

Multi-agency guidance to support adults at high risk of financial abuse

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Introduction

This guidance has been developed as part of the East Sussex Safeguarding Adult Board Financial Abuse Strategy and is designed to clarify pathways, roles and responses to improve engagement and positive outcomes for adults who are chronically financially abused.

The guidance is for all agencies working with adults over 18 years of age who have care and support needs, and have been assessed, using the [financial abuse screening tool](#), as being at high risk of financial abuse and / or there are significant professional concerns regarding the risk of financial abuse.

The guidance does not replace, but supports, the [Sussex Safeguarding Adults Policy and Procedures](#). The guidance can be used alongside the [financial abuse toolkit](#) which provides information to inform responses to suspected cases of financial abuse.

Context of financial abuse

Reported incidents of financial abuse are on the increase, both nationally and locally. Increased awareness and better levels of reporting may explain the increase but research shows that much of this type of abuse can go undetected for a variety of reasons.

Financial abuse is most frequently perpetrated by a person acting in a trusted capacity. This can include family members, friends and neighbours, or care workers and other professionals. Financial abuse may also be perpetrated by individuals who are initially strangers and seek out vulnerable adults with the intention of exploitation.

Financial abuse can include fraud, coercion in relation to finances, theft, misuse or misappropriation of property, possessions or benefits.

Adults can be at higher risk of financial abuse if they are living alone, isolated, divorced or separated, dependent on others for daily living skills, have difficulties with numeracy, lack capacity around finances, and are in denial that they are being exploited. This could include adults who have a physical disability, learning disability, sensory impairment, mental health needs, long-term health condition and / or misuse substances.

Aim of this guidance

The purpose of this guidance is to reduce the likelihood of adults with care and support needs who are at high risk of financial abuse continuing to suffer from this type of abuse by ensuring:

- Adults are empowered to understand the implications of their actions and become more resilient.
- A shared multi-agency understanding and recognition of the issues involved in working with high risk victims of financial abuse.
- Effective multi-agency working between all relevant agencies.
- All agencies uphold their duty of care responsibilities within the legal framework.

This will be achieved by:

- A Making Safeguarding Personal approach.
- Key agencies having a point of contact, and working in partnership.
- Clarity on each agency's role and responsibilities, accountability, evidence of decision making and actions undertaken.
- A joint framework for assessment of risk of financial abuse, risk reduction and review.

Indicators of high risk of financial abuse

Adults who are potentially at high risk of financial abuse may be:

- Unable to manage their own finances due to lack of mental capacity.
- Unable to manage their own finances due to lack of numeracy skills.
- Dependent on another person or people to manage their money.
- Dependent on others for all aspects of daily living tasks.
- Isolated or living alone.
- Of a 'trusting' nature.
- Susceptible to emotional grooming.

- In poor health.
- Divorced, widowed or separated.
- Are repeatedly targeted and can be in denial due to the nature of the exploitation.

Working with adults at high risk of financial abuse

Working with an adult at high risk of financial abuse can be most effective when there is:

- Continuity, rapport, empathy, persistence and respect.
- An understanding of the meaning and significance of the adult's life experience.
- Making the most of moments of their motivation to secure behaviour changes.
- Assessment and review of the adult's mental capacity in relation to financial decisions when there is a doubt about the adult's ability to make this specific decision.
- Openness, honesty and communication about risks.
- Proactive working to engage and co-ordinate agencies with specialist expertise to contribute towards shared goals.
- Professional judgement to establish who is the best placed person(s) to engage with the adult.

This guidance does not replace East Sussex County Council's statutory responsibilities as the lead agency in adult safeguarding as identified in the Care Act 2014.

Adult Social Care and Health (ASCH) leads in the co-ordination of enquiries into allegations of neglect or abuse of adults who meet the three key tests ie:

- an adult who has care and support needs (whether or not the local authority is meeting any of those needs), and
- may be experiencing, or is at risk of, abuse and
- as a result of those needs is unable to protect themselves from either the risk of, or the experience of, abuse.

If it has been assessed that the adult does not meet the three key tests, the most proportionate approach would need to be considered which may include:

- the local authority's discretionary power to undertake a safeguarding enquiry;
- other agencies who are best placed to co-ordinate the response using the principles set out in this guidance.

Financial Abuse Screening Tool

In order to initially assess whether an adult is at high risk of financial abuse a Financial Abuse Screening Tool is completed. This can be completed by ASCH or other agencies which have agreed to complete this where financial abuse safeguarding concerns are indicated. This initial risk identification must be undertaken by asking all the questions, so the information gathered can provide a picture of what is currently happening. Please see [Financial abuse screening tool](#) for risk rating and next steps.

