

THE WATCHET PHOENIX

Safeguarding Policy

The Phoenix Centre has adopted this Safeguarding Policy.
All Trustees and volunteers should make themselves aware of its contents.

If you think you or someone you know is being abused or neglected you should tell someone you trust.

This could be a friend, a teacher, a family member, a social worker, a doctor or healthcare professional, a police officer or someone else that you trust. Ask them to help you report it.

Supporting people when concerns are raised about abuse or neglect can be very difficult and distressing for everyone involved. Deciding what's the right thing to do can be stressful, particularly if the person you are concerned about is reluctant to accept support. If you are not sure what to do you can always seek advice.

The Safeguarding Officer is the Chairperson of the Phoenix Centre.

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1. Background and principles

1.1 The Phoenix Centre is committed to the following principles in all aspects of its safeguarding work:

Empowerment – putting people first and helping those who lack mental capacity feel involved and informed
Protection – supporting victims so they can take action
Prevention – responding quickly to suspected cases of abuse
Proportionality – making sure what we do is appropriate to the situation and for the individual
Partnership – sharing the right information in the right way
Accountability – making sure all agencies have a clear role

2. New legislation in England and Wales

2.1 The Care Act 2014 came into force in England on 1 April 2015. The Social Services and Wellbeing Act 2014 is due to come into force in Wales on 1 April 2016. The acts introduce new duties and responsibilities on local authority adult social services as the lead agencies in protecting adults at risk. This gives public services and government clear responsibility to make sure that people in the most vulnerable situations are safe from abuse or neglect.

2.2 The Phoenix Centre supports the principles in the acts and believes that safeguarding is everyone's Business. We know how important it is for organisations to work together and create shared strategies to protect people.

2.3 We're committed to taking action quickly, effectively and professionally when abuse takes place.

3. What is Safeguarding?

3.1 Safeguarding is a term we use to describe how we protect adults and children from abuse or neglect. It is an important, shared priority of many public services, and a key responsibility of local authorities.

3.2 Safeguarding is about protecting certain people who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions (or lack of action) of another person. In these cases, it is vital that public services work together to identify people at risk, and put steps in place to help prevent abuse or neglect[1].

4. The Terms we use

4.1 Adults and children at risk who are covered by The Phoenix Centre's safeguarding policy will be referred to in this policy as 'clients.

4.2 The term 'adult at risk' is used in this policy to replace 'vulnerable adult'. This is because the term 'vulnerable adult' may wrongly imply that some of the fault for the abuse lies with the victim of abuse. We use 'adult at risk' as an exact replacement for 'vulnerable adult' as that phrase is used throughout existing government guidance.

4.3 When we refer to 'staff' throughout this policy, this means The Phoenix Centre's permanent and temporary volunteer staff, Court of Protection visitors and contractors.

5. Our safeguarding duty

5.1 The Public Guardian has a statutory duty to safeguard:

- any person who has a deputy appointed by the Court of Protection
- the donor of any registered enduring power of attorney (EPA) or lasting power of attorney (LPA)

[1] Factsheet 7: Care Act factsheet: Protecting adults from abuse and neglect

- anyone for whom the Court of Protection has authorised someone else to carry out a transaction on their behalf, under s16 (2) of the Mental Capacity Act 2005 (single orders).

5.2 This includes some children and young people where the Court of Protection has appointed a deputy because the child or young person is likely to still lack capacity to make financial decisions when he or she turns 18.

6. Out areas of responsibility

6.1 This policy relates to all forms of abuse. These are described in a later section.

6.2 Most of The Phoenix Centre's clients are adults. Allegations of abuse of vulnerable children (or young people aged up to 21 in some Our areas of responsibility circumstances) will usually be dealt with by local authority children's services. Where allegations of abuse relate to a child or young person, The Phoenix Centre will raise the issue with the police and/or the local authority children's services department.

We will raise concerns and allegations about people who are not covered by our policy to the police, local authorities and/or children's services.

7. The Mental Capacity Act 2005

7.1 The Mental Capacity Act 2005 is a legal framework which protects people who may lack capacity to make decisions for themselves. It also sets out how decisions should be made on their behalf. The act covers all sorts of decisions, from lifechanging events to everyday matters. All safeguarding decisions The Phoenix Centre takes must be in accordance with the act. The act says that:

"… a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain."

7.2 The presumption is that adults have mental capacity to make informed choices about their safety and how they live their lives. Mental capacity and a person's ability to give informed consent are at the heart of decisions and actions taken by The Phoenix Centre under this safeguarding policy. Every time we become involved on a safeguarding issue we need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take.

7.3 This includes how able they are:

- to understand what is likely to result from or affect their situation
- to take action themselves to prevent abuse
- to take part as fully as they can in making decisions about getting other parties involved.

8. What is abuse?

8.1 Abuse and neglect take many forms[2]. Abuse can lead to a violation of someone's human and civil rights by another person or persons. Abuse can be physical, financial, verbal or psychological. It can be the result of an act or a failure to act.

It can happen when an adult at risk is persuaded into a financial or sexual exchange, they have not consented to, or can't consent to. Abuse can occur in any relationship and may result in significant harm or exploitation.

Some types of abuse are illegal, and in these cases adults who lack capacity are

[2] 'Care and Support statutory guidance – issued under the Care Act'. Department of Health/Home Office (2014)

protected by law the same as everyone else. If The Phoenix Centre suspects that a crime against a client has been commit ted, we refer the matter to the police. Sometimes, an urgent referral is made for the safety of the adult at risk and/or to preserve evidence.

8.2 Abuse is a misuse of power and control that one person has over another. Where someone is dependent on another, there is the possibility of abuse or neglect unless enough safeguards are put in place.

8.3 Abuse can fall into the following categories[3]:

Physical
This includes assault, hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone or only letting them do certain things at certain times.

Domestic
This includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.

Sexual
This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn't consent to or was pressured into consenting.

Psychological
This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

Financial or material
This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.

Modern slavery
This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

Discriminatory
This includes types of harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation or religion.

Organisational
This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.

Neglect and acts of omission
This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.

Self-neglect
This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.

[3] 'Care and Support statutory guidance – issued under the Care Act'. Department of Health/Home Office (2014)

8.4 Abuse can take many forms. It might not fit comfortably into any of these categories, or it might fit into more than one. Abuse can be carried out by one adult at risk towards another. This is still abuse and should be dealt with. The adult at risk who abuses may also be neglecting him/herself which could also be reason for a safeguarding referral.

9. Who might be an abuser?

9.1 Adults at risk can be abused by a wide range of people – anyone, in fact, who has contact with them. This includes family members, professional staff, paid care workers, other adults at risk, volunteers, other
service users, neighbours, friends and associates, people who deliberately take advantage of vulnerable people, strangers and people who see an opportunity to abuse.

9.2 Abuse is always wrong, but it's especially worrying when carried out by someone in a position of power or authority over someone, who uses that power to harm an adult at risk.

10. Spotting signs of financial abuse

10.1 The Phoenix Centre receives and records more instances of financial abuse than any other form of abuse. Financial abuse can occur by itself, but research has shown that where other forms of abuse take place, there is likely to be financial abuse too. The Phoenix Centre volunteers should keep this in mind.

10.2 There are some signs[4] that might show financial abuse is taking place.

- A change in living conditions.
- Selling possessions.
- Being unable to pay bills, or an unexplained lack of money.
- Money being taken out of an account without a reason.
- Financial documents being lost without a reason.
- Someone being cut off from family, friends or their social network.
- The carer having more money to spend on things like clothes, travel or accommodation.
- Sudden changes to a bank account or how someone uses it.
- New, recent authorised signers on a client or donor's account card.
- Money being taken without permission from the adult at risk's ATM card.
- Changes in how the ATM card is being used (such as more frequently or from different locations).
- Sudden or unexpected changes to someone's will or other financial documents.

10.3 This list shows some of the signs (there can be others) that abuse might be taking place. If something on this list happens, it doesn't automatically mean someone is being abused – it just means we need to look closer at the situation.

11. Other Forms of abuse

11.1 There are some things which might increase the risk of someone being abused[5].

- Records of the client being abused before, or records of suspected abuse.
- Other members of the client's family being abused.
- Family tensions and conflicts.

Factors which have been shown to increase the chance of abuse include:

- a client or donor being over 75 and female
- organic brain injury (lower mental function due to illness)
- cognitive impairment (someone having trouble with memory, thinking skills or making decisions)

[4,5] Help the Aged (2008) 'The Financial Abuse of Older People – a review of the literature'

- physical, mental or emotional dysfunction, especially depression, recently losing a partner, not having friends or a social network, living alone, or not having contact with their children[6].

12. Being aware of forced marriage

12.1 Forced marriage happens across all cultures. It's when someone is pressured into an arranged marriage or forced to marry someone they haven't freely chosen. It can also happen if someone lacks the mental capacity to make their own choices.

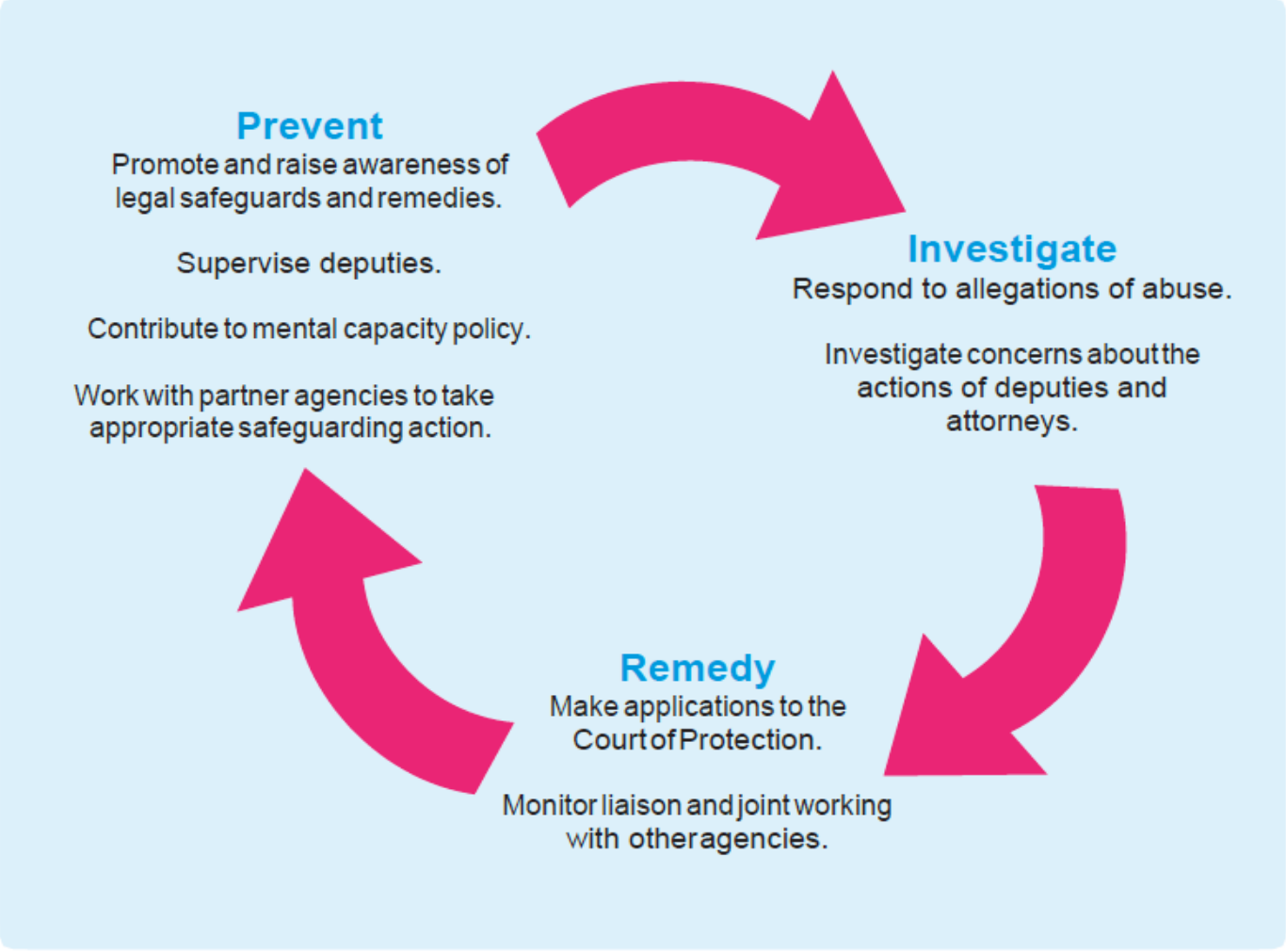
12.2 Signs of forced marriage might be:

- someone having a brother or sister who has been forced to marry
- parents talking about marriage
- hearing talk of weddings or parties
- talk of family members coming to live with the family, or family trips overseas
- wedding photos, clothes, gifts, Mehdi henna
- unreasonable restrictions being placed on someone at home

how much the person's family deals with professionals who might help with organising a wedding or a visa, before a trip overseas

13. The Phoenix Centre's role in safeguarding adults at risk

13.1 The diagram below shows the different sides of The Phoenix Centre's role in safeguarding people who lack mental capacity.



