



**Royal Association for Deaf people**

# Safeguarding Adults Policy

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Reviewed by: Safeguarding and Wellbeing Officer (Safeguarding Lead)  
Date: October 2022  
Version: Version control policy 2022-003  
Next review date: October 2023

Version number	Date	Author	Purpose
001	January 2021	Director of Operations	Policy review
002	May 2021	Director of Operations	2021 final approved version
003	October 2022	Director of Operations/Safeguarding and Wellbeing Officer	Policy review 2022

**[\\*\\*click here for BSL\\*\\*](#)**

**If you are worried that an adult may be at risk of harm or abuse, it is your duty to raise your concerns using this policy and the operational procedures. In an emergency, you must ensure the safety of the person and follow reporting procedures.**

## **Summary** **[\\*\\*Click here for BSL\\*\\*](#)**

RAD supports the aims of adult safeguarding as stated by the Department of Health (12/2016) the care and support statutory guidance.

Safeguarding aims to:

- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- Stop abuse or neglect wherever possible
- Safeguard adults in a way that supports them in making choices and having control about how they want to live
- Promote an approach that concentrates on improving life for the adults concerned
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect
- Provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult
- Address what has caused the abuse or neglect

RAD recognises that it has an important role to play in the safeguarding of adults from harm, abuse, neglect and radicalisation. This role includes the way in which RAD designs and delivers its services. In addition, it is recognised that RAD has a significant role to play in recognising and reporting potential harm, abuse or radicalisation happening to adults who may be at risk in the community.

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All colleagues working with adults must be familiar with this policy and with their local areas' multi-agency policy and procedures such as:

- Essex, Southend and Thurrock (SET) Safeguarding Adult Guidelines
- London Multi-Agency Adult Safeguarding Policy and Procedures
- Surrey Safeguarding Adults' Policy and Procedures
- All other relevant procedures that apply to the area in which we are working across the UK

Please see [Our Safeguarding Standards](#) for more information:

## The legal context [\\*\\*click here for BSL\\*\\*](#)

RAD's role in safeguarding people who are potentially at risk of abuse or harm is set in the context of the implementation of the Care Act 2014 and the department of health guidance known as "Care and Support Statutory Guidance."

The Care Act 2014 makes the "wellbeing principle" central to care and support. Section 42 of the Care Act also gives a specific role to the local authority: The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case, if so, what and by whom. This is a Section 42 enquiry.

Other legislation such as the Human Rights Act 1998 and Mental Capacity Act 2005 are also acknowledged as being of importance. Therefore, it is acknowledged that combined with the wellbeing principle, the principles of the Mental Capacity Act are the starting point for our approach:

1. There is a presumption of mental capacity of an individual
2. Individuals will be supported in their decision making (which includes the use of specialist communication skills where appropriate)
3. Individuals can make decisions which may appear to be unwise; however, this does not mean the person lacks capacity
4. If a person is in need of protection from harm or abuse, and they lack mental capacity, any protection plan will be carried out as part of a best interests approach
5. Any protection plan or intervention will be the least restrictive of a person's human rights and freedoms

**The Mental Capacity Act** (Section 44) creates a criminal act of ill treatment or wilful neglect, as such some allegations of abuse or harm may require investigation under this part of the legislation.

**The Criminal Justice and Courts Act 2015** (Section 20 and 21) creates two criminal offences of ill treatment or wilful neglect applying to care workers and to individual organisations.

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**Sexual Offences Act 2003** states that it is a criminal offence for workers employed in a position of trust to engage a person with a mental disorder in sexual activity.

**Corporate Homicide Act 2007** states that it is a criminal offence if the management of an organisation's activities are the cause of a person's death.

**The Counter Terrorism and Security Act 2015** provides a general duty on a range of organisations to prevent people being drawn into terrorism.

Under this Act the Prevent Duty places a duty on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

**[\\*\\*Click here for BSL\\*\\*](#)**

**Consent** - RAD does not initiate Section 42 enquiries. This is the role of the local authority.

RAD does however have a duty to report safeguarding concerns to the local authority who will then consider the appropriate course of action and seek any necessary consents for the adult at risk.

As part of RAD's reporting to the local authority - information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). However, it is good practice to try and gain a person's consent to share information and where it does not increase risk, colleagues should inform them of their intention to make a safeguarding report to the local authority.

The law does not prevent the sharing of sensitive or personal information within RAD, or across supporting organisations where there is a safeguarding concern and the sharing of information is justified.

