



Safeguarding Adults Code of Conduct for Staff and Volunteers

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1. Purpose of Procedure

The vast majority of adults who work with 'Adults' (see Safeguarding vulnerable Groups Policy for definition) in professional contexts act responsibly and in the Adult's best interests in line with their duty of care. Such adults seek to provide a safe and supportive environment which secures the well-being and the very best support for Adults in their care. Staff and volunteers have a crucial role to play in supporting the Adults with whom we come into contact with. They have a unique opportunity to interact Adult's in ways that are both affirming and inspiring. However, achieving such aims is not always straightforward. When working with Adults it is possible that tensions and misunderstandings can occur. It is in such circumstances that the behaviour of staff can cause allegations to be made against them. Such allegations may be genuine, malicious or misplaced. However they may have occurred, they are undeniably distressing and difficult for all concerned.

This document seeks to set out what constitutes 'best practice' in relation to working safely with Adults. It is hoped that staff will use it to monitor their own standards and practice. It will also help to give a clear message that unsafe behaviour on the part of staff will not be tolerated and that, where appropriate, legal or disciplinary action will follow. In this way its aim is to reduce the risk of staff and volunteers being falsely accused of improper or unprofessional conduct.

This document is not meant to be exhaustive; no guidance can cover all eventualities. There may be times when professional judgements are made in situations not mentioned here. In these circumstances it is expected that staff and volunteers will advise their line managers or supervisor of any justification for such action, whether already taken or proposed.

2. Procedure Instructions

1. Introduction

The Care Standards Act 2000 places a duty on organisations and individuals to safeguard and promote the wellbeing of adults. The vast majority of individuals who work with Adults act professionally and aim to provide a safe and supportive environment, which secures the wellbeing and very best outcomes for such individuals.

It is recognised that achieving this aim is not always straightforward and sometimes tensions and misunderstandings can occur. It is here that the behaviour of adults can give rise to allegations of abuse being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

In recent years concern has been raised about the potential vulnerability of individuals working with vulnerable groups. There is a need for clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. This document has been produced in response to these concerns and provides practical guidance about which behaviours constitute safe practice and which behaviours should be avoided. It will also help to give a clear message that unlawful or unsafe behaviour on the part of staff will not be tolerated and that, where appropriate, an internal finding of fact or investigation will be carried out and may lead to disciplinary or legal action. In this way its aim is to reduce the risk of staff and volunteers being falsely accused of improper or unprofessional conduct.

This document seeks to set out what constitutes 'best practice' in relation to working safely with Adults. It is hoped that staff and volunteers will use it to monitor their own standards and practice alongside of the Safeguarding Competencies. This document is not meant to be exhaustive; no guidance can cover all eventualities. There may be times when professional judgements are made in situations not mentioned here. In these circumstances it is expected that staff and volunteers will advise their line managers or supervisor of any justification for such action, whether already taken or proposed.

1. Basic Principles Which Underpin this Code

- a) To ensure the protection of Adults in vulnerable circumstances or at risk from abuse and neglect and to promote the highest standards of quality in the care that people receive, whoever is providing that care.
- b) Staff and volunteers should understand their responsibilities to safeguard and promote the welfare of Adults.
- c) Staff and volunteers are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation or intentions.
- d) Staff and volunteers should work, and be seen to work, in an open and transparent way with Adults.
- e) Staff and volunteers should discuss/and or take advice promptly from their line manager or another senior member of staff (e.g. Safeguarding Team) about any incident that may give rise to concern.
- f) Face finding and records should be made of any such incident and of decisions made/further actions agreed, in accordance with the Guide Dogs Safeguarding Adults Procedures (see Adults at Risk Concern Flowchart).
- g) Staff and volunteers should apply the same professional standards regardless of race, gender or sexuality.
- h) Staff and volunteers should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
- i) Staff and volunteers should be clear about their responsibilities to report concerns about the conduct of any Guide Dogs staff or staff of any partner organisation, as well as who they should report such concerns to.

2. The Context for Guide Dogs Staff and Volunteers

Through their work, Guide Dogs staff and volunteers come into contact with Adults in a variety of ways, including:

- a) Preparatory work with people who may wish to become guide dog owners
- b) Training and supporting people in receiving, using and caring for their guide dog
- c) Providing mobility training and other rehabilitation services for visually impaired people. These services can be provided directly by Guide Dogs Teams, and also by Guide Dogs staff working on Service Level Agreements with local councils and other voluntary organisations.
- d) Providing literature and information, for example through websites
- e) Working in the community with fundraising activities

The above are purely examples; the list is not meant to be exhaustive.

