Apuldram Centre

Safeguarding Adults at Risk Policy

Version: June 2026

Version History

Date	Created by / Amended by	Comments	Owner
Sept 2022	Rachel Aslet-Clark	Adopted	CEO
Feb 2024	Rachel Aslet-Clark	Reviewed	CEO
Sept 2024	Rory Massey	Reviewed and restructured.	CEO and Board of Trustees
Jan 2025	Rory Massey and Board of Trustees	Volunteers incorporated throughout the document. Additional examples of abuse by befriending service users added. Council guidance on police involvement added (*minor changes*)	CEO and Board of Trustees
June 2026	Rory Massey and Board of Trustees	Changing term “Vulnerable Adults” with “Adults at Risk, amend mention of “ Care and Support Statutory Guidance 2023” to avoid frequent updates, addition of “Regulatory Compliance” bullet point under section 5, addition of paragraph regarding Whistleblowing Policy in section 6, addition of learnings paragraph in section 9, increased different types of abuse, expansion on positive risk taking in section 3, inclusion of Prevent Duty/Radicalisation in section 7, expansion of self-neglect definition, addition of review of retention periods in section 7, addition of inclusion service users in section 1, inclusion of Lone Working policy adherence in sections 4 and 6.	CEO and Trustees

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1. Background and Scope

Safeguarding is the act of protecting people's health, wellbeing and human rights, ensuring they can live free from harm, abuse and neglect. Safeguarding encompasses measures that go beyond standard health and safety requirements to address specific risks and vulnerabilities.

This policy is designed to guide the charity in fulfilling its statutory and ethical responsibilities to protect adults at risk from harm, abuse, neglect, exploitation, discrimination, or radicalisation. It will be reviewed annually, or sooner if necessary. It applies to staff, volunteers and contractors.

The policy provides a safeguarding framework under which more specific policies and procedures will operate. It addresses safeguarding concerns related to service users, staff, volunteers and the general public.

This policy applies to activities conducted:

- On Apuldram Centre premises.
- During off-site visits and activities.
- In properties where the Apuldram Centre provides services.
- Off-site activities for which the Organisation is responsible.
- Off-site activities that may affect the Organisations staff, volunteers or service users.

Additionally, the charity reserves the right to require that contractors, working on or off its premises, provide requested assurances and have appropriate safeguarding policies in place.

The policy covers both the preventative measures which the Organisation has, or should have, in place, and guidelines on responding to specific events, concerns or allegations.

The Apuldram Centre is committed to its wider role of safeguarding and promoting welfare of adults at risk. This refers to the activity which is undertaken to protect specific adults at risk who are suffering or are at risk of suffering significant harm.

The Organisation is committed to involving service users, where possible, in shaping safeguarding practices and promoting their voice in decisions affecting their safety and wellbeing.

Effective safeguarding and promoting the welfare of adults at risk—particularly protecting them from significant harm — relies on collaborative efforts among agencies and professionals with diverse roles and expertise.

The Organisation recognises that safeguarding adults at risk is a shared responsibility involving staff, volunteers, external agencies, professionals, Service Users and their families. This policy outlines the organisation's responsibilities and the expectations for staff, volunteers and contractors in safeguarding its Service Users.

All staff members must behave in an appropriate and professional manner at all times and in accordance with their Contract of Employment, this Code of Conduct in the Staff Handbook and the Care and Support Framework document

No staff member or volunteer is to abuse, or be perceived to abuse, their power or befriend an adult at risk/vulnerable adult outside of their professional role, including but not limited to, sharing or accepting personal details including contact details, linking with an adult at risk on social media, taking photographs or meeting beyond their professional role, accepting a financial loan or be lent money by a service users, helping service users gain access to inappropriate websites, supplying or aiding the supply of harmful substances.

Any concern about an adult at risk/vulnerable adult should be acted upon immediately as indicated in section 6 "Reporting" of this document.

2. Definitions

For the purposes of this policy:

- **Service User**: the term 'service user' throughout this document is used as a generic term to cover all users of Apuldram Centre services
- **Vulnerable adult**: includes those who, because of mental health difficulties and/or physical health conditions and/or personal circumstances, may be vulnerable to abuse, exploitation or significant harm. Service users may arrive with vulnerability issues, or these may develop during their time being supported by the Organisation. Vulnerability may be long term - for example learning disabilities, long term mental or physical conditions, other disabilities, personal circumstances such as history of care and / or abuse - or short term - for example due to bereavement, an accident resulting in serious physical and/or mental illness, extreme stress due to financial failure, or as a result of regular alcohol and/or drugs abuse. As per the Safeguarding Vulnerable Adults Act 2006 "vulnerable adult" means any adult to whom an activity which is a regulated activity relating to adults at risk by virtue of any paragraph of paragraph 7(1) of Schedule 4 is provided https://www.legislation.gov.uk/ukpga/2006/47/schedule/4
- **Adult at risk**: a person aged 18 years or older, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. An 'Adult at Risk' is defined by the Law Commission as: 'A person aged 18 years or over who appears to have health and social care needs and appears to be at risk of harm'.

  An 'Adult at Risk' is defined by the Care Act 2014, as 'A person aged 18 or over who is at risk of abuse or neglect because of their need for care or support'.

  Section 42(1) states "a local authority has reasonable cause to suspect as an adult in its area (whether or not ordinarily resident there)

  > (a) has needs for care and support (whether or not the authority is meeting any of those needs),
  >
  > (b) is experiencing, or is at risk of, abuse or neglect, and
  >
  > (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it."

- **Abuse:** abuse is about the intentional or unintentional misuse of the power and control that one person has over another. This definition is 'motive free', i.e. it does not matter whether the perpetrator intended harm to take place. What matters is whether or not harm was caused. Abuse may be:
  - A single act, of any scale, which causes harm and can be of varying degrees
  - Repeated acts of a similar or different nature
  - Intentional or unintentional. Causing harm may also be intentional or unintentional
  - An act of neglect or a failure to act on the part of someone who has caring responsibilities

  Unintentional harm may come about through lack of knowledge or, for example, due to the fact that a carer's own physical or emotional frailties make them unable to care adequately for the adult at risk.

  The Care Act 2014 and the Care and Support Statutory Guidance (as amended) issued by the Department of Health and Social Care, defines eleven areas of abuse. The list is not

exhaustive but is a guide:

- Physical abuse - Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic Violence/ Domestic Abuse - Including psychological, physical, sexual, financial, emotional abuse or 'honour' based violence.
- Psychological abuse - Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, online exploitation, digital coercion and misuse of technology, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- Exploitation- Including sexual and/or criminal exploitation
- Sexual abuse - Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography. Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Financial or material abuse - Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- Modern slavery - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- Discriminatory abuse - Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.
- Organisational abuse - Including 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 long-term ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.
- Neglect and acts of omission - Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Self-neglect - This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Cases of self-neglect may require a multi-agency response in line with local safeguarding procedures.

3. Key Principles of Adult Safeguarding

In the safeguarding of adults, the Organisation is guided by the six key principles set out in The Care Act 2014 and 'Making Safeguarding Personal' initiative. The Organisation aims to demonstrate and promote these six principles in our work:

i. Empowerment – People being supported and encouraged to make their own decisions and informed consent

ii. Prevention – It is better to take action before harm occurs.

iii. Proportionality – The least intrusive response appropriate to the risk presented.

iv. Protection – Support and representation for those in greatest need.

v. Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

vi. Accountability – Accountability and transparency in delivering safeguarding.

Safeguarding means protecting a vulnerable adult's right to live in safety, free from abuse and neglect. It is about people and Organisation's working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented to or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

All members of staff and volunteers are therefore encouraged to behave in the best interests of the Service User at all times and to provide the best possible standard of care they can.

The Organisation recognises the importance of supporting positive risk-taking and least restrictive practice, ensuring that safeguarding responses do not unnecessarily limit an individual's independence, rights or choices.

4. Associated Policies and Procedures

Safeguarding is integral to all aspects of the Apuldram Centre's operations and serves as a foundation for many of its policies. This Policy should be read in conjunction with all other policies and in particular, the Apuldram Centre Safeguarding Children Policy.

Due to the nature of the Organisation's services, a number of staff undertake lone working. The Organisation recognises that lone working may present additional safeguarding risks for both staff and service users. Staff must therefore adhere to the Organisation's Lone Working Policy and associated risk assessments to ensure appropriate safeguards are in place at all times.

5. Preventing Abuse from Occurring

The organisation is fully committed to preventing the abuse of adults at risk and has implemented the following measures to protect its service users:

Safer Recruitment Practices: Robust recruitment and selection procedures ensure the suitability of individuals working with adults at risk. This includes advertising relevant roles with a Disclosure and Barring Service (DBS) requirement and conducting thorough reference checks before employment.

