

Safeguarding Adults and Vulnerable Persons Policy

Policy Control

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Of interest to

Mountain Independence staff, Mountain Independence sub-contractors and clients

Introduction Statement

Mountain Independence believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

Mountain Independence is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

Mountain Independence acknowledges that safeguarding is everybody's responsibility and is committed to preventing abuse and neglect through safeguarding the welfare of all adults involved.

Mountain Independence recognises that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

Mountain Independence recognises that there is a legal framework within which sports need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by Mountain Independence will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

Who is at risk?

In Wales the Social Services and Well Being Act 2014 defines an “adult at risk”, as an adult who;

- a) is experiencing or is at risk of abuse or neglect;
- b) has needs for care and support (whether or not the authority is meeting any of those needs); and
- c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

While we recognise that some people will be vulnerable due to their learning disability or mental health needs there are also those adults who are at risk due to a specific circumstance they may find themselves in, for example: domestic abuse, forced marriage, sexual or commercial exploitation (this is not an exhaustive list).

Whether or not an adult is identified as being ‘at risk’, all adults should be safeguarded from different types of abuse (Please note: bullying is usually psychological/emotional abuse, but can also be physical abuse) which include but not limited to:

Self-neglect	Physical abuse	Psychological abuse
Modern Slavery	Sexual abuse	Radicalisation
Domestic abuse	Financial & Material abuse	Forced Marriage
Discriminatory	Neglect	Cyber Bullying
Organisational abuse	Emotional abuse	Mate Crime

Mountain Independence staff or sub-contractors generally do not have responsibility or contact with vulnerable adults on a regular or ongoing basis, but do typically have intensive contact over short periods up to 6 days. They should be aware of the various forms of abuse above and look out for them in all adults who may be at risk due to a specific circumstance they find themselves in. See appendix A for more detail.

What staff & sub-contractors should look out for

An adult may confide to a member of staff or participant that they are experiencing abuse inside or outside of the organisation’s setting. Similarly, others may suspect that this is the case. There are many signs & indicators that may suggest someone is being abuse. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
 - Person is not attending / no longer enjoying their sessions.
 - A change in the behaviour or confidence of a person.
- Self-harm.
- A fear of a particular group of people or individual.
- They may tell you / another person they are being abused – i.e. a disclosure
 - A staff member discriminating against an individual

What staff & sub-contractors need to do

In Wales the Social Services and Well Being Act's (2014) principles are;

- Responsibility - Safeguarding is everyone's responsibility.
- Well-being - Any actions taken must safeguard the person's well-being.
- Person-centred approach - Understand what outcomes they wish to achieve & what matters to them.
- Voice and control - Expect people to know what is best for them and support them to be involved in decision making about their lives.
- Language - Make an active offer of use of the Welsh language and use professional interpreters where other languages are needed.
- Prevention - It is better to take action before harm occurs.

As such all Mountain Independence staff and sub-contractors should understand these principles and that it is their responsibility to act. Any actions taken to safeguard an adult will take their whole well-being into account and be proportionate to the risk of harm. We understand

Reporting Procedure

- All allegations or suspicions must be reported immediately through the DSL (Stuart Lade)
- Use the form at the end of this document to report the details, Annex ?

Staff and Sub-Contractor Code of Conduct

All staff & sub-contractors are to create a learning environment which is positive, supportive and which:

- Values inclusivity, appreciates difference, welcomes learning from others, and considers all participants to be equal;
- Builds relationships based on mutual respect, & gives & receives feedback in a constructive way;
- Does not tolerate bullying and harassment;
- Respects confidentiality whenever possible when issues are reported;
- Respects everyone's dignity equally.

Good Practice

- Work in an open environment - avoid unobserved situations & encourage open communication.
- Always put the welfare of each individual person first.
- Maintain appropriate distance with clients & discuss/seek consent for close behaviour or touching.
- Be an excellent role model - be aware of the effect that your words and actions may have.
- Staff and sub-contractors should act professionally and not pursue romantic or sexual relationships in the course of work activities.

Practices to be avoided

- Spending excessive amounts of time alone with any client away from others
- Straying from the activity or specific task.
- Being unnecessarily inquisitive – only ask what is necessary to fulfill the requirements of the activity or matter in hand.
- Saying anything that might make any adult feel uncomfortable or debased.
- Saying anything that could be interpreted as aggressive, hostile or impatient.
- Being drawn into overly personal conversations or introducing overly personal subjects.
- Standing over or otherwise making the adult feel pressured.
- Meeting other than at the pre-arranged venue.
- Using sexually suggestive language.

Practices never to be sanctioned

You should **never**;

- Allow or engage in any form of inappropriate touching.
- Allow threatening or inappropriate language unchallenged.
- Make sexually suggestive comments to an adult, even in fun.
- Reduce an adult to tears as a form of control.
- Allow allegations made by any person to go unchallenged or unrecorded.
- Promise a person that their confidences will be kept secret.

Designated Safeguarding Lead Follow-Up Procedure

- The DSL will decide whether to refer the case to the relevant authority (e.g. Social Services, the Police)
- The DSL will inform MTC that safeguarding procedures have been invoked.
- If a member of Mountain Independence staff or sub-contractor has an allegation against them, they may be immediately suspended from further work pending outcome of any investigation.
- The DSL will keep all sensitive information secure, including dates & details of the report, the feedback received, the procedures followed the outcome of advice given by relevant authorities, as appropriate.
- If a report is received anonymously, the DSL will contact the individual concerned in confidence, sharing the evidence if appropriate, asking for a response with 5 working days. If no response is received the DSL may follow up the referral or may contact any relevant authorities.
- Any reports or allegations of abuse or discrimination concerning the DSL will be forwarded (with consent) to Mountain Training to handle in the interests of impartiality.

