

Safeguarding Adults Policy

Policy Aims

Healthywork Ltd has a commitment to ensure that all their own associates have a clear understanding of what constitutes the abuse of adults at risk.

The Health and Social Care Act 2008 sets outcomes (Regulation 13) for all CQC registered services, giving them a responsibility to safeguard all adults who use services from abuse and improper treatment. We have adopted these guidelines.

Healthywork Ltd believes that everyone has the basic human right to live a life based on fairness, respect, equality, dignity, and autonomy and we aim to promote these values throughout our work.

An adult at risk is defined as a person aged 18 or over.....

“ who is, or may be, in need of 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” (Care Act 2014).’

Safeguarding Lead

This policy lies at the heart of Healthywork Ltd and is integral to our aims, ethos and values.

The Safeguarding Lead for Healthywork Ltd is Alison Biggs, Director.

Tel: 07958 502363

Email: alison@healthywork.org.uk

Local Authority Information

Watford Borough Council

T: 0300 123 4042

Out of hours calls on the same number 01273 295555

Online to report a safeguarding concern -

<https://hcsportal.hertfordshire.gov.uk/web/portal/pages/SAFA#hInstructions>

We provide our services to clients throughout the UK. Watford Borough Council is our local authority.

In emergency call 999 for the police.

This policy will be provided to all team members and clients for information.

Legal and Statutory Guidance Framework for this Policy

- Care Act 2014
- Care & Support Statutory Guidance, issued under the Care Act 2014
- Human Rights Act 1998
- Equality Act 2010
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part 3) (as amended)
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards (DoLS)
- Domestic Abuse Act 2021
- Health and Care Act 2022
- Prevent Duty (Counter-Terrorism and Security Act 2015)
- Public Interest Disclosure Act 1998 (in reference to whistleblowing)
- UK GDPR and Data Protection Act 2018

Policy and Procedure

Abuse may be a one-off incident, or a series of incidents over a period of time. Sometimes this may be intentional, or due to poor practice and unsafe ways of working which puts the client at risk.

To understand how to protect adults at risk, all team members need to be aware of how different forms of abuse can manifest and accept the fact that anyone can be an abuser.

Preventing Abuse

All team members/associates have a personal responsibility to safeguard adults at risk and to act without delay if they are worried about abuse or neglect. Safeguarding responsibilities, including recognising different types of abuse and how to report concerns, are covered in induction, mandatory training and regular supervision.

Healthywork Ltd follows the safeguarding adult procedures issued by the Local Authority Safeguarding Adults Board and works in partnership with statutory agencies to prevent, identify and respond to abuse.

Team members are expected to work in a way that promotes people's rights, dignity, choice and control, and to raise any concerns about poor practice, discrimination or closed cultures through supervision, incident reporting, complaints or whistleblowing routes.

Information about what abuse is, how to raise a concern, and how to contact the Local Authority and CQC is provided in accessible formats where required.

Types of Abuse (in line with the Care Act 2014)

Healthywork Ltd recognises and responds to all forms of abuse as defined within the Care Act 2014. Abuse may be a single act or repeated acts and can occur in any setting.

The following categories of abuse are recognised:

1. **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
2. **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate touching, or any sexual activity to which the person has not consented or lacks the capacity to consent.
3. **Psychological or emotional abuse** – including verbal abuse, threats of harm, coercion, controlling behaviour, humiliation, intimidation, isolation or withdrawal of services.
4. **Financial or material abuse** – including theft, fraud, exploitation, misuse of benefits, pressure in connection with wills, property or inheritance.
5. **Neglect and acts of omission** – including ignoring medical or physical care needs, failure to provide access to appropriate services, or withholding necessities such as medication, nutrition, or heating.
6. **Discriminatory abuse** – including harassment, slurs or unfair treatment based on protected characteristics such as age, disability, gender, race, religion or sexual orientation.
7. **Organisational abuse** – including poor care practice, neglect within a service setting, or failure to provide appropriate care due to systemic issues or poor leadership.
8. **Domestic abuse** – including psychological, physical, sexual, financial or emotional abuse by a partner, family member or close associate, including coercive and controlling behaviour.
9. **Modern slavery** – including human trafficking, forced labour, domestic servitude and exploitation where individuals are controlled or coerced.
10. **Self-neglect** – including neglect of personal hygiene, health, or surroundings, and behaviours such as hoarding.