The law also does not prevent the sharing of sensitive or personal information between organisations where the public interest outweighs the interest served by protecting confidentiality – i.e. where a crime may be prevented.

Emergency or life-threatening situations may warrant the sharing of relevant personal information with emergency services without consent.

Colleagues should expect the local authority to adhere to their duty to include any adult at risk in a Section 42 enquiry and if the local authority does not, or does not make reasonable adjustments (for the adult), then RAD colleagues should ensure appropriate advocacy is provided for the adult.

**Where harm or abuse may have happened or could potentially happen RAD acknowledges that it has a role to raise the concerns under the local area multi-agency policy and procedures.**

**Changes in legislation** - RAD acknowledges its responsibility to keep up to date with any changes in legislation. It is vitally important that we continually review our safeguarding practices in line with statutory guidance to fulfil the legal and regulatory requirements associated with our organisation's activities. Where there are updates in safeguarding legislation, the designated safeguarding lead will provide updates to colleagues as well as preparing reports for the trustee board. Updates will be provided through team meetings and will be on the agenda for monthly safeguarding reviews. The safeguarding training program will refresh this knowledge annually for all RAD colleagues. Safeguarding is everyone's responsibility; therefore, colleagues

are expected to engage in this information so that RAD services operate in line with the legal framework for safeguarding.

## Principles of the RAD approach [\\*\\*click here for BSL\\*\\*](#)

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RAD fully supports the government's approach to safeguarding adults, through the adoption of "making safeguarding personal" for example, ensuring safeguarding concerns are dealt with in a person-led way and are outcome focused for the person for whom concerns exist.

RAD adopts the Department of Health safeguarding adults' principles of:

- *Empowerment*- presumption of person led decisions and informed consent
- *Prevention*- it is better to take action before harm occurs
- *Proportionality*- proportionate and least intrusive response proportionate to the risk presented
- *Protection*- support and representation for those in greatest need
- *Partnership*- local solutions through services working with their communities
- *Accountability*- accountability and transparency in delivering safeguarding

(Department of Health: statement of Government Policy on Safeguarding Adults 2013)

RAD's policy is to design its services giving a priority to prevention of abuse, harm or radicalisation, balanced with promoting the empowerment of the individual.

## Definitions [\\*\\*click here for BSL\\*\\*](#)

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### Adults at risk

RAD recognises and supports the terminology through the Care Act 2014, fully acknowledging that just because someone has a disability, it does not necessarily make them unable to protect themselves from risks related to harm or abuse. However, the issue of how their care and support needs affect their ability to protect themselves now or in the future is important.

The adult at risk and the ability to protect themselves from abuse or neglect is related to how able they are to make and exercise their own informed choices free from duress, pressure or undue influence of any sort. It is acknowledged that risk can be associated with a positive benefit or outcome that enables a person to do something they chose to do. It is important to identify and recognise that the risk may appear unsafe or unwise but when managed it will achieve a desired outcome.

### Who is an "adult at risk?" [\\*\\*click here for BSL\\*\\*](#)

#### An adult at risk:

(a) Has needs for care and support (whether or not the authority is meeting any of those needs).

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(b) Is experiencing, or is at risk of, abuse or neglect.

(c) As a result of those needs is unable to protect themselves against the abuse, neglect or the risk of it.

RAD has a duty of care to its service users and cannot agree to keep secrets or fail to notify the local authority if concerns exist for a person, which may be related to abuse, neglect, or if we suspect that someone lacks mental capacity - concerns should always be raised.

A person with a disability who has the mental capacity to make decisions about their own lives could be perfectly able to make informed choices and protect themselves from harm.

### **What is abuse? [\\*\\*click here for BSL\\*\\*](#)**

For the purpose of this policy, the term abuse is defined as:

**A violation of an individual's human and civil rights by any other person or persons. (DH, 2000)**

Patterns of abuse and neglect vary and may be serial, long term or opportunistic and may consist of a single or repeated acts. Abuse or neglect may be carried out by anyone and can happen in any setting. Abuse can involve an intentional, reckless, deliberate or dishonest act by the perpetrator. The Police should always be consulted for advice where there is a concern that the abuse may be a criminal act.

The following list detailing examples of abuse and neglect is not exhaustive. In each case, the individual circumstances must be considered.

### **Physical abuse [\\*\\*Click here for BSL\\*\\*](#)**

Physical abuse such as infliction of physical force that results (or could result) in bodily injury, pain or impairment, *examples*; - hitting, slapping, pushing, burning, \*physical restraint, harassment, enforced sedation, inappropriate use of medication, catheterisation for management ease.

