



**ADULT SAFEGUARDING
POLICY
&
PROCEDURES**

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PART ONE

I: Who we are

Brighter Horizons is a charity with registered address 2 Shroffold Road, Bromley, BR1 5PE and registered charity number 1165053. Our contact details are as follows:

Telephone: 020 8698 8858

Email: info@brighterhorizonslewisham.org

Website: www.brighter-horizons.org

The charity provides day services for adults with learning disabilities at our main centre and in public locations across Lewisham and the surrounding areas.

II: Introduction: Safeguarding is ‘Everyone’s Business’

Brighter Horizons recognises the vital role it plays in helping to protect adults at risk of abuse and takes seriously its responsibility to work with local Safeguarding Adults Boards to share a collective ‘whole community approach’ to keeping people safe and preventing abuse and neglect.

Brighter Horizons aims to achieve this by Making Safeguarding Personal (MSP). This means that the adult should always be placed at the centre of any work to help protect them, and that practice is person-led and outcome-focussed, by enhancing the individual’s involvement, choice and control, which should lead to improvements in their quality of life, wellbeing and safety.

Brighter Horizons also believes that professionals also have a responsibility to adopt a ‘Think Family’ approach, which seeks to consider the needs of the whole family, and not just individual members of it, making sure that support provided by services is coordinated and takes account of how individual problems effect the whole family.

III: Purpose

The purpose of this policy is to outline the principles, definitions and duties that underpin adult safeguarding work as set out under the Care Act 2014, using these to describe how Brighter Horizons will fulfil our professional responsibilities in keeping people safe and preventing abuse and neglect. This policy and procedure is also supported by these relevant documents:

- Role and Job Description for the Nominated Safeguarding Lead
- Privacy Policy
- Managing allegations against staff and volunteers
- Code of conduct for staff and volunteers
- Photography and sharing images guidance
- Safer recruitment
- Anti-bullying
- Complaints Policy
- Whistleblowing
- Health & Safety and Risk assessment policy

IV: Scope of policy and definitions

This policy sets out Brighter Horizons' responsibilities to protect 'adults at risk' from abuse or neglect. The safeguarding duties apply to any adult who:

- has needs for care and support (whether or not the Local Authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

For the purposes of this policy an adult is a person, aged 18 years and over who is at a greater risk of suffering abuse or neglect because of physical, mental, sensory, learning or cognitive illnesses or disabilities; and substance misuse or brain injury, and includes:

- those who purchase their care through personal budgets.
- those whose care is funded by Local Authorities and/or health services.
- those who fund their own care.
- informal carers, family and friends who provide care on an unpaid basis.
- those aged between 18 and 25 years and in receipt of children's services.

When we refer to 'care and support needs' at Brighter Horizons, we mean:

- managing and maintaining nutrition.
- maintaining personal hygiene and/or managing toilet needs.
- being appropriately clothed.
- being able to make use of the home safely and/or maintaining a habitable home environment.
- developing and maintaining family or other personal relationships.
- accessing and engaging in work, training, education or volunteering.
- making use of necessary facilities or services in the local community including public transport and recreational facilities or services.
- mental health needs.
- poor general health.
- poor lifestyle choices.

This list is indicative rather than exhaustive. More detailed information on this subject can be found [here](#).

V: Policy statement

Brighter Horizons is committed to safeguarding and promoting the wellbeing and independence of adults who are experiencing, or at risk of abuse and neglect.

We will take every reasonable step to ensure that adults at risk are protected where our staff, volunteers and partners are involved in the delivery of our work. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately, in accordance with our safeguarding procedures.

We shall enable all our staff and those who work with us to make informed and confident decisions regarding safeguarding. We expect all staff, volunteers, trustees, partners and anyone working on behalf of Brighter Horizons to have read, understood and adhere to this policy and procedures.

VI: Legal framework

This policy has been developed within the context of the law and guidance that seeks to protect adults including (but not exhaustively):

- [The Care Act 2014](#)
- [Care Act 2014 Statutory Guidance](#)
- The [Mental Capacity Act 2005](#) (including Deprivation of Liberty Safeguards)
- The [Human Rights Act 1998](#)
- The [Equality Act 2010](#)
- [Mental Health Act 1983](#) and the [Code of Practice 2015](#)
- [Serious Crime Act 2015](#)
- [Modern Slavery Act 2015](#)
- [Criminal Justice and Courts Act 2015](#)
- [Statutory Guidance on Female Genital Mutilation](#)
- [Domestic Abuse Act 2021](#)

VII: Who this policy applies to

This policy applies to all Brighter employees, volunteers, trustees as well as non-employees contracted to work for Brighter Horizons (such as session facilitators) and any other adults involved in the delivery of our Day service.

This includes all activities which take place at our Day Centre, in community venues such as leisure centres and libraries, when out in public spaces such as the shops or cafes and pubs, when on public transport and when travelling in Brighter Horizons own vehicles and any organised online activities.

Brighter Horizons employees and volunteers are not permitted to provide any services in homes.