Responding to Safeguarding Concerns

It is the responsibility of all associates working directly or indirectly for Healthywork Ltd to report suspected, alleged or actual abuse or neglect, including concerns involving:

- Adults at risk
- Team members/associates
- Commissioned care providers
- Personal assistants
- Family members or friends
- Any other person
- Children or minors in the household (where relevant)

Raising a Safeguarding Concern

Healthywork Ltd encourages an open and transparent culture where safeguarding concerns can be raised by anyone.

Concerns about abuse or neglect may be raised by:

- Team members/associates
- Service users
- Family members or carers
- Health and social care professionals
- Members of the public

Concerns can be raised in the following ways:

- To any associate of Healthywork Ltd
- Directly to Alison Biggs, Director
- By telephone, email, or in writing
- Through the company's complaints or whistleblowing procedures
- Directly to external agencies where appropriate

All concerns will be:

- Taken seriously
- Responded to promptly
- Treated sensitively and confidentially

No individual will be disadvantaged or treated unfairly for raising a genuine safeguarding concern. Healthywork Ltd promotes an open culture and operates a zero-tolerance approach to victimisation or retaliation.

Where appropriate, individuals will be supported to raise concerns and provided with information in accessible formats to meet their communication needs.

Reporting Safeguarding Concerns

Any member of the team who knows of or believes that abuse of an adult at risk is occurring has an obligation to report it as quickly as possible to Alison Biggs within Healthywork Ltd or direct to the Police or appropriate local Social Care Adult Safeguarding Team / Contact team.

Failure to report abuse could be seen as collusion and may be subject to disciplinary proceedings.

Healthywork Ltd recognises that it is not always easy to make allegations of abuse, however the well-being of your client must remain paramount.

Procedure Following a Safeguarding Concern

Once a safeguarding concern has been raised, Healthywork Ltd will take the following actions:

1. **Ensure Immediate Safety**
The safety and wellbeing of the individual is the priority. Immediate action will be taken to remove or reduce any risk.
2. **Seek Emergency Assistance if Required**
If there is immediate danger or a serious crime has occurred, emergency services will be contacted by dialling 999.
3. **Report Internally**
All concerns must be reported without delay to Alison Biggs, Director or the most senior person available.
4. **Record the Concern**
A clear, factual, and contemporaneous record will be made, including what was seen, heard, or disclosed.
5. **Initial Risk Assessment**
Alison Biggs, Director will assess the level of risk and determine immediate protective actions. Where the adult has capacity, their wishes and feelings will be considered when determining immediate actions, in line with the Mental Capacity Act 2005.

6. Referral to External Agencies

Where required, a safeguarding referral will be made to the relevant Local Authority Safeguarding Adults Team in accordance with statutory guidance under the Care Act 2014.

7. Preserve Evidence

Care will be taken not to contaminate or interfere with any potential evidence.

8. Support the Individual

The person affected will be supported in a person-centred manner, ensuring their wishes and feelings are considered.

9. Cooperate with Investigations

Healthywork Ltd will work in partnership with external agencies and fully cooperate with any safeguarding enquiries.

10. Maintain Confidentiality

Information will only be shared on a need-to-know basis, in line with data protection and safeguarding requirements.

11. Review and Learn

Following any safeguarding concern, the incident will be reviewed to identify learning, improve practice, and prevent recurrence.

Consent and Safeguarding Adults

Consent is a key consideration in safeguarding adults. Healthywork Ltd recognises that adults have the right to make their own decisions, including the right to refuse intervention, where they have mental capacity to do so.

Where a safeguarding concern is identified, Healthywork associates must report this immediately to Alison Biggs. Alison Biggs is responsible for assessing the concern and determining whether a safeguarding referral should be made to the Local Authority.

In line with the Care Act 2014, where an adult has capacity, their consent will be sought before making a safeguarding referral. However, a referral may still be made without consent where:

- There is a risk to other individuals
- A serious crime has been committed
- The individual is at significant risk of harm
- Team members are concerned about coercion or undue influence

Capacity must be assessed in line with the Mental Capacity Act 2005.

Where a person lacks capacity, decisions must be made in their best interests.

All safeguarding concerns will be managed in line with local safeguarding procedures, ensuring that the individual's safety, wellbeing, and rights remain central to all actions taken.

Confidentiality and Data Protection

In view of the sensitive and confidential nature of our work and the information that we collect and hold about our clients and other stakeholders, this policy must be read alongside Healthywork Ltd's policies on UK GDPR.

Concerns about data protection should not prevent the sharing of information for the purposes of safeguarding.

Action in Emergency Situations

If the situation is an emergency, with an adult in immediate danger, the individual who observes this must take urgent action to intervene and assist the person to a place of safety and call 999 for emergency assistance as soon as possible. They should give any necessary first aid (within their capabilities) and contact appropriate emergency services. If the abuser remains present, team members should seek to calm the situation.

It is important to remember that team members have a right to avoid placing themselves at risk of violence or other harm. Every effort should be made not to interfere with any evidence or question those present as this may compromise any criminal investigation.

Guidance on the Reporting of alleged Incidents of Abuse or Poor Practice

To observe the principles of good practice, written records must include the following:

- What happened? Report facts, direct observations, and actual conversations only.
- Where did it happen? State the location and approximate time of the incident.
- When did it happen? State the date and approximate time of the incident
- Who was present? State the names/contact details of any witnesses (e.g. colleague, family member or member of the public)

Dos and Don'ts:

- **Do** use plain language not jargon
- **Do** use legible handwriting
- **Do** use Healthywork Ltd's Incident / Accident Report form
- **Do not** give opinions or judgements
- **Do** ensure timely reporting

Team members/associates should write a clear, objective account of any safeguarding concern or incident they become aware of and share this with their Line Manager as soon as possible.

External Reporting and Cooperation

Healthywork Ltd will:

- Work with Local Authority Safeguarding Teams
- Cooperate fully with Police and statutory investigations

Ongoing Cooperation with Statutory Services in Adult Safeguarding Investigations and Processes.

Healthywork Ltd will work in partnership with other statutory services to ensure the ongoing safeguarding of any adult referred. This should be done in an open and transparent way and liaison will be needed with the commissioner of the service to ensure they understand the need for and costs of an any ongoing role.

Where referrals are made to the statutory services it is important that Healthywork Ltd make regular follow ups to ensure that they are aware of any ongoing involvement from statutory services and the outcome.

Action to be taken in the Absence of a Statutory Investigation

In instances where an investigation by the Social Services and/or Police against a Healthywork Ltd team member does not proceed with their work. Liaison should take place with Alison Biggs as to how they wish to proceed. This may then lead to an internal investigation. All involved should keep the situation under review in case it becomes possible or necessary to re-refer to statutory services. Healthywork Ltd will follow statutory obligations and where necessary, report team members to the Disclosure and Barring Service as per current government guidance/procedures.

Additional Procedural Issues

Healthywork Ltd will comply with the Health and Social Care Act 2008 requirements to protect all clients from abuse, exploitation, and neglect and self-harm by ensuring that:

- All new associates complete an Enhanced DBS check.
- All new associates will, prior to employment, provide a full employment history/CV, photographic ID and satisfy us as to their fitness to work with adults at risk.
- A session on the protection of adults is to be completed by all associates (self-employed, so completed by their own arrangement and evidence provided). They must also ensure that training will be updated regularly according to national guidance.
- Team members/associates supervision includes safeguarding awareness. All associates are aware that they have a duty to reinforce protection issues during support team meetings and individual supervision sessions.
- Healthywork Ltd will ensure that appropriate incident and safeguarding reporting processes are in place and that concerns raised by team members/associates or other stakeholders are recorded and acted upon.

Referral to the Disclosure and Barring Service / Professional Bodies

Where the incident has been perpetrated by a member of the team/an associate at Healthywork Ltd, consideration will need to be given at the conclusion of the investigation of whether this meets the threshold to make a referral to the Disclosure and Barring Service (DBS).

Where concerns relate to individuals who are not employed by Healthywork Ltd, including associates or other professionals involved in the services provided by Healthywork Ltd, Alison Biggs will share relevant information with the appropriate employer, commissioning body, or safeguarding authority to ensure that appropriate action is taken.

Where a team member or professional holds a professional registration, consideration will also be given as to whether a referral to the relevant professional body is required.

In all cases, if there is any doubt about whether a referral is required, advice will be sought from the appropriate authority.

Restrictive Practice and Use of Physical Intervention

Healthywork Ltd is committed to a least restrictive approach to support and care. The use of any form of restrictive practice or physical intervention will only be considered where it is necessary to prevent immediate harm to the individual or others.

Restrictive interventions will:

- Only be used as a **last resort**
- Be **proportionate and reasonable** to the level of risk
- Be used for the **shortest possible duration**
- Never be used as a form of punishment or to enforce compliance

Healthywork Ltd does not deliver hands-on care or physical interventions. However, team members are expected to understand the principles of de-escalation, risk management, and restrictive practice in order to appropriately coordinate, monitor, and respond to risks identified within care arrangements.

Where behaviour-related risks are identified, Healthywork Ltd will support team members to consider appropriate positive, person-centred approaches to reduce escalation and improve outcomes. Where relevant to the individual's needs, this may include behaviour support planning approaches.

Healthywork Ltd do not support individuals with autism or learning disabilities, the need for restrictive practice is expected to be extremely rare and would only arise in emergency situations where there is immediate risk of harm.

Team members must ensure that all actions are consistent with the Mental Capacity Act 2005 and best interest principles where applicable.

Where restrictions may amount to a deprivation of liberty, , Healthywork Ltd will act in accordance with the Mental Capacity Act 2005 and the Deprivation of Liberty Safeguards (DoLS), ensuring appropriate legal authorisation is in place.

Procedures:

Managing Restrictive Physical Intervention

Where there is any risk that restrictive practice may be required, Healthywork Ltd will ensure that all actions are guided by necessity, proportionality, least restriction, and respect for human rights. In case management settings, the use of restrictive physical intervention is expected to be extremely rare and only ever in emergency situations.

1. Assessment (Risk Identification and Planning)

Where relevant, team members will be aware of any known risks recorded in care plans or risk assessments. This may include:

- Any known triggers of distress or escalation
- Communication needs and preferences

- Environmental or situational risks
- Previous incidents (if applicable)
- Any agreed de-escalation strategies

This information will be used to support safe care coordination of care and reduce the likelihood of escalation.

2. De-escalation (Preventative and Active Response)

Healthywork Ltd does not deliver direct care or undertake physical interventions. However, team members are expected to understand and promote the use of de-escalation strategies.

This may include ensuring that team members:

- Use calm and clear verbal communication
- Offer choices to reduce distress
- Provide reassurance and active listening
- Adjust the environment (noise, space, stimulation) where possible
- Allow time and space for the individual to settle
- Involve known or trusted team members where appropriate

Team members are expected to use professional judgement to monitor risk and escalate concerns where de-escalation strategies are not being appropriately implemented.

3. Physical Intervention (Only Where Absolutely Necessary)

Healthywork Ltd do not undertake physical interventions.

Where physical intervention is used, it should only occur where:

- There is an immediate risk of harm to the individual or others
- All reasonable de-escalation strategies have been attempted or are not possible in the moment
- It is the least restrictive option available

Healthywork Ltd will expect that any such intervention:

- Is carried out by appropriately trained individuals
- Uses the minimum force necessary for the shortest time possible
- Avoids any technique that restricts breathing or causes pain
- Is used solely to prevent harm and never as punishment or to enforce compliance.

4. Recording, Reporting and Manager Notification

All incidents involving restrictive practice must be:

- Recorded immediately after the incident by the care provider or individual involved using factual, objective language
- Reported to Alison Biggs without delay
- Fully documented including time, location, triggers, actions taken, and outcome

Records must include:

- Time, date, and location
- What led to the incident
- What de-escalation steps were attempted
- Exact nature and duration of intervention
- Any injury, distress, or impact on the individual
- Names of team members involved or witnesses

Healthywork Ltd will ensure that such information is reviewed.

5. Review, Learning and Safeguarding

Following any incident involving restrictive practice:

- A managerial review will be completed

- Team members will reflect on triggers and what could be improved
- Client plans and risk assessments will be updated where required
- Concerns relating to service practice will be escalated appropriately.

Where there is any concern that restrictive practice may have been inappropriate, excessive, or indicative of abuse or neglect, this will be treated as a safeguarding concern and referred in line with the Care Act 2014.

All incidents will contribute to organisational learning and service improvement.

6. Complaints and Safeguarding

All complaints, concerns, or allegations relating to restrictive practice will be managed in line with Healthywork Ltd Safeguarding Adults Policy and relevant Local Authority safeguarding procedures. Where required, external agencies including the Local Authority will be informed.

Auditing and Monitoring

Healthywork Ltd will set up regular auditing and governance systems to ensure that this policy is adhered to and that any safeguarding incident events are shared with others in Healthywork Ltd and where necessary lessons are learnt from such.

This might include:

- Collation and review of Complaints and Concerns which may well contain safeguarding elements.
- Regular review and auditing of any safeguarding concerns raised, and actions taken
- Due diligence regarding quality of training and regular evaluation of training provided and added value from such.

How we will work with stakeholders to ensure we meet this policy

Healthywork Ltd is committed to working openly and transparently with all stakeholders when it comes to the protection and safeguarding of adults hence why this policy is available to all those who engage with our service.

This policy needs to be shared with the people outlined below and those individuals / stakeholders who use our service.

This policy will be given to all associates of Healthywork Ltd, at the commencement of their induction. They will be asked to confirm receipt and to confirm that they have read and understood the content.

This policy will also be shared, where appropriate, with personal assistants and other professionals involved in supporting the individual, to ensure a consistent understanding of safeguarding expectations.

It will also be given to other stakeholders as follows:

- Clients.
- Family Members involved.
- Those who commission our services e.g. solicitors / Deputies.
- Others who have a significant involvement with our clients e.g. members of the MDT particularly those who do not have access to other safeguarding systems / policies through their own organisational framework.

How allegations against the Director are to be reported

- We are committed to maintaining a transparent and safe environment for all team members and clients. It is vital that any concerns or allegations relating to the conduct of the Director of Healthywork Ltd are reported promptly and investigated thoroughly.
- If a safeguarding concern or allegation relates to the conduct or performance of the Director, team members, clients or other stakeholders should feel confident to raise their concerns without fear of retaliation or victimisation. Such concerns must be reported promptly and will be handled in line with the principles of transparency, impartiality and fairness set out in this policy.

- Where a concern or allegation about the Director involves, or may involve, abuse, neglect or a breach of safeguarding duties, it will be managed in line with Healthywork Ltd's Safeguarding Adults Policy and local Safeguarding Adults Board procedures, including making safeguarding referrals where required.
- Concerns and allegations about the Director will be investigated by the Health and Care Professions Council - <https://www.hcpc-uk.org/standards/standards-of-proficiency/occupational-therapists/>.
- The contact details for the Health and Care Professions Council related to raising concerns is this website: <https://www.hcpc-uk.org/concerns/raising-concerns/>.
- Where the complaint raises potential safeguarding or regulatory issues, also consider whether to notify external agencies, for example:
 - Hertfordshire Council
 - Tel: 0300 123 4042.
 - <https://www.hertfordshire.gov.uk/services/adult-social-services/report-a-concern-about-an-adult/professionals-request-social-care/professionals-make-an-social-care-referral.aspx#safeguard>
- These agencies do not investigate employment complaints but may need to be informed where there are safeguarding or regulatory concerns.
- If the complainant remains dissatisfied after the internal investigation is completed, they may use the appeal stage of this complaints procedure and/or raise their concerns with external bodies such as the Local Government and Social Care Ombudsman.

Training Requirements

The safeguarding training needs of all team members working with Healthywork Ltd will be reviewed as part of their induction and ongoing supervision. Any relevant prior learning may be taken into account where up-to-date certificates are provided, but all team members must still read this Safeguarding Adults Policy and confirm that they have understood it.

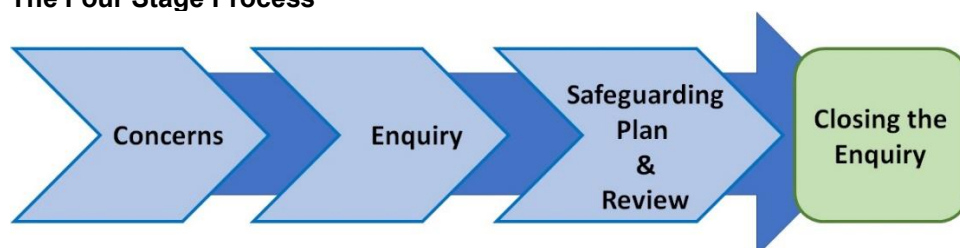
Safeguarding training will cover recognising different types of abuse, the six principles of safeguarding, how to prevent and report abuse, and how to follow local Safeguarding Adults Board procedures. This supports the expectations set out in the Preventing abuse section of this policy.

Training will be refreshed at intervals in line with local and national guidance, and safeguarding responsibilities will be reinforced through supervision, team meetings and governance reviews. Records of all safeguarding training and updates will be maintained.

See the Safeguarding Procedure below.

Safeguarding Procedure

The Four Stage Process



Stage 1: Concerns	Immediate action in cases of emergency. Response within one working day.
Stage 2: Enquiries	Initial conversation - same day concern is received if not already taken place. Investigation led by Social Worker within 45 days of concern being reported.
Stage 3: Safeguarding Plan and Review	Safeguarding plan put in place following receipt of investigation report. Review - as stated within the investigation report, set by the local authority policies and procedures.
Stage 4: Closing the enquiry	As stated within the investigation report.

Deprivation of Liberty Safeguards Authorisation

Where clients are not covered by the Mental Health Act 1983 (amended 2007), we will, if allowed by legislation, only request authorisation under the Mental Capacity Act 2005 Deprivation of Liberty Safeguards, when it is in the best interests of the person who uses services and that person lacks capacity. We will advise the local authority of any client situation which we come across in our work and we believe may fall under the definition of a Deprivation of Liberty. Deprivation of Liberty can occur in the person's own home and not just institutions.

We will implement and review any subsequent authorisation in line with guidance.

Records That Must be Kept

The manager should ensure that full records are kept and maintained at all times and on every occasion where abuse is alleged or suspected, in the following records as appropriate:

- Team members Communications Book
- Communication Record Sheet
- Person Centred Care Plan
- Accident / Incident / Near Miss Report Form

Records into investigation of an abuse should be kept separate from the other documents in the office or on computer.

A record should be kept of all team members who have been made aware of the agency's policy on abuse.

A record should be kept of all team members who have received training in recognising and preventing abuse.

Local Safeguarding Board Adults

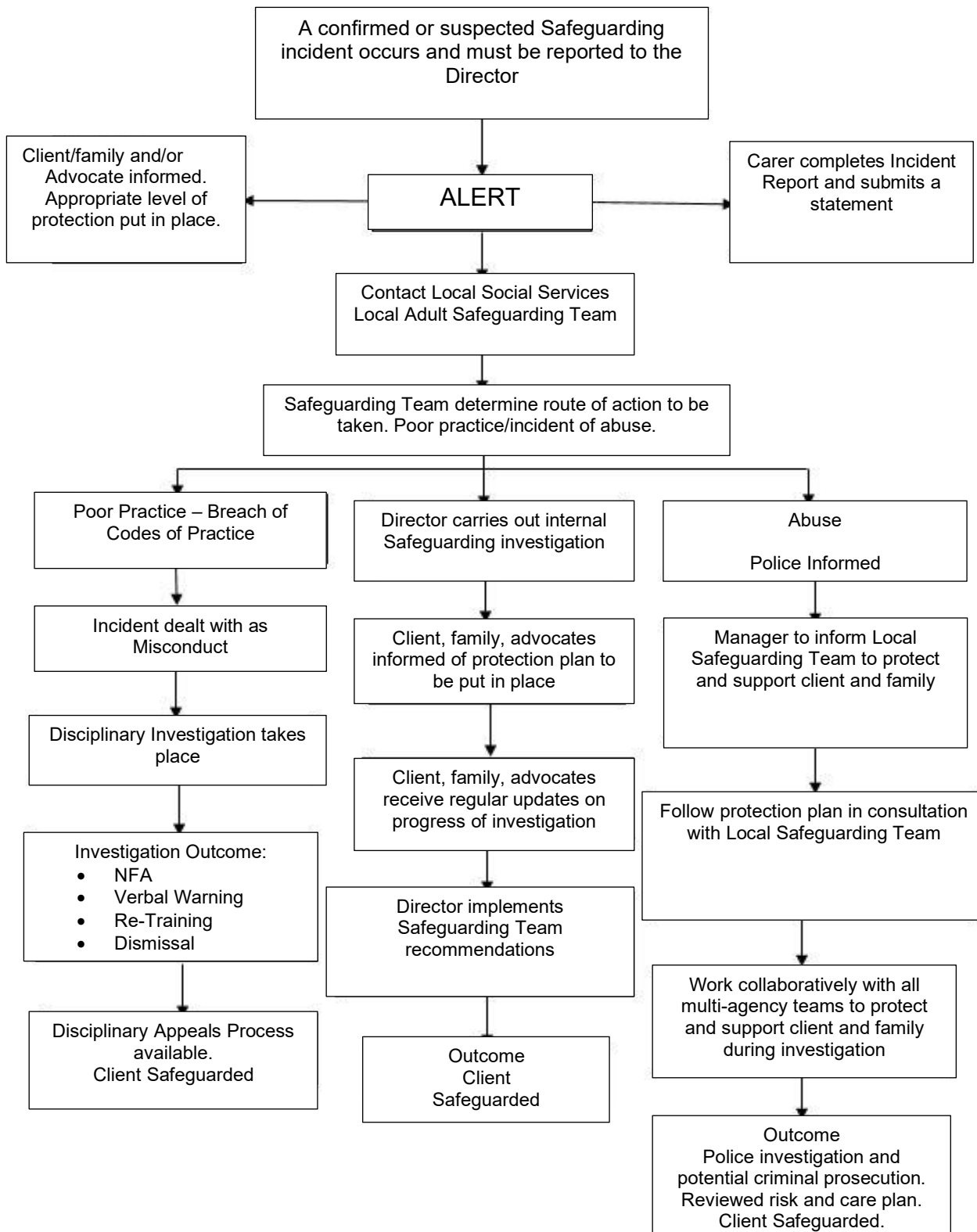
Where required, the Director should participate in Local Safeguarding Board Adults training.

Flowchart

See Safeguarding flowchart for reporting abuse as below.

The Manager to contact in relation to safeguarding incidents will be Alison Biggs, Director - contact details on page 1

SAFEGUARDING FLOW CHART



Associates / Team members Confirmation

Everyone must comply with this policy. Alison Biggs has overall responsibility for this policy. It will be monitored regularly to make sure it is being adhered to. If you have any questions or concerns about anything in this policy, do not hesitate to contact

Alison Biggs on:

Tel: 07958 502363

Email: alison@healthywork.org.uk

I confirm that I have read and understood this policy.

Name:

Signature:

Date:

This policy applies to the following people in our company	Associate Therapists / Admin team members / other stakeholders
Policy Written by	Alison Biggs, Director
Date Policy written	26/08/2026
Due for Review	26/08/2027
Who has or can give authority to change policy	Alison Biggs, Director
Where is this policy kept	On the company's shared drive.

Date	Reviewer	Version	Date for Next Review	Date of recirculation