Roles and responsibilities

Adult Social Care and Health

Adult Social Care and Health (ASCH) will identify a lead practitioner, who is the Enquiry Manager, for high risk financial abuse safeguarding enquiries. When Health and Social Care Connect (initial access point for ASCH in East Sussex) receives a safeguarding concern and / or a Financial Abuse Screening Tool which indicates the adult is at high risk of financial abuse and has care and support needs, they will contact the appropriate ASCH team.

If the Financial Abuse Screening Tool has not been completed, the Enquiry Manager will complete this with the adult when safe and appropriate or will delegate to a colleague to complete.

If high risk is identified and / or there are significant concerns around financial abuse this guidance should be followed.

The Enquiry Manager will be the lead person and point of contact throughout and will co-ordinate the response which will include:

- Liaising with the relevant people.
- Chairing multi-agency meetings.

- Ensuring information is shared.
- Reviewing risk.
- Implementing actions with clear roles, responsibilities and timescales until the risks have been reduced where possible.
- Ensure ongoing monitoring, once the enquiry has concluded.

Police

All high risk victims of financial abuse will be referred to the Police Multi-agency Safeguarding Hub (MASH). The MASH Detective Sergeant will review the referral, assist in reviewing the level of risk and identify any criminal offences. Any criminal offences will be recorded in accordance with the National Crime Recording Standards. A MASH representative will attend any multi-agency meetings, share information and ensure any police actions agreed are undertaken. Where a criminal investigation is agreed, a Detective Constable Officer in Charge (OIC) from the Safeguarding Investigation Unit will be assigned.

For further information see the [Financial abuse toolkit](#) 'Who can help with what' section for police.

Trading Standards

If the high risk financial abuse enquiry relates to a consumer protection issue, Trading Standards will have an identified lead person who will share information including any investigatory actions, attend the multi-agency meetings, assist in reviewing risks and ensure any actions they agree are undertaken.

For further information see the [Financial abuse toolkit](#) 'Who can help with what' section for Trading Standards.

Finance and Benefits Assessment Team

The East Sussex County Council Finance and Benefits Assessment Team (FABA) will identify a lead person when an adult has been assessed as at high risk of financial abuse by a person acting in a trusted capacity, which includes family members, friends and neighbours, or care workers and other professionals. The Enquiry Manager will involve the FABA lead person and consider whether the enquiry, or parts of the enquiry, could be undertaken by them.

For further information see the [Financial abuse toolkit](#) 'Who can help with what' section for FABA.

Multi-agency meetings for adults at high risk of financial abuse

Where the adult has been assessed as high risk, or there is professional judgement of significant concerns, this will be discussed within a multi-agency meeting.

This meeting will have a clear agenda based on the principle of no delay and will aim to be convened within five working days from the completion of the financial abuse risk assessment.

Principles for multi-agency planning meeting

- The Enquiry Manager will be responsible for convening this meeting and making arrangements such as venue and minute taking.
- The Enquiry Manager will make arrangements to involve the adult and / or their representative to attend the meeting if they agree.
- At the multi-agency meeting a decision will be made as to how best to include the adult if they do not wish to attend and it will be agreed how to feed their views into the meeting. Any decisions taken will be clearly recorded and communicated back to the adult.
- The meeting will emphasise the need for building trust with the adult in order to achieve any change.
- Each agency approached will be responsible for making any contacts or taking any actions considered necessary before the planning meeting.
- The meeting will include the relevant appropriately skilled and experienced people who need to come prepared with the required information.
- Minutes of the meeting will be taken so that responsibilities for implementing the safeguarding plan are clearly accepted and understood by named individuals.
- All professionals who attend the meetings must fully understand the legal duties, resolve ethical dilemmas and establish individual responsibility within the plans made.
- A fully co-ordinated response will be essential to achieving a satisfactory outcome and ensure there is clear understanding of the agreed way forward.

Purpose of the multi-agency planning meeting

- Establish or review the adult's views and wishes where possible.
- Discuss current level of risk and co-ordinate information sharing.
- Evaluate relevant information to inform the most effective approaches and agree actions.
- Gain historical perspectives of the current situation.
- Assess willingness of the adult to engage and / or accept intervention and support.

Reasons for convening a meeting

- The Financial Abuse Screening Tool has indicated the adult is at high risk of financial abuse, with significant on-going risks remaining.
- The level of risk requires formal information sharing and recording of the agreed multi-agency safeguarding plan.

Timescales

Actions that need to be achieved will be agreed and specified within the formal written record of the multi-agency meeting. This will include timescales for completion of a further Financial Abuse Screening Tool and any other specialist assessments.

A date will be set for a review meeting if required which will be informed by the individual circumstances of the enquiry but will aim to be within 30 working days so any revised actions can be agreed.

Assessment material

It is the responsibility of all the agencies involved to share relevant assessment material and for it to be brought together in one place, and for each professional involved to have an understanding of the links between their own involvement and that of others.