3. Guidelines for safe working practice

3.1 Confidentiality

Members of staff and volunteers may have access to confidential information about Adults in order to undertake their day-to-day responsibilities; this may include some highly sensitive or private information in respect of some people. Information of this kind should never be used for the staff member's or volunteers own, or other's advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate or embarrass the vulnerable adult.

Similarly, such information should never be used casually in conversation or shared with any other person other than on a need-to-know basis. In circumstances where the Adult's identity does not need to be disclosed the information should be used anonymously.

All staff should:

- a) Treat personal information about an Adult confidentially and discreetly.
- b) Seek advice from their line manager if they are in any doubt about the need to share the information they hold. At times there may be a need to share information with other agencies for example Social Care, Health and the Police, and generally permission would be asked before doing so. However in exceptional circumstances e.g. if it is considered that an Adult is at serious risk of abuse then information may be disclosed without consent and is permissible within the framework of the Data Protection Act
- c) Pass any legal or media enquiries about a vulnerable adult to their line manager/senior manager.

Information held by Agencies is subject to the legal duty of confidence and should not normally be disclosed without the consent of the persons who have provided the information or are subject of the information. However, the public interest in maintaining confidentiality can be overridden by the public interest to protect vulnerable persons. Disclosure without consent must therefore be necessary and justifiable in each case and be the minimum necessary to achieve the aim. In the event of doubt, legal advice should be obtained before a disclosure is made, but due regard must be made to the fact that this may cause unnecessary delay which could have additional implications about why immediate action wasn't taken and a dangerous delay was caused.

The storing and processing of personal information about an Adult is governed by the General Data Protection Regulation (GDPR). All staff and volunteers who are responsible for storing/processing such information should be familiar with their responsibilities under this legislation.

3.2 Physical Contact

There are times when it is entirely appropriate for staff and volunteers to have physical contact with Adults, but it is crucial to do so only in ways that are appropriate to their professional role. Physical touch should never come as a surprise to the person. If touch is deemed necessary the permission of the person should always be sought, sometimes in advance to cover emergency situations.

3.2.1 Appropriate physical contact may include:

- a) Regular contact through assessment and training that is necessary in order to efficiently and effectively discharge these tasks. The contact should be formally agreed in advance with the person in their life planning and should be subject to periodic review.
- b) Responding to the needs of the Adult at the time, for example a person in distress. Staff and volunteers offering such comfort and reassurance should remain self-aware at all times in order that their contact is not threatening, intrusive or open to misinterpretation. The touch should be of limited duration and appropriate to their age, gender, ethnicity and background.

3.2.2 Further guidelines for appropriate physical contact

- a) Physical contact should never be secretive, or for the gratification of the member of staff, or represent a misuse of authority. If a member of staff or volunteer believes that their action could be misinterpreted, the incident and the circumstances should be reported and recorded as soon as possible.
- b) An Adult should never be touched in a way that could be considered indecent.
- c) Extra caution should be exercised where it is known that an Adult has suffered previous abuse or neglect. In the person's view, physical contact might be associated with such experiences and lead to staff and volunteers being vulnerable to allegations of abuse. Some Adults, in such circumstances, may seek out inappropriate physical contact. It is **always** the responsibility of the member of staff or volunteer to deter the person sensitively by helping them to understand the importance of personal boundaries.

3.2.3 Appropriate physical contact during Guide Dog activities

Given the specific nature of Guide Dog activities best practice will include ensuring that Adults are informed, prior to and during rehabilitation and Guide Dog and Client assessment and training that certain types of physical contact will be necessary including:

- a) preventing the person from stepping into danger
- b) teaching the person about body awareness
- c) placing hands on shoulders of person in order to reinforce positions when turning
- d) demonstrating correct hand and arm positions with a cane.

Further good practice guidance can be found in 'How to give sighted guide'.

4.Managing an Adult's Behaviour

All Adults have a right to be treated with respect and dignity. There may be occasions where a person presents angry or aggressive behaviour or 'pushes the boundaries' with a staff member or volunteer.

In these circumstances:

- a) Try to defuse such situations early, if at all possible.
- b) Staff and volunteers should maintain self-awareness and self-control at all times.
- c) Staff and volunteers should talk calmly to the person without engaging in argument or confrontation. A consistent message should be given at all times. If a person verbally abuses a member of staff and volunteers or volunteer this should be ignored; the member of staff and volunteers or volunteer should walk away if at all possible. However, it may not be possible for the member of staff and volunteers or volunteer to absent themselves because it is deemed necessary to stay in contact to keep the person safe. Such a judgement will need to take precedence over other considerations.
- d) A 'cooling off' period can be helpful in situations such as this.

5.Incidents and Interventions

5.1 Physical Intervention

There may be occasions where it is necessary for staff and volunteers to intervene physically with an Adult to prevent them from inflicting injury to others, self-

injury, damaging property, or causing disruption. In such cases only the minimum force necessary may be used and any action taken must not exceed the need to make the situation safe.

5.1.1 Acceptable forms of intervention are defined as:

- a) Physically interposing between people
- b) Blocking a person's path
- c) Holding
- d) Pushing
- e) Pulling
- f) Leading a leading by the arm
- g) Shepherding a person away by placing a hand in the centre of the back
- h) In more extreme circumstances, using more restrictive holds. Such actions should only be undertaken by staff who have had appropriate training in such methods.

Intervention should avoid areas such as the head, neck, or collar. Intervention should not be such that it causes injury through, for example, slapping, punching, kicking, twisting, tripping, holding or pulling by the hair or ear, holding a person's face down to the ground or holding/touching a person in a manner which might be considered indecent.

5.1.2 N.B. The use of reasonable force

There is no legal definition of 'reasonable force'. So it is not possible to set out comprehensively when it is reasonable to use force, or the degree of force that may reasonably be used. It will always depend on all the circumstances of the case.

5.1.3 There are two relevant considerations:

- a) The use of force can be regarded as reasonable only if the circumstances of the particular incident warrant it. The use of any degree of force is unlawful if the particular circumstances do not warrant the use of physical force. Therefore physical force cannot be justified to prevent a person from committing a trivial misdemeanour, or in a situation that clearly can be resolved without force.
- b) The degree of force employed must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent. Any force used should always be the minimum needed to achieve the desired result.

5.2 Reporting

Where a member of staff or volunteer has taken action to physically restrain an Adult they should make a written report of the incident and promptly send it to their Line Manager, and the Safeguarding Team for Guide Dogs. The report should contain the following:

- a) The name of the Adult involved, and when and where the incident took place.
- b) The names of any other staff or volunteer or people who witnessed the incident.
- c) The reason that force was necessary.
- d) How the incident began and progressed, including details of the Adult's behaviour.
- e) What was said by each of the parties, including the steps taken to defuse or calm the situation.
- f) The degree of force used, how that was applied and for how long.
- g) The Adult's response and the outcome of the incident.
- h) Details of any injury suffered by the Adult, or any other person, or a member of staff or volunteer and of any damage to property.

5.3 Debriefing after an Incident of Physical Intervention

A very considerable lapse of time should be allowed (a minimum of several hours or ideally half a day) before a debriefing session takes place between the Adult and the staff member(s) involved in the incident of physical intervention. Consideration should be given to whether or not including a mediator might be helpful.

Each party should have an opportunity to say what happened from their point of view and to explain how they were feeling. Apologies should be made if this is at all possible. Some people find it humiliating to admit that they were wrong. It is important, therefore, for staff to model an ability to apologise and admit that they are sorry for any distress that may have been caused. The member of staff should always explain the need to prevent harm from taking place. If the Adult cannot apologise in words it might be helpful to acknowledge any behaviours which are conciliatory on their part after the event.

'Physical interventions refers to the use of force to restrict movement or mobility or the use of force to disengage from dangerous or harmful physical contact initiated by a service user. Physical intervention differs from manual guidance or physical prompting in so far as it implies the use of force against a resistance. The main difference between holding and physical intervention is the manner of

the intervention and the degree of force applied’.

DOH Guidance 1999

Staff and volunteers working with Adults must operate within the law. Inappropriate use of physical restraint may give rise to criminal charges. All staff and volunteers have a duty of care which means taking reasonable care to avoid acts or omissions which could lead to or cause harm to other people. In practice, staff or volunteers failure to take appropriate steps to prevent injury would be seen as an omission.

The law states that every citizen is entitled to live without interference from others. This means that people should not be unlawfully restrained, must not be in fear of being attacked by another, and must not have unlawful violence inflicted on them.

The rights of Adults should not be contravened in line with the Human Rights Act 1998.

Behaviour which causes damage to property only and where there is no physical risk to themselves or others is unlikely to necessitate the use of physical interventions. When a physical intervention is employed, as soon as the person is calm and it is felt safe to do so, the level of physical restraint or restriction should be systematically reduced. This returns personal control to the Adult as soon as possible.

6. Propriety and Behaviour of Staff

All staff and volunteers have a responsibility to maintain public confidence in their ability to safeguard the welfare of Adults. They should adopt high standards of personal conduct.

Staff should not:

- a) Behave in a manner that would lead any reasonable person to question their suitability to work with Adults.
- b) Meet with Adults outside of organised activities in order to pursue a personal relationship with them.
- c) Make sexual remarks to, or about, an Adult.
- d) Discuss their own sexual relationships with or in the presence of Adults.
- e) Engage in sexual relationships with Adults either in the work context or out of it.

- f) Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate or might be interpreted as such.
- g) Dress in a way which could be considered inappropriate or overtly sexually provocative.

6.1 Infatuations

Staff and volunteers should be aware that it is possible that an Adult may develop a strong attraction to them and may develop a heterosexual or homosexual infatuation or crush. All situations should be responded to sensitively in order to maintain the dignity of all concerned. Such situations may carry a high risk of words or actions being misinterpreted which can result in allegations against a member of staff and volunteers. Such situations should be discussed with the line manager at the earliest opportunity so that appropriate action can be taken.

6.2 Communications with Adults Using Technology

Communication between Adults and staff members or volunteers, by whatever method, should take place within professional boundaries. This includes the wider use of technology such as social media, mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites and blogs. When it is considered necessary for staff to communicate with Adults the equipment used by staff should be provided by Guide Dogs. Where it is necessary to give a Guide Dogs mobile telephone number for emergency contact out of hours, it should be made explicit to the potential caller that it is for this purpose only. Techniques for managing unwanted calls should be adopted i.e. allow the caller to leave a message and return call when appropriate.

Staff and volunteers should avoid any communication with Adults which could be open to misinterpretation of their motives or behaviour. Staff and volunteers should not give their personal contact details to adults, including e-mail, home or mobile telephone numbers unless the need to do so is first agreed with their line manager. It is preferable to use work telephone numbers and Internal e-mail systems should only be used in accordance with Guide Dogs policy. Staff and volunteers should never take or send images of Adults using personal mobile phones.

6.3 Photography, Videos and other Creative Arts

Some workplace activities may involve recording images. These may be taken for publicity or to celebrate achievement. Staff and volunteers need to be aware of the potential for such material to be misused for improper purposes. Careful consideration should be given as to how such activities are organised and undertaken. Line managers should be made aware that the photography/image equipment is being used and for what purpose. Particular care needs to be given when they involve people who may be unable to question why or how the activities are taking place.

Adults who have been previously abused in this way may feel threatened by the use of photography, filming etc. even for legitimate purposes. Staff and volunteers should remain sensitive to any person in this position and should recognise the potential for misinterpretation.

Using images of Adults will require written consent of the individual concerned. 'Consent form to allow Guide Dogs to use case studies, including photography, of you and or your child in the [‘Consent form to allow Guide Dogs to use case studies, including photography, of you and or your child in the media’](#) All images taken should be available for scrutiny in order to screen acceptability. Images should not be displayed on websites, in publications or in a public place without written consent. The definition of a public place includes areas where visitors have access to the workplace.

It is recommended that when using photographs, images should be securely stored only by individuals who are authorised to do so. Any individual should be able to justify images of Adults in their possession.

6.4 Inappropriate Images

Under no circumstances should a member of staff or volunteers use Guide Dogs' equipment to access pornography. Personal equipment containing such images, or links to them, should never be brought into or used in the workplace.

Accessing indecent images of children on the Intranet, or making, storing or disseminating such material, whether using Guide Dogs equipment or personal equipment on or off the working premises, is illegal. If proven, this will lead to criminal proceedings. In the event of any illegal material being discovered on a workplace computer, the equipment should not be tampered with in any way. **Staff and volunteers and/or managers should not attempt to investigate the matter themselves until the police investigation is completed or to evaluate**

the material as this may lead to contamination of evidence and a possibility that they might risk prosecution themselves. Instead, the Police should be contacted immediately.

7. Transporting Adults

Staff and volunteers should ensure that all adults being transported wear seatbelts. Check to ensure that this is done properly. Avoid leaning across an Adult if you have to help them to fasten or adjust the seat belt.

