

Safeguarding Adults Policy

1.1. Aim

The purpose of our Safeguarding Policy is to prevent harm and reduce the risk of adults with care and support needs suffering from abuse or neglect. This policy is based on the fundamental principle that all adults regardless of age, disability, gender, gender identity, ethnic, cultural, racial, national origins, religious belief/non-belief or sexual orientation have the right to live safely, free from abuse and neglect.

This policy will give clear guidance to staff, volunteers and visitors about the behaviour we expect and our legal responsibilities to safeguard and promote the welfare of adults at risk of abuse or neglect that we come in contact with at our organisation.

1.2. Introduction

Norfolk SEN Network fully recognises the contribution we can make in protecting adults from abuse and neglect. Our policy applies to all adults at risk of abuse or neglect, staff, volunteers and visitors.

Under the *Care Act 2014*, 18 and older is considered to be an adult, and could potentially be considered under s42 of that Act - which relates to the duty to carry out safeguarding adult enquiries – if the adult:

- has needs for care and support (regardless of the level of need and whether or not the local authority is meeting any of those needs)
- is experiencing, or is at risk of abuse or neglect, and
- as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Where someone over 18 is still receiving children's services, for example in an education setting until the age of 25, and a safeguarding issue is raised the matter should be dealt with through adult safeguarding arrangements. Children's safeguarding and other relevant partners should be involved, as appropriate. The level of need is not relevant, and the young adult does not need to have eligible needs for care and support under the Care Act.

For domestic abuse the age limit is 16 years of age

To be considered as a safeguarding concern the adult must meet the criteria set out in the Care Act 2014 and detailed above.

1.3. Our Ethos

Norfolk SEN Network will establish and maintain an environment where adults feel safe, secure, are encouraged to talk and are listened to. Adults will be able to talk freely to any member of staff, volunteer or regular visitor to our organisation if they are worried or concerned about something.

We will support anyone who, in good faith, reports a concern that an adult is being abused or neglected or is at risk of abuse or neglect even if those concerns prove to be unfounded.

Through training – which is mandatory for all staff and volunteers, both at induction and through on-going refresher training - we will ensure that all:

- understand the importance of safeguarding and their role in safeguarding adults
- recognise an adult potentially in need of safeguarding and know what action to take
- are able to recognise a disclosure from an adult and react appropriately
- are aware of the different forms of abuse and neglect
- understand dignity and respect when working with individuals
- know how to report an adult safeguarding concern in line with this policy.

We will provide information and advice to enable all the adults we work with to understand their rights and how they can obtain help and support.

At all times we will work in partnership and try to establish effective working relationships with carers, spouses/partners, relatives and colleagues from other agencies and organisations.

2. What is Abuse and Neglect?

The *Care Act 2014* does not set out a specific definition of abuse. Abuse can consist of a single or repeated act(s); it can be intentional or unintentional or result from a lack of knowledge. Abuse and neglect:

Can take many forms:

- it may be an isolated incident, a series of incidents or a long-term pattern of behaviour
- it could affect one person or many more
- it may be in someone's home, in public or in an institutional setting
- it may be deliberate or the result of negligence or ignorance
- exploitation in particular is a common pattern in abuse and neglect
- the degree or lack of intent will inform the response which will be appropriate and proportionate to the concerns that have been raised.

Can happen anywhere - including:

- in a person's own home and/or other people's homes
- in public places or in the community
- in clubs
- at work
- schools and colleges of further education
- in hospitals, surgeries or other health centres
- care homes
- in places of worship
- via electronic media including the internet
- day centres.

Patterns of abuse vary - and include:

- **Serial abusing** in which the perpetrator seeks out and 'grooms' individuals – sexual abuse sometimes falls into this pattern as do some forms of financial abuse and radicalisation
- **Long-term abuse** in the context of an ongoing family relationship such as domestic violence between partners/spouses or generations or persistent psychological abuse
- **Opportunistic abuse** such as theft occurring because money or jewellery has been left lying around
- **Situational abuse** which arises because pressures have built up and or because of difficult or challenging behaviour
- **Neglecting** a person's needs because the carer has difficulties. These could be debt, alcohol, or mental health related or the specific demands resulting from caring for someone.

Anyone can be an abuser or neglect someone – including:

- Spouses/partners
- Other family members
- Carers
- Neighbours
- Friends
- Acquaintances
- Local residents
- People who deliberately exploit adults they perceive as vulnerable to abuse
- Paid staff or professionals
- Volunteers and strangers

Types of Abuse and Neglect

The statutory guidance in the *Care Act 2014* lists ten types of abuse. However, this is not intended to be an exhaustive list but rather a guide to the sort of behaviours which could give rise to a safeguarding concern. It is important that we do not limit our view of what constitutes abuse or neglect to those types or the different circumstances in which they can take place.