**\*Restraint** - Unlawful or inappropriate use of restraint or physical interventions and/or deprivation of liberty is physical abuse. There is a distinction between restraint, restriction and deprivation of liberty.

A judgement as to whether a person is being deprived of their liberty will depend on the particular circumstances of the case, taking into account the degree of intensity, type of restriction, duration, the effect and the manner of the implementation of the measure in question. In extreme circumstances, unlawful or inappropriate use of restraint may constitute a criminal offence. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where a person's freedom of movement is restricted, whether they are resisting or not.

Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something, or does not do something they want to do, for example, the use of key pads to prevent people from going where they want from a closed environment. Appropriate use of restraint can be justified to prevent harm to a person who lacks

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capacity as long as it is a proportionate response to the likelihood and seriousness of the harm.

### **Sexual abuse [\\*\\*Click here for BSL\\*\\*](#)**

Sexual abuse including rape, indecent exposure, sexual harassment, 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.

It includes penetration of any sort, incest and situations where the person causing harm touches the abused person's body (e.g. breasts, buttocks, genital area), exposes his or her genitals (possibly encouraging the abused person to touch them) or coerces the abused person into participating in or looking at pornographic videos or photographs. Denial of a sexual life to consenting adults is also considered abusive practice

Any sexual relationship that develops between adults where one is in a position of trust, power or authority in relation to the other (e.g. day centre worker/social worker/residential worker/health worker etc.) may also constitute sexual abuse (see section on position of trust).

### **Neglect and acts of omission [\\*\\*Click here for BSL\\*\\*](#)**

This can take several forms and can be the result of an intentional or unintentional act(s) or omission(s). Neglect includes, ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition or heating.

The Police have the powers to investigate allegations of neglect under the Mental Capacity Act 2005, section 44 and also under the Criminal Justice and Courts Act 2015 section 20 and 21.

### **Self-neglect [\\*\\*Click here for BSL\\*\\*](#)**

An individual may be considered as self-neglecting and therefore at risk of harm where they are either unable or unwilling to provide adequate care for themselves, unable or unwilling to obtain necessary care to meet their needs and/or declining essential support without which their health and safety needs cannot be met. This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

### **Psychological /emotional abuse [\\*\\*Click here for BSL\\*\\*](#)**

Psychological abuse is that which affects the emotional health and development of individuals, examples; shouting, swearing, insulting, ignoring, threats, intimidation, harassment, humiliation, depriving an individual of the right to choose and privacy. Cyber bullying, isolation or withdrawal of service or supportive networks.

### **Financial or material abuse [\\*\\*Click here for BSL\\*\\*](#)**

Financial abuse can occur in isolation but it is also likely to be connected to some other forms of



abuse. Although this is not always the case, everyone should be aware of this possibility.

### **Financial abuse is a crime**

Examples may include - change in living conditions; lack of heating, clothing or food; inability to pay bills/unexplained shortage of money; unexplained withdrawals from an account; unexplained loss/misplacement of financial documents; the recent addition of authorised signers on a client or donor's signature card; sudden or unexplained changes in a will of other financial documents; theft; fraud; internet scamming, postal scams and doorstep crimes; coercion in relation to an adult's financial affairs or arrangements; the misuse or misappropriation of property, possessions or benefits

### **Domestic violence and abuse [\\*\\*Click here for BSL\\*\\*](#)**

This is any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial, emotional abuse, so called 'honour' based violence

### **Modern slavery [\\*\\*Click here for BSL\\*\\*](#)**

Modern Slavery exists in the UK and can be perpetrated against all adults and children, UK nationals, and those from abroad. Modern slavery includes slavery, human trafficking, and exploitation in the sex industry, forced labour, domestic servitude in the home and forced criminal activity. It can include victims that have been brought from overseas and vulnerable people in the UK being forced to work illegally against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. 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.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:

- Forced to work - through mental or physical threat
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or has restrictions placed on his/her freedom of movement

Contemporary slavery takes various forms and affects people of all ages, gender and races.

### **Organisational abuse [\\*\\*Click here for BSL\\*\\*](#)**

Is abuse that happens when professionals such as care workers, doctors, nurses, misuse their role, power and/or trust. For example they might do nothing about suspected abuse/crimes; provide poor care or neglect the services they should provide; have a sexual relationship with a patient/client; provide poor, ill-informed, or out-of-date practice; not provide support for an adult

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to access health care/treatment. Abuse can happen in residential services when groups of users live together but are incompatible or where there are negative responses to challenging behaviours. Organisational abuse can also be a result of policies, practice and processes within an organisation

### **Discriminatory abuse** [\\*\\*Click here for BSL\\*\\*](#)

Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals.

