remember some important communication points:

to stay calm and not express dismay or shock

to allow the person to express their feelings, including their fears

to try to discover what the person is afraid of and when they feel most at risk

to listen carefully to what the person is saying

to assure the person that they are being taken seriously

to demonstrate regret that abuse has taken place and the impact that it must have had on the person physically and emotionally

to reassure them that there is help available

to summarise their account and check that you have it right

It is the responsibility of the Designated Safeguarding Officer to:

1. Decide without delay on the most appropriate course of action once the allegation or suspicion of abuse has been raised.

2. Deal with any immediate needs:

- Ensure that the victim of the alleged abuse is safe.
- Ensure that any necessary emergency medical treatment is arranged.
- Ensure that no forensic evidence is lost.
- If the alleged perpetrator is also a vulnerable adult, ensure that a member of staff is allocated to attend to their needs and ensure that other participants are not put at risk.

3. Clarify the facts stated by the member of staff but do NOT in any circumstances discuss the allegation of abuse with the alleged perpetrator or, if possible, the victim.

4. Check that the circumstances fall within the safeguarding adults procedures i.e. meeting the definition of abuse as defined in this Policy and Procedure. If at all uncertain a referral should be made to the Tower Hamlets safeguarding adults hotline on 020 7364 6085

5. Address issues of consent and confidentiality.

6. A formal referral must be made on the same day as the alert is raised wherever:

- A crime has been, could have been, or yet could be committed.
- There is a suspicion that an abuse has taken place.
- The allegation involves a member of staff or paid carer.
- Other vulnerable adults are at risk.
- The alleged perpetrator is a vulnerable adult, therefore they are unsure if abuse has taken place.

7. Where a decision is made NOT to refer, the alert must still be recorded, with the record including the reason(s) for the decision not to refer. The Tower Hamlets Safeguarding Team must be informed that an alert has been considered.

- If the vulnerable adult is in immediate risk (or it is felt will be at risk within a brief period of time after the disclosure) then refer to emergency services and police depending severity of disclosure/incident. Also record this as above and contact the lead safeguarding officer

Policy Review

The policy will be reviewed and updated annually in case the pattern of work and contact with vulnerable adults changes and will include any new legal requirements that may arise.

Partners

St Margaret's House will ensure we are aware of the partner venue's vulnerable adults policies and will make sure they are not in conflict. We will have an agreed protocol on how to deal with situations of abuse and risk of harm to vulnerable adults. We will carry out risks assessments with all partners.

Section Five: Contacts

Lead Safeguarding Officer (St Margaret's House): Stuart Cox – Arts and Wellbeing Project Manager
0771 891 3860

Or email Tony Hardie (St Margaret's Director) tony.hardie@stmargarethouse.org.uk or call 07926259402

Or

If you or the person you are concerned about is not being mistreated (but you or they still have needs to address) you can make a referral to Tower Hamlets Safeguarding Team

- **If the danger is immediate, always call the police on their emergency number: 999**
- If the danger is not immediate telephone 101

You can contact the Tower Hamlets Safeguarding Team

- Telephone: 0300 303 6070
- Email: enquiry@towerhamletsconnect.org

Safe Spaces

We have signed up to the Safe Spaces Tower Hamlets MIND project which promotes SMH (especially the Gallery Café and Ayoka) as a space that is supportive of people who may have personal experience of mental health issues.

It must be noted that Safe Spaces is not a replacement for our safeguarding procedures and that the above procedures apply for all safeguarding concerns

However the following lines may be useful:

Tower Hamlets Mental Health helpline (24 hours) 020 7771 5807

Samaritans: 116 123

Childline: (Under 19's) 0800 1111

MIND helpline: 020 7510 1081

This policy was last updated on 15/4/22 and will be reviewed again on 15/4/2023

Implementation of this policy

The ways in which our policy will be made aware to staff, volunteers and partners are:

- 1- Face to face meetings with the designated safeguarding lead to explain and talk through the policy before the activity starts with relevant staff, volunteers and partners to that activity.
- 2- Where policies are targeted at specific groups such (as pregnant women) they will be made aware of these policies through our website and signing up methods such as sign up form or Mindbody/app accounts.
- 3-The designated safeguarding lead will send the policies by email after meeting with someone and ask them to confirm by email that they have read them and understood them and sign and date the bottom of the policy.
- 4- St Margaret's House will have some kind of team training each year on safeguarding in which the policy and updates are referenced.