Physical Abuse - includes:

- hitting, pushing, pinching, shaking, grabbing, biting, hair-pulling, scalding
- misusing medication
- withholding food or drink, force-feeding
- restraint or inappropriate physical sanctions
- failing to provide physical care or aids to living – for example glasses or a walking stick.

Psychological & Emotional Abuse - includes:

- threats of harm or abandonment
- deprivation of contact
- radicalisation (being exploited by those who would want them to embrace terrorism)
- humiliation, blaming, controlling
- intimidation, coercion
- harassment, verbal abuse and cyber bullying
- isolation or unreasonable and unjustified withdrawal of services or support.

Financial or Material Abuse – while it can occur in isolation, it is often present with other forms of abuse and includes:

- theft and fraud
- internet scamming
- some forms can involve the perpetrator seeking out and grooming individuals
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- misuse or misappropriation of property, possessions or benefits.

Sexual Abuse – includes:

- rape, sexual assault or sexual acts to which the adult has not consented, was unable to consent to, or was pressured into consenting to
- indecent exposure; sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography, subjection to pornography or witnessing sexual acts.
- **Sexual Exploitation** is a subset of sexual abuse. It involves:
 - exploitative situations and relationships where people receive 'something' (e.g. accommodation, alcohol, affection, money) as a result of them performing, or others performing on them, sexual activities
 - can also involve serial abusing in which the perpetrator seeks out and 'grooms' individuals - grooming is defined as developing the trust of an individual at risk of abuse and/or their family in order to engage in illegal sexual conduct.

Organisational Abuse – includes:

- 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.

Neglect and Acts of Omission - includes:

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services
- withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory Abuse – includes:

- forms of harassment, slurs or maltreatment because of someone's actual or perceived age, disability, gender, gender identity, ethnic, racial, cultural or national origin, religious belief/non-belief or sexual orientation
- hate incidents are a form of discriminatory abuse.

Domestic Abuse – The *Domestic Abuse Act 2021* defines this as an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been 'personally connected' (so no longer just intimate partner or family member) regardless of gender or sexuality. For this type of abuse the age range is extended down to 16. It includes:

- psychological, physical, sexual, financial, emotional abuse
- 'so called honour' based violence
- female genital mutilation
- forced marriage
- it also includes being a witness to domestic abuse of another person

Modern Slavery and Human Trafficking encompasses:

- sexual exploitation including prostitution and 'adult entertainment'
- forced labour – commonly in agricultural, construction, food processing, hospitality industries, factories, car washers and nail bars
- domestic servitude
- organ harvesting
- forced criminality – includes cannabis cultivation, street crime, forced begging, burglary, metal theft and benefit fraud.

Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. They may use concerns about an individual's immigration status or concerns that their families may be at risk if they resist exploitation.

Self-neglect covers a wide range of behaviour - including:

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

The definition of self-neglect excludes a situation in which a mentally competent person, who understands the consequences of their decisions, makes a conscious and voluntary decision to engage in acts that threaten their health or safety as a matter of personal choice.

However, there is a need to assess your concerns - balancing the individual's right to choose their lifestyle, considering their mental health or capacity to understand the consequences of their actions. It can often be a care or risk management issue rather than a safeguarding concern and may require a social care assessment in the first instance.

Signs and indicators of abuse/neglect/human trafficking

The signs of abuse are not always clear. The following may, however, suggest the possibility of abuse:

- disclosures by the victim
- concern expressed by a third party
- admissions by the perpetrator
- someone expressing fears that abuse might happen
- evidence of unreported injuries
- signs of fear or distress
- injuries suggesting a possible non-accidental cause
- explanations that are incompatible with injuries presented or where conflicting explanations are given
- a history of persistent illness, infection or injury
- inappropriate use of medication
- possessions or money going missing or bills not being paid
- property being sold without the owner's consent or understanding
- sudden or unexpected removal of an individual from a care setting
- a person is uncharacteristically withdrawn, without apparent reason
- a person is found alone and at risk without adequate explanation
- a long-time lapse between injury or illness and obtaining medical or other care
- abrupt or frequent changes of doctor or caring agency
- unexplained weight loss
- uncharacteristically unkempt appearance or surroundings
- agencies have repeated difficulty in gaining access to see someone
- it is made difficult to speak to a person alone without their carer/another person present
- evidence of avoidance, including regularly missed appointments, refusal of help, etc
- evidence of alcohol or other substance misuse
- signs of stress
- history of previous abuse or violence in the family
- unexplained pain, itching, infection or injury in the anal, genital or abdominal areas
- torn, stained or bloody underclothing
- multiple unrelated people living at one address living in overcrowded private rental accommodation.

Signs an individual may be led into extremism

The following may indicate that an individual is at risk of being radicalised or is being exposed to extremist views:

- being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- accessing extremist material online, including through social networking sites
- possessing or accessing materials or symbols associated with an extremist cause
- justifying violence to address social issues
- graffiti symbols, writing or artwork promoting extremist messages or images
- significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause
- changing their style of dress or personal appearance to accord with the group
- attempts to recruit others to the group/cause
- using insulting or derogatory names for another group.

Hate Incidents

A hate incident is any incident which is perceived by the person, or any other person as being motivated by prejudice or hatred. Hate incidents/crime can be anything from name calling, physical attack, vandalism or stealing a person's property, motivated by prejudice, hostility or hatred towards that individual because they are 'different'. It may or may not be a crime and it may or may not be linked to a safeguarding concern. There are a number of ways to report a hate incident:

- In an emergency always phone 999
- Contact the Police via email: enquiries@norfolk.pnn.police.uk or visit their website: [How to report hate crime | Norfolk Constabulary](#)
- Going to any Norfolk County Council public building such as libraries and reporting it, where staff will be able to assist if needed
- Going to your district council, local police station or anywhere you see the 'Hate Incident Reporting Place' logo.

Access further information at [Stop Hate in Norfolk \(SHiN\) | Norfolk Constabulary](#)

3. General Procedures

When new staff, volunteers or regular visitors join our organisation they will be informed of the safeguarding arrangements in place. If appropriate they will be given a copy of our organisation's Adult Safeguarding Policy and will be told who our Designated Safeguarding Officer and Deputy are. They will be asked to read the policy and be required to sign to say they have. They will also be shown the Referral form and given information on how to complete both.

Every new member of staff or volunteer will have an induction that will include essential safeguarding information. Where appropriate and within 3 months of employment (staff) or engagement (volunteers) this programme will include safeguarding training through The Safer Programme relating to signs and symptoms of abuse, how to manage an allegation from a vulnerable adult, how to record and issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all vulnerable adults and the remit of the roles of the Designated Safeguarding Officer and Deputy. All staff and volunteers will be asked to read this policy annually and after it has been reviewed and updated if necessary. They will sign to say they have read and understood the policy.

We will display the internal reporting and referral flowchart (Appendix A) when our organisation is operating.

All regular visitors and volunteers to our organisation will be told where our policy is kept, they will be given a set of safeguarding procedures, they will be told who our Designated Safeguarding Officer and Deputy Designated Safeguarding Officer are and what the recording and reporting system is.

All service users, partners, spouses, relatives and carers will be verbally informed of our Safeguarding Adults Policy. They will be informed of our legal duty to assist our colleagues in other agencies with adult safeguarding enquiries and what happens should we have cause to make a referral to Adult Social Care.

Norfolk SEN Network is clear that Norfolk County Council (and Police where a concern relates to a potentially criminal matter) must lead all investigations into any allegation regarding safeguarding.

Telephone Norfolk County Council on 0344 800 8020 [operates 24 hours a day 365 days a year] – follow the prompts to take you to the Safeguarding Option.

- State that it is an adult safeguarding matter and explain your concerns
- Clarify with them what action should be taken and by whom
- Make a note of the person you spoke to including the guidance they gave you, their name and contact details

Guidance on the information required when making a referral is available on the NSAB website – see [SGA-Referrer-CHECKLIST-2023.pdf](#)

If we are unsure if a referral should be made, we will contact Norfolk County Council Adults Social Care and ask for advice. This can be anonymous on the part of the adult to help establish the level of concern and any action advised.

All adults or, where the adult does not have capacity, their partner/spouse, relatives or legal guardians, will be required to consent at the start of the adult's involvement with Norfolk SEN Network. This will include all vital medical and health information, contact details for the individuals Doctor and next of kin in the case of an emergency. It will also contain a section requesting permission for photographs to be taken and used for promotion purposes only.

4. Domestic Abuse

Domestic abuse is defined by legislation (*Domestic Abuse Act 2021*) as any incident 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, regardless of gender or sexuality.

What is clear in this definition is that no actual violence needs to happen hence the more inclusive term of Domestic Abuse.

The *Domestic Abuse Act 2021* also includes being a witness to domestic abuse of another person, including extending the recognition of children as victims if they see, hear or experience the effects of abuse.

Having a long-term illness or disability, including mental health problems, increases a person's risk of experiencing domestic violence or abuse. The law emphasises freedom from abuse as essential to a person's wellbeing (*Care Act 2014*) and highlights the harm to children who experience domestic abuse (*Children Act 2004*). It is also extensive covered in *Working Together to Safeguard Children 2023*.

4.1 Asking about Domestic Abuse

Asking about a person's experiences in their relationships and recognising the signs of possible domestic abuse are the first steps in making sure they receive the right help and support.