8. Home Visits

- a) Home visits should be arranged in advance either by letter or telephone, stating the name(s) of the person(s) who are visiting. Where reasonably practicable, home visits should be carried out by 2 people where: a) insufficient information is known about the individuals, b) there may be a risk of allegation made against staff/volunteers or c) there is a risk of abuse toward staff/volunteers. Whenever possible visits should be carried out within normal working hours. Visits outside normal working hours (for example to carry out night time mobility lessons) should only be undertaken with the full knowledge of an identified manager within Guide Dogs and/or, in the case of Orientation and Mobility Specialists contracts, an identified manager within the partner organisation. When evening visits are necessary, refer to further guidance through contacting H&S team or via the Intranet at H&S, Strategy and Procedures, Personal Security, Personal Security Guidance.
- b) A risk assessment should include an evaluation of any known risk factors regarding a child/young person, parents/carers and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make staff and volunteers more vulnerable to an allegation. Specific consideration should be given to visits outside of normal working hours or secluded locations. Following the assessment, appropriate risk management measures should be in place before the visit is undertaken. Information should be stored on GDI, Critical information page. Where little or no information is available, visits should not be made by a lone worker.
- c) A record (diary) of movements and visits should be held by the identified manager showing details of visits. Minimum details should include: The name of the person being visited, date, time, address and telephone contact details where these are not readily available. In addition, it is recommended that estimated start/finish times be recorded along with details relating to times of phone calls confirming these.

- d) All appropriate staff and volunteers should refer to further guidance through contacting their manager or the Health and Safety Team or via the Health and Safety pages on the Intranet, (or the partner organisation's) lone working and personal security protocols should be followed and should include a risk assessment (with control measures) of all work activities, where staff and volunteers are potentially at risk.
- e) If a member of staff or volunteer ever feels personally at risk on a visit, they should make an excuse and leave. The situation should be discussed with the line manager and a focused risk assessment carried out. It may be sensible for two workers to visit the home together or arrange an alternative to a home visit.
- f) Where special visiting arrangements are established these must be clearly marked on the critical information page on the Adults file on GDI.
- g) Individuals must report and properly record all incidents of concern. It is the responsibility of the individual to be aware of the content of files prior to contact and to keep files up to date.
- h) Whenever possible workers should carry a mobile phone.
- i) A personal alarm should be readily available for the use of staff and volunteers in appropriate circumstances.
- j) Guide Dogs line managers are advised to seek further advice from the Guide Dogs Health and Safety Advisor to ensure staff and volunteers have proper training and advice with regard to personal safety issues.

9. Intimate Care

There may be very rare occasions when as part of their duty of care, staff and volunteers may need to perform or assist an Adult in carrying out a piece of intimate care. This might occur, for instance, if an Adult unexpectedly becomes sick in the care of a member of staff or volunteer.

In such circumstances the following should apply:

- a) The dignity of the person should be a primary consideration.
- b) Encourage the person to act as independently as possible and to undertake as much of their own personal care as practicable.
- c) If another member of staff is in the vicinity make them aware of the task to be undertaken.

- d) Undertake the tasks that may be required as sensitively and discreetly as possible, paying attention to the person's wellbeing.
- e) Make your line manager aware of the circumstances of your intervention as soon as it is possible to do so.
- f) Make a written note of the circumstances of the intervention, date and sign it.
- g) Where appropriate, make carers of Adults aware that you provided such care and explain the circumstances of your intervention.

10. Health and Safety

All staff/volunteers should be aware of Health and Safety procedures within Guide Dogs and any other agencies in which Guide Dogs' activities are undertaken.

All staff working on a site, whether a Guide Dogs establishment or a partner agency site should know the name of the appropriate designated person for the protection of adults, or the equivalent individual, and know and follow relevant vulnerable adult protection policy and procedures. All staff has a duty to report any vulnerable adult protection concerns without delay.

The purpose of this document is to set out what is considered best practice when working with Adults in order to promote safe practice and to avoid allegations of poor practice.

Documentation

Safeguarding Key Principles in Relation to Children and Adults

Recruitment and Selection Policy

Safeguarding Competencies

Whistle Blowing Policy

All documents are available on the Knowledge Hub.

Permissible exceptions

None identified at this time

Related Policies or Processes:

Related Policy

Safeguarding Vulnerable Groups Policy

Related Procedure

Safeguarding Adults Procedures

Governance Review & Approval Table:

The table below contains two rows and five columns. The first row contains headings

	H&S	Protection of Children & Adults	Insurance	Legal
Date Reviewed	N/A	January 2020 March 2020	N/A	N/A

Version control table:

The table below contains three rows and four columns. (Only the original approval date and the most recent amendment should be included in the table.) The first row contains headings

Date	Version	Status	Details of Change
January 2020	12.0	Approved	Kathryn Ward, Director of People and Performance
06/10/20	12.1	Update	Transferred to updated template
24/03/20 22	12.2	Update	Procedures and links - Chris Roach

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