VIII: Partnership working

Brighter Horizons is committed to working in partnership with local Adult Safeguarding Boards, Local Authorities and other support services for adults with learning disabilities, including (but not exhaustively):

[Lewisham Adult Safeguarding Pathway](#)

[London Borough of Lewisham Adult Social Care](#)

[Bromley Adult Safeguarding Board](#)

[London Borough of Bromley Adult Social Care](#)

[Greenwich Adult Safeguarding Board](#)

[London Borough of Greenwich Adult Social Care](#)

[Southwark Adult Safeguarding Board](#)

[London Borough of Southwark Adult Social Care](#)

IX: What we mean by Adult Safeguarding

The Care Act 2014 Guidance defines safeguarding as protecting an adult's right to live in safety, free from abuse and neglect. It further states that it is about people and organisations 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. Within this context, the guidance recognises that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Abuse and neglect can take many forms and it is important that staff working in all organisations should not be constrained in their view of what constitutes abuse or neglect, and the circumstances of an individual case should always be considered.

Abuse or Neglect may be:

- A single act or repeated acts.
- Multiple in form.
- A deliberate act of neglect or a failure to act.
- An opportunistic act or a form of serial abusing where the perpetrator seeks out and grooms the individual(s).

The Department of Health and Social Care Statutory Guidance issued under the Care Act 2014 sets out the different types and patterns of abuse and neglect, though stresses that the list is not exhaustive, and describes the different circumstances in which they may take place.

X: Types of abuse and neglect

Discriminatory abuse which Includes forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

Domestic abuse. Behaviour of a person towards another person is domestic abuse if both are aged 16 or over and are 'personally connected' to each other, and the behaviour is abusive. Behaviour is abusive if it consists of any of the following: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour; economic abuse; psychological, emotional or other abuse; and it does not matter whether the behaviour consists of a single incident or a course of conduct. See the [Domestic Abuse Act 2021](#) for definitions of 'Personally Connected' and Economic Abuse.

Financial or Material abuse which includes 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.

Physical abuse which includes assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Psychological abuse which includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Self-neglect which covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Sexual abuse which includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.



Modern Slavery which encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Organisational abuse which Includes 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 ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglects and Acts of Omission which includes carers (both formal and informal) 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.

Part XI: The context of adult abuse and neglect

The table below can be used to consider the context of adult abuse and neglect alongside the broader issues such as mental capacity, physical disability, learning disability, communication, coercive control and the relationship between the victim and any alleged perpetrator.

1. The Abusive Act	Less Serious	More Serious		Less serious concerns are likely to be dealt with at the initial enquiry stage by a Local Authority, whilst with more serious concerns progress further into safeguarding adults' procedures.
				
2. Seriousness of Abuse	Less Serious	More Serious		Look at the relevant categories of abuse and use your knowledge of the case and your professional judgement to gauge the seriousness of the concern.
				
3. Pattern of Abuse	Isolated incident	Recent abuse in an ongoing relationship	Repeated abuse	The volume of incidents or Safeguarding Concerns about an individual adult should be carefully considered as part of the wider context of potential abuse.
4. Impact of Abuse on Victims	No impact	Some impact but not long-lasting	Serious long-lasting impact	Impact of abuse does not necessarily correspond to the extent of the abuse – different people will be affected in different ways. Views of the adult at risk will be important in determining the impact of abuse. Protected Characteristics such as disability should be considered as well as disproportionality.
5. Impact on Others	No one else affected	Others indirectly affected	Others directly affected	Other people may be affected by the abuse of another adult. Are relatives, children or other adults distressed or affected by the abuse? Are other people intimidated and/or their environment affected?
6. Intent of Alleged Perpetrator(s)	Unintended/ ill-informed	Opportunistic	Deliberate / targeted	Is the act/omission a violent/ serious unprofessional response to difficulties in providing care? Is the act/omission planned and deliberately malicious? Is the act a breach of a professional code of conduct?

7. Illegality of Actions	Bad practice/ Not illegal	Criminal act	Serious criminal act	Seek advice from the Police if you are unsure if a crime has been committed. Is the act/ omission poor or bad practice (but not illegal) or is it clearly a crime?
8. Risk of Repeated Abuse on the Victim	Unlikely to recur	Possible to recur	Likely to recur	Is the abuse less likely to recur with significant changes e.g., training, supervision, respite, support or very likely even if changes are made and/or more support provided?
9. Risk of Repeated Abuse on Others	Others not at risk	Possibly at risk	Others at serious risk	Are others (adults and/or children) at risk of being abused: Very unlikely? Less likely if significant changes are made? This perpetrator/setting represents a risk/threat to other adults or children?

XII: Principles

The Statutory Guidance issued under the Care Act 2014 describes six principles that underpin all adult safeguarding related work. This applies to all sectors and settings.

These principles should always inform the ways in which professionals and other staff work with adults.

Empowerment	People being supported and encouraged to make their own decisions and informed consent. <i>"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."</i>
Prevention	It is better to take action before harm occurs. <i>"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."</i>
Proportionality	The least intrusive response appropriate to the risk presented. <i>"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."</i>
Protection	Support and representation for those in greatest need. <i>"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."</i>
Partnership	Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. <i>"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."</i>
Accountability	Accountability and transparency in delivering safeguarding. <i>"I understand the role of everyone involved in my life and so do they."</i>

Brighter Horizons supports these principles signposting all service users to relevant safeguarding literature, in appropriate formats or languages, and support to understand this if necessary. In addition,

all parent-carers are provided with a copy of this policy in a format or language to support their understanding. In so doing, Brighter Horizons aims to focus on Prevention.

XIII: Key roles & responsibilities

Employees & volunteers

All staff (including volunteers) must understand their responsibility under this Safeguarding Policy to identify Safeguarding Concerns in relation to adults who are experiencing, or at risk of abuse and neglect, and to deal with these accordingly using the procedures set out in Part Two.

Managers

All managers, and specifically the Day Service Manager, must have the necessary knowledge (via appropriate training), experience and skills to fulfil their duties.

All managers must also provide induction, on-boarding, training and support to employees and volunteers to enable them to fulfil their safeguarding responsibilities effectively.

Regular supervision sessions should also refer to safeguarding responsibilities, to ensure that this subject is given appropriate ongoing focus and attention.

CEO (Nominated Safeguarding Lead)

The nominated safeguarding lead within the organisation must have the necessary knowledge (via appropriate training), experience and skills to fulfil their duties.

The Nominated Safeguarding Lead is:

Dave King, CEO, dave@brighterhorizonslewisham.org | 07702 954233

The Deputy Safeguarding Lead, in the absence of the CEO is:

Samuel James. Day Service Manager, Samuel@brighterhorizonslewisham.org | 07810 354366

The nominated lead is responsible for providing the necessary leadership to the whole organisation by:

- Being proactive in promoting Brighter Horizons Adult Safeguarding Policy and Procedures, ensuring these are regularly checked and updated using the learning from any safeguarding activity within the organisation.
- Being a Single Point of Contact (SPOC) for any member of staff, volunteer, or external partner, who can be approached for advice in relation to any matter relating to safeguarding, including the reporting of any Safeguarding Concerns or other related activity.
- Maintaining a record of all safeguarding activity within the organisation, and for any Safeguarding Concerns that have been reported to a Local Authority, and or Police.
- Ensuring the organisation is adhering to and supporting the Six Safeguarding Principles, and particularly in ensuring that service users are given (or signposted to) appropriate safeguarding literature, and in doing so helping to support Making Safeguarding Personal by providing information in a bespoke way suitable to the needs of those using the organisation's services.
- Championing the wider subject by facilitating regular briefings and workshops to staff and volunteers.

- Ensuring that appropriate training is being provided to staff and volunteers on an at least an annual basis, and that this is being checked to ensure it is up to date and of the necessary quality (the legal framework underpinning adult safeguarding is constantly evolving).
- Reviewing all safeguarding incidents with the Day Service Manager as they arise to ensure that learning occurs each time,
- Reporting to the Board of Trustees any safeguarding activity on an annual basis.
- Staying up to date with safeguarding legislation and best practice, as well as employing any relevant learning from wider adult safeguarding networks (including from Safeguarding Adults Reviews).
- Ensuring the organisation is working effectively in partnership with other relevant agencies, including Safeguarding Adults Boards.
- Ensuring all staff (including Trustees & volunteers are DBS checked in line with the DBS eligibility schedule as part of the Recruitment of Ex-Offenders Policy.

Those supporting the Safeguarding Lead

The Board of Trustees has appointed a Safeguarding Lead to provide advice, support and guidance to the CEO in their capacity as the Nominated Safeguarding Lead. This designated Trustee is Huda Ghalegolabi who can be contacted via safeguarding@brighterhorizonslewisham.org.

Board of Trustees

The most senior people in the Charity take ownership and responsibility for safeguarding in line with their moral, ethical, professional and legal duty to the Charity's service users, employees, volunteers [and partners to help keep people safe and prevent abuse and neglect.

This means that senior leaders must give the subject the profile and prominence it deserves and ensure that the necessary resources are provided to staff and managers to fulfil the duties outlined in this policy and their job descriptions.

XIV: Information sharing

All employees and volunteers should adhere to the principles and guidance outlined in Brighter Horizons Privacy Policy. In regard to safeguarding, staff should pay particular responsibility to the following:

1. The Data Protection Act 2018 is not a barrier to sharing information but provides a framework to ensure that personal information about a natural person is shared appropriately.
2. If there are concerns that an adult may be at risk of significant harm all staff have a duty to follow the relevant procedures without delay. Seek advice if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.
3. Be open and honest with the adult (and/or their parent-carers where appropriate) from the outset about why, what, how and with whom information will, or could be, shared, by another lawful reason.
4. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
5. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is a lawful reason to do so such as where safety may be at risk. You will need to base your judgement on the facts of the case.

6. Consider safety and wellbeing: base your information-sharing decisions on considerations of the safety and wellbeing of the person and others who may be affected by their actions.
7. Necessary, proportionate, relevant, accurate, timely and secure: ensure that information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in timely fashion, and is shared securely, and in accordance with any organisation policy in handling personal information.
8. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share and then record what you have shared, with whom and for what purpose.