- If you are concerned, they may be experiencing domestic abuse, offer to talk privately with them somewhere that they feel safe.
- Ask sensitive questions that help the person talk about their experiences.
- If the person needs support to communicate, including an interpreter, use a professional who is impartial and has a duty to maintain confidentiality. Do not use family and friends.
- Many people will be worried about sharing what is happening to them. Your response can help them know that they are not alone and to feel that they will be believed.
- If the person is an adult with Care and Support needs and/ or you are aware that children are present in the property you will need to raise a Safeguarding Alert through the Safeguarding App.

You can help people to talk about domestic abuse, to know they are not alone and to feel that they will be believed. Remember your role is to support and direct to appropriate services. If you have concerns that someone is experiencing Domestic Abuse in Norfolk support them to make contact with Norfolk Integrated Domestic Abuse Service, - [Home - NIDAS](#)

Be Aware of the Potential Impact of Equality and Diversity Issues

Make sure you know about the services available locally to support people who experience or perpetrate domestic violence or abuse and how to make a referral.

- Your assumptions about people's beliefs, values, age, gender identity or sexuality may affect how you recognise and respond to domestic violence and abuse.
- Lesbian, gay, bisexual and trans people are also at risk of forced marriage. 'Honour'-based violence may be triggered by someone's gender identity or sexuality.

4.2 Training and One-to-One

You will receive ongoing training and regular one-to-one to support you in developing the knowledge and skills necessary to understand domestic abuse and the role of professionals in ensuring people's safety.

If your role is specifically about safeguarding, you should also be confident in identifying and assessing risk (often by using the 'DASH' domestic abuse, stalking and harassment and 'honour'-based violence tool), safety planning and liaising with specialist support services.

4.3 Responding to Domestic Abuse

Everyone involved in situations of domestic abuse should be offered support.

After an allegation

If a person makes an allegation of domestic abuse, their safety and the safety of others, including any children who may be affected, is the first priority.

- Make sure you are aware of the *Data Protection Act (2018)*, professional guidelines and local protocols about confidentiality and information sharing. Check that you know about:
 - Getting consent from people to share their information.
 - Telling people when and with whom their information is being shared.
 - When it may be necessary to share information without consent to keep the person safe.
- Share information about specialist services and offer a referral, including to a local support group.
- Consider the type of support needed, both immediately and longer-term.
- If the person appears to have additional needs associated with alcohol or drug misuse or mental health problems, offer to refer them to the relevant service, as well as to domestic violence and abuse support.
- Record your discussion and the actions you have agreed and follow immediately with a telephone call to the Designated Safeguarding Officer.

Specialist services

You should know what your local specialist services can offer and how to refer someone for this support.

- Domestic abuse services can help address emotional, psychological, physical and sexual harm. They can offer advice; help develop future plans and increase the person's safety.

- Services include refuges, advocacy, floating support, outreach support, specialist support for perpetrators, and tailored interventions, as well as housing workers, independent domestic violence advisors (IDVA) and a Multi-Agency Risk Assessment Conference (MARAC) for people at high risk.
- Be aware that some people may find domestic abuse services more difficult to access or use. This may include older people, men, people with disabilities, people from black and minority ethnic groups, and lesbian, gay, bisexual or trans people. It may also include people who are not entitled to benefits, housing and other public services, usually due to their immigration status. Advocacy and additional support may help with this.

4.4 Records and Confidentiality

If we are concerned about the safety or wellbeing of any adult in Norfolk SEN Network, we will record our concerns immediately followed by telephone contact with the Designated Safeguarding Officer.

All information is confidential and must be managed and stored within our organisation in line with the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). However, we understand that where there are concerns that an adult may be at risk of harm or abuse, information can be shared with other agencies, for example, Adult Social Care, the Police and, where appropriate, the Care Quality Commission.

5. Roles and Responsibilities

Any concern for an adult's safety or welfare will be recorded in writing using the Safeguarding App and notification made to the Designated Safeguarding Officer.

The Designated Safeguarding Officer:

Pat Brickley Tel: 07501 027323

Email: pat@norfolksennetwork.org

Deputy Designated Safeguarding Officer:

Karla Cooper Tel: 07742 538926

Email: karla@norfolksennetwork.org

Norfolk SEN Network also has a named Trustee with responsibility for Safeguarding, currently this is:

Alex O'Sullivan Tel: 07803 409954

Email: aemosullivan@gmail.com

If you feel a vulnerable adult is at risk of immediate harm, call the Police on 999.

The Designated Safeguarding Officer is responsible for:

- Liaising with Adult Social Services and other agencies where necessary and making referrals using the agreed procedures detailed below
- Ensuring that all staff and volunteers are aware of our policy and the procedure they need to follow
- Ensuring that all staff, volunteers and regular visitors have received appropriate safeguarding information and training during induction and this training is refreshed every three years
- Ensuring that our safeguarding policy is in place, is reviewed annually and follows the guidance provided by the NSAB
- ensuring that at all times safer recruitment practices are followed

The Designated Safeguarding Officer will be used as the first point of contact for any staff concerns/queries regarding a safeguarding concern in Norfolk SEN Network.

