

Code of Practice 22

Safeguarding Adults at Risk



Originated	May 2019
Reviewed and updated	June 2023
Due for Review:	2024

1. Purpose and Scope

Cumbria Wildlife Trust (CWT) is committed to safeguarding and promoting the welfare of all vulnerable adults engaged in the breadth of its activities. CWT acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse or neglect.

Definition (from The Care Act 2014): an **Adult at risk** (also referred to as vulnerable adults) is defined as any individual aged 18 and over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Our separate “Safeguarding Children and Young People” Code of Practice CP21 should be referred to for all safeguarding those aged under 18.

This code of practice applies to all staff, trustees, volunteers and anyone working on behalf of CWT.

The purposes of this code of practice:

- to protect vulnerable adults who receive CWT’s services.
- to provide staff and volunteers with the overarching principles that guide our approach to protecting vulnerable adults from abuse;
- to protect staff by having a clear framework, robust procedures and transparent reporting

We recognise that:

- the welfare of vulnerable adults involved in our services is paramount;

- all people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, marital status, pregnancy and maternity have the right to equal protection from all types of harm or abuse; Working in partnership with vulnerable adults, their carers and other agencies is essential in ensuring their welfare.

We will seek to keep vulnerable adults safe by:

- valuing them, listening to and respecting them;
- adopting a best practice approach to safeguarding through appropriate procedures and a code of conduct for staff and volunteers; and appointing a Designated Safeguarding Officer (DSO) and lead trustee with responsibility for oversight of the Trust's safeguarding procedures
- providing an effective management framework for staff and volunteers with appropriate supervision, support and training;
- ensuring all necessary checks are made when recruiting staff and volunteers in roles involving regular contact with vulnerable adults;
- working with other agencies within the framework of the Cumbria Safeguarding Adults Board policy and procedures, issued under the Care Act 2014 statutory guidance;
- acting within our confidentiality policy and usually gaining permission from service users before sharing information about them with another agency;
- informing service users that where a person is in danger or at risk, or a crime has been committed, then a decision may be taken to pass information to another agency without the service user's consent;
- making safeguarding referrals to the Cumbria Safeguarding Adults Board as appropriate;
- keeping up to date with national developments relating to preventing abuse and the welfare of adults.

2. Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect vulnerable adults, including Charity Commission Guidance and Cumbria Safeguarding Adults Board procedure (see www.cumbriasab.org.uk for information).

- General Data Protection Regulations, 2018
- Human Rights Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2004
- Special Educational needs and disability code of practice 2014
- The Care Act 2014

3. This code of practice includes six appendices:

- Role of the Designated Safeguarding Officer-Appendix A
- Safer recruitment, including our use of the Disclosure and Barring Service-Appendix B
- Reporting guidance for staff and volunteers-Appendix C
- Recognising the signs and symptoms of abuse-Appendix D
- Taking, storing and using images-Appendix E
- E-safety-Appendix F

This code operates in conjunction with our policies and procedures on:

- Recruitment
- Equal Opportunities including Recruitment of Ex-Offenders and Dignity at Work (covering issues including bullying and harassment)
- Complaints Procedure
- Data Protection
- Disciplinary
- Grievance
- Health and Safety
- Social Media (currently under development in 2018)
- Public Interest Disclosure (also known as 'whistleblowing')

4. Contact Details

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

If you are worried about a vulnerable adult but it is not an immediate risk – please contact the CWT Designated Safeguarding Officer for guidance. You can call Cumbria's Safeguarding Adults Board on the numbers below if DSO is unavailable.

Cumbria Safeguarding Adults Board – these numbers cover different areas in the county - see <http://www.cumbriasab.org.uk/sections/contactus.asp> for info.

0300 303 2704 (South Lakes & Furness) - out of hours 01228 526690

0300 303 3249 (Eden & Carlisle)

0300 303 3589 (Allerdale & Copeland)

Designated Safeguarding Officer (DSO)

Learning & Education Manager – Jamie Normington

Phone Number / email 01539 816226 jamien@cumbriawildlifetrust.org.uk

Deputy Designated Safeguarding Officer

HR Manager- Claire Shepherd

Phone number / email: 01539 816225 claires@cumbriawildlifetrust.org.uk

Out of hours

Plumgarths office 01539 816300 - Out of hours emergency number: 01539 816316

Trustee lead for safeguarding

Jane Wilson Tel: 01539 72267/email: janewilsonkendal00@gmail.com

Safeguarding 'Adults at Risk' Procedure

Cumbria Wildlife Trust endeavours to encourage vigilance and awareness of the issues surrounding the protection and safety of adults at risk. The Trust aims to create a culture in which suspicions or allegations can be made in good faith and without fear of reprisal.

We are committed to the welfare and safety of adults at risk in all our policies and procedures. We will monitor emerging legislation and best practice to ensure all necessary policies and procedural guidelines are appropriate, up to date, accessible and reflect national Safeguarding for Adults at Risk guidance. Appropriate risk management processes will be applied to all our contact with adults at risk.

To deliver effective safeguarding for adults at risk we will:

1. Keep procedural guidelines appropriate, up to date and accessible

- There will be a Designated Safeguarding Officer (DSO) supported by a Deputy Safeguarding Officer who will be responsible for dealing with any concerns about the protection or welfare of adults at risk (see **appendix A** for more details of the DSO role)
- The DSO will be trained to Level 3 standard either through the Cumbria Local Safeguarding Adults Board or other recognised provider and attend refresher training every 2 years
- We will appoint a Trustee with responsibility for keeping an overview of Safeguarding policy and review together with the DSO
- Safeguarding procedures will be reviewed on an ongoing basis and updated as necessary with new legislation. Our code of practice is reviewed every 5 years
- Our Safeguarding codes of practice and procedures will be available from Plumgarths Office and are currently stored on the CWT network folder at: [HEALTH & SAFETY POLICY & CODES](#).
- Our Safeguarding policy is available from Plumgarths Office and is currently stored on the CWT network folder at [TRUST POLICIES](#)

2. Ensure that all staff and volunteers are properly informed, supported, managed and trained

- All relevant staff and volunteers will be carefully selected and vetted to best ensure they do not pose a risk to vulnerable adults, as far as reasonably possible, including the taking up of two written references, and our provision of a clear role description and responsibilities
- All relevant staff & volunteers will be subject to a Disclosure and Barring Scheme (DBS) check (**see Appendix B**). DBS checks will be repeated where necessary, every 3 years or for those subscribing to the update service, annual updates carried out. (n.b. Cumbria Wildlife Trust does not currently need/use the update service)

- Safeguarding procedures will be covered in the standard new starters' induction programme
- All relevant staff & volunteers will receive the 'Reporting Guidance for Staff & Volunteers' (**appendix C**) and 'Recognising Signs and Symptoms of Abuse' (**appendix D**)
- All relevant staff and volunteers will need to complete or provide evidence of completing Level 1 safeguarding training/e-learning. This should be refreshed/repeated every 3 years.

3. Have clear processes for reporting and addressing any concerns or allegations relating to safeguarding adults at risk

- CWT will have in place clear, written processes for reporting, recording and addressing concerns or allegations relating to safeguarding adults at risk (**appendix C**)
- Where appropriate, any information given to users about the activities of the organisation will include information about the safeguarding policy and procedure
- There will be a clear system for reporting and processing allegations against staff and volunteers (**appendix C**).

4. Run safe activities for vulnerable adults

- All staff and volunteers involved in running an activity will have clear roles and responsibilities; this applies equally to 'external' staff or assistants attending with visiting groups
- Risk management for activities including vulnerable adults will recognise the specific needs of each group within risk assessments
- All appropriate staff and volunteers will be made aware of issues of particular vulnerability arising from an individual's background or abilities e.g. those facing barriers in communication or who are dependent on others for care
- All staff and volunteers will be suitably qualified and/or experienced to supervise and deliver the activities they undertake and will have access to the training/e-learning to regularly update their knowledge and practices.
- This policy will apply to any third party individual or organisation involved in delivering activities as part of a CWT event. We will check that they have appropriate experience and where relevant hold the appropriate qualifications and/or accreditation and insurance. If they are operating with any degree of autonomy i.e. not under the close supervision of CWT staff or volunteers, we should ensure that they have equivalent safeguarding procedures.
- All staff and volunteers that commission third parties/contractors to work with vulnerable adults, should ensure that they have appropriate experience and qualifications (including DBS if necessary) and should check and record evidence of this.

5. Store data and digital images appropriately

- All staff must use the standard CWT photography consent form when collecting children's data.
- All staff and appropriate volunteers to be aware of the guidelines on taking, storing and using images (**appendices E and F**)
- Carers must be made aware of how we use data and images
- Systems must be in place for the deletion of historical records or images, which ensures that information is only kept for as long as required/allowed.

APPENDIX A

The role of the Designated Safeguarding Officer

Cumbria Wildlife Trust has a designated member of staff to take responsibility for our safeguarding of adults at risk.

Designated Safeguarding Officer (DSO)

Learning & Education Manager – Jamie Normington

Phone Number/Email 01539 816226 jamien@cumbriawildlifetrust.org.uk

Deputy DSO

HR Manager- Claire Shepherd

Phone number/email 01539 816225 claires@cumbriawildlifetrust.org.uk

Out of hours

Our office is only staffed during weekday office hours. Outside these times, the switchboard (01539 816300) answerphone message provides an out of hours number.

The DSO must have attended Cumbria Safeguarding Board's Level 3 training; have a current Enhanced + Barred List DBS check and two references taken up.

The role includes:

- Ensuring the organisation's safeguarding policies and procedures are followed.
- Ensuring they know how to make contact with Cumbria Safeguarding Adults Board and the police who are responsible for dealing with safeguarding concerns both during and after office hours.
- Reporting any concerns to the Cumbria Safeguarding Adults Board or the police and the Trust's Chief Executive and/or Chair and/or Lead Trustee for Safeguarding (n.b. urgent concerns should be reported immediately by those aware of them, even if the designated person is not available).
- Acting as a source of advice on all safeguarding matters and seeking further advice and guidance from local statutory agencies as needed.
- CWT is committed to maintaining confidentiality wherever possible and information will be shared only with those who need to know. The DSO will ensure that a record is kept of any concerns about any adult at risk and of any conversation or referrals to statutory agencies. These records will be secure and comply with data protection.
- Reporting quarterly to the CWT Health & Safety committee any action taken, concerns recorded, or incidents. Also report when any 'new' situations may arise, such as a new area of work where safeguarding may need to be reviewed.
- Maintaining and regularly updating their safeguarding knowledge through relevant training, and refreshing Level 3 Safeguarding training every 2 years.
- Conducting regular audit activity to ensure the organisation is working in line with current practice.

APPENDIX B

Safer Recruitment – the Disclosure and Barring Service (DBS)

Certain posts (both paid & voluntary) within CWT are exempt from some provisions of the Rehabilitation of Offenders Act 1974 because they involve working with children or adults at risk. In these cases, the Trust is entitled to ask for details of all spent and unspent convictions. New roles are to be assessed by the DSO and HR as to whether they fall within this category.

Where the above applies, staff and volunteers will be required to submit personal details for the purpose of a Disclosure and Barring Service (DBS) check. Any offer of employment or confirmation of a voluntary role where the provisions apply will be subject to DBS clearance. CWT uses Disclosure Services to provide DBS checking.

The DBS helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It has three levels. CWT only uses the third level (detailed below), for roles that involve regular work with vulnerable groups, and the supervision of others involved in such work. Currently, this involves staff and volunteers who:

- Lead Wildlife Watch groups (Watch leaders/helpers)
- Lead educational sessions/visits (tutors/visitors)
- Lead projects that engage with vulnerable groups (project officers)
- Or deliver engagement work with vulnerable groups (various staff)

Key criteria for requiring any such check are explained in the ‘regulated activity’ section below. The three levels of DBS check are:

Standard checks – To be eligible for a standard level DBS check the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

Enhanced checks – To be eligible for an enhanced level DBS check, the position must be included in both the ROA Exceptions Order and in Police Act Regulations.

Enhanced checks with children’s and/or adults’ barred list check(s) – To be eligible to request a check of the children’s or adults’ barred lists, the position must meet the new definition of **regulated activity** (see next page/below for details). There are a small number of other positions for which you can also request list checks.

General

CWT implements the approved disclosure procedure for criminal record checking for all staff and volunteers who work regularly with children or adults at risk through the Disclosure and Barring Service.

In doing so, CWT will ensure that they comply fully with the DBS Code of Practice and its obligations under the General Data Protection Regulations and any other legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosures and Disclosure information. We require the applicant's consent before requesting this check.

The Trust will also ensure that it complies with any legislation relating to the Rehabilitation of Offenders Act 1974 and the Human Rights Act 1998.