Key assessment material that may be required can include:

- Financial Abuse Screening Tool.

- Social care assessments.
- Mental capacity assessments.
- Pen picture including adult's own views on their situation and needs.
- Adult's activities of daily living including numeracy skills.
- Adult's social and medical history.
- Mental health assessments.
- Any cognitive assessments.

Information from other agencies including the police, Trading Standards (if consumer protection issues), FABA Team, Victim Support, primary and secondary health services, supporting agencies, outreach services, supported accommodation, residential / nursing care, supply management, banks / building societies, adult's network and family members where relevant.

Outcome of the multi-agency planning meeting

The Enquiry Manager will confirm the following outcomes:

- Achieve the adult's desired outcomes where possible.
- Agreed actions including contingency plans, relevant assessments including financial risk assessment and agreed professional who has or will build rapport.
- Monitoring and review arrangements.
- Clear communication and sharing of information with the key people involved.
- Agreed time and date for any required multi-agency review meeting.

Outcome of assessment of risk

The multi-agency planning meeting should confirm the following outcomes around risk:

- **Risk addressed:** Ongoing monitoring arrangements to be agreed.
- **Risk remains:** Adult continues to be at high risk which includes non-engagement, initial protective measures have not addressed issue and if relevant professionals have not participated fully or refused to engage.

Resolution

If there is a disagreement between agencies every attempt should be made to seek an agreed resolution. However, if this is not possible the [East Sussex Safeguarding Adults Board Resolution Protocol](#) should be followed.

Multi-agency review meeting

A multi-agency review meeting will be convened if the adult remains at high risk.

The safeguarding enquiry will not be closed because the adult is not engaging and / or refusing the agreed safeguarding plan. Legal advice may be sought if required.

This meeting will reconvene to discuss a review of the safeguarding plan.

The review is an opportunity to revisit the assessment material including the original financial risk assessment, review decision-specific mental capacity assessments, and review the adult's current functioning, engagement, support system, environment, physical and mental health.

The discussion within this review meeting will focus on:

- Contingency planning based upon assessed risk.
- Continuing to provide opportunities for the adult to accept support.
- Reviewing multi-agency actions and timescales where risks may be increasing.

The Enquiry Manager will ensure there are clear identified timescales for implementing contingency plans, so that where there is legal and professional remedy to do so, risk is responded to and harm is prevented.

All relevant professionals will attend the multi-agency review so that:

- information is shared,
- contingency planning is fully discussed, and
- inter-agency ownership of the plans is achieved.

A co-ordinated and planned response is essential to the achievement of success and it is important to ensure an objective and fresh perspective is maintained as far as possible throughout.

Consider the following approaches:

- Include people with relevant skills and experience who have not previously been involved.
- Other agencies which may succeed if the adult has not engaged.
- Ensure chronologies are up-to-date with multi-agency information and analysed as part of reviewed risk assessments and safeguarding planning. Consider whether escalation of some or all issues to more senior professionals may assist or provide any benefit.

A further meeting date will be set at each multi-agency review which aims to be within 30 working days, until there is a multi-agency agreement that the situation has become stable and the risk of harm has reduced to an acceptable level.

Where agencies are unable to implement support or reduce risk significantly, the reasons for this will be fully recorded and maintained on the adult's social care file, with a full record of the efforts and actions taken.

The adult or adult's representative will be fully informed of the support offered and the reasons why this has not been implemented. The risks must be shared with them to ensure they are fully aware of the consequences of the continuing risk. This will require an implementation of ongoing monitoring arrangements and making proactive contact to ensure that the adult's needs, risks and rights are fully considered in the event of any changed circumstances.

Record keeping

The ASCH record will include a summary of the efforts and actions taken by all other agencies involved. Individual agencies will also need to keep their own records of their specific involvement.

Accurate records will be maintained that demonstrate adherence to the [Sussex Safeguarding Adults Policy and Procedures](#).

Key contacts

To report a safeguarding concern

Contact Health and Social Care Connect:

Tel: 0345 60 80 191

Email: HSCC@eastsussex.gov.uk

Trading Standards

Tel: 03454 040 506 (Monday – Friday 9am to 5pm)

07876 036 999 (out of hours)

Email: trading.standards@eastsussex.gov.uk

Key contacts (for ASCH use only)

Sussex Police

Sussex Police referrals should be sent to the relevant adult MASH team:

For referrals for Eastbourne / Lewes / Weald

Email: MASH.Eastbourne@sussex.pnn.police.uk

Tel: 01323 747373

For referrals for Hastings / Rother

Email: MASH.Hastings@sussex.pnn.police.uk

Tel: 01424 724144

The Finance and Benefits Assessment Team

Tel: 01323 464699

Email: Finance.&.Benefits.Assessment.Team@eastsussex.gov.uk

Flowchart to support the use of the multi-agency guidance