We undertake to remedy without delay any weakness regarding our safeguarding arrangements that are brought to our attention.

6. Training

Every member of staff will undertake appropriate safeguarding training every three years. Those staff working directly with vulnerable adults will also undertake appropriate safeguarding training through the NSAB.

We actively encourage all our staff and volunteers to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via [Norfolk Safeguarding Adults Board \(NSAB\)](#)

Those acting as Designated Safeguarding Officer and Deputy Safeguarding Officer will have additional training to support them in this role. The DSO should be used as the first point of contact for any safeguarding queries or concerns in Norfolk SEN Network.

7. Safer Recruitment

All staff, volunteers and regular visitors who come into contact with the adults we work with have a duty of care to prevent harm and reduce the risk of them suffering from abuse or neglect. There is a legal duty placed upon us to ensure that everyone who works with or on behalf of all the adults who we come in contact with is competent and suitable to do so.

Our recruitment practices are designed to help prevent unsuitable people from working with adults at risk of abuse or neglect. An integral part of this is the correct use of Disclosure and Barring Service (DBS) check, of which there are three types:

- **Standard** – which includes checks for spent and unspent convictions, cautions, reprimands and final warnings

- **Enhanced** – which includes the same checks as the standard plus any additional information held by local Police that is reasonably considered relevant to the post being applied for.
- **Enhanced with Barred List** – this includes the same checks as the enhanced check plus checks against the appropriate barred list to ensure that the individual has not been barred from working with adults at risk of abuse or neglect. Only members of staff involved in regulated activities (health care, personal care, social work, assistance with cash, bills and/or shopping, assistance in the conduct of a person's own affairs, transport to and from a place where an individual receives health, personal or social care [excludes family, friends and taxi drivers]) are required to undergo a mandatory Enhanced DBS with Barred List.

It is a criminal offence to allow anyone on the adult barred list to undertake regulated activities with adults at risk of abuse or neglect.

Further information on DBS Checks is available on [Disclosure and Barring Service - GOV.UK](https://www.gov.uk/government/organisations/disclosure-and-barring-service)

We are committed to reflecting best practice in recruitment by ensuring that we:

- Carefully consider the job description/role profile and person specification ensuring they accurately reflect the duties, qualifications and experience that are required
- Define our selection criteria based on the person specification the role
- Prepare an information pack for candidates
- Circulate details of all vacancies widely
- Ask for a written application form which includes a written declaration with regards to criminal convictions [you can only ask for details of spent convictions when role involves regulated activities]
- Ask for identification which includes a photograph
- Ask to see and copy the original of any qualifications
- Conduct interviews with at least two people present
- Ask for and check at least two references, including the most recent employer
- Obtain enhanced DBS checks where current legislation requires us to do so
- Organise a comprehensive induction period which includes familiarisation with our safeguarding policies, procedures and safeguarding training

Norfolk SEN Network will check all staff DBS statuses annually and will advise in all Terms and Conditions of employment (contracts) that we reserve the right to redo the DBS check at any time. We request staff to sign up to the update service once in employment with Norfolk SEN Network.

More details can be found in our Safer Recruitment Policy.

8. Good Working Practices

Good practice guidance will help staff and volunteers avoid putting themselves in a situation which could put them at risk of having an allegation of abuse made against them. This includes:

- Always trying to ensure, where practical to do so, that a third party is present
- Avoiding unobserved one-to-one situations with adults – keep a door open and/or ensure that you are within the hearing of others
- Not offering to transport an adult in your own vehicle
- Never allowing yourself to be drawn into inappropriate attention seeking behaviour
- Never entering a room where an adult may not be fully dressed without first clearly obtaining their consent
- Never undertaking activities of a 'personal' nature for an adult unless that is clearly defined as part of your role – this is likely to be considered a regulated activity.
- Never engaging in, or allowing, any sexually provocative games, whether based on talking or touching
- Never making suggestive remarks or discriminatory comments
- Never engaging in, or tolerating, bullying or harassment
- Never engaging in, or tolerating, inappropriate physical activity e.g., horseplay
- Never trivialising allegations of abuse or neglect
- Contributing to developing a culture where everyone feels able to point out inappropriate attitudes and behaviours to each other
- Ensuring that all allegations of abuse are reported, including any made against you
- Remembering that someone else might misinterpret your actions, no matter how well intentioned

If staff or volunteers realise, they have inadvertently engaged in unsafe behaviour, it is important to raise the issue immediately with their line manager or volunteer co-ordinator. This allows for reflection and risk assessment to prevent recurrence. It is important to recognise that, due to the spontaneous and sometimes challenging nature of our work, such situations can occasionally arise. It is always better to be open about the situation and agree on a strategy to manage future occurrences rather than let it become a repeated pattern of unsafe practice or cover it up. (Both of these scenarios could result in disciplinary action).

