

# GSS - Safeguarding Vulnerable Adults and Children Policy

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GSS (UK) Ltd are committed to ensuring the appropriate safeguarding of vulnerable adults and children who are customers of, or come into contact with, the services of GSS UK Ltd or indeed maybe employees, contractors or associates of GSS UK Ltd.

GSS (UK) Ltd acknowledges its responsibility to safeguard the welfare of all vulnerable adults and children who use our services whether face to face or remotely. This policy seeks to ensure that Global Solution Services UK Ltd (GSS) undertakes its responsibilities with regard to protection of vulnerable adults and or children and will respond to concerns appropriately. The policy establishes a framework to support all staff in their practices and clarifies the organisations expectations and understanding.

## **1. KEY PRINCIPLES**

- 1.1 The welfare of the vulnerable adult or child is, and must always be, paramount to any other considerations
- 1.2 All customers regardless of age, gender, ability or disability, race, faith, culture, shape, language or sexual identity have the right to protection from abuse or harm.
- 1.3 All allegations or suspicions of abuse, neglect, harm and poor practice will be taken seriously and responded to swiftly, fairly and appropriately.
- 1.4 Working in partnership with other organisations, statutory agencies, parents, carers, and those in trusted positions is essential for the welfare of vulnerable adults, children and young people.
- 1.5 Vulnerable adults and children have a right to have access to support, and personal and social development delivered by an appropriately recruited, vetted and managed professionals.
- 1.6 Staff at GSS UK Ltd who have contact or dealings with vulnerable adults or children must undertake an Enhanced Disclosure Barring Service check. GSS will also consult and work with the Independent Safeguarding Authority (ISA) to ensure that all staff meet the minimum requirements by law to ensure we meet our contractual legal and moral obligations for the services we provide

## **2. THE AIM OF THE POLICY**

- 2.1 The purpose of this policy is to outline the duty and responsibility of all staff (including Associates, agency staff, temporary remote, face to face and contract) working on behalf of the organisation in relation to Safeguarding Vulnerable Adults and children.

- 2.2 All adults and children have the right to be safe from harm and must be able to live free from fear of abuse, neglect and exploitation.

### **3. OBJECTIVES**

- 3.1 To explain the responsibilities the organisation and its staff, (including Associates, agency staff, temporary and contract) have in respect of vulnerable adult protection.
- 3.2 To provide staff with an overview of vulnerable adult and child protection
- 3.3 To provide a clear procedure that will be implemented where vulnerable adult and child protection issues arise and in particular this will include protecting young people and adults and children from
1. Abuse (Child protection)
  2. Bullying or Harassment (including E-Safety and cyber safety)
  3. Forced Marriage or Honour-based violence
  4. Radicalisation
  5. Human Trafficking and Slavery
  6. Cyber bullying or disclosure

### **4. CONTEXT**

- 4.1 For the purpose of this policy 'adult' means a person aged 18 years or over and child/children will be under the age of 18.

#### **What do we mean by abuse?**

- 4.2 Abuse of a vulnerable adult may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter into a transaction (whether financial or sexual) to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.
- 4.3 Concerns about abuse may be raised and reported to the GSS Management as a result of a single incident or repeated incidents of abuse. However, for some clients the issues of abuse relate to neglect and poor standards of care. They are ongoing and if ignored may result in a severe deterioration in both physical and mental health and even death.
- 4.4 Anyone who has concerns about poor care standards and neglect in a care setting may raise these within the service, with the regulatory body and/or with a social services agency ensuring GSS Safeguarding Officer is also aware.
- 4.5 Where it is brought to our attention, concerns relating to a vulnerable adult or child living in their own home, with family or with informal carers they must be reported to a social services agency via the GSS Management Team. These reports must be addressed through

the adult protection process and a risk assessment must be undertaken to determine an appropriate response to reduce or remove the risk by the appropriate agencies concerned.