Definition of 'Regulated Activity'

CWT will work within the definition of working with children and vulnerable adults as defined in the Safeguarding Vulnerable Groups (SVG) Act 2006 and the Protection of Freedoms Act 2012. The Protection of Freedoms Act 2012 repealed previous legislation which labelled adults as vulnerable because of their personal characteristics or circumstances. It focused instead on the types of activities which might render someone vulnerable – e.g. provision of health care or personal care.

Regulated activity is work a barred person cannot do. For CWT, this is principally our educational work – “teach, train, instruct, care for or supervise children” carried out by community engagement staff and volunteers.

However in terms of adults with learning difficulties or mental health issues, for example, encountered through our wellbeing and volunteering work, the definitions of regulated activity need to be considered carefully.

Providing Personal Care

- Anyone who provides an adult with physical assistance with eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails because of the adult's age, illness or disability, is engaged in **regulated activity**
- Anyone who prompts and then supervises an adult who, because of their age, illness or disability, cannot make the decision to eat or drink, go to the toilet, wash or bathe, get dressed or care for their mouth, skin, hair or nails without that prompting and supervision, is engaged in **regulated activity**
- Anyone who trains, instructs or provides advice or guidance which relates to eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails to adults who need it because of their age, illness or disability, is engaged in **regulated activity**
- **There is one exception to this** - any physical assistance provided to an adult in relation to their hair care when that assistance relates only to the cutting of the adult's hair

Assistance with general household matters

Anyone who provides day to day assistance to an adult because of their age, illness or disability, where that assistance includes at least one of the following three tasks, is engaged in **regulated activity**:

- managing the person's cash,
- paying the person's bills, or
- shopping on their behalf.

Conveying

- Any drivers and any assistants who transport an adult because of their age, illness or disability to or from places where they have received, or will be receiving, health care, relevant personal care or relevant social work, are engaged in **regulated activity**. The driver does, or the person assists in, such conveying on behalf of an organisation and for the purpose of enabling the adult to receive services. The meaning of health care, relevant personal care and relevant social work are discussed above
- Because of their age, illness or disability to or from places where they have received, or will be receiving, health care, relevant personal care or relevant social work, are also engaged in a **regulated activity**
- Conveying does not include licensed taxi drivers or licensed private hire drivers, and does not include trips taken for purposes other than to receive health care, personal care or social work (e.g. trips for pleasure are excluded)

In order for such activity to be classed as **regulated activity**, and therefore a legitimate DBS check, each activity must be carried out on a regular basis – at least weekly, or four times within a four week period, or if it involves an overnight stay. It must also be unsupervised, or without a reasonable amount of supervision.

CWT will assess whether any work with adults at risk falls into one of the above **regulated activity** categories. It will also review when working with people with mental health challenges as to whether work is therapeutic and could then be seen to be some form of “health care...the provision of psychotherapy and counselling under the direction or supervision of a health care professional”. Advice will be sought as necessary from Disclosure and Barring Services.

CWT staff and volunteers also need to be aware that individuals may be vulnerable to abuse in other settings, which they may disclose to us during the course of our work.

Enhanced Disclosures

Enhanced disclosures will be sought for the following:

- All staff and volunteers providing '**regulated activity**' to vulnerable adults
- All staff and volunteers leading activities for vulnerable adults as agreed with, and on behalf of CWT, unsupervised at least weekly, four times in a thirty day period or overnight
- Roles providing day to day management or supervision on a regular basis of any person providing activities which would be regulated, if unsupervised

Any potential volunteer engaging with adults at risk will be able to "shadow" a previously checked member of staff until their disclosure has been completed.

DBS checks do not have an expiry date – they show a person's status at the time of application. Individuals can now choose to join the 'DBS Update Service', which allows them to reuse their DBS check for similar positions at their own cost. CWT does not currently use this update service, preferring to carry out role-specific DBS checks instead, to ensure the correct level of check is carried out.

All new staff and volunteers working with children or vulnerable adults will be supervised by an experienced member of staff during their probation period, and/or at any point thereafter, to observe standards and behaviour.

System for Enhanced DBS checks

Before the recruitment of any staff or volunteer, the HR officer and the relevant manager will assess whether the role requires Enhanced Disclosure in liaison with the Designated Safeguarding Officer and ensure the necessity for Enhanced Disclosure is put in the role description and any recruitment advertising.