9. Dealing with Allegations of Abuse/Neglect Against Our Staff

Allegations of abuse or neglect can sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some people who harm or abuse adults.

As part of our commitment to safeguarding the adults we work with and support, we will follow the policies and guidance from Norfolk Safeguarding Adults Board.

All the people who work and volunteer with us will be made aware of the procedures that will be followed if an allegation of abuse or neglect is made against them.

We will support anyone who, in good faith, reports their concerns that an adult is being abused or neglected or is at risk of abuse or neglect even if those concerns prove to be unfounded.

In Norfolk, the lead agency for safeguarding adults is Norfolk County Council (Adult Social Services). Any allegation raised directly with Norfolk SEN Network must be reported on to Norfolk County Council within one working day.

Telephone 0344 800 8020 follow the prompts to the Safeguarding Adults option.

If a concern involves immediate or serious risk or injury, we will report first to emergency services using 999.

Where any allegations are made to the Police or Adult Social Care about an employee, the relevant authorities will liaise with us about the appropriate course of action.

If an individual [paid worker or unpaid volunteer] is dismissed or stopped from working in Norfolk SEN Network because they pose a risk of harm to adults (even if they have left e.g., resigned), we must make a referral to the Disclosure and Barring Service. **It is a criminal offence to FAIL to make a referral without good reason.**

Making a Barring Referral to the Disclosure and Barring Service

If an allegation has been made about a staff member or volunteer, then our organisation has a legal duty to make a barring referral if the following conditions are met:

Condition 1

You withdraw permission for a person to engage in regulated activity with children and/or vulnerable adults. Examples: dismissed, re-deployed, retired, been made redundant or retired.

Condition 2

You think the person has carried out one of the following:

- engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk of harm, or
- satisfied the harm test
- received a caution for, or a conviction for, or been convicted for a relevant offence

More information on Barring Referrals can be found [online](#). If we need guidance on making a Barring Referral, we will contact the [East of England DBS Outreach Advisor](#) for support. A Barring Referral can be completed online via the DBS [website](#)

Barring Referrals will be made by Beckie Clifton and our Safeguarding Officer.

If the Barring Referral relates to Pat Brickley, then Clayton Anderson, Chairman will make the referral.

There could be times when we might consider that we should still make a referral in the interests of safeguarding vulnerable adults even if the legal duty to refer has not been met. This could include acting on the advice of the police or a safeguarding professional, or in situations where there may not be enough evidence to dismiss or remove a person from working with vulnerable groups. DBS are required by law to consider any and all information sent to them from any source. This includes information sent to them where the legal referral conditions are not met. If we do make a referral to DBS where the referral conditions are not met, we will do so in consideration of relevant employment and data protection laws.

Contacting The Charity Commission

The Charity Commission requires charities, such as Norfolk SEN Network, to report serious incidents that have taken place with prompt, full and frank disclosure. Details will include what happened and how it is being dealt with.

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to Norfolk SEN Network's beneficiaries, staff, volunteers or others who come into contact with Norfolk SEN Network through its work
- loss of Norfolk SEN Network's money or assets
- damage to Norfolk SEN Network's property
- harm to Norfolk SEN Network work or reputation

The responsibility for reporting a serious incident rest with the Trustees with guidance available from The Charity Commission:

[RSI guidance what to do if something goes wrong Examples table deciding what to report.pdf.](#)

The Commission will ensure that Trustees have complied with their legal duties, and the incident is being managed responsibly. The Commission can also use its powers to protect Norfolk SEN Network from further harm by providing regulatory advice and guidance.

Handling a Disclosure of Abuse

An adult may tell someone they trust that they are being abused or neglected. They will often not be aware of sources of help and support. It takes courage to confide in someone – the way in which staff/volunteers respond can be crucial.

Do:

- remain calm and receptive
- listen without interrupting
- make it clear that you are taking the matter seriously

- acknowledge their courage in telling you
- let them know you will do what you can to help
- try to get their permission for you to share the information on a need-to-know basis to enable them to receive the help and support they need
- record, using the Safeguarding App, what was said as soon as possible
- contact the Designated Safeguarding Officer immediately after logging the concern on the Safeguarding App
- seek support.

Do not:

- allow your shock to show
- ask leading questions
- probe for more information
- make assumptions or speculate
- make negative comments about the abuser
- make promises you cannot keep
- give assurances of absolute confidentiality – particularly in those situations where other adults may be at risk

What to do if the adult asks you to keep the information secret:

- If the adult has mental capacity the public interest test applies [if someone else could be a victim of the alleged perpetrator it is in the public interest to report it with or without the victims' consent]
- If they do not have mental capacity, you have a duty to report it without their consent.