Staffing Policy and Safer Recruitment

Mountain Independence carefully select staff and sub-contractors to ensure they are suitably qualified, experienced, and share our values.

- We ensure all staff or sub-contractors are suitably qualified checking against Mountain Training qualification records on the CMS.
- We ensure all staff or sub-contractors are suitably First Aid Trained checking first aid training certificates are current and relevant to outdoor work.
- We ensure all staff or sub-contractors are suitably insured, checking Public Liability insurance certificates are held.
- We check all staff or sub-contractors are suitably experienced discussing their prior delivery of similar courses, and supporting those who require additional guidance.
- We ask all staff or sub-contractors to read through and sign they have understood and will adhere to this Safeguarding Adults and Vulnerable Persons Policy and record their responses.
- We ask all staff or sub-contractors to have undertaken some form of safeguarding training and record their currency. We will direct to suitable training or information where needed - see appendix B.

Appendix A - Types of abuse and neglect

Types of abuse and neglect as described in the Care Act 2014. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern. The following definitions are taken from the Care Act 2014.

- Self-neglect: covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings, and includes behaviour such as hoarding. This could be an adult whose appearance becomes unkempt, does not wear suitable kit, shows deterioration in hygiene or doesn't care about themselves.
- Modern slavery: encompasses slavery, human trafficking, forced labour and domestic servitude. 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.
- Domestic abuse: includes psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. Sport participants may notice a power imbalance between a participant and a family member. For example, a participant may be looking quiet and withdrawn when one person comes to collect them from sessions, in contrast to another person whom they greet with a smile.
- Discriminatory: discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act. This could be the harassing of a course participant member because they are or are perceived to be different in some way.
- Organisational abuse: includes neglect and poor care practice within an institution or setting such as a club for people with learning disabilities or a military training institution, for example, or in relation to groups from a college or training organisation. This may range from one-off concerns to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. In

- Physical abuse: includes, for example, hitting, pushing, slapping or punching an individual, and the inappropriate use of medication, restraint or inappropriate sanctions.
- Sexual abuse: includes rape, sexual assault or harassment, indecent exposure, sexual grooming or coercion, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting, e.g. a mentor who puts pressure on a person to be more “friendly” than they are comfortable with, in order to maintain a good relationship.
- Financial or material abuse: includes theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. This could be someone taking equipment from a participant or asking them to pay for extra training.
- Neglect: includes ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Emotional or Psychological abuse: includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- Not included in the Care Act 2014 but also relevant:
- Cyber bullying: occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.
- Forced marriage: is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry.
- Mate crime: as defined by the Safety Net Project is ‘when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.’ Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.
- Radicalisation; the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

Appendix B - Training and Information

The Ann Craft Trust, funded by Sport England, promote and encourages the safeguarding of adults in sport and physical activity. A programme of training is delivered online. It is recommended that staff and sub-contractors as a minimum, should view these videos, links below:

<https://www.anncrafttrust.org/resources/what-is-safeguarding/>

<https://www.anncrafttrust.org/resources/a-video-introduction-to-safeguarding-adults-in-sport/>

Introduction to Safeguarding Adults Video - Club Matters Sport England

<https://www.youtube.com/watch?v=pCoUlHITzWM> 6mins

Recommended courses to keep up to date with safeguarding issues are the;

<https://www.anncrafttrust.org/an-introduction-to-safeguarding-adults-elearning/>

<https://www.anncrafttrust.org/safeguarding-adults-in-wales-an-introduction-elearning/>

<https://www.anncrafttrust.org/safeguarding-adults-sport-activity/>

Appendix C - Resources

General resources

<https://learning.nspcc.org.uk/safeguarding-child-protection/writing-a-safeguarding-policy-statement>

<https://learning.nspcc.org.uk/research-resources/2019/safeguarding-child-protection-standards>

<https://www.anncrafttrust.org/resources/#sport>

<https://www.sport.wales/content-vault/safeguarding/>

Other Safeguarding training

<https://learning.nspcc.org.uk/training>

<https://learning.nspcc.org.uk/training/child-protection-safeguarding-sport>

<https://thecpsu.org.uk/training-events/choose-the-right-training/>

Annex A - Safeguarding Concern Reporting Form

Our Safeguarding reporting form can be found on the next page. Please do report any, and all concerns as soon as reasonably possible, ideally within 24 hrs to the DSL (Stuart Lade).

Please fill this form in with as much detail as possible, be sure to keep it factual and avoid personal opinions. It is best to ask open-ended questions when discussing matters and allow people to explain their situation in their own words.

It can be filled in electronically or printed as best suits. As access to a computer can often be difficult when working outdoors, we advise handwritten or mobile phone notes to be taken which can be sent in the first instance by text or email, but should be followed up with a completed copy of this form.

These can be distressing matters to discuss, please do reach out as early as possible to the DSL who will do their utmost to provide support to all staff or sub-contractors dealing with these reports.

Safeguarding Concern Reporting Form

Use this form to record any safeguarding concern, however small. Please give as much information as you can, and continue on a blank sheet if necessary.

Details of person at risk

Name:

Date of Birth:

How do you know
this person?

About the safeguarding concern

Please provide details
of the concern you have
including dates, times,
descriptions of events,
full names and whether
the information is first-
hand or the accounts of
others.

When did this happen?
Don't worry about an
exact date. Some idea
of when the incident
might have happened.
And if you believe this
is an ongoing incident,
how often?

Did you discuss
reporting your
concerns with the
person at risk? How did
they feel, and what sort
of outcome would they
like to see?

Have you spoken to
anyone else about this
concern?

About you (person filling in this form)

Name:

Declaration: I have completed this form to the best of my knowledge

Signature:

Date: