



Bereavement Care

Supporting you through grief and loss

SAFEGUARDING ADULTS AT RISK POLICY STATEMENT

***including procedure for dealing with referrals
from people who may have mental ill health***

APPROVED BY

The Chair of Trustees:

Signature: Gopal Bhachu

Additional Trustee:

Signature: Richard Segalov

CREATION DATE (OR LATEST VERSION): February 2026

TO BE REVIEWED ON OR BEFORE: February 2027

Safeguarding Adults at Risk - Policy Statement

‘Protecting adults at risk is everyone’s responsibility’

Overview

Statement of commitment

Bereavement Care recognises its responsibility to safeguard and promote the welfare of all adults who are or may be at risk of harm or abuse.

Scope of this policy

This policy applies to all **Bereavement Care** staff and volunteers, including Trustees and anyone working on behalf of the Charity.

Purpose of this policy

The purpose of this policy is to outline the duties and responsibilities of staff and volunteers working on behalf of the Charity, in relation to adults at risk.

All adults have the right to be safe from harm and must be able to live free from the fear of abuse, neglect or exploitation. To achieve this Bereavement Care will -

- Provide all staff and volunteers with clear principles to follow
- Make all staff and volunteers aware of what is expected of them in relation to their approach, behaviour and actions
- Evidence to users, the local community, partner organisations, the Local Authority and funding and commissioning bodies that **Bereavement Care** is committed to Safeguarding
- Support people with mental ill health as far as is safe to do so (see Appendix 1).

Objectives

Everyone who works for, volunteers for or receives a service from **Bereavement Care** is entitled to do so in a safe and respectful environment.

Bereavement Care is committed to helping everyone associated with the Charity to accept their responsibility to safeguard adults at risk from harm or abuse.

All suspicions and allegations of abuse or poor practice will be taken seriously and will be responded to swiftly and appropriately.

Staff and volunteers have a responsibility to notify concerns to the Safeguarding Lead of **Bereavement Care** and/or their equivalent within their employing

organisation and to ensure timely reporting and accurate recording in line with local policies and procedures.

When appropriate **Bereavement Care** will work in partnership with other statutory and voluntary agencies to investigate and if required take action to reduce or end the abuse.

Definitions

Types of abuse (as per The Care Act 2014) include physical, sexual, financial or material, emotional or psychological, neglect (or acts of omission), self-neglect, discrimination, organisational or institutional abuse, domestic violence / abuse and modern slavery. (For examples see Appendix 2).

Not included in the Care Act but also relevant are cyber bullying, forced marriage, radicalisation, cuckooing and mate crime.

Adults at risk are those aged 18 or over who are in need of care and support, regardless of whether they are receiving any, and because of those needs are unable to protect themselves against abuse or neglect.

An adult at risk is a person who may have:

- A learning or physical disability
- A physical or mental illness, chronic or otherwise, which may include addiction to alcohol or drugs
- A reduction in physical or mental capacity
- Care responsibilities.

and as a consequence of this/these condition(s) may have:

- A dependency on others for care and support
- Severe impairment in their ability to communicate
- Impairment in their ability to protect themselves from harm or abuse.

Abuse is defined as ‘a violation of an individual’s human and civic rights by another person or persons’.

Capacity refers to an ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (Mental Capacity Act 2005).

Safeguarding in this context, is defined as ‘protecting an adult’s right to live in safety, free from abuse, harm, neglect or exploitation.’

Serious Incident is an adverse event, whether actual or alleged, which results in or risks significant harm. What is considered to be “significant” is a matter for the Safeguarding Lead to determine, possibly in consultation with other Trustees, however this should not prejudice or delay a referral to the local Safeguarding Team or in an emergency, the Police.