Appendix One

Disclosure Form, St Margaret's House

St Margaret's House has a duty of care to safeguard everybody involved in its projects from harm. This form is to be used to record any incidents which may have threatened someone's welfare during an activity/workshop. This form should also be completed in the instance of a workshop facilitator having been alerted to the potential of some external/ indirect danger to the person in question.

Please notify Stuart as soon as possible by telephone on 020 89802092 or 07718913860 (Safeguarding Officer) on the same day as the concern has arisen

Please complete by hand and return to Safeguarding Officer immediately or within 24 hours of the workshop. The Safeguarding Officer will be responsible for any further action to be taken.

Date and time of session:	Venue:
Staff/ volunteers present:	
Name of person concerned:	
What happened? (Please describe exactly what you witnessed as clearly as possible):	
What did the person say happened? Please use their words.	
Signature of person making the Disclosure	

Date:

If Stuart is not available call Tony Hardie on 07926259402

Safeguarding structure of reporting:

Workshop facilitator/Staff Member/volunteer witnesses something involving a participant that arouses concern (e.g. person has an injury that may be non-accidental or a person discloses information of a sensitive nature)



Telephone Head of Participation Stuart Cox on 020 8980 2092 or 07718913860 (designated Safeguarding Officer) on the same day as the concern has arisen. (If the person requires immediate medical assistance telephone the Emergency Services on 999 then telephone Stuart Cox). Or email Tony on tony.hardie@stmargarethouse.org.uk or call 07926259402

Or if you can't get through to Stuart or Tony and you feel this must be reported immediately call

You can contact the Tower Hamlets Safeguarding Team

- Telephone: 0300 303 6070
- Email: enquiry@towerhamletsconnect.org

Information that would be helpful:

- Why you are concerned
- The name, age and address of the adult at risk
- If anyone lives with them
- If they're getting help from any organisation
- Who may be doing the abuse

Don't delay in reporting abuse if you're not sure about some of these details.

- **If the danger is immediate, always call the police on their emergency number: 999**
- If the danger is not immediate telephone 101

Appendix two

Pregnancy & Yoga Policy

FAQ

Is it safe to practice yoga when I'm pregnant?

Yes, it is safe to practice yoga when pregnant but always check with your GP first. Always tell the teacher leading the class that you are pregnant. It is recommended to only start practicing yoga or take up other kinds of physical activity after 12-14 weeks or after the first trimester. This is not enforced but a teacher may choose not to accept you into the class. Practice at this early stage is at your own judgment and own risk.

If I'm pregnant, can I only go to pregnancy yoga?

If you already have a regular yoga practice prior to becoming pregnant you can continue your practice as before with adaptations and support where needed. If you are coming to yoga for the first time in your pregnancy, we would recommend that you only attend the pregnancy yoga classes on the schedule.

SMH Policy

- Teachers who are not pregnancy trained and qualified cannot accept pregnant women into their classes.
- All teachers who accept pregnant women into their open classes must be insured and covered by their policies to teach pregnant women.
- Always remind students that they should really start practicing after 12-14 weeks and when they are into their second trimester. It's not something we can enforce but it should be clear that this is what we recommend.
- All teachers should know which postures and which movements are prohibited during pregnancy and also how to adapt asana safely in a mixed led class.
- Teachers who are not comfortable which teaching women in their first trimester also have the option to turn these students away. Yoganest will support the teacher should they decide to do this.

Etiquette

If you are pregnant and attending class, please follow these helpful suggestions:

- Always tell the teacher that you are pregnant and how many weeks you are.
- Get permission from the teacher to join the (regular) class.
- Pregnancy is not a time to push the body, so adapt postures and use support where needed.
- Make sure you have spoken to your GP and been given the green light to practice yoga.
- Most of all, enjoy your practice and use it to support you as your body is changing and use it to help you prepare your mind, body and breathing for labour.