Comprehensive Training: Employees and volunteers receive training to recognise signs of abuse and understand their responsibilities in safeguarding adults at risk

Clear Reporting Procedures: The organisation provides clear protocols for employees to report suspected abuse and designates safeguarding leads to handle enquiries and investigations.

Financial and Property Safeguards: Strict procedures are in place to regulate employees' contact with service users' property, money, and financial affairs to prevent misuse or exploitation.

Policy Adherence: The Organisation will adhere to the policies and procedures set out by the Sussex Safeguarding Adults Board (SSAB) and complies with the Sussex Safeguarding Adults Policy and Procedures, ensuring concerns are reported to the appropriate local safeguarding authorities in line with West Sussex Safeguarding Adults Board thresholds.

Regulatory Compliance: The Organisation operates in line with the safeguarding requirements of the Care Quality Commission, including Regulation 13 (Safeguarding service users from abuse and improper treatment), and promotes a culture where service users are safe, listened to and protected from harm.

Regulatory Communication: Concerns are communicated to the Care Quality Commission and other relevant regulatory bodies, following current policies and professional guidelines.

Relationship Building: Employees are encouraged to foster positive relationships with service users, helping to identify and avoid situations or relationships that may increase vulnerability to abuse.

Prioritising Service Users' Needs: Staff and volunteers are reminded that service users' needs and safety take precedence over loyalty to colleagues, promoting a culture of transparency and accountability.

Zero Tolerance for Non-Reporting: Staff and volunteers are made aware that failing to report suspected abuse is itself a form of abuse and may result in disciplinary action or criminal proceedings.

Monitoring and Quality Control: Systems for record-keeping, supervision, internal inspections, and quality assurance are in place to identify and address any potential abuse.

Empowerment of Service Users: The organisation supports service users in recognising risks and taking steps to protect themselves.

Duty of Candour: The organisation upholds its legal and moral obligation to be open and honest in all matters relating to safeguarding and the welfare of its service users.

Lone Working Arrangements: The Organisation has specific procedures in place to manage risks associated with lone working, including risk assessments, communication protocols and escalation procedures, in line with the Organisation's Lone Working Policy.

6. Reporting Abuse

Any staff member or volunteer who witnesses a situation where a service user is in actual or imminent danger must use their judgment to determine the best way to intervene without causing further harm to anyone involved, including themselves. This may involve directly intervening or summoning assistance from other staff or management.

If a staff member or volunteer suspects that a service user is being abused, they must immediately report their concerns to a manager so that appropriate steps can be taken to investigate. This report should be documented using the Safeguarding Cause for Concern Reporting Form (Appendix A), which should be completed as soon as possible unless there is a significant threat to safety which should be prioritised or alternatively an email or the organisation's care management system can be used but all information requested in the form must be included in these alternative methods.

Staff and volunteers may also raise concerns through the Organisation's Whistleblowing Policy. Concerns can be escalated externally where appropriate, and individuals will be protected from victimisation or detriment when raising safeguarding concerns in good faith.

Failure to report suspected or witnessed abuse is considered a serious breach of this policy and may result in disciplinary action under the organisation's procedures. Such failure is regarded as a form of abuse. Staff members or volunteers are strongly encouraged to report any concerns promptly to management or, in the absence of a manager, to a senior staff member.

The senior staff member or manager who receives the report must promptly notify West Sussex County Council Adult Social Care Support and follow its procedures and guidance. In some cases, they may also need to report the matter directly to the police by calling 101 or 999 depending on the severity and act in accordance with their instructions to ensure the safety of all parties involved. The West Sussex County Council Adult Social Care Support will advise on whether the matter should be reported to the police.

If the alleged abuser is an employee or worker, and there is sufficient evidence to suggest abuse has occurred or may occur, the individual may be suspended from duty while further investigations are conducted. This suspension is a precautionary measure to facilitate a fair investigation and determine whether disciplinary action is warranted.

7. Sensitive Information, Record Keeping and Confidentiality

Safeguarding issues are highly sensitive and require careful handling to minimize potential harm to all parties involved, including the individual for whom there is concern and, in some cases, the person accused (if allegations are false or misinterpreted). Only those who need to know from a professional perspective should be informed or receive written information about allegations. Staff and volunteers should bear in mind that these issues are governed by legislation relating to confidentiality, human rights, and data protection and information is shared in line with the Organisation's Privacy Notice's and General Data Protection Regulations (GDPR) and Data Protection Act 2018. If any adult requires immediate protection from harm, the police and/or Adult Social Care must be contacted.

It is recognised that dealing with these situations and listening to personal accounts can be distressing for the listener. A debriefing session *may* therefore be essential. Should this take place, it is important to do so without reference to identifying details.

Records made about allegations should be kept for seven years and then destroyed, unless they are the subject of ongoing proceedings. If and when an allegation is found to be false, the records should also be kept for six years unless proceedings are ongoing. Where it can be justified in doing so, and in good faith, actual physical or on-line records will be kept and stored in compliance with current data protection legislation.

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made.

Safeguarding cases often challenge the boundaries of confidentiality. Individuals may hesitate to disclose abuse if they fear their information will be shared, including with the police. Similarly, those seeking help for violent, abusive, extremist, or terrorist tendencies may fear a breach of confidentiality.

While the organisation strives to respect confidentiality, the law places limits on this in safeguarding matters. Staff and volunteers must inform individuals in advance about these limitations and explain that sensitive disclosures may need to be shared with a manager or another designated authority within the organisation.

Confidentiality may be extended in rare cases, particularly in situations involving:

- A vulnerable adult whose welfare is at risk.
- Threats or intentions to harm oneself or others.
- Risk of involvement in terrorism or extremist ideologies, or expressions of intent to support or participate in such activities.

When it is considered necessary to extend confidentiality, staff and volunteers are advised to first discuss the issues with a manager and to do so on what is called a 'need to know' basis only.

Where possible and safe, the need to extend confidentiality should be discussed with the person making a disclosure.

It is important to stress that, in relation to safeguarding, staff and volunteers cannot give an assurance of confidentiality. Instead, they should normally inform the person making the disclosure that the information will be passed on to the relevant manager, who may then have to pass this to the Police or Social Services. In exceptional circumstances, such as where informing the individual would hinder a criminal investigation, endanger others, or obstruct the arrest of an offender, the information may be shared without prior notice to the individual.

The Organisation recognises its responsibilities under the Prevent Duty and will take appropriate action where there are concerns that an individual may be at risk of radicalisation.

Retention periods will be reviewed periodically to ensure alignment with current legislation, local authority guidance and regulatory expectations.

8. Training

The organisation ensures that training is accessible to all staff, volunteers, and trustees through various methods tailored to meet diverse needs. The Training Framework includes **Safeguarding Awareness** and **Safeguarding Adults Level 1** as a minimum standard, with advanced training provided for those in roles requiring deeper knowledge, such as managers who participate in **Local Authority Safeguarding Adults Enquiry Training for Provider Services**.

Training is conducted at intervals aligned with the requirements of each course, ensuring knowledge remains current. Attendance is recorded to monitor compliance and maintain accountability.

9. Implementation and Monitoring

This Policy shall be reviewed every 12 months unless there are changes to the legislation or statutory guidance, in which case the Policy will be reviewed in accordance with such changes.

The effectiveness of the Policy will be assessed through the monitoring and analysis of safeguarding incidents through feedback and reports from staff and volunteers, and the Organisation’s Safeguarding Log.

The Organisation will take account of learning from Safeguarding Adults Reviews (SARs) published by the West Sussex Safeguarding Adults Board and other relevant bodies, and will incorporate lessons learned into policy, training and practice.

10. Acceptance

I have read and understood this Safeguarding Adults at Risk Policy 2026 and agree to abide by its terms.

Name.....

Signed.....

Date……

Appendix A: Safeguarding Cause for Concern Reporting Form

This form is strictly confidential and should be delivered to a manager. Please do not make or keep a copy of this form unless instructed.

Details of person of concern (whether at risk or the alleged perpetrator)	
Name	Service Users ☐ Staff/Volunteer ☐ Volunteer ☐
Date of birth / age	Phone / Mobile Number
Email address	Service Users address ☐ Staff department ☐ :

Concern / Disclosure / Allegation / Incident	
Name of source of information (if different from above) and contact details (mobile no, email)	
Date of incident	Approximate time
Description of concern / allegation	
Action taken and by whom	

Concern has been discussed with (please check and give names)	
☐ Line Manager	Name:
☐ CEO	☐ Operations and Compliance Manager
☐ Supported Living Manager	☐ Day Services Manager

Details of person completing this report	
Name	Role
Telephone Number	Email address
Signature	Date