10. If in doubt, ask your Designated Safeguarding Officer or equivalent Records and Confidentiality

If we are concerned about the safety or wellbeing of any adult in Norfolk SEN Network, we will record our concerns immediately followed by telephone contact with the Designated Safeguarding Officer.

The personal information required to record concerns is name, date of birth, address (including postcode), and telephone number.

All information is confidential and must be managed and stored within our organisation in line with the *Data Protection Act 2018* and *UK General Data Protection Regulation (UK GDPR)*. However, we understand that where there are concerns that an adult may be at risk of harm or abuse, information can be shared with other agencies, for

example, Adult Social Care, the Police and where appropriate the Care Quality Commission.

Information will only be shared internally within the organisation on a need-to-know basis for the protection of the vulnerable adult.

Any equipment that is used to access records but is not the property of Norfolk SEN Network is subject to a Bring Your Own Device assessment to ensure it is secure by policy.

11. Relevant Guidance and Legislation

- Care Act 2014
- Domestic Abuse Act 2021
- Human Rights Act 1998
- Equalities Act 2010
- Public Interest Disclosure Act 1998
- Data Protection Act 2018 (and UK General Data Protection Regulations (UK GDPR))
- Care Standards Act 2000
- Sexual Offences Act 2003
- Domestic Violence Crime and Victims Act 2004
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- 'Safeguarding Adults' National Framework 2005
- The Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012

Section 26 and 29 of the Counter Terrorism Security Act 2015 (Prevent duties)

12. Other Relevant Policies

To underpin the values and ethos of our organisation and our intent to ensure the adults we work and support with are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Safeguarding Children Policy
- Anti-Bullying and Harassment
- Code of Conduct
- Compliments and Complaints
- Confidentiality and Data Protection
- Equality, Diversity and Inclusion
- Health & Safety and First Aid
- Safer Recruitment (including internal DBS process)
- Safer Working Practice
- Whistle Blowing

13. Useful Internal Contacts

Named Designated Safeguarding Officer

Pat Brickley

Tel: 07501027323

Email: pat@norfolksennetwork.org

Named Deputy Designated Safeguarding Officer

Karla Cooper

Tel: 07742538926

Email: karla@norfolksennetwork.org

Norfolk SEN Network also has a named Trustee with responsibility for Safeguarding currently:

Alex O'Sullivan Tel: 07803 409954

Email: aemosullivan@gmail.com

14. Useful External Contacts

- Norfolk County Council (for concerns about adults and children): 0344 800 8020
- Norfolk Police:
 - Non-Emergency: 101
 - In an Emergency: 999
 - Website: www.norfolk.police.uk
- Norfolk Safeguarding Adults Board:
 - Website: [Norfolk Safeguarding Adults Board \(NSAB\)](#)
- Care Quality Commission (CQC): 0300 061 6161
- NHS and Social Care Whistleblowing Helpline: 0800 072 4725

Domestic Abuse Helplines

Leeway Domestic Violence Helpline (local): 0300 5610077

www.leewaysupport.org

National 24-hour Domestic Violence Helpline: 0808 2000247

www.nationaldomesticviolencehelpline.org.uk

Childline: 0800 1111

www.childline.org.uk

Mens Advice Line (for male victims): 0808 8010327

www.mensadviceline.org.uk

National Domestic Violence Helpline (Women's Aid): 0808 2000247

www.nationaldomesticviolencehelpline.org.uk

National Victim Support: 0808 1689111
www.victimsupport.org.uk

National Centre for Domestic Violence: 0800 9702070
www.ncdv.org.uk<http://www.ncdv.org.uk/>
For Help TEXT "NCDV": 60777

ManKind Initiative - Supporting Male Victims of Domestic Abuse

Honour Abuse Helplines

Karma Nirvana: 0800 5999247
Aanchal: 08454 512547 (Asian Languages spoken)
Southall Black Sister: 0208 5710800
Ashiana Network: 0208 5390427 (Turkish and South Asian)
Ikrow (Iranian, Kurdish women's rights organisation): 0207 9206460

Other Helplines

Samaritans: 116 123
Shelterline: 0344 5151860
Crime Stoppers: 0800 555111
National Drugs Helpline: 0800 5404120
National Help Line for LGBT: 0800 9995428
Debtline: 0808 8084000
NHS Direct: 111
Paladin National Stalking Helpline: 0203 8664107

Hospitals

Queen Elizabeth, Kings Lynn: 01553 613613
Norfolk & Norwich University Hospital: 01603 286286
James Paget University Hospital, Gorleston: 01493 452452
West Suffolk Hospital, Bury St Edmunds: 01284 713000

15. Policy Review

We will always make any changes immediately to our procedures in line with guidance from Norfolk Safeguarding Adults Board and any legislative changes or relevant national policy updates.

Copies of this policy will be given to all staff, volunteers and trustees and discussed with staff in detail at induction and they will be kept informed of any changes to the Policy.

