

# North Somerset Multi-Agency Adult Safeguarding Procedures



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## Organisational abuse (Service level safeguarding) guidance

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# Introduction

This document provides guidance for a multi-agency approach to responding to concerns in relation to the organisational abuse of adults with care and support needs. Its purpose is to help partners give better informed and more effective support to people who have, or are, experiencing organisational abuse. It applies to all services that work with adults with care and support needs, regardless of who is funding their support or whether they are regulated by the Care Quality Commission (CQC) or not.

This policy should be read alongside the [NSSAB whistleblowing policy and the NSSAB multi agency safeguarding procedures.](#)

# Definitions

## Service level safeguarding

North Somerset Safeguarding Adults Board uses the term 'Service Level Safeguarding' to describe responses to concerns around what the Care Act 2014 defines as 'organisational abuse'. The board believe that the notion of 'service level safeguarding' encompasses the partnership approach that is expected when responding to concerns associated with a service as a whole.

This document uses language consistent with NSSAB.

The Care Act identifies organisational abuse as:

*"...neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation."*

The Care Act differentiates between isolated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. Repeated instances of poor care may be an indication of more serious problems, and this can constitute organisational abuse.

NSSAB say:

*A service level concern exists when several adults using a service are considered at risk. For example through neglect or repeated poor professional practice. It may be as the result of the behaviour of one or more staff member(s) or other people in a position of trust toward adults using a service or as a result of the structure, policies, processes and practices within an organisation*

## Six principles of safeguarding adults

The six principles of adult safeguarding will be applied by the council and its partners in responding to service level safeguarding concerns.

- **Protection** – The council will take direct action and work with providers and other partners to ensure people at risk of abuse are protected and expects all relevant organisations to do the same.
- **Prevention** – The council will take action and work with providers and other partners at an early stage to prevent the experience of abuse or neglect and expects all relevant organisations to do the same.
- **Partnership** – The council will work in partnership with all relevant agencies and expects all relevant organisations to do the same.
- **Accountability** – The council will be open and transparent in its responses to Service level concerns and expects all relevant organisations to do the same.
- **Empowerment** – The council will ensure that information is shared appropriately with adults at risk or their representatives
- **Proportionality** – There is no single response to service level safeguarding concerns. The Council's response will be proportionate to the level or risk presented.

## General principles

- Services should view service level safeguarding as a process that is engaged in together in partnership.
- North Somerset Council takes a broad view of 'relevant services' for the purpose of organisational safeguarding including those that provide care, support or accommodation to adults who may be considered 'at risk'.
- Practitioners should be most concerned when problems are identified across a range of domains of care or service provision.

- The council will look beyond single incidents to identify patterns or early indicators of risk.
- Service level safeguarding responses will be proportionate to the level of risk identified.
- Internal council procedures aim to ensure that proportionate and appropriate information is shared at relevant times while reducing duplication.

## Why does organisational abuse happen?

Like all types of abuse, there is no single cause of organisational abuse. It generally happens in institutions where staff are:

- Poorly trained.
- Poorly supervised.
- Unsupported by management.
- Bad at communicating.
- Highly stressful environments that are consistently short staffed.

Organisational abuse can involve more than one abuser. This includes a culture whereby one or more staff members fail recognise or respond to the actions of a lone/multiple perpetrators.

## Examples of organisational abuse

Organisational abuse doesn't have to involve physical violence. It can include coercion and control, for example that a person in care must drink their tea at the same time every day.

This is the sort of thing that many of us take for granted. But when the right to choose is taken away, it can count as abuse.

The abuse can either be a one-off incident or an ongoing culture of ill-treatment. The abuse can take many forms, including neglect, and poor professional practices as a result of the structure, policies, processes and practices in an organisation.

Here are some forms organisational abuse might take:

- Inappropriate use of power or control.
- Inappropriate confinement, restraint, or restriction.