[6] Help the Aged (2008) 'The Financial Abuse of Older People – a review of the literature'

13.2 The ways we work to prevent abuse include:

- making people aware of legal safeguards such as lasting powers of attorney and the services of The Phoenix Centre and the Court of Protection. We promote safeguarding through talks, training, presentations, publicity and work with our key stakeholders and partners
- supervising deputies appointed by the Court of Protection to make decisions on behalf of someone who lacks mental capacity
- developing and reviewing strategies and policies about protecting our clients, both within the Ministry of Justice and in partnership with other government departments and external partners
- making sure systems are in place to prevent or reduce the possibility of a member of The Phoenix Centre volunteers abusing an adult at risk
- working with other agencies, including adult social services and the police.

13.3 The ways we investigate reports of abuse include:

- receiving reports that an adult at risk is being abused (we call this 'whistleblowing')
- answering requests to search the register of deputies and attorneys (free of charge)
- investigating concerns about the actions of a deputy or registered attorney, or someone acting under a single order from the Court of Protection
- working in partnership with other agencies, including adult social services and the police, including taking part in meetings and case conferences
- taking part in joint investigations of suspected abuse.

13.4 The ways we work to stop abuse include:

- applying to the Court of Protection to suspend, discharge or replace a deputy and to cancel or revoke an EPA or LPA
- providing reports to the Court of Protection under Sections 49 and 58 of the Mental Capacity Act 2005, to help the court make informed decisions
- reviewing our client files and visiting clients where we know abuse has happened in the past or if we feel there's a risk abuse might happen.

14. The statutory role of the Public Guardian

We'll use the legal powers given to The Phoenix Centre, on behalf of the Public Guardian, in the following ways:

14.1 The Phoenix Centre can carry out an investigation into the actions of a deputy, a registered attorney (LPA or EPA) or someone authorised by the Court of Protection to carry out a transaction for someone who lacks capacity, and report to the Public Guardian or Court of Protection. How we will investigate will be decided at the start of each case. Usually, our investigations will include contacting people and agencies linked to the client, requesting copies of accounts and financial transactions, reviewing decisions and reviewing our file records. The Phoenix Centre can ask a deputy or attorney to provide specific information or documents when we investigate complaints or concerns.

- As part of an investigation, The Phoenix Centre may visit a client or deputy, or a donor or attorney of a registered EPA or LPA. Visits are usually carried out by a Court of Protection visitor.

15. When we can't investigate

15.1 The Phoenix Centre doesn't have authority to carry out investigations in some cases. However, even if we can't act directly, The Phoenix Centre and/or the Court of Protection may still have some involvement in an investigation being carried out by another party.

15.2 The Phoenix Centre doesn't have legal power to investigate in these cases:

Concerns about the actions of attorneys acting under an unregistered EPA
In this case we'll usually refer the matter to adult social services for an investigation. If the donor lacks capacity to make decisions, The Phoenix Centre may advise that an application is made to the Court of Protection to revoke the EPA and appoint a deputy.

The court will sometimes order the Public Guardian to provide a report under Section 49 of the Mental Capacity Act. If the donor has capacity, The Phoenix Centre may suggest that a local agency or solicitor or a third party could help them to decide whether to revoke the EPA and make an LPA.

Concerns about the actions of former deputies or receivers
If there are concerns about the actions of a deputy whose appointment has ended, or a former receiver (someone whose appointment ended before 1 October 2007), The Phoenix Centre will usually advise that it's a matter for the current deputy, if there is one, to deal with. This includes where the former deputy or receiver has died.

If the Court of Protection ends a deputyship because of concerns about the deputy's actions, the court may order any new deputy to investigate the former deputy or receiver.

Sometimes concerns are raised after the client has died. Any deputyship ends when the client dies. It's then the responsibility of the client's personal representatives to deal with
any investigation. In cases where a deputy has been discharged, or the deputy or client has died, and The Phoenix Centre has concerns about possible financial abuse, we can call for a final report from the former deputy (or the personal representatives of the deputy if the deputy has died).

If the Public Guardian is not satisfied with the report, we may apply to the Court of Protection for enforcement of the security bond (a sum of money, a bit like an insurance policy, that's paid to the bond provider to protect a client's money) under Regulation 40 of the Public Guardian Regulations 2007. This only applies to deaths or discharges after 1 October 2007.

Concerns about the actions of people other than deputies and attorneys
In this situation, The Phoenix Centre will refer the concerns to adult social services for investigation. If the adult at risk has a deputy then The Phoenix Centre will ask to be kept informed of the situation. We could assist by monitoring the situation through supervision of the deputy and visits to the adult at risk from a Court of Protection visitor.

Concerns about the actions of someone acting under certain types of Court of Protection short orders
Short orders were granted by the Court of Protection before the Mental Capacity Act came into force in October 2007. The Public Guardian does not have powers to investigate all short order situations. Where we don't have authority, we'll usually refer the concerns to adult social services for an investigation. This may result in an application being made to the Court of Protection to revoke the order and, if necessary, a court order to appoint a deputy.

The application could include authority to look into the transactions of the person acting under the short order.

[7] Data Protection Act 1998, Schedule 2, interpreted by the Information Commissioner
[8] Report on the review of patient-identifiable information from the Caldecott Committee (1977)

Concerns about persons acting under an appointeeship made by the Department for Work and Pensions (DWP)
In these circumstances, The Phoenix Centre will refer the matter to DWP and make a referral to adult social services for investigation under their procedures.

16. Supervision

16.1 The Public Guardian has a legal duty to supervise deputies appointed by the Court of Protection to make decisions on behalf of someone who lacks capacity. Supervision is an important part of safeguarding, and it includes:

- preventative measures, for example, calling for deputy reports and making sure deputies pay security premiums
- monitoring how the deputy makes decisions, for example through checking deputy reports, having regular contact with the deputy and anyone else interested in the client's welfare, and through visits by a Court of Protection visitor
- responding to concerns and complaints about the actions of the deputy, and applying to court to discharge unsuitable deputies.

17. Dealing with abuse

17.1 We'll look at a range of ways to put things right where abuse has been discovered. We may:

- apply to the court for a deputy to be suspended, discharged or replaced
- apply to the court for an order to be varied or for a deputy's security bond to be called in or varied
- apply to the court for a power of attorney to be revoked
- inform the police, if we think a crime has been committed
- tell a deputy they must provide a final report where the person he or she was acting for has died or the deputy has been discharged. If the deputy has died, the Public Guardian can require the deputy's personal representatives to submit a final report
- continue to closely monitor the situation through ongoing supervision of the case
- tell external agencies. This includes notifying any professional body where the person who has committed abuse is a member. The Public Guardian also has power to make referrals to the Disclosure and Barring Service, which may mean the abuser is put on the 'barred list' so they can no longer work with other adults at risk or with children.

18. Getting other agencies involved

18.1 Local authority adult social services take the lead in co-ordinating the multi-agency approach to safeguard adults at risk. Initial investigations can be undertaken by any agency, however the agency most closely involved with the client may be best placed to lead this investigation at first, with action, information sharing and advice from adult social services at all stages of an investigation.

18.2 After discussion with a trustee, any suspected abuse can be referred by The Phoenix Centre to the appropriate adult social services by making a Safeguarding Adults At Risk referral (SAAR).

18.3 The way local authorities work varies, but each adult social services' response will be within a framework based on the Care Act/ Social Services and Well-being (Wales) Act guidance. The local authority will agree any investigation through its strategy meeting and discussion process so that initial enquiries don't put any police investigation at risk.

18.4 The role The Phoenix Centre will take in any investigation will be decided on a case-by-case basis. We may:

[7] Data Protection Act 1998, Schedule 2, interpreted by the Information Commissioner
[8] Report on the review of patient-identifiable information from the Caldecott Committee (1977)

- investigate the case ourselves. This happens when the Public Guardian has statutory powers under the Mental

  Capacity Act 2005 to investigate the actions of an attorney or deputy. In these cases, adult social services and/or the police can still be informed that we have received a report of suspected abuse. We don't have to prove that abuse has taken place before telling other agencies about it

- refer straight to adult social services and/ or the police if the Public Guardian doesn't have the authority to investigate
- work with other agencies (in particular adult social services) to investigate and deal with an allegation relating to an The Phoenix Centre client. 19.5 We'll discuss and agree the need to involve other agencies with the local authority or the lead agency in any investigation.