- 4.6 Anyone who has highlighted any form of Cyber security risk, breach of personal data or e-safety guidelines or abuse through electronic or remote means

#### **Who is included under the heading 'vulnerable adult and child'?**

- 4.7 An Adult (a person aged 18 or over), a child (a person under the age of 18) who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'. (*Definition from 'No Secrets' March 2000 Department of Health*)
- 4.8 This could include people with learning disabilities, mental health problems, older people and those with a physical disability or impairment. It is important to include people whose condition and subsequent vulnerability fluctuates. It may include an individual who may be vulnerable as a consequence of changes in their situation or personal circumstance.
- 4.9 It may also include victims of domestic abuse, hate crime and anti-social abuse behaviour. The persons' need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.
- 4.10 It is important to consider the meaning of 'Significant Harm'. The Law Commission, in its consultation document 'Who Decides,' issued in Dec 1997 suggested that; 'harm' must be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also 'the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development'.

#### **5. LEGAL FRAMEWORK**

- 5.1 Human Rights Act 1998, the Mental Capacity Act 2005 and Public Interest Disclosure Act 1998
- 5.2 (new) Data Protection Act 2018, General Data Protection Regulations (GDPR) 2018, Freedom of Information Act 2000, Safeguarding Vulnerable Groups Act 2006, Deprivation of Liberty Safeguards, Code of Practice 2008
- 5.3 The Mental Capacity Act 2005, covering England and Wales, provides a statutory framework for people who lack capacity to make decisions for themselves, or who have capacity and want to make preparations for a time when they may lack capacity in the future. It sets out who can take decisions, in which situations, and how they must go about this.
- 5.4 The Human Rights Act 1998 gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR).
- 5.5 The Public Interest Disclosure Act 1998 (PIDA) created a framework for whistle blowing across the private, public and voluntary sectors. The Act provides almost every individual in

the workplace with protection from victimisation where they raise genuine concerns about malpractice in accordance with the Act's provisions.

- 5.6 The General Data Protection Regulations 2018 (GDPR) created to provide higher levels of protection on individuals data, how this is stored, used and the rights of individuals over their information.

## 6. THE ROLE OF STAFF AND MANAGEMENT

- 6.1 All staff (including Associates, agency staff, temporary, remote face to face and contract) and Management working on behalf of the organisation have a duty to promote the welfare and safety of vulnerable adults and children.

- 6.2 Staff and management may receive disclosures of abuse and observe vulnerable adults and children who are at risk. This policy will enable staff to make informed and confident responses to specific adult and child protection issues.

### 6.3 PLAYING YOUR PART IN THE PREVENT STRATEGY

The Prevent Strategy is part of the Government's counter-terrorism strategy led by the Home Office. The Prevent agenda requires Training and Government organisations to work with the police to contribute to the prevention of terrorism.

The definition of 'vulnerable adult and child' has been widened to include individuals who might be at risk of being radicalised. These individuals should be identified and referred to the regional Prevent team contacts for appropriate advice and support. Where there are signs that someone has been or is being drawn into terrorism, radicalisation or extremism you must know where these individuals should be referred to locally for support.

The definition of these include

**Radicalisation** is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.

**Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological.

**Extremism** is vocal or active opposition to fundamental British Values, including democracy, the rule of law, Individual and mutual respect and tolerance of different beliefs.

GSS recommend the following actions:

#### **a. Observe**

Note factual signs and symptoms of potential or suspected radicalisation without alarming the individual

#### **b. Discuss**

Alert and discuss your concerns with your Manager (Sonia Benjamin-Leach or Richard Wood), or designated staff member depending on your working location.

#### **c. Act**

If appropriate, inform GSS's Prime contract Regional Prevent team and supply them with a copy of your recorded observations

When reporting information, reports should be restricted to

- the nature of the suspicious behaviour or concern
- facts which support the concerns.

#### **d. Confirm**

Confirm telephone notifications in writing by fax, email or letter within 48 hours. If you are using a non-secure method of communication, consider anonymising this notification.

You should receive confirmation of referral within one working day. If you have not heard back within three working days, contact again.

#### **e. Record**

Ensure that all observations, advice sought, received and actions taken are recorded and stored confidentially and separately from the customers file.

