

OPERATING POLICIES

Gateway Psychology Operating Policies are statements on the way Gateway Psychology will operate within the Business System. They signal the values and philosophy of our Company and provide a framework of general principles for all employees, Associates and colleagues to follow.

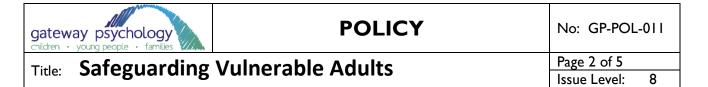
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SIGNATORIES (signed and controlled electronically)

Dr Meryl Ann Forse
Dr M.A. Forse – Managing and Clinical Director



1.0 Scope of policy

This policy applies to all staff (this includes Employees, Contracted Associates, Agency workers and Service Contractors) of Gateway Psychology ("The Company").

2.0 Why we need a policy

Gateway Psychology believes that it is always unacceptable for a vulnerable adult to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all vulnerable adults by a commitment to practices that protect them.

We recognise that:

- The welfare of a vulnerable adult is paramount.
- All vulnerable adults, regardless of age, disability, gender, gender reassignment, racial heritage, religious belief, other beliefs, sexual orientation, gender identity or other identity, have the right to equal protection from all types of harm or abuse.
- The rights of vulnerable adults to live a life free from neglect, exploitation and abuse are protected by the Human Rights Act 1998.

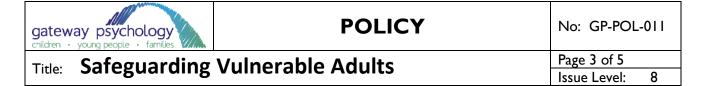
The purpose of this policy:

- To provide protection for the vulnerable adult who receives a service from the Company.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a vulnerable adult may be experiencing, or be at risk of, harm.

3.0 Definitions

A **vulnerable adult** is a person over 18 years of age and who is or may be in need of community care services by reason of mental or other disability; age or illness; 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. This could include people with learning disabilities, mental health problems, older people and people with a physical disability or impairment. It may include an individual who may be vulnerable as a consequence of their role as a carer in relation to any of the above.

Abuse is a violation of an individual's human and civil rights by any other person. It may take the form of physical abuse (e.g. hitting, slapping), sexual, psychological (e.g. emotional abuse, threats, blaming), financial / material (e.g. misuse of money or possessions, theft, fraud), neglect or acts of omission, discrimination, institutional (e.g. abuse within a context of a care home, reduced or omitted acts of care), domestic (e.g. abuse within a family or between partners)



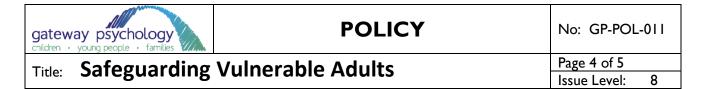
4.0 Key management responsibilities

This policy applies to all staff, including senior managers and board of directors, paid staff, associates, volunteers and sessional workers, agency staff, trainees, students or anyone working on behalf of the Company or using its premises.

- 4.1 Understand current and new policies, and the role of management with respect to them.
- 4.2 Ensure that all employees, Associates and contractors understand current and new policies through communication and familiarisation, and behave in accordance with them.
- 4.3 Actively work to ensure that Gateway Psychology Policies are maintained and developed, through reviewing their own policies and processes and receiving and monitoring feedback information.
- 4.4 Monitor the policy locally and eradicate any non-conformances that may be identified.
- 4.5 Agree and contribute to the development of new policies and processes where applicable, and when agreed, commit to implement those policies and processes.
- 4.5 Company Managers are responsible for the continual monitoring and improvement of Policies and Processes for which they have responsibility.
- 4.6 Ensure that any concerns raised with Policies or Procedures are directed to the manager within the relevant function

5.0 Details of the policy

- 5.1 The Company believes that vulnerable adults must be protected from abuse, neglect, exploitation and harm at all times.
- 5.2 We want vulnerable adults who use or have contact with this Company to enjoy what we have to offer in safety, free from abuse, discrimination or exploitation.
- 5.3 Vulnerable adults will have access to information that they can understand to make an informed choice.
- 5.4 Vulnerable adults will have the opportunity to choose independently from a range of options where available, based on clear and accurate information.
- 5.5 Vulnerable adults will know that information about them is managed appropriately and that there is a clear understanding of confidentiality and its limits among staff/volunteers.
- 5.6 Vulnerable adults have the right to be supported to make their own decisions and to give or withhold their consent to an activity or service.
- 5.7 Vulnerable adults will be treated equally and their background and culture will be valued and respected.
- 5.8 We will seek to safeguard vulnerable adults by:
 - Valuing them, listening to and respecting them.



- Adopting safeguarding procedures, Gateway Psychology's Code of Conduct (Ref. Safeguarding Procedure) and the HCPC/Social Work England Code of Conduct for staff and volunteers.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made.
- Sharing information about concerns with agencies who need to know.
- Providing effective management for staff and volunteers through supervision, support and training.
- 5.9 We may discover current or historical abuse or suspect such abuse through direct disclosure by a vulnerable adult, a complaint or expression of concern by a member of staff, a volunteer, carer, member of the public or relative or observation of the behaviour of the vulnerable adult by a volunteer, member of staff or carer.
- 5.10 If we discover or suspect a vulnerable adult is suffering from current or historical abuse or harm we will notify Social Services or the police in order that they can be protected if necessary. See Safeguarding Vulnerable Adults Procedure (GP-PRO-004).
- 5.11 If one of our staff or associates or volunteers are subject to an allegation of harming a child or other safeguarding concern, we will notify social services and conduct an internal investigation. See Safeguarding Children Procedure (GP-PRO-003) for the categories of abuse
- 5.12 Our policy and procedures will be reviewed regularly to make sure they are still relevant and effective.

CROSS REFERENCES TO OTHER POLICIES AND PROCEDURES

Safeguarding Vulnerable Adults Procedure	GP-PRO-004	
Safeguarding Children Procedure	GP-PRO-003	
Equality Policy	GP-POL-002	
Health and Safety Policy	GP-POL-004	
Data Protection Policy	GP-POL-006	



POLICY

No: GP-POL-011

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Title: Safeguarding Vulnerable Adults

CHANGE HISTORY		
Details of Change	Date of Change	Issue Level
Draft issue	10/11/2014	0
Initial Issue	22/3/2015	1
Review, no changes made	24/01/2016	2
Review, no changes made	04/05/2017	3
Review, added para 5.11	16/1/18	4
Review, added 'gender identity'	31/07/2019	5
Review, no changes made	09/08/2021	6
Review, added 'other beliefs'	31/07/2022	7
Review, no changes made	31/05/2023	8