Underlying principles

At Bereavement Care we will endeavour to safeguard adults at risk by:

- Responding to safeguarding concerns speedily
- Ensuring that all staff and volunteers visiting an adult at risk on behalf of the Charity have had a DBS check within the past three years
- Maintaining an up-to-date register of DBS checks
- Listening to service users and respecting and valuing them at all times
- Challenging discrimination and promoting the right to equal protection regardless of race, ethnicity, culture, religion, faith, gender, sexual orientation, disability, social or immigration status or any other element of diversity
- Providing effective management to staff and volunteers through support, supervision and training.
- Recruiting staff and volunteers safely, ensuring that all necessary checks are made and safe recruitment and good practice guidelines are followed
- Responding to safeguarding concerns appropriately and seeking advice from the relevant Safeguarding Lead or their Deputy
- When required, reporting concerns to the Local Authority, Police or other relevant bodies. This includes the legal requirement to report all Serious Incidents to the Charity Commission.

The Role of Key Agencies

Most areas across England and Wales are covered by a Safeguarding Adults' Board which oversees multi-agency work and coordinates policy, procedures and training for the protection and safeguarding of vulnerable adults.

Every Local Authority has a Social Care service, available 24/7. Lead responsibility is usually based on where the 'victim' normally resides.

Harrow Safeguarding Adults Service:

Telephone: 020 8420 9453

Out of hours number Emergency Duty Team:

Telephone: 020 8424 0999

Hillingdon Safeguarding Adults Service:

Telephone: 01895 556 633

Out of hours number:

Telephone: 01895 250 111

For details of Safeguarding Adults Services in other areas, contact the appropriate Local Authority via phone or on-line.

The nominated Safeguarding Lead for **Bereavement Care** is **Richard Segalov**.
The nominated Safeguarding Deputy Lead for is the **Chair of Trustees**.
Contact details can be obtained from the office – 0208 427 5720.

Action to be taken

In response to an incident, or an allegation of abuse, **Bereavement Care** will:

- Act quickly to stop or minimise further harm or abuse, if necessary by calling the Police on 999
- Manage concerns, complaints, whistleblowing, and allegations effectively and in keeping with its published policies and procedures
- Adhere to the Safeguarding Adults at Risk Policy and inform/seek advice from the Safeguarding Lead or Deputy
- Record details of the incident and action taken sharing the information on a 'need to know' basis in keeping with Data Protection and Safeguarding legislation
- Engage with all relevant agencies and regulators in a timely and professional manner
- Communicate with everyone involved with the Charity and the media as appropriate
- Ensure openness and transparency
- Review all serious safeguarding incidents to understand, learn and prevent recurrence
- Report all criminal behaviour to the Police
- Report all allegations of abuse by staff to the Local Authority Designated Officer (LADO).

Appendix 1. For people who may have mental ill health

Every effort will be made by office staff to establish whether the referral is suitable for **Bereavement Care**. If in doubt the office will contact the Assessors and/or the Honorary Supervisor before continuing with the referral procedure.

It is unlikely that referrals will be accepted when relating to -

- People who have a serious or acute mental illness and are receiving support from mental health professionals
- People who are receiving professional counselling
- People using non-prescribed drugs or other illegal substances
- People with a known history of violence or abusive behaviour

Appendix 2. Adult Abuse – Areas to Consider

Physical abuse

Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

Possible indicators of physical abuse

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

Sexual abuse

Types of sexual abuse

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure
- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings

- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

Psychological or emotional abuse

Types of psychological or emotional abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Possible indicators of Psychological & Emotional abuse

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

Financial or material abuse

Types of financial or material abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions

- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Possible indicators of financial or material abuse

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

Modern slavery

Types of modern slavery

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to
- Possible indicators of modern slavery
- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn

- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers
- Further Home Office information on identifying and reporting modern slavery

Discriminatory abuse

Types of discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic
- Possible indicators of discriminatory abuse
- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Organisational or institutional abuse

Types of organisational or institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs

- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints
- Possible indicators of organisational or institutional abuse
- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

Neglect and acts of omission

Types of neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity
- Possible indicators of neglect and acts of omission
- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

Self-neglect

Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety

- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs
- Indicators of self-neglect
- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

[Safeguarding for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/safeguarding-for-charities-and-trustees) November 2021 Safeguarding and protecting people for charities and trustees - GOV.UK (www.gov.uk) June 2022

Review arrangements

Bereavement Care will review this policy every year or following notification of relevant legal or local procedural change.