After the post is offered the individual will be asked to provide the identity information required and complete a DBS check, the results of which are sent to the individual along with their certificate. A digital copy of the result (n.b. not the actual DBS certificate) is sent to the Trust. The individual's reference number & result are kept securely recorded within the Disclosure Services website and will be noted on individual staff files.

If anything is flagged via the DBS check, the Designated Safeguarding Officer will be informed that something is recorded and must be discussed with the applicant in order to gain full details with their express consent.

This information will be shared with the HR officer, relevant line manager and CEO. A decision will be made about whether an individual should be allowed to work / volunteer in that role, or be considered for an alternative role. The final decision will be recorded on the relevant staff/volunteer file.

After completing this DBS checking process, a copy of the Disclosure result is received by Cumbria Wildlife Trust. In the event of anything appearing on the check, a copy of the actual Disclosure form may be kept securely for up to 6 months, if deemed necessary.

If a member of staff or volunteer is found guilty by a court of law, of perpetrating abuse, Cumbria Wildlife Trust has the responsibility to inform DBS within one month of their conviction. This should be carried out by the HR officer and Designated Safeguarding Officer.

APPENDIX C

Reporting Guidance for Staff and Volunteers

CWT believes that everyone has a responsibility to safeguard adults at risk from harm. Please read this guidance carefully. It will tell you what you need to know to safeguard adults at risk. All staff and volunteers are expected to follow this guidance.

The Designated Safeguarding Officers' details are listed below. If you have any queries around the welfare of any vulnerable adult please contact them to discuss your concerns.

Contact Details

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

If you are worried about a vulnerable adult but it is not an immediate risk – please contact the CWT Designated Safeguarding Officer for guidance. You can call Cumbria's Safeguarding Adults Board on the numbers below if DSO is unavailable.

Cumbria Safeguarding Adults Board – these numbers cover different areas in the county - see <http://www.cumbriasab.org.uk/sections/contactus.asp> for info.

0300 303 2704 (South Lakes & Furness) - out of hours 01228 526690

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Designated Safeguarding Officer (DSO)

Learning & Education Manager – Jamie Normington

Phone Number/Email 01539 816226 jamien@cumbriawildlifetrust.org.uk

Deputy Designated Safeguarding Officer:

HR Manager - Claire Shepherd

Phone number / email: 01539 816225 claires@cumbriawildlifetrust.org.uk

Out of hours

Any issues will usually be dealt with during office hours on weekdays

Phone Number – Plumgarths Office 01539 816300

Out of hours emergency number: 01539 816316

Trustee lead for safeguarding

Jane Wilson

Phone Number/Email 01539 722671 janewilsonkendal00@gmail.com

Managing a Disclosure or Suspicion of Abuse

If a vulnerable person discloses that they are being abused or any service user discloses that they are involved in abuse of a vulnerable person, action must proceed urgently and without delay.

There may be circumstances when a volunteer or member of staff suspects that a vulnerable adult is being abused or neglected. It is vital that anyone who suspects this is the case discuss the situation immediately with the Designated Safeguarding Officer or their manager.