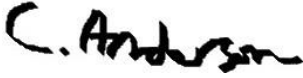
This Policy will be reviewed annually.

16. Data Protection

In the implementation of this policy, Norfolk SEN Network may process personal data and/or special category personal data collected in accordance with our Data Protection policy. Data collected from the point at which this policy is invoked will only inform the charity for the benefit of implementing this policy. All data is held securely and accessed by, and disclosed to, individuals only for the purposes of this policy.

Inappropriate access or disclosure of personal data constitutes a data breach and should be reported in accordance with the organisation's UK GDPR and data protection policy immediately. For current employees this conduct may amount to a gross misconduct offence under Norfolk SEN Network's disciplinary procedure and could lead to summary dismissal; if you have a different relationship with Norfolk SEN Network following investigation this may be terminated and even if your involvement with Norfolk SEN Network is no longer current, we may consider taking legal action.

Dated: 7th August 2026

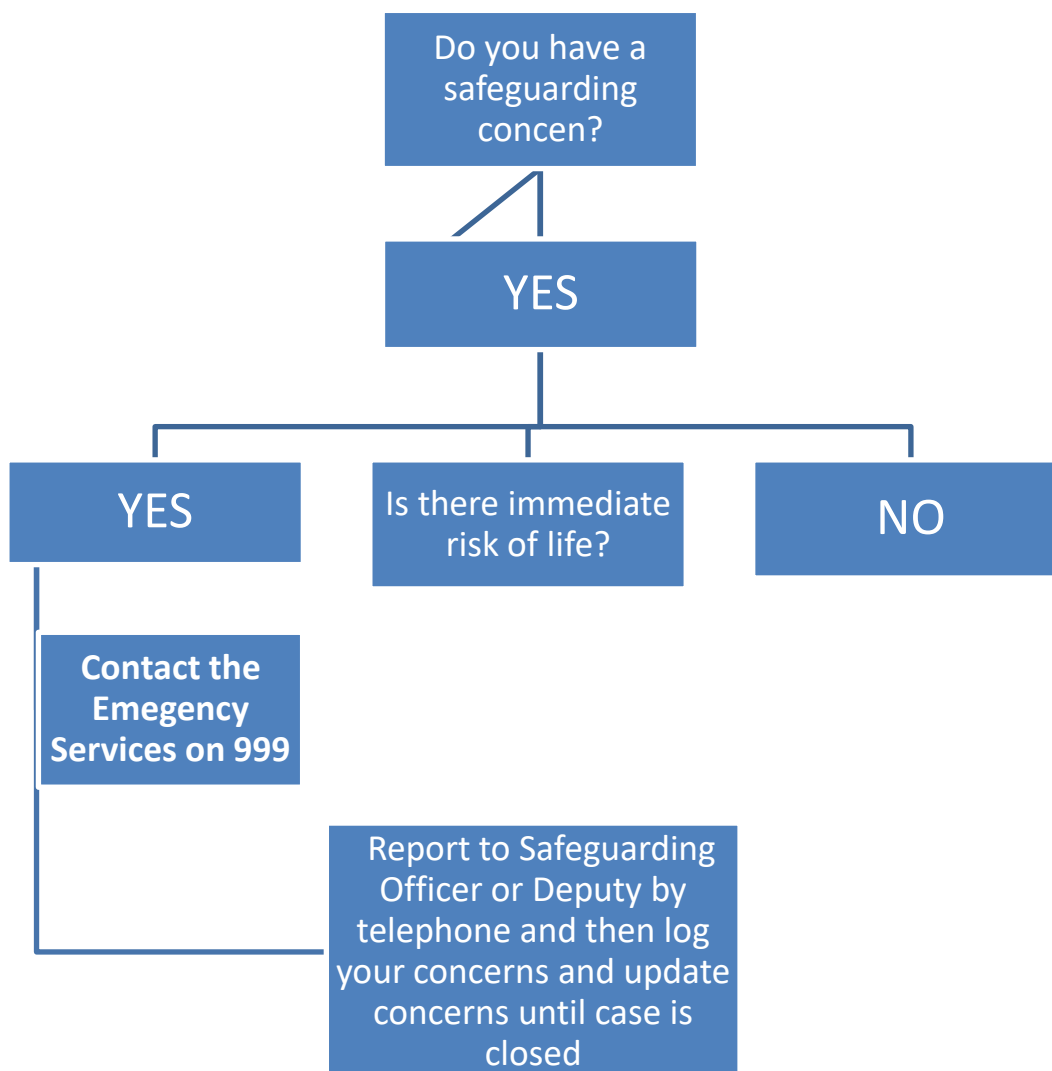
Signed: 

Clayton Anderson, Chairman

Appendix A



Safeguarding Concern Flowchart



Contact details: Pat Brickley, Safeguarding Officer Tel: 07501027323
Karla Cooper, Deputy Safeguarding Officer Tel: 07742538926