

SAFEGUARDING VULNERABLE ADULTS POLICY

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1. Policy aim

NILE is committed to providing a safe, respectful, and inclusive learning environment for all course participants and staff. We recognise our responsibility to safeguard adults who may be vulnerable or at risk, from abuse, neglect, exploitation, and harm. This policy applies to all staff (permanent, temporary, contractors), trainers, group leaders, homestay hosts, course participants and visitors.

2. Policy purpose

The purpose of this policy is to protect adults at risk from harm, abuse, and neglect, ensure staff understand their safeguarding responsibilities and provide clear procedures for reporting concerns. This policy also aims to promote a culture of vigilance and accountability, and ensure NILE is compliant with relevant safeguarding legislation.

3. The Law

This policy is underpinned by the Care Act 2014, the Mental Capacity Act 2005, the Safeguarding Vulnerable Groups Act 2006, the Equality Act 2010, the Human Rights Act 1998 and the Data Protection Act 2018.

4. Definition of an Adult at Risk

An adult at risk is someone aged 18 or over who has care and support needs (whether or not these are being met), is experiencing, or at risk of, abuse or neglect, and is unable to protect themselves due to those needs. In the UK this is mainly governed by the Care Act 2014.

5. Types of Abuse

Adult safeguarding includes financial exploitation and coercive control, which are less common in child safeguarding frameworks.

Staff must be aware of the following types of abuse:

- Physical abuse – assault, hitting, misuse of medication
- Emotional/Psychological abuse – intimidation, threats, humiliation
- Sexual abuse – unwanted sexual activity or exploitation
- Financial abuse – fraud, theft, coercion over money
- Neglect and acts of omission – failure to provide care/support
- Discriminatory abuse – harassment based on race, gender, disability, etc.
- Organisational abuse – poor practice within institutions
- Modern slavery – forced labour, human trafficking
- Domestic abuse – coercive or controlling behaviour

6. Recognising Signs of Abuse

Possible indicators may include unexplained injuries, sudden changes in behaviour, withdrawal or fearfulness, poor hygiene or malnutrition, financial irregularities, inappropriate relationships.

Please refer to *Appendix A - What is neglect and abuse?* for more information.

7. Roles and Responsibilities

NILE Designated Safeguarding Person (DSP) & Lead (DSL)

The DSP & DSL, currently Miriam Anderson and Mike Riley respectively, are responsible for keeping NILE policies up to date, receiving safeguarding concerns, maintaining confidential records, referring cases to relevant authorities, providing staff guidance, ensuring training is up to date.

Contact Miriam: During office hours: 01603 664473, Ext. 1113, miriam@nile-elt.com, Out of office hours: NILE Emergency Phone 07889649768

Contact Mike: 01603 664473, Ext. 1120, mike@nile-elt.com

All staff

All staff must complete safeguarding training, remain alert to signs of abuse, report concerns immediately to the DSL, maintain confidentiality and record factual information only. Staff must **not** investigate allegations themselves, **nor** promise confidentiality to learners, **nor** delay reporting concerns.

For full NILE Safeguarding Team contact details, roles and responsibilities, please refer to the NILE Safeguarding Policy.

8. Responding to a disclosure

Please refer to the NILE Safeguarding Policy, section **4. Procedures for handling disclosures** for information on how to respond to a disclosure.

If an adult is in immediate danger, or a crime is in progress, call 999 (emergency services) or 101 for non-emergencies. Do this before internal reporting if urgent.

All NILE staff must report to the DSP/DSL or a member of the NILE Safeguarding Team. They will record the concern, assess the risk, decide whether to refer externally, liaise with the relevant authorities. Staff must not investigate the concern themselves.

Safeguarding and Incident report forms can be found at the end of this policy, and paper copies in the NILE offices and at reception.

9. External referrals

In Norfolk, adult safeguarding concerns are reported to: Norfolk County Council – Adult Social Services, by calling 0344 800 8020, or via the online referral form via the Norfolk County Council website. Referrals should be made where the adult has care and support needs, is experiencing or at risk of abuse or neglect, is unable to protect themselves.

A police report should be made if a crime has occurred (assault, sexual abuse, theft, coercion, fraud etc). Police may investigate alongside Adult Social Care.

For allegations against staff Norfolk Adult Social Care can be contacted, and the Disclosure and Barring Service where appropriate.

For Domestic abuse support (Norfolk): Contact Leeway Domestic Violence and Abuse services 0300 561 0077 or the National Domestic Abuse Helpline 0808 2000 247. For Modern Slavery concerns, contact the Modern Slavery Helpline: 0800 808 3733, or the police.

Please note local services can offer advice but may be restricted in what support they can offer NILE course participants due to their being from outside the UK and the short time they are in the UK.

10. Allegations against NILE staff

Any allegation or concern that a member of NILE staff has behaved in a way that has harmed, or may have harmed, an adult at risk, possibly committed a criminal offence against an adult, or behaved in a way that indicates they may pose a risk of harm must be reported immediately to the DSP/DSL. If the allegation concerns the DSP/DSL, the matter must be reported directly to the Director, Thom Kiddle.