It can be a feature of any form of abuse of an adult at risk, but can also be motivated because of age, gender, sexuality, disability, religion, class, culture, language, race or ethnic origin. It includes harassment and slurs

### **Other related issues:** [\\*\\*Click here for BSL\\*\\*](#)

#### **Disability hate crime**

The Criminal Justice System defines a disability hate crime as any criminal offence, which is perceived by the victim or any other person to be motivated by hostility or prejudice based on a person's disability or perceived disability. The Police monitor five strands of hate crime:

- Disability
- Race
- Religion
- Sexual orientation
- Transgender

It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. Individuals may be concerned that they would not be recognised as victims or be believed and taken seriously. Abusers may also control their victims, threatening to 'out' them to friends, family or support agencies.

### **Mate crime** [\\*\\*click here for BSL\\*\\*](#)

A 'mate crime' as defined by the safety net project 22 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 often difficult for police to investigate, due to its ambiguous nature, but should be reported to the police who will make a decision about whether or not a criminal offence has been committed. Mate crime is carried out by someone the adult knows and often happens in private.

### **Radicalisation** [\\*\\*click here for BSL\\*\\*](#)

Radicalisation is comparable to other forms of exploitation, such as grooming and Child Sexual Exploitation. The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their

cause. This may be direct through a relationship, or through social media.

RAD recognises its responsibility under *Prevent Duty Guidance for England and Wales: Guidance for specified authorities in England and Wales* on the duty in the *Counter-Terrorism and Security Act 2015* to have due regard in the need to prevent people from being drawn into terrorism.

‘Prevent’ is a key part of the Government’s counter terrorist strategy. Its aim is to stop people becoming terrorists or supporting terrorism. It is the preventative strand of the government’s counter-terrorism strategy, CONTEST. Early intervention to divert people away from being drawn into terrorist activity is at the heart of Prevent. Safeguarding adults from radicalisation is no different from safeguarding them from other forms of harm.

### **Online [\\*\\*click here for BSL\\*\\*](#)**

Online abuse is any type of abuse that happens on the internet, facilitated through technology like mobile phones, computers, gaming consoles, tablets and other internet-enabled devices. It can happen anywhere online that allows digital communication and can happen at any time. This can include via social media, social networks, online forums, online chats, messaging apps, voice chat in games and through comments on live streaming sites. People can be victimised and experience further abuse when abusive content is recorded, uploaded, or shared by others online. This can happen if the original abuse happened online or offline. People may experience several types of abuse online which can include bullying/cyberbullying, emotional abuse (including emotional blackmail, for example pressuring others to comply with sexual requests via technology), sexting (this can include pressure or coercion to create sexual images), sexual abuse and/ or sexual exploitation.

Vulnerable people can also be groomed online as perpetrators may use online platforms to build trusting relationships in order to abuse them. This abuse may happen online, or the perpetrator may arrange to meet in person with the intention of abusing them.

### **Bullying [\\*\\*click here for BSL\\*\\*](#)**

Bullying is the term used to describe when an individual or group of individuals seek to harm, intimidate, or coerce someone who is perceived to be vulnerable. Bullying can be a form of discrimination, particularly if the abuse is related to the person’s disability, race, religion or belief, gender identity or sexuality. Bullying can affect people anywhere – at home, at work or through online platforms and technologies (cyberbullying). The term ‘bullying’ encompasses a range of behaviours and actions. The abuse can be verbal, physical and/or emotional, it can take place online or in person. It can put those at risk in immediate danger as well as having long term effects on their physical and mental wellbeing. Some of the main examples of bullying include:

#### **Verbal Abuse:**

- Verbal aggression
- Shaming language
- Derogatory or offensive remarks about someone or their family

#### **Physical Abuse:**

- Hitting, kicking, pushing

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- Physical assault

#### **Emotional abuse:**

- Making threats
- Undermining someone
- Excluding someone from a friendship group or from activities
- Stalking

#### **Cyberbullying/Online Bullying:**

- Sending threatening, upsetting or abusive messages
- Creating and sharing malicious images or videos
- 'Trolling' – sending upsetting messages on social networks, chat rooms or through online gaming
- Setting up hate sites or groups about a particular individual

## **RAD's role in safeguarding adults** [\\*\\*click here for BSL\\*\\*](#)

RAD acknowledges the role of the local authority, under the Care Act, as the organisation that, in partnership with others, will be the decision maker related to whether a situation meets the need for a Section 42 enquiry or whether other approaches are more appropriate.