For more information visit <https://ico.org.uk/for-organisations/>

Brighter Horizons guidance on information sharing

- a. Brighter Horizons requires that all employees and volunteers are discreet with information that may be shared with them about and/or by an adult(s) with whom they are working. Staff must only share information with others if they feel that there is a safeguarding risk to the adults(s) in relation to abuse or neglect, or that they are at risk of harming themselves or others.
- b. In the event that information needs to be shared, staff should explain to the service users that they will have to let their manager know about what has been spoken about. It will then be [their] responsibility to escalate the matter to statutory or other services, if necessary and appropriate.
- c. It is essential to consider whether the adult at risk is capable of giving informed consent. If they are, their consent should be sought. If not, this should be recorded.
- d. The circumstances when Brighter Horizons may need to raise a safeguarding concern without a person's consent are outlined in Part Two of this document.
- e. If a concern must be raised without consent, staff should inform the person at risk of their reasons for making the referral against their wishes, unless it will cause them significant harm and distress or unless telling them would jeopardise their safety or the safety of others.
- f. Staff must not speak to colleagues (other than their line manager), family members or friends about safeguarding incidents.
- g. Staff must not talk about any safeguarding incidents in front of anyone else (including non-verbal service users).
- h. Staff must never promise an individual that they can keep a disclosure confidential or 'a secret'. Staff should explain their duty of care to share information to protect themselves and other individuals.
- i. Staff must not speak about individuals in public areas or in front of others - information should be shared on a 'need to know' basis - which means only sharing as much information about a service user with others as is necessary, in order for them to be able to perform their role.
- j. Staff must never leave any papers or documents containing information about an individual in public or communal areas. All safeguarding related information must be stored and secured appropriately in line with Brighter Horizons Data Retention Policy.
- k. Staff must never electronically transport client data on any portable mediums (e.g., memory sticks)
- l. Staff must never take personal data about clients offsite without the permission of their line manager and only if they are able to securely store such information while offsite

- m. Staff must never share any comments about the individuals they support outside of work or on social media.
- n. Staff who feel that their concerns have not been acted on by their manager/ the safeguarding lead/ the organisation, must take it their concerns to an external agency. Every local area has an Adult Social Care Team, the details of which can be found in section VII.

XV: Related issues, policies, procedures and safeguarding related offences

County Lines

This is a term used when drug gangs from cities start operating in smaller towns, exploiting children and adults at risk of abuse (including human trafficking) to sell drugs. These dealers use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users.

Cuckooing

Criminal gangs target the homes of those who are most at risk, or vulnerable, to be used for drug dealing – a process known as “Cuckooing” after the Cuckoo bird that invades other bird’s nests. Victims are often left with little choice but to co-operate. Drug dealers will often approach the person offering money or free drugs to use their home for dealing. In some instances, after providing free drugs, the dealers will then force the person to sell drugs for them in order to ‘re-pay’ their drug debts.

These criminals are selective about who they target, a lot of the time victims are lonely, isolated, frequently drug users themselves and can already be known to the police. Cuckooing means the drug dealers can operate from a property rather than the street, which is out of sight from the police making it a very attractive option. They can then use the premises to deal drugs from, which is difficult for the police to monitor.

Domestic Abuse (MARAC)

The role of the Multi-Agency Risk Assessment Conference (MARAC) is to provide a consistent approach to the risk assessment of those individuals that have been identified at the highest risk of serious harm from domestic abuse in order to safeguard them and to enable appropriate actions to be taken to increase public safety.

The MARAC facilitates, monitors and evaluates effective information sharing between representatives of the local police, probation, health, child protection, housing practitioners, Independent Domestic Violence Advisors (IDVAs) and other specialists from the statutory and voluntary sectors. MARAC works on the assumption that no single agency or individual is able to see the complete picture of the life of a potential victim, but all may have insights that are crucial to their safety.

The offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence imposes a maximum 5-year imprisonment, a fine or both. The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members.

Hate Crime

Hate crime involves any criminal offence which is perceived by the victim or any other person to be motivated by hostility or prejudice based on a personal characteristic. The definition covers five main strands:

Disability | Gender identity | Race | Religion or faith | Sexual orientation

The website [True Vision](#) is supported by all police forces in England and provides information for victims and the public about what hate crime is and why it is important to report it, together with setting out the range of ways hate crimes can be reported, including via an online reporting form. The site also provides links to organisations that can offer support and advice on hate crime related issues and can be accessed.

Mate Crime

[Mate Crime](#) is the exploitation, abuse or theft from an adult by those they consider to be their friends. Those that commit such abuse or theft are often referred to as 'fake friends'. Mate crime is most prevalent when the victim lives with a disability and is especially common when that disability is ASD.

Multi Agency Public Protection Arrangements (MAPPA)

[Multi-Agency Public Protection Arrangements](#) are a set of arrangements to manage risk posed by the most serious sexual and violent offenders under the provisions of the Criminal Justice Act 2003. They bring together the Police, Probation and Prison Services into MAPPA responsible authorities. A number of other agencies are under a duty to co-operate (DTC) with the responsible authority including Social Services and Health Trusts.

PREVENT

[PREVENT](#) is part of the national counter-terrorism strategy (CONTEST) and aims to stop people being drawn into or supporting terrorism. The strategy focuses on three key areas which are:

- Respond to the ideological challenge of terrorism and the threat from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Safeguarding Children

Local Child Protection Procedures apply to people who are under the age of 18. More information can be found on the [NSPCC website](#) and the Lewisham Safeguarding Children Partnership [website](#).