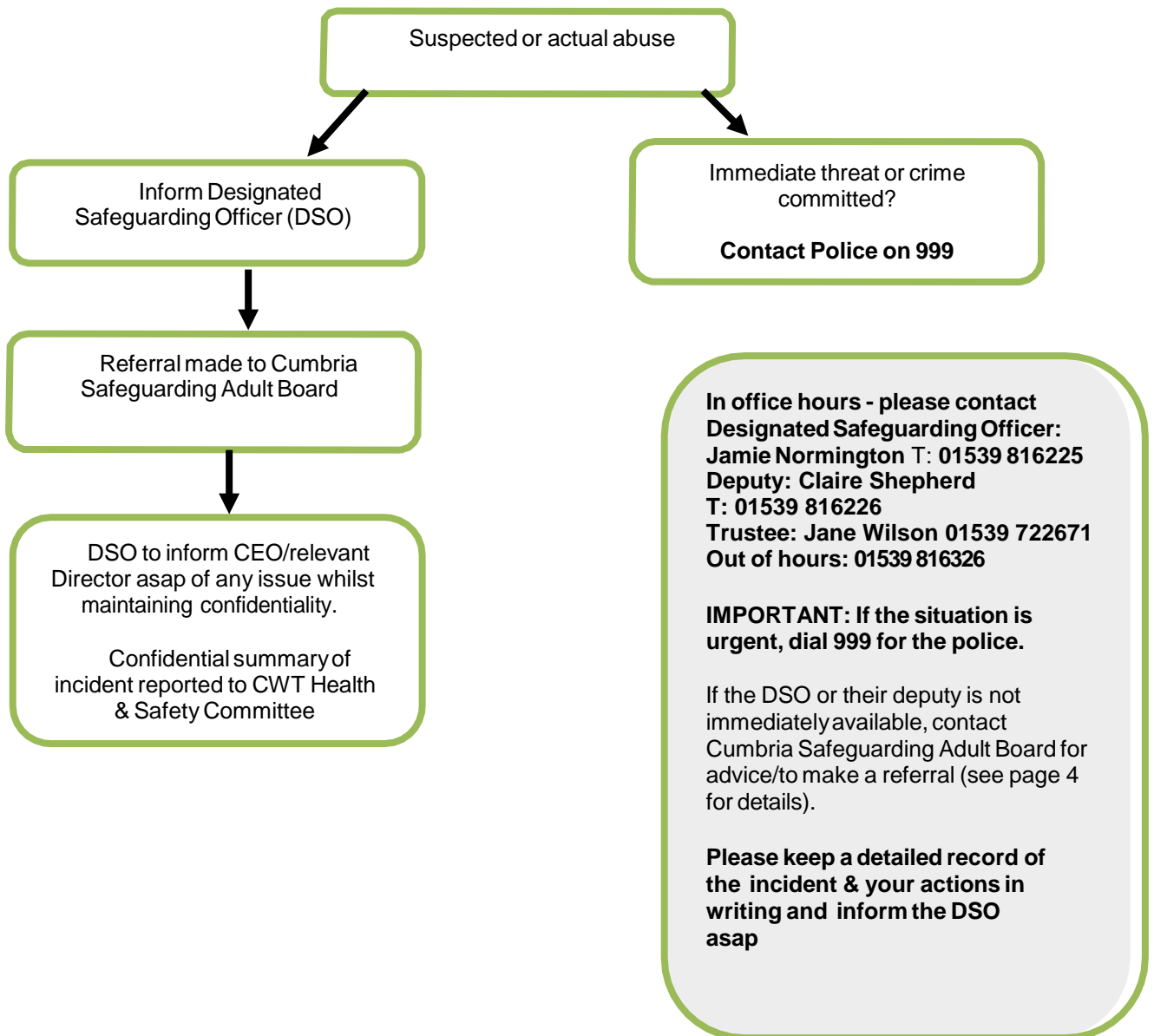
All staff and volunteers must inform the Designated Safeguarding Officer if they are:

- Charged with a criminal offence involving a vulnerable adult, violence, breach of trust or a criminal offence relevant to their duties, e.g. a driving offence if they drive as part of their duties.
- Investigated by any authority due to concerns that they may have had involvement in causing harm to a vulnerable adult.
- Diagnosed with any medical condition that may affect their ability to carry out a role of supervising vulnerable adults safely, for example, psychotic illness.

What to do when abuse is disclosed by an Adult at Risk:

Do	Don't
Listen carefully, stay calm and make notes of what they say using their own words.	Question, put pressure on the person for more details, start your own investigation or take photographs.
Be aware that medical evidence may be needed	Act in a way that may prevent the person talking about the abuse in future
Reassure the person that the information will be treated seriously.	Promise to keep secrets
Help the person to understand that whatever has happened is not their fault	Make any promises that you may not be able to keep (e.g. 'It won't happen again')
Explain the referral process and that others will need to be made aware	Question the alleged abuser.
Explain that the matter will have to be referred on even if they do not consent but that their wishes will be made clear if this happens.	Agree not to refer because the Vulnerable Adult withholds consent
Make the referral immediately	Wait to discuss with colleagues or gather more information
Always record in writing concerns about a vulnerable adult's welfare, whether or not further action is taken	
Additionally, all action taken following a disclosure of abuse should be discussed with the Designated Safeguarding Officer (but the referral should not be delayed if you do not get the opportunity to discuss first)	

Action to take when abuse is suspected and/or disclosed by an Adult at Risk



It is important for staff and volunteers to make written records of any incidents or concerns that they have as soon as possible and if appropriate to include sketches (**NOT photos**) of sites and sizes of injuries without inspecting/investigating beyond that which can be viewed in plain sight.