#### **RAD will:**

- Promote services and social care practices that prevent abuse
- Promptly report any concerns or suspicions that an adult at risk is being, or is at risk of being, abused or neglected through the local multi-agency safeguarding adults policy and procedures
- Safeguard adults in a way that supports them in making choices and having control about how they want to live
- Take action if appropriate to do so to protect the person from further harm e.g. by contacting the emergency services
- As far as possible acknowledge and respect the rights of the person causing harm - If that person is also an adult at risk, they might need support to discuss their own needs with social services
- Ensure colleagues are aware of RAD's policy and internal operational procedures which relate to safeguarding adults

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- Ensure that RAD's policies link complaints, 'whistleblowing' (The Public Interest Disclosure Act 1998) and safeguarding
- Train colleagues and volunteers how to recognise safeguarding situations. Ensure colleagues know the process for reporting concerns and respond appropriately to situations where the risks appear to be high
- Deliver safeguarding training every two years. Safeguarding awareness is reinforced and checked through RAD's supervision processes and team meetings
- Participate in safeguarding adults' meetings under the local areas multi agency safeguarding adults' policy where required
- Undertake enquiries as agreed with the relevant local authority/multi agency safeguarding boards (and report back accordingly)
- Support service users and carers through an advocacy role when asked to do so in relation to safeguarding adults
- Seek to obtain consent to share information for the purpose of safeguarding disclosure

## Safeguarding enquiries [\\*\\*click here for BSL\\*\\*](#)

When requested by the local authority to undertake a Section 42 enquiry, RAD must comply and notify the local authority of the outcomes of any enquiry it conducts by the submission of a written report.

The objectives of a safeguarding enquiry are to:

- Establish the facts
- Ascertain the adult's views and wishes
- Assess the needs of the adult for protection, support and redress and how they might be met
- Protect from the abuse and neglect, in accordance with the wishes of the adult
- Make decisions as to what follow-up action should be taken with regard to the person or organisation responsible for the abuse or neglect
- Enable the adult to achieve resolution and recovery
- Decide whether something should be done to help and protect the adult

A safeguarding enquiry should be transparent, open minded, timely, fair and effective and always involve the adult, starting with establishing their views and wishes i.e. what outcome(s) do they want from the enquiry.

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Who leads an enquiry and the nature of it will depend on the circumstances and will be decided by the Local Authority. Those involved must work together to improve the adult's wellbeing, reflecting their wishes and taking the mental capacity assessment into consideration.

The action taken after an enquiry will again depend on the circumstances, but may be:

- Disciplinary, complaints or criminal investigation
- Work to improve care standards
- Focussed safeguarding planning
- Fuller assessments with health and social care agencies
- A protection plan

## **Supervision** [\\*\\*click here for BSL\\*\\*](#)



All colleagues must receive regular supervision in line with RAD's supervision policy. One to one or peer supervision sessions can be used to provide updates to colleagues who have reported safeguarding concerns and to check knowledge and assess training needs. It is also an opportunity to provide updates in relation to legislation/policy changes and ensuring internal procedures are understood.

At every one to one supervision meeting, colleagues are required to make a self-declaration that nothing has changed in their personal circumstances that might call into question their suitability to work with children or adults at risk.

Any safeguarding concerns must be reported immediately via My Concern in line with RAD's accident, incident and safeguarding (AIS) procedures and disclosures should not wait until supervision.

## **Dissemination** [\\*\\*click here for BSL\\*\\*](#)



This policy will be shared with all colleagues at every review.

It will be provided in both English and BSL. It will be held on RAD's HR database and RAD's external case management system for safeguarding: My Concern - accessible to all colleagues. Any changes to the policy will be shared with colleagues immediately, and the updated version held centrally (on both databases).

Managers will be reminded of their responsibility to share/discuss the policy with new starters and to continually reinforce safeguarding through supervision and team meetings. They will also be required to ensure all colleagues are aware of any updates.

## **Monitoring and review** [\\*\\*click here for BSL\\*\\*](#)



This policy will be updated annually, or earlier if there are changes to the law and/or to

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incorporate learning from cases or safeguarding enquiries/adult reviews.