Self-Neglect and Hoarding

These subjects are some of the most high risk and complex in relation to adult safeguarding, and as such staff and volunteers should refer to [the LSAB Self-Neglect and Hoarding Multi-Agency Policy, Practice Guidance & Hoarding Toolkit](#) when this is identified.

Wilful Neglect

An intentional or deliberate omission or failure to carry out an act of care by someone who has care of a person who lacks (or whom the person reasonably believes lacks) capacity to care for themselves. Section 44 of the Mental Capacity Act introduced a new offence of wilful neglect of a person who lacks capacity.

XVI: Useful links

- [Age UK Advice](#) Age UK provides advice and information for people in later life through our Age UK Advice line, publications and online. Telephone 0800 169 65 65. Lines are open seven days a week from 8.00am to 7.00pm.
- [Action Fraud](#) - National fraud reporting centre, providing advice and information about fraud

and scams. Telephone 0300 123 2040.

- [Care Quality Commission](#) Independent regulator of adult health and social care services in England, covering NHS, local authorities, private companies or voluntary organisations and people detained under the Mental Health Act. Telephone 03000 616 161.
- [Citizens Advice In England](#) National network of advice centres offering free, confidential, independent advice, face to face or by telephone. Telephone 0344 411 1444.
- [Court of Protection](#) Telephone 0300 456 4600.
- [Equality Advisory Support Service](#) Provides information and advice about the Equality Act 2010 and human rights. Telephone helpline 0808 800 0082 Mon-Fri 9am-7pm, Sat 10am-2pm.
- [Hourglass](#) Works to protect and prevent the abuse of vulnerable older adults. Their helpline is confidential and provides information and emotional support. **The Hourglass helpline number will not appear on your phone bill.** Telephone 080 8808 8141 (free phone) Mon-Fri 9am-5pm.
- [Local Government and Social Care Ombudsman](#) Final stage for local authority complaints. Also deals with complaints about care providers when services are privately purchased Telephone 0300 061 0614.
- [ManKind Initiative](#) Charity for male victims of domestic violence and abuse. Helpline provides confidential information and support. Telephone helpline 01823 334244.
- [Mencap](#) - for individuals with learning disabilities.
- [National Centre for Domestic Violence](#) Provides free help to get an emergency injunction. Also provides information about other services. Telephone 0207 186 8270 or 0800 970 2070.
- [Office of the Public Guardian](#) Telephone 0300 456 0300.
- Police: If there is a serious danger an older person may be in imminent risk of harm and the situation warrants immediate attention, the police should be called. The local police force can be contacted by dialling 101. In an emergency, call 999.
- [POhWER](#) - free advocacy for anyone living in England who needs support to express their views.
- [Protect](#) Charity providing information and advice about 'whistle-blowing' at work. Telephone 020 3117 2520.
- [Samaritans](#) Provides emotional support for people who are experiencing feelings of distress or despair, including those which may lead to suicide. Telephone 116 123 (24 hours).
- [seAp Advocacy](#) - provides independent advocacy for individuals seeking to resolve issues around health and wellbeing.
- [Victim Support](#) Charity for victims and witnesses of crime in England and Wales. Telephone Victim Supportline 08 08 16 89 111.
- [Women's Aid](#) Charity working to end domestic violence against women and children. Helpline provides confidential advice, information and support. All calls are answered by fully trained female support workers and volunteers. Telephone National Domestic Violence Helpline 0808 2000 247 (free phone 24 hours).

PART TWO

I: Adult safeguarding procedures

The following procedures should be read and used in conjunction with [The Lewisham Adult Safeguarding Pathway](#)

Where to report

Brighter Horizons is based and registered in Lewisham and therefore The Lewisham Adult Safeguarding Pathway is the principal route for reporting concerns. The following exceptions may apply, after consultation with the Nominated Safeguarding Lead:

- a. Safeguarding incidents which occur whilst with Brighter Horizons but on an activity in another borough
- b. Disclosures of historical abuse which should be reported in the borough in which the adult lives

'Think Family'

Safeguarding and promoting the welfare of children and adults at risk of abuse and neglect is a shared responsibility. The 'Think Family' approach should be used by all professionals who should consider the needs of the whole family, including young carers, taking into account family circumstances and responsibilities. Existing professional relationships should be viewed as a chance to identify risk, refer to colleagues in other services, and to use targeted support to help prevent problems from escalating and therefore potentially limiting harm.

II: Responding to a safeguarding disclosure: guidance for staff

It can be very difficult for someone to disclose abuse or neglect, so how you respond to them is crucial (and you may only get once chance). By telling you, they have shown that they trust you, so your reaction must make them feel comfortable and give them reassurance to continue with the disclosure. It is important to stay calm and not act shocked or surprised, as this may cause them to think or feel that they have done something wrong.

DO

It is important that you:

- provide first aid treatment or seek medical help if required.
- assure the adult that you are taking them seriously and thank them for telling you.
- do not give any promises of complete confidentiality: explain that you have a duty to keep them and others safe, which means you may have to share some information with other people to help you to do this.
- listen very carefully and avoid expressing your own opinions or views.
- clarify what you have heard to avoid misinterpretation if you are unclear about anything.
- record what you have been told as accurately as you can using a Safeguarding Report form, including the individual's own words as far as is possible.
- are not judgmental and that you don't jump to any immediate conclusions.
- reassure the adult that they have done the right thing in telling you and that they will be involved in decisions about what will happen.
- explain that you will take steps to protect them from further abuse or neglect.

- Inform your manager/ nominated safeguarding lead immediately to decide on next steps.

If they have specific communication needs, provide support and information in a way that is most appropriate to them.

DO NOT

It is important that you do not:

- discuss the concern with the person alleged to have caused the harm (e.g., a family member or carer) unless the immediate welfare of the adult makes this unavoidable. It is not our place to do this and could put the adult in more danger.
- conduct your own investigation into the nature of their disclosure (this could put the adult and the organisation at significant risk and lead to further harm). Our role is to act on the information provided.
- take photographs.
- examine the individual or remove any of their attire to look at marks.

III: Immediate danger or risk of serious harm AND/OR a crime has taken place

If the adult is in immediate danger or at risk of serious harm, this should be reported to the Police immediately. Help to keep the adult safe until the Police respond. Do your best to obtain consent from the adult for calling the Police but the adult does not need to give their consent in this circumstance due to **vital interest** considerations (i.e., because they are in immediate danger or at risk of serious harm).

Our concerns about immediate danger or risk of serious harm also extends to others. If children or other adults are in immediate danger or at risk of serious harm, then this should be reported to the Police immediately. Help to keep any child or other adult at risk safe until the Police respond. Consideration should also be given by the Nominated Safeguarding Lead as whether this should also be reported to Children's services. adult(s) does not need to give their consent under these circumstances due to **public interest** considerations (others, including children are in immediate danger or risk of serious harm).

In all cases where anyone is in immediate danger or at risk of serious harm, this should be referred to the Nominated Safeguarding Lead, or in their absence, the Deputy.

IV: Deciding to refer a concern or disclosure

If a disclosure or concern is not one of immediate danger, you should consider whether the matter meets the Section 42 (1) criteria within the Care Act 2014 as a statutory Safeguarding Concern by asking:

- do I have reasonable cause to suspect that the adult has needs for care and support; and
- do I have reasonable cause to suspect that the adult is at risk or experiencing abuse or neglect.

It must be noted that the third criteria (c) under the legal duty for a Section 42 Enquiry (1) is not relevant at the concern stage, and this is for the Local Authority to determine:

- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.*

If the concern or disclosure does not relate to a crime and these criteria appear to have been met, then you speak to the adult to get their views on the Safeguarding Concern or the incident. It is always best to support the adult in reporting abuse themselves. As far as possible, find out what they want to happen next using suitable communication aids if necessary. Refer to the Empowerment and Protection principles in section 11 for more information on this.

In the event that you have a concern (not a disclosure) you may wish to discuss this with your manager to gain a more fully informed opinion before discussing it with the Nominated Safeguarding Lead.

Refer your concerns to the Nominated Safeguarding Lead, or in their absence, the Deputy.

If a decision is made not to refer to the Local Authority, then make a record of the concern and any action taken, using the internal safeguarding record form. Concerns should be recorded in such a way that repeated, low level harm incidents are easily identified and subsequently considered for referral in the future. Not referring under statutory safeguarding adults' procedures does not negate the need to report and record the matter internally.

If there is any doubt on whether a referral should be made, the local authority adult social care team should be contacted for advice.

V: How to record a safeguarding concern internally

All safeguarding disclosures or concerns should be recorded on the Safeguarding Report Form which can be found online here and is also included in Appendix 2.

Completed forms should also be passed onto the Nominated Safeguarding Lead for safe storage.

VI: What to include on a Safeguarding Report Form

Safeguarding Report Forms should be completed for disclosures and concerns.

Written records must reflect as accurately as possible what was said and done by the people initially involved in the incident including the adult at risk (the victim), the staff member(s) who received and dealt with the disclosure, as well as any suspects or potential witnesses. Including:

- The date and time of the incident/ disclosure.
- Exactly what the adult at risk said, using their own words, about the abuse and how it occurred or exactly what was reported to you.
- The appearance and/or behaviour of the adult at risk.
- Any injuries observed/ disclosed.
- The name of the person who received the disclosure / raised the concern.
- If you witnessed the incident, write down exactly what you saw.
- The names of any managers who consulted on the course of action or signed off the decision to raise a concern.
- Information from/ action taken by another person should be clearly attributed to them with their initials.

All records should be purely factual. If the record contains an opinion (e.g., an assessment decision on whether to refer or proceed without consent, it should be clearly stated as such and be backed up by factual evidence where possible.

VII: Seeking consent to submit a safeguarding concern

Always seek consent from the adult before submitting a safeguarding concern to the local authority. In doing so you should:

- explain that this may mean that several agencies may gain access to their personal details.
- consider if the adult has the mental capacity at that time to consent to the safeguarding concern being submitted now. If not, and it will not place the adult at risk, consent should be sought from their parent-carer or a Court Appointed Deputy (if known).
- consider if there is any possibility that the adult has/ is suffering from any type of coercion, control, threat, duress or pressure from another person(s) which may mean they refuse consent.

If so, contact the Nominated Safeguarding Lead for further advice.

- consider if mental capacity (including executive capacity) needs to be assessed or reviewed? For more information the [Decision Making and Mental Capacity \(NICE Guidelines\)](#)
- give due regard to the adult's views and wishes, including their desired outcomes, even if Best Interest Decisions have been made linked to the Mental Capacity Act. For more information read: [Local Government Association - Making Safeguarding Personal Toolkit](#)

if the adult does have the mental capacity *at that time* to consent to the Safeguarding Concern being submitted, but refuses, you must be careful that they consider how to keep the adult safe if you continue to submit the concern. This may be particularly relevant in domestic abuse cases. The adult must be informed that a Safeguarding Concern has been submitted, unless it is unsafe or impractical to do so.

If the adult does have the mental capacity *at that time* but refuses and there are no vital or public interest considerations, and a decision is taken not to proceed in submitting a Safeguarding Concern, the adult should be provided with information about where to get help if they change their mind or if the abuse or neglect continues and they subsequently want support to promote their safety.

A safeguarding/disclosure incident must be logged using a Safeguarding Report Form, detailing the adult at risk's decision and of the decision not to refer, with reasons.

A record should also be made of what information they were provided with by staff.

Note that a Safeguarding Concern can still be submitted without the adult's consent if 'vital' or 'public' interest considerations apply (see section 2.3 above).

VIII: How to keep the adult safe until the Local Authority respond

Good practice guidelines on this can be found [The Lewisham Adult Safeguarding Pathway](#).

IX: Submitting the adult safeguarding concern to the Local Authority

All concerns should be submitted to the relevant local authority (see Section 2.1) using the relevant Safeguarding Concern Pathway.

For Bromley local authority, fill out the online form [here](#).

For Greenwich local authority, concerns should be raised by calling 020 8921 2304 (or 020 8854 8888 out of hours)

For Lewisham local authority, complete the form which can be found [here](#).

For Southwark local authority, complete the form which can be found [here](#).

Ensure all of the relevant fields in the Safeguarding Concern Form are fully completed with as much detail as possible and submitted correctly using the contact details outlined.

You should receive receipt of this and be kept informed of progress.

If you do not receive any feedback on progress, you should follow this up with the Local Authority involving an appropriate manager if required, and in exceptional circumstances this can also be escalated to the Local Authority Safeguarding Adults Board to consider.

X: After submitting a safeguarding concern to the Local Authority

An appointed person within the Local Authority will assess the details of the concern and decide if this will progress to a Safeguarding Enquiry. If it does not, then a referral to another pathway or services could be made to help support the adult's wellbeing.

If a Safeguarding Enquiry is initiated the Enquiry Officer (normally a social worker) or another professional delegated this responsibility will contact the adult to talk to them about their situation and find out what they think should be done to help keep them safe. At this stage the Enquiry Officer will also be thinking about the involvement of family members, carers and the possible use of advocacy if this is necessary to support the adult.

As the Enquiry progresses this could involve a number of organisations and multi-agency safeguarding planning meetings could be held to agree on a plan to help support the adult, improve their situation, and reduce or remove the risk(s) they are facing. This work will normally be completed within 25-30 working days from the Safeguarding Concern being submitted, although this could take longer depending on the complexity of the issues that are being considered.

Any further concerns that arise during this time should be raised to the Nominated Safeguarding Lead and a further safeguarding concern should be submitted if this is necessary and appropriate.

XI: Concerns about employees or volunteers

Any member of staff (employee or volunteer) that has a concern that any Brighter Horizons employee or volunteer has abused an adult at risk has a duty to report these concerns immediately to the Nominated Safeguarding Lead. Failure to do so may result in a referral to Brighter Horizons Disciplinary Procedure.

In the event that the concern is about the Nominated Safeguarding Lead, they should report their concerns immediately to the Trustee with responsibility for safeguarding (safeguarding@brighterhorizonslewisham.org)

XII: Historical abuse

If an adult discloses historical abuse to you (abuse which happened in the past and which is not ongoing), you still need to follow up with and record the disclosure in the same way (as detailed above) immediately. The perpetrator could still be harming someone else currently. Historical concerns should be referred to the local authority in which the adult lives (see section 2.1)

If the adult discloses a historical crime, this should also be shared with the police immediately.