- Lack of choice – in food, in decoration, in lighting and heating, and in other environmental aspects.
- Lack of personal clothing or possessions.
- No flexibility of schedule, particularly with bed times.
- Financial abuse.
- Physical or verbal abuse.
- Sexual abuse.
- Forced labour.

Remember that this list is by no means exhaustive. It is important to inform yourself. Please refer to the Local Government Association organisational abuse resources for more information [Organisational abuse resources | Local Government Association](#).

## Signs of organisational abuse

These are the sort of things that may indicate that organisational abuse is happening:

- An unsafe, unhygienic or overcrowded environment.
- A strict or inflexible routine.
- Lack of privacy, dignity, and respect for people as individuals.
- Withdrawing people from community or family contacts.
- No choice offered with food, drink, dress or activities.
- No respect or provisions for religion, belief, or cultural backgrounds.
- Treating adults like children, including arbitrary decision-making.

Also be on the lookout for more telling signs of abuse, including cuts, bruises, and restraint. Another big warning sign is an organisation that discourages visits, or the involvement of friends and relatives.

## Responding to concerns raised about organisational abuse

If you believe that someone may be a victim of organisational abuse then you can do the following:-

- Reflect upon the feelings of concern that you may have about a particular service using the [Early Indicators of Concern Residential and Nursing Homes for Older People](#) and [Early Indicators of Concern in Residential Support Services for People with Learning Disabilities](#) developed by the University of Hull.
- If you are a member of staff in the organisation that is abusing the person, you should initially speak to your line manager or use your organisations Whistleblowing policy.
- You can contact the Care Quality Commission
  - [Contact us by online form - Care Quality Commission](#)
  - enquiries@cqc.org.uk
  - 03000 616161
- You can make a referral to the Safeguarding Adults Team through care connect

As with all forms of abuse you should talk to the individual on whose behalf you are making the referral to obtain their consent. However, if the person lacks the mental capacity to make a decision regarding their care and treatment or you believe other people may also be victims of the abuse, then you MUST refer to care connect immediately. Please use the referral form to raise an adult safeguarding concern.

[Submit your completed form](#) to [care.connect@n-somerset.gov.uk](mailto:care.connect@n-somerset.gov.uk).

Alternatively, anyone can call our Care Connect service directly to raise a concern, make a referral or to seek further guidance on:

01275 888 801

Monday to Friday 8am - 6pm

**In an emergency please ring 999 and ask for the police.**

Emergency Duty Team

01454 615 165

Out of hours and weekends

If you are deaf or hearing impaired

- text 'EDT' followed by your name and message to 60066

- you will be sent an immediate autoreply to confirm that your text has been received
- you will be contacted by an Emergency Duty Team officer via text, to discuss your concerns - this should happen within 30 minutes, although during busy periods this may take longer
- texts will cost your standard network rates