It is also important to make a record of conversations with the vulnerable person using the same language the vulnerable person used - especially any names used for body parts or sexual acts.

Full written records must be maintained of all disclosures and actions following disclosure.

If you have had to make an emergency referral, tell the Designated Safeguarding Officer as soon as possible. They should follow up and take further advice if they think the action the Cumbria Safeguarding Adult Board takes, leaves the vulnerable adult in danger.

Support to Staff and Volunteers

If Social Services need further involvement from staff or volunteers following a report of abuse, a member of the management team will discuss with the Social Services department the nature of their needs and how they might be met.

Allegation of Abuse made against a staff member or volunteer

Staff and volunteers may be subject to abuse allegations. CWT will ensure that any allegations made against members of staff or volunteers will be dealt with swiftly.

CWT will offer support to staff in these circumstances, but Social Services will need to be assisted in their investigation and the disciplinary procedure may be implemented (please **see appendix G of CP21** for more details).

Where a member of staff/volunteer is thought to have committed a criminal offence the Police will be informed. If a crime has been witnessed the Police should be contacted immediately.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The line manager, HR officer and Designated Safeguarding Officer will liaise with the Cumbria Safeguarding Adult Board to discuss the best course of action and to ensure that the Trust's disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

APPENDIX D

Recognising the signs and symptoms of abuse

CWT is committed to ensuring that all managers, staff and volunteers who have frequent face to face contact with others undertake training to gain a basic awareness of the signs and symptoms of abuse.

All appropriate staff and volunteers will be asked to complete the appropriate training/e-learning modules. This training will be recorded on your employee file and should be repeated every 3* years (*2 years for Level 3/Designated Safeguarding Officer).

CWT will not be limited in its view of what constitutes abuse or neglect, as they can take many forms and the circumstances of an individual case will always be considered.

Types of Abuse include:

- **Discrimination**

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

- **Domestic abuse or violence**

Including an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been, an intimate partner or family member regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual, financial abuse; so called 'honour' based violence, forced marriage or Female Genital Mutilation (FGM).

- **Financial or material**

Including theft, fraud, internet scamming, exploitation, 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.

- **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.

- **Neglect and acts of omission**

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

- **Organisational/Institutional**

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in a person's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

- **Physical**

Including assault, hitting, slapping, pushing, burning, misuse of medication, restraint or inappropriate physical sanctions.

- **Psychological (sometimes referred to as emotional)**

Including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

- **Sexual**

Including rape, indecent exposure, sexual assault, sexual acts, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts to which the adult has not consented or was pressured into consenting.

It also includes sexual exploitation which may include situations, contexts and relationships where the person receives "something" (e.g. food, accommodation, drugs, alcohol, mobile phones, cigarettes, gifts, money) or a perceived friendship/relationship based on them or others performing sexual acts.

- **Self-neglect**

Includes a person neglecting to care for their personal hygiene, health or surroundings; or an inability to provide essential food, clothing, shelter or medical care necessary to maintain their physical and mental health, emotional wellbeing and general safety. It includes behaviour such as hoarding.

Abuse may be carried out deliberately (commission) or unknowingly (omission) and it may be a single act or repeated acts.

People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

Responsibilities of Staff and Volunteers

Staff and volunteers have a responsibility to be aware and alert to signs that all is not well with a vulnerable person. However, they are not responsible for diagnosing, investigating or providing a therapeutic response to abuse.

APPENDIX E

Taking, Storing and Using Images

It is important to be aware of safeguarding issues when considering photos and videos. We use images of children and adults in our publications, websites and social networking sites. As an organisation, we must ensure that appropriate measures are taken to ensure the privacy and dignity of the subjects of images taken at Cumbria Wildlife Trust events. **Our current consent form follows below.**

Everyone must be consulted about taking their photograph. This ensures that they are aware that the image is being taken and understand how it is going to be used.

- Photographs and video can only be used by the Trust in the support of its work where consent is given.
- Photographs and consent forms will be kept in a locked cabinet and stored securely on the Trust's network as appropriate. Photos must be deleted from the Trust's cameras/smart phones once uploaded.
- No personal use of images taken on behalf of Cumbria Wildlife Trust is permitted.
- Parents, carers and partner or client organisations must be made aware of this photography policy.

The term child also covers vulnerable adults below:

- DO use a parental/school permission form to obtain written consent for a child to be photographed and videoed, and for the subsequent use of those images by the Trust, including online
- DO obtain the child's and a parent's permission to use their image
- DO ensure images of children in suitable clothing/poses only to reduce the risk of inappropriate use
- DO state written expectations of professional photographers or the press who are invited to an event. These should make clear the organisation's expectations of them in relation to child protection.

- DO NOT use images where the child could be identified or use children's full names in photograph captions or text
- DO NOT allow photographers unsupervised access to children
- DO NOT approve photography sessions outside the event
- DO NOT use any personal equipment to take photos and recordings of children and use only cameras or devices belonging to the Trust.

Where schools or groups have their own consent for photos, a copy of this consent form could be requested and when received (ideally ahead of the visit) can be saved with the photos in place of individual consent forms. If this consent form is not received by the beginning of the visit, photos should not be taken unless individual parental consent forms are filled in or an equivalent group consent form is obtained from their leader.

Photography Consent Form

Cumbria Wildlife Trust produces a wide range of materials to tell people about our nature reserves, Cumbrian wildlife and to raise money for our work or report to our funders. From time to time, we take photographic images (moving and still) of subjects to use in these materials. By completing this form, you consent to our use of these images in printed and digital materials which reasonably promote or advertise Cumbria Wildlife Trust's aims. This may include, but is not limited to, **printed publications** such as; adverts, newsletters, leaflets, reports etc.; **audiovisual** and **digital** materials such as; films, websites, online publications and social media; **display** materials and any other media we may use in the future.

The copyright of any material which is generated as a result of this photographic session shall be assigned and shall be the property of Cumbria Wildlife Trust. Your consent will remain valid until you advise us otherwise. You can do this by calling our main office on 01539 816300 and asking to speak to the staff member responsible for safeguarding.

Event:

Date:

I hereby grant Cumbria Wildlife Trust the right to use any photograph(s) or video content taken of me / my child and any reproductions or adaptations of the photograph(s) and video(s) for all general purposes in relation to Cumbria Wildlife Trust's work including, the right to use them in any publicity materials and in all forms of digital media.

Name:	Over 18 years: Yes / No
Signature:	Parent/guardian name: (subjects under 18 years)
Address:	Tel:
Email:	Date:

Name:	Over 18 years: Yes / No
Signature:	Parent/guardian name: (subjects under 18 years)
Address:	Tel:
Email:	Date:

Name:	Over 18 years: Yes / No
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Email:		Date:

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Address:		Tel:
Email:		Date:

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Signature:	Parent/guardian name: (subjects under 18 years)	
Address:		Tel:
Email:		Date:

Name:		Over 18 years: Yes / No
Signature:	Parent/guardian name: (subjects under 18 years)	
Address:		Tel:
Email:		Date:

Name:		Over 18 years: Yes / No
Signature:	Parent/guardian name: (subjects under 18 years)	
Address:		Tel:
Email:		Date:

APPENDIX F

E-safety and social media

Social media including sites such as Facebook, Twitter, What's App, blogs, instant messaging and photo and video exchange sites provide an opportunity to connect with people. It is important to make the most of networking sites, whilst safeguarding children, young people and vulnerable adults.

- Make sure that you are aware of the way individual social media services operate and the potential safeguarding implications before setting up a presence.
- Ensure that those managing your social media understand online safeguarding issues, including warning signs of grooming and sexual exploitation.
- Be aware that social networking services usually have a minimum requirement age of 13
- Consider using models or illustrations to promote an activity
- Avoid taking personal details of children and young people
- If a child or vulnerable adult is named, **do not use their image**
- If an image is used, **do not name** the child or vulnerable adult
- Obtain a parent's written consent to use photographs/videos on web sites
- Images showing identifiable children and young people under the age of 18 and vulnerable adults must be avoided due to the potential for misuse e.g.:
 - the tagging of children and young people and vulnerable adults, thus identifying them at a location and allowing the opportunity for abusers to identify and locate them on social networking sites
 - the morphing of the image
 - personal intimidation by posting derogatory, abusive and threatening comments
 - cyber-bullying

For the above reasons and the potential to post inappropriate images and live incidents that occur, e.g. bullying, special care should be taken regarding allowing any users to upload their own images on the Trust's website or any Trust social networking sites.

Cumbria Wildlife Trust is currently developing a specific Social Media code of practice that will support and complement our existing procedures.