19. Reporting abuse to the police

19.1 If an incident of abuse is thought to be a criminal offence, The Phoenix Centre will refer it to the police. Examples of action that may be criminal include: physical assault, psychological assault, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination on the grounds of race or gender.

19.2 Added to this, the Mental Capacity Act 2005 states that a deputy or attorney is guilty of an offence if he or she ill treats or wilfully neglects the client.

19.3 Because deciding whether a case should be referred to the police is not always clear, decisions to involve the police will be taken by a trustee, with support from the The Phoenix Centre legal adviser, if needed.

20. Reporting abuse to the Forced Marriage Unit

20.1 If we suspect abuse involving a forced marriage, we will refer the matter to the Forced Marriage Unit (FMU). FMU is a joint agency with the Home Office and Foreign and Commonwealth Office.

20.2 FMU reassures, helps and gives options to victims of forced marriage. It works with the police, social services, teachers, welfare officers and health professionals to protect people at risk, and in extreme cases can help to rescue victims who have been taken abroad.

20.3 If the forced marriage of a donor or client has been organised by an attorney or deputy, or the attorney or deputy is aware of it, as well as referring the case to the FMU, The Phoenix Centre can investigate.

21. Sharing information

21.1 We will treat any information you give us in line with the UK General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018. This means we won't give it to anyone else unless we have a safeguarding concern or we have to apply to the Court of Protection, when it would be available to anyone involved in the court proceedings. Find out more: go to GOV.UK and search for "The Phoenix Centre privacy".

21.2 We handle sensitive personal information about people, including personal identity information and information about health and financial issues. We make sure there's no unauthorised access, loss, misuse, amendment or disclosure of this information. When safeguarding adults at risk, we sometimes need to share personal or sensitive information to someone from another organisation. The Phoenix Centre will only do this where the law says we can, and where sharing the information is in the

[7] Data Protection Act 1998, Schedule 2, interpreted by the Information Commissioner
[8] Report on the review of patient-identifiable information from the Caldecott Committee (1977)

client's best interests, including where it might prevent a crime taking place.

21.3 Where abuse is alleged or suspected, The Phoenix Centre will share information between relevant professionals so we can protect the individual concerned, or other people. Anyone who is being abused or is suspected of being abused, has a right to expect that we will protect their privacy. This goes for their families and carers too.

21.4 But where their 'vital interests'[7] (that is, questions of life or death) or 'best interests'[8], are involved, or if it's a matter of public interest, finding out the facts through sharing information becomes more important than anything else.

Your Privacy
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21.5 There are also sections in the Mental Capacity Act 2005 that allow the sharing of information between The Phoenix Centre and local authorities, and other agencies who care for or treat a client:

- Section 58(2) of the Mental Capacity Act 2005 allows the Public Guardian to supervise deputies and investigate concerns about the way a deputy or attorney is exercising their powers. We do this this in co-operation with any other person who deals with the care or treatment of 'P' ('P' is the term used in the Act for the person who lacks mental capacity to make decisions).
- Section 58(5) of the Mental Capacity Act 2005 gives the Public Guardian authority to examine and take copies of any social services record held by a local authority which relates to 'P' (but not records about a deputy or attorney).

21.6 The Phoenix Centre will share information with professional and regulatory bodies if it's in the public interest. These bodies include the Solicitors Regulation Authority, the Disclosure and Barring Service, the Care Quality Commission (England) and the Care and Social Services Inspectorate (Wales).

21.7 If we're going to share personal or sensitive information, we'll do it (where possible) with the person's agreement. If they don't agree, we decide whether releasing information would be in their best interests. If sharing information is in the public interest, we may feel that the need to release the information is more important than the views of the person concerned.

21.8 Where adults lack mental capacity to safeguard themselves, others will need to make decisions for them according to the Code of Practice and in the person's best interests. We respect the rights of 'whistleblowers' and of people accused of carrying out abuse.

We'll always share information which safeguards adults at risk, and children, on a 'need to know' basis. We'll take care to make sure any information we share is correct.

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22. Assessing and responding to the level of risk

22.1 We'll take all suspicions or allegations of abuse seriously. The Phoenix Centre volunteers know that the needs of the adult or child at risk are of the highest importance.