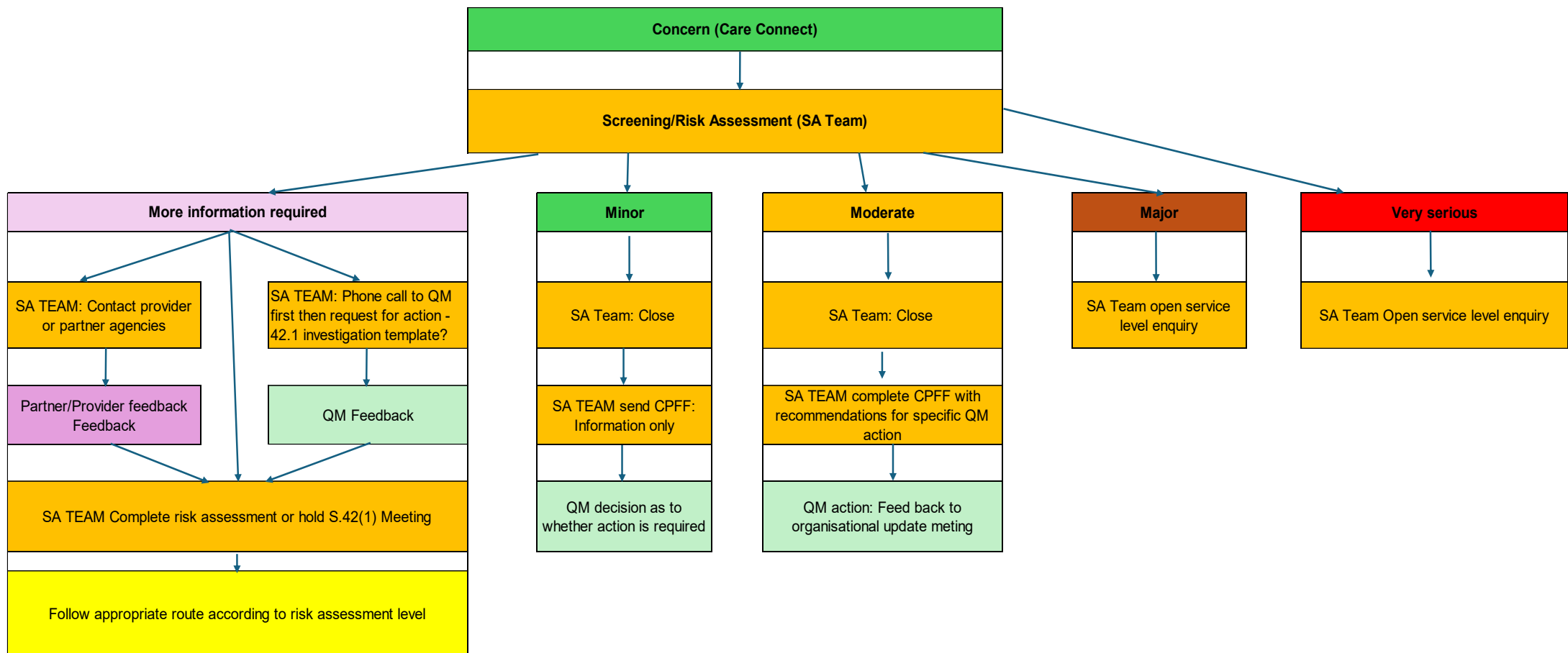
The internal process outlining how North Somerset Council responses to concerns raised regarding organisational abuse is outlined in the document titled *North Somerset Council Service Level Safeguarding Framework and Quality Monitoring Joint Working Arrangements*.

The decision-making process, and definition used for level of risk, outlined in this framework is summarised in [appendix one](#).



# Appendix one

## Service level decisions S.42 and definitions of levels of risk



<u>Terminology</u>	<u>Definitions</u>		
<b>Very Serious</b>	Immediate multi-agency action is required due to very serious concerns. Perception of an immediate high level of risk to people using the service. Carries a risk of reputational damage and media interest.		
<b>Major</b>	<p>Large Scale Safeguarding enquiry required, due to multiple concerns, impacting more than 1 person.</p> <p>The number and/ or seriousness of the concern(s) indicate that people are not protected against unsafe or inappropriate care</p>	<b>Persisting Major</b> (May be used later in the safeguarding response)	Despite multi-agency intervention the provider persistently fails to improve, or improvements are not sustained leading to persisting major concerns and a lack of confidence in them.
<b>Moderate</b>	<p>Where there is more than one issue raised but no harm has occurred</p> <p>The concern is 'contained' in that limited Multi-agency working may be required. Perception is that people are generally safe but there are specific improvements or assurances required.</p>		
<b>Minor</b>	<p>Singular concern impacting practice across the home or directly impacting an un-named individual.</p> <p>People are generally safe but shortfalls in quality of provision mean that outcomes may not be achieved and that people using the service are potentially at risk if service provision deteriorates.</p>		