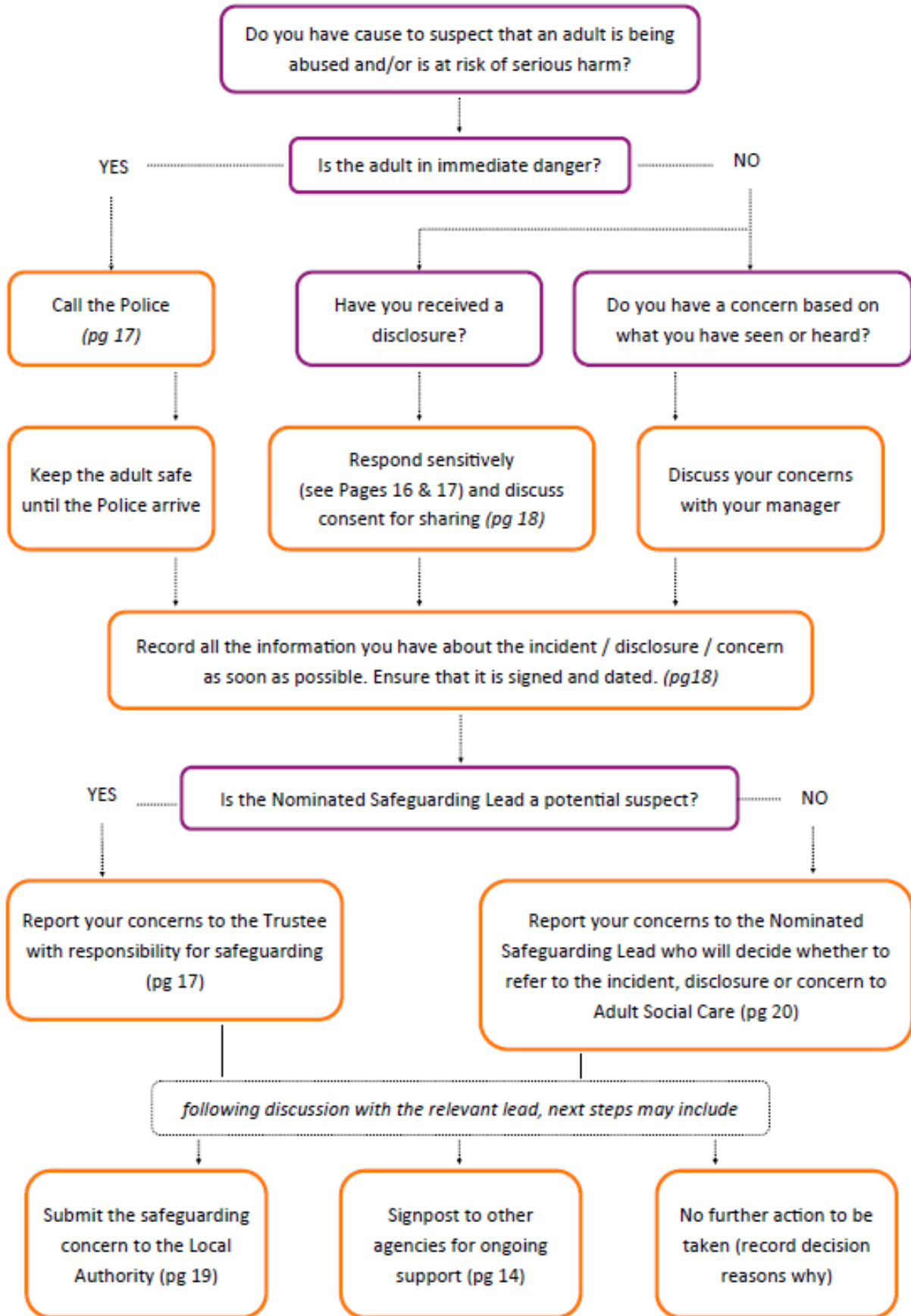
XIII: Concerns about how a safeguarding issue has been dealt with

If you have concerns about how a safeguarding issue has been dealt with by the Nominated Safeguarding Lead, you should raise your concerns with the Trustee with responsibility for safeguarding (safeguarding@brighterhorizonslewisham.org).

If you remain unhappy with the response, you have a responsibility to refer to and use Brighter Horizons Whistleblowing Policy.

DOCUMENT CONTROL	
Name	Safeguarding Adults Policy
Issue	2
Date	November 2022
Revision Date	November 2023
Author	Dave King
Authorised	Chief Executive Officer
Total Pages	24

APPENDIX 1: SAFEGUARDING REFERRAL PROCESS



APPENDIX 2: Safeguarding Report Form



This form should be used to record safeguarding concerns for adults and/or children. All information on this form must be treated as confidential and reported to the Nominated Safeguarding Lead as soon as possible. This form should be completed at the time, or immediately following a disclosure but after any emergency actions have been taken. Please complete the form as fully as possible.

If an adult or child is in immediate danger or at risk of serious harm, inform the Police immediately.

SECTION 1: YOUR DETAILS (the person completing the form)

Your name:	
Position:	
Telephone:	
Email:	

SECTION 2: DETAILS OF THE PERSON AFFECTED

Name:		
Address:		
Contact Name & Relationship:		
Contact Telephone:		
Contact Email:		

SECTION 3: OTHER PRESENT OR POTENTIAL WITNESSES

Name:	
Address:	
Contact Telephone:	
Contact Email:	

SECTION 4: DETAILS OF THE DISCLOSURE, INCIDENT OR CONCERN

Please describe in detail using only facts.

Additional relevant information which may be helpful or important.

Please detail if consent has been obtained. If not, please outline the reasons why.

Signed:

Date:

SECTION 5: SAFEGUARDING LEAD USE ONLY.

Received By (name):

Date:

Overview of actions taken.