22.2 We'll always try to act in the best interests of the adult or child at risk, while remembering that the Mental Capacity Act 2005 supports involving people who lack mental capacity, in decisions which affect them. Where an individual has capacity and is not being pressured, threatened, frightened or bullied, that person has the right to make an unwise decision.

22.3 We'll respond quickly to all allegations that abuse has happened or is likely to happen. The Phoenix Centre's business plan shows how quickly we'll respond.

23. Roles and responsibilities of The Phoenix Centre volunteers

23.1 The Public Guardian will do whatever is in his or her power to guarantee the safety and protection of adults and children at risk. This policy is adopted by the agency board, executive team and senior leadership team. They will spread the messages in it and make sure that all volunteers adhere to it.

23.2 The senior leadership team is responsible for:

- making sure that volunteers are fully aware of the safeguarding policy
- telling people that the policy is important and keeping it up to date

- allowing volunteers to attend training and letting them access guidance to help them identify abuse and the risk of abuse, and deal with it in the ways set out in this policy making sure volunteers know about, and follow, reporting systems
- planning performance objectives which support The Phoenix Centre's safeguarding policy for volunteers working in safeguarding roles

23.3 These roles also have specific responsibilities:

The head of practice and compliance is responsible for making sure The Phoenix Centre follows this policy and for putting the right work systems and processes in place.

The head of strategy and business development looks after relationships with external agencies and stakeholders about safeguarding issues, and with the communications team is responsible for communications with customers and stakeholders about safeguarding issues.

The head of corporate services will manage finance policies and practices including (but not limited to) providing a robust fees policy to support safeguarding matters, guidance on handling cash, and a suitable risk management policy for trustees.

The head of corporate services is also responsible for managing information held by The Phoenix Centre, including providing guidance on how we manage safeguarding records[9].

23.4 All The Phoenix Centre volunteers will know where to find a copy of this policy. Volunteers will be responsible for reading and understanding this policy. If someone doesn't understand any part of the policy, they can ask a trustee for help.

23.5 If they work in safeguarding, volunteers will agree to performance objectives that contribute to The Phoenix Centre's safeguarding role and will record positive contributions they make to safeguarding.

23.6 All volunteers, and especially those who have contact with clients, deputies and attorneys, will use this policy to help them identify and deal with abuse or risk of abuse.

23.7 Trustees are responsible for making sure volunteers in their teams understand this policy and are skilled enough to follow it.

23.8 All volunteers will check the guidance on information assurance and security when managing personal information about clients, deputies and attorneys

23.9 Court of Protection visitors (visitors) will be given a copy of this policy.

23.10 All visitors are responsible for reading and understanding this policy. If visitors don't understand something in this policy when they read it, or when they're dealing with a client's case, they will ask the Phoenix Centre trustee or the safeguarding officer.

23.11 Visitors will use this policy, their professional training and any other information given to them, to help identify and deal appropriately with risk or abuse.

23.12 If visitors spot safeguarding concerns during a visit, they'll take action to prevent or stop the abuse or neglect to the client, working with the Phoenix Centre safeguarding officer. Action may include making a SAAR, referring the matter to the police or raising concerns with the Care Quality Commission.

24. Training

24.1 All The Phoenix Centre trustees and team leaders will attend training or meetings about the responsibilities of The Phoenix Centre, how to recognise abuse or the risk

[9] All Information Assets Owners are responsible for compliance with such policies

of abuse, and on The Phoenix Centre procedures.

24.2 All The Phoenix Centre volunteers who have contact with clients, deputies, attorneys, visitors and case files will attend training on this policy.

24.3 We expect Court of Protection visitors, as part of their terms of appointment with The Phoenix Centre, to attend meetings or training on this policy – in particular how to recognise abuse.

24.4 Mandatory training and briefing sessions will be put on to keep all volunteers updated about changes to this policy or our processes around it.

24.5 This policy is part of an ongoing process to strengthen working with other agencies. It will be reviewed and revised whenever there's a change in national policy or the law.

24.6 The head of practice and compliance is responsible for making this happen.

25. Reviewing this policy

25.1 This policy is part of an ongoing process to strengthen working with other agencies. It will be reviewed and revised whenever there's a change in national policy or the law.

25.2 The head of practice and compliance is responsible for making this happen.