NILE will take all allegations seriously, ensure the immediate safety of the adult concerned, refer the matter without delay to the relevant external contacts and follow guidance from the Norfolk Safeguarding Adults Board. NILE will not conduct its own investigation where a criminal offence may have occurred. All actions will be handled sensitively, fairly, and confidentially, in line with the Care Act 2014.

Suspension of a staff member may be considered as a neutral act where necessary to safeguard adults while investigations are ongoing. Malicious or unfounded allegations will also be taken seriously and may be addressed under NILE's disciplinary procedures.

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

We will support anyone who, in good faith, reports his or her concerns, even if those concerns prove to be unfounded.

11. Consent and autonomy

Adults are presumed to have capacity unless proven otherwise. They have the right to make "unwise decisions". If an adult with capacity refuses help, NILE staff and other professionals must respect that – unless: there is serious risk to others, a crime has occurred, they lack mental capacity. This principle is linked to the Mental Capacity Act 2005.

Whereas children have a low threshold for intervention, due to children being legally dependent, adults have a higher threshold. They must meet the three-part test under the Care Act: 1) Care and support needs 2) experiencing or at risk of abuse 3) unable to protect themselves.

If in doubt, ask the DSP/DSL.

12. NILE procedures

NILE has measures in place to ensure vulnerable adults are protected whilst at NILE. These are the same as for safeguarding children.

For this reason, please refer to NILE's Safeguarding Policy for full information regarding:

- Safer recruitment
- Safeguarding training
- Procedures for handling disclosures
- Confidentiality
- Record keeping
- Whistleblowing
- Complaints

13. Policy review

We will always make any changes immediately to our procedures in line with Norfolk Safeguarding Adult's Board guidance. This policy is reviewed annually and after any safeguarding incident.

Policies cannot cater to every eventuality and response is down to the specific situation. However, whenever a gap in NILE's policies is highlighted, we endeavour to rectify this as soon as possible.

14. Other relevant NILE policies

- NILE Safeguarding Policy
- Major Incident Policy and Emergency Contact Procedure
- Safer Recruitment Policy
- Staff Code of Conduct
- Off-site visits procedures policy
- Bullying Policy
- Sexual harassment policy
- Equality and Diversity Policy
- Online safety
- Student substance Misuse
- ICT Code of Conduct for students

These documents are stored on the NILE Shared Drive, and are accessible on our website and in paper form in the Student Services and Academic Officers and at reception.

Appendix A – 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;
- At work;

- Schools and colleges of further education;
- In hospitals, surgeries or other health centres;
- In places of worship
- Via social media
- Via the online course platform (Brightspace)
- 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; or
- 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; and
- Volunteers and strangers

Safeguarding Report Form

This form is to be filled in by anyone who has a concern, or has been reported to about a concern, about the safety and/or welfare of someone at NILE.

Please complete this form and give it to the Designated Safeguarding Person (DSP), Miriam Anderson.

In her absence, please pass the form to Designated Safeguarding Lead (DSL), Mike Riley.

Student Name		Under 18?	
Student Gender		Student Nationality	
Your Name		Your job role	
Date of reporting		Time of reporting	
Describe the safeguarding concern as factually as possible. Include who you are concerned about and why, including any behavioural or physical signs. If you are reporting something that has been reported to you, please include who you spoke to and the circumstance of how it was reported to you. Please also describe any action you have taken. Continue on plain piece of paper if needed and attach to report.			
Your Signature:			

Please now check to make sure your report is clear - and will also be clear to a stranger reading it next year.

<i>To be completed by DSP/DSL</i>							
Name		Date & time report received		Safeguarding Report number:		Incident report number:	
Please circle:		Referral made to DSL / Safeguarding team (specify)/ NILE Director / police / First aid administered / visit to medical facilities / referral made to other agency (specify) / Other					
Action to be taken by DSP / DSL							

Incident Report Form

This form is to be completed by anyone who has experienced, witnessed or been reported to about an incident regarding someone at NILE.

Please complete and return to the Designated Safeguarding Person (DSP), Miriam Anderson.

In her absence, please give to the Designated Safeguarding Lead (DSL), Mike Riley.

Name of person(s) involved		Under 18?	
Nationality(/ies)		Gender(s)	
Your Name		Your job role	
Date of incident		Time of incident	
Date of filling in report		Time of filling in report	
Type of incident Please circle:	Attendance / Behaviour & discipline / Bullying / Child Protection concern / Health concern / Racial / Welfare / Other		
Describe the incident as factually as possible. Include who was involved, where it happened, what was said or done and by whom. Include what was the situation leading up to it. If you are reporting something that has been reported to you, please include who you spoke to and the circumstance of how it was reported to you. Please also describe any action you have taken. Continue on plain piece of paper if needed and attach to report.			
Your Signature:			

Please now check to make sure your report is clear - and will also be clear to a stranger reading it next year.

<i>To be completed by DSP/DSL</i>							
Name		Date & time report received		Safeguarding Report number:		Incident report number:	
Please circle:		Referral made to DSL / Safeguarding team (specify)/ NILE Director / police / First aid administered / visit to medical facilities / referral made to other agency (specify) / Other					
Action to be taken by DSP / DSL							