Further information can be accessed via

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/97976/pre-vent-strategy-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/pre-vent-strategy-review.pdf)

## **7. TYPES OF ABUSE**

- 7.1 Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.
- 7.2 Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it.
- 7.3 The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:
  - 7.3.1 Physical abuse - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
  - 7.3.2 Sexual abuse - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.
  - 7.3.3 Psychological abuse - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
  - 7.3.4 Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- 7.3.5 Neglect and acts of omission - including 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.
- 7.3.6 Discriminatory abuse - including race, sex, culture, religion, politics, that is based on a persons' disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.
- 7.3.7 E-Safety encompassing all internet technologies, remote working practices and electronic communications such as mobile phones, phone and video conference tools as well as other collaboration tools and personal publishing (*please also see GSS internet Policy*)
- 7.3.8 Forced Marriage & Honour-based violence – A forced marriage is one in which one or both spouses do not (or in the cases of some adults or children with learning or physical difficulties cannot) consent to the marriage and duress is involved.
- 7.3.9 The terms “Honour crime” or “honour based violence” embrace a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community.
- 7.3.10 Radicalisation - the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues or external partners if they have any concerns:
- Use of inappropriate language
  - Possession of violent extremist literature
  - Behavioural changes
  - The expression of extremist views
  - Advocating violent actions and means
  - Association with known extremists
  - Seeking to recruit others to an extremist ideology
- 7.3.11 Multiple forms of abuse - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.
- 7.3.12 If GSS Management Team/Trainers, tutors or staff has any significant concerns about a learner or individual beginning to support terrorism and/or violent extremism, they should discuss them with the nominated local police officer so they can be part of further work to address the issues.
- 7.3.13 GSS will work with Government organisations such as ‘Channel’ (an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour) if it suspects Learners or individuals are being drawn into radicalisation, acts or Terrorism or violence

## **8 PROCEDURE IN THE EVENT OF A DISCLOSURE**

- 8.1 It is important that vulnerable adults and children are protected from abuse. All complaints, allegations or suspicions must be taken seriously.
- 8.2 This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult or child has been abused.

- 8.3 Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.
- 8.4 A full record shall be made as soon as possible of the nature of the allegation and any other relevant information.
- 8.5 This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult or child who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.
- 8.6 For the avoidance of doubt GSS will deem any of the above perpetrated by GSS staff (including Associates, agency staff, temporary and contract) to constitute gross misconduct and as such will result in disciplinary action being taken against them.

## **9 RESPONDING TO AN ALLEGATION**

- 9.1 Any suspicion, allegation or incident of abuse must be reported to the Designated Adult Protection Lead, Safeguarding Officer or GSS Senior Manager on that working day where possible.
- 9.2 The nominated member of staff shall telephone and report the matter to the appropriate local adult social services duty social worker or child Protection or social worker, or in the case of referred JCP customers – their referral point. A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to GSS Management within 24 hours.

## **10 RESPONDING APPROPRIATELY TO AN ALLEGATION OF ABUSE**

- 10.1 In the event of an incident or disclosure:

### **DO**

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Listen
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your GSS Manager for Support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

## DON'T

- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic

10.2 It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional protection agencies, following a referral from the designated Vulnerable Adult or child Protection Officer.

## 11 CONFIDENTIALITY

11.1 Vulnerable adult and child protection raises issues of confidentiality which must be clearly understood by all.

11.2 All staff and Management have a professional responsibility to share relevant information about the protection of vulnerable adults or children with other professionals, particularly investigative agencies and adult and children social services.

11.3 Clear boundaries of confidentiality will be communicated to all.

11.4 All personal information regarding a vulnerable adult or child will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.

11.5 If an adult or child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult or child sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.

11.6 Within that context, the adult or child must, however, be assured that the matter will be disclosed only to people who need to know about it.

11.7 Where possible, consent must be obtained from the adult or child before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable person is the priority.

11.8 Where a disclosure has been made, staff must let the adult or child know the position regarding their role and what action they will have to take as a result.