## Events and activities [\\*\\*click here for BSL\\*\\*](#)

All RAD colleagues, when delivering events and services are required to follow the organisation's code of conduct and other relevant organisational policies e.g. health and safety in order to ensure:

- Appropriate dress, behaviour and language
- Health and safety remains everyone's priority
- Safe use of vehicles to transport people
- Relevant image consents are in place
- Colleagues ratios are adequate
- Adults are safe from harm

To ensure events and services comply with RAD's safeguarding policy colleagues must ensure that:

- A full risk assessment is carried out for activities and venues before an event takes place
- Full insurance cover is in place and checked for the activity and venue
- Appropriate licenses/registrations and checks are in place when working with or using third party organisations or instructors
- An up to date client registration form or support plan is held on file
- The required medical and consent forms are received and checked before the event
- Appropriate insurance is in place to transport in private vehicles or vehicle hire i.e. minibus

## Online safety [\\*\\*click here for BSL\\*\\*](#)

We recognise that the online world provides opportunities, however it can also present risks and challenges and we have a duty to ensure that vulnerable people involved in our organisation are protected from potential harm online. People should be able to use the internet for support, education and personal development, but safeguards must be in place to ensure safety at all times.

Colleagues working in frontline services and all colleagues in the marketing team will undertake face to face safeguarding training every two years and take online refresher courses in between. Online safety will be covered within the learning which will include how to identify; cyberbullying, emotional abuse, sexting (coercion), sexual abuse and sexual exploitation.

All colleagues and volunteers, regardless of whether or not their role includes working directly with vulnerable people must understand that we have a responsibility to:

- help keep people safe online, whether or not they are using RAD's network and devices
- ensure that images of our clients are used only after their written permission has been obtained, and only for the purpose for which consent has been given

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- work in partnership with carers and other agencies in helping people to be responsible in their approach to online safety
- review and update the security of our information systems regularly

## Data Retention [\\*\\*click here for BSL\\*\\*](#)

RAD recognises the responsibility it has to record and retain safeguarding data, supporting the guidance given in The Data Protection Act (2018). The Data Protection Act categorises the 'safeguarding of children and individuals at risk' as Special Category Data. This definition enables Data Controllers to process and store adult and child protection data indefinitely to prevent harm and reduce the risk of abuse. RAD acts in accordance with this legislation, storing safeguarding data indefinitely because there is legitimate interest to do so. This decision is justified by the fact that it is in the public interest to retain this information; deleting safeguarding data may increase the risk of harm or impact future enquiries. Any decisions to delete protection data will be considered, justified, and recorded.

## Safeguarding Colleagues [\\*\\*click here for BSL\\*\\*](#)

RAD is committed to providing a working environment which supports the wellbeing of all colleagues and enables them to carry out their duties effectively. We will continue to develop an open culture in which physical, mental, and emotional wellbeing is prioritised, and colleagues feel empowered to seek the help and support they need. Colleagues have a duty of care towards themselves; to keep safe and well in order to effectively perform their duties. All colleagues must adhere to processes that ensure the safety of themselves and others. All colleagues must report concerns if they suspect another colleague to be at risk of harm or abuse. All colleagues are expected to be mindful of confidentiality and to treat concerns seriously and with sensitivity.

For more information please see our [Safeguarding Adult Procedures](#).

## Useful contacts [\\*\\*click here for BSL\\*\\*](#)

**Designated Safeguarding Lead:** Eleanor Martin, Safeguarding and Wellbeing Officer

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**Director of Operations:** Julie Ratcliffe

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Email: [julie.ratcliffe@royaldeaf.org.uk](mailto:julie.ratcliffe@royaldeaf.org.uk)

### **RAD's Accident, Incident and Safeguarding (AIS) Team:**

For anyone outside of the organisation that has concerns for a deaf adult and feels they are at risk of abuse or neglect, please email: [AIS@royaldeaf.org.uk](mailto:AIS@royaldeaf.org.uk). The AIS operational team will assess your concern and take the appropriate action. All concerns will be treated seriously and with sensitivity.

Organisation	Phone	Available
Police	999	24 hours
999 BSL (app)	999	24 hours
Typetalk emergency number	18000	24 hours

If you are Deaf and want to contact emergency services for any reason, you need to first download the 999 BSL app. Once the app is open, click on the red button and you will be connected with a BSL interpreter.

**It is everyone's responsibility to be alert to and report signs of abuse**

Reviewed by: Safeguarding and Wellbeing Officer (Safeguarding Lead)

Date: October 2022

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