11.9 Staff must assure the adult or child that they will keep them informed of any action to be taken and why. The persons' involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

11.10 This policy needs to be read in conjunction with other policies for the organisation including:

- GSS Confidentiality
- GSS Disciplinary and Grievance
- GSS General Data Protection Regulations
- GSS Slavery and Human trafficking statement
- GSS Lockdown Policy
- GSS E-safety policy

## **12 THE ROLE OF KEY INDIVIDUAL AGENCIES & OFFICER**

12.1 The role of the designated officer is to deal with all instances involving adult and child protection that rise within the organisation. They will respond to all vulnerable adult and child protection concerns and enquiries.

12.2 The designated Vulnerable Adult and Child Protection Lead for the organisation is Sonia Benjamin. Should you have any suspicions or concerns relating to Adult or child Protection, contact 0208 665 4294 or 0844 745 2001

### Role of Line Manager

12.3 The role of the line manager is to support the member of staff, trustee or volunteer involved with the incident and to ensure the correct procedures are followed.

12.4 The line manager could, if agreed with the staff member dealing with the incident, contact with the designated Adult or Child Protection Lead in the first instance.

12.5 The line manager must ensure that all staff within their team are familiar with the organisation's vulnerable adult or child protection procedures and ensure that all staff undertakes training, where appropriate.

### Borough Safeguarding Leads

GSS works with Borough safeguarding leads for the reporting and updating of information and for further information on your local Borough safeguarding Lead please speak to Sonia Benjamin

### Project Griffin

Project Griffin seeks to enlist the help and support of individuals and groups interested in maintaining the safety and security of buildings, business areas or neighbourhoods and encourage and enable members of the community to work in partnership with the police to deter and detect terrorist activity and crime.

## Training

- 12.6 Training will be provided, as appropriate, to ensure that staff are aware of these procedures. Specialist training will be provided for the member of staff with vulnerable adult or child protection responsibilities.
- 12.7 All staff involved in the delivery of GSS services where there may be a possibility of any type of interaction where vulnerable adults or children may be concerned will also undertake external Safeguarding training which will be updated and reviewed annually and will form part of individuals Continual Professional Development programmes.

## Complaints procedure

- 12.8 The organisation has a complaints procedure available to all staff and customers and can also be accessed via the GSS website at [www.globalsolutionservices.co.uk](http://www.globalsolutionservices.co.uk)

## Recruitment procedure

- 12.9 The organisation operates procedures that take account of the need to safeguard and promote the welfare of vulnerable adults and children, including arrangements for appropriate checks on new staff, (including Associates, agency staff, temporary and contract) where applicable.  
*Please also see GSS Safer Recruitment Policy*
- 12.10 All staff and those engaged to deliver services through GSS whether Face to face remote, temporary, permanent or contract will be subject to Enhanced DBS checks
- 12.11 GSS will work with the Independent Safeguarding Authority (ISA) to ensure that all staff are vetted and meet the requirements of all legislation for the delivery of our contracts and procedures with regards to safety of vulnerable adults and children

## Review

This policy will be reviewed and updated as necessary to reflect best practice, future amendments to the General Data protection Regulations (GDPR) May 2018, the Data protection act, Lone Workers policy, Slavery and Human Trafficking policy, E-safety, DBS statement and Safer recruitment.

Any breaches to the above could constitute gross misconduct and where found, individuals could be subject to disciplinary procedures accordingly.



Signed by Sonia Benjamin  
Director  
25.03.2020  
Updated v10

## Safeguarding Vulnerable Adults and Children Policy

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Initial cause for concern form which must be discussed with Line Manager/ Safeguarding Lead or Member of the Senior Management Team within 24 – 48 hours.

Date

Time

Name of individual cause for concern is about

Age (if known)

Address (if known)

Describe your concern and action taken

Observations to support cause for concern

Description and location of any visible marks, bruising etc

Name of alleged abuser, relationship with child (if known)

Name of person completing form:

Signature:

Date:

Name of Line Manager:

Signature:

Date:

Name of Safeguarding lead or Senior Manager

Signature:

Date: