

SAFEGUARDING ADULTS' POLICY

1. General Policy Statement

- 1.1 Barnet Churches Action has a moral and legal duty to ensure that it functions with a view to safeguarding and promoting the welfare of vulnerable adults. We are committed to fulfilling the requirements of the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012 and other relevant legislation aimed at the protection of vulnerable adults.
- 1.2 Throughout these policies and procedures, reference is made to “vulnerable adults”. This term is used to mean “those aged 18 and over”. Definition in accordance with The Police ~Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2002: -
‘Definition of Vulnerable Adult’ means a person aged 18 or over who is receiving services of a type listed in paragraph (1.2.1) below and in consequence of a condition of a type listed in paragraph (1.2.2) below has a disability of a type listed in paragraph (1.2.3) below.
 - 1.2.1 The services are:
 - (a) accommodation and nursing or personal care in a care home.
 - (b) personal care or nursing or support to live independently in their own home.
 - (c) any services provided by an independent hospital, clinic, medical agency or NHS body.
 - (d) social care services.
 - (e) any services provided in an establishment catering for a person with learning difficulties.
 - 1.2.2 The conditions are:
 - (a) a learning or physical disability.
 - (b) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs.
 - (c) a reduction in physical or mental capacity.
 - 1.2.3 The disabilities are:
 - (a) a dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions.
 - (b) severe impairment in the ability to communicate with others.
 - (c) impairment in a person’s ability to protect themselves from assault, abuse or neglect.
- 1.3 The trustees are committed to ensuring that the organisation:
 - ♦ Provides a safe environment for vulnerable adults.
 - ♦ Identifies vulnerable adults who are suffering.
 - ♦ Takes appropriate action to see that such vulnerable adults are kept safe from harm.
- 1.4 In pursuit of these aims, the trustees will approve and annually review policies and procedures with the aim of:
 - ♦ Raising awareness of issues relating to the welfare of vulnerable adults and the promotion of a safe environment for the vulnerable adults and young people.
 - ♦ Providing procedures for reporting concerns.
 - ♦ Establishing procedures for reporting and dealing with allegations of abuse against members of “staff”. These apply to all staff, whether trustees, administrative, management or support, as well as to volunteers. The word “staff” is used for ease of description.
 - ♦ The safe recruitment of staff.

- 1.5 Safeguarding Lead Person. The trustees have nominated **Mary Boland as designated person for 2026** with special responsibility for vulnerable adults' protection issues. She will undertake appropriate training and will ensure safeguarding issues are kept current and up to date. This person is a senior member of the management team.
- 1.6 Staff working with vulnerable adults will receive training adequate to familiarise them with vulnerable adults' protection issues and responsibilities and the organisations procedures and policies, with refresher training at least every three years. If appropriate, there will also be a member of the management team or volunteer who may through their employment background have particular expertise in vulnerable adults' protection issues. He/she may be delegated by the trustees.
- 1.7 The trustees will receive from the designated person with lead responsibility for vulnerable adult's protection an annual report that reviews how the duties have been discharged.

2. Abuse.

The governing body recognises the following as definitions of abuse:

2.1 Physical Abuse

Physical abuse causes harm to a vulnerable adult's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.

2.2 Neglect

Neglect is the persistent or severe failure to meet a vulnerable adult's basic physical and/or psychological needs. It will result in serious impairment of the vulnerable adult's health or development.

2.3 Sexual Abuse

Sexual abuse involves a vulnerable adult or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the vulnerable adults to be aware that the activity is sexual and the apparent consent of the vulnerable adults is irrelevant.

2.4 Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the vulnerable adult's or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

2.5 Financial Abuse

Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Financial or material signs include:

- ♦ Unexplained or sudden inability to pay bills.
- ♦ Unexplained or sudden withdrawal of money from accounts.
- ♦ Disparity between assets and satisfactory living conditions.
- ♦ Extraordinary interest by family members and other people in the vulnerable person's assets.

3. 'Relevant conduct' under the Safeguarding Vulnerable Groups Act 2006

In addition, the governing body accepts the following definitions of relevant conduct under Schedule 3 of the Safeguarding of Vulnerable Groups Act 2006 in relation to the barring of those who pose of a risk of harm to vulnerable adults. A relevant conduct is a conduct which must be referred to the DBS and which could lead to a barring decision. It includes any:

- ♦ Conduct which endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult.

- ♦ Conduct which if repeated against or in relation to a child or vulnerable adult would endanger that child or vulnerable adult.
- ♦ Conduct involving sexual material relating to children (including possession of such material).
- ♦ Conduct involving sexually explicit images depicting violence against human beings.
- ♦ Conduct of a sexual nature involving a child or vulnerable adult (or in the case of a vulnerable adult an act that is considered inappropriate).

4. Safeguarding Lead Person (with responsibility for protection of adults)

- 4.1 The designated person with lead responsibility for vulnerable adults' protection issues is Mrs Mary Boland, Hope Corner Community Centre, 185 Mays Lane, Barnet, Hertfordshire, EN5 2DY. Contact: 020 8364 8756. The Safeguarding Lead Person may or may not be designated as the regulated Activity Provider and/or Manager and/or Senior Care Worker(s).
- 4.2 The Safeguarding Lead Person has a key duty to take lead responsibility for raising awareness within the organisation of issues relating to the welfare of vulnerable adults and young people and the promotion of a safe environment for the vulnerable adults and young people.
- 4.3 The Safeguarding Lead Person is responsible for ensuring that exempted questions are asked on relevant volunteer and employment application forms. The question can be worded accordingly – "This post meets the requirements in respect of exempted questions under the Rehabilitation of Offenders Act 1974. Any applicants for this post who are offered employment or who become volunteers for this organisation will be subject to a criminal record check from the Disclosure and Barring Service before the appointment is confirmed. This will include details of cautions, reprimands or final warnings as well as convictions. A criminal record will not automatically bar a person from successfully taking up this post."
- 4.4 The Safeguarding Lead Person has received appropriate training and should keep up to date with developments in vulnerable adults' protection issues. They also have responsibility for making new staff aware of the existing vulnerable adults' protection policy.
- 4.5 The Safeguarding Lead Person will be the main contact point for vulnerable adults' Protection issues and will have contact details for relevant organisations available for employees and volunteers. This list will usually include contact details of relevant organisations including the local police.

5. Disclosure of Abuse and Procedure for Reporting Concerns

- 5.1 Procedure for reporting a concern or suspected abuse of a vulnerable Adult.
If a member of staff is concerned about a vulnerable adult or suspects that the vulnerable adult may be a victim of abuse, they are to inform the Seniors' Co-Ordinator or the Centre Manager (responsible person) immediately. It is the duty of the responsible person to:
- ♦ Listen carefully and stay calm.
 - ♦ Assesses the vulnerable adult(s) at the point of their visit.
 - ♦ Informs the vulnerable adult(s) that they must pass the information on, but that only those that need to know about it will be told.
 - ♦ Inform them of to whom you will report the matter to.
 - ♦ Complete the Professional Referral Form to Social Care Direct at socialcaredirect@barnet.gov.uk
 - ♦ Inform the designated Safeguarding Lead, Mary Boland of actions taken.
- 5.2 If a vulnerable adult or young person tells a member of staff about possible abuse:
- ♦ Listen carefully and stay calm.
 - ♦ Do not interview the vulnerable adults, but question normally and without pressure, in order to be sure that you understand what the vulnerable adult is telling you.
 - ♦ Do not put words into the vulnerable adult's mouth.
 - ♦ Reassure the vulnerable adults that by telling you, they have done the right thing.
 - ♦ Inform the vulnerable adults that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
 - ♦ Note the main points carefully.

- ♦ Make a detailed note of the date, time, place, what the vulnerable adults said, did and your questions.
- ♦ Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Person.

5.3 Reporting allegations of Abuse against Members of Staff

Because of their frequent contact with vulnerable adults, staff may have allegations of abuse made against them. Barnet Churches Action recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that the investigations are thorough and not subject to delay.

Abuse by a member of staff includes conduct where they have:

- ♦ Behaved in a way that has harmed a vulnerable adult and/or
- ♦ Possibly committed a criminal offence against or related to a vulnerable adult, and/or
- ♦ Behaved or may have behaved in a way that indicates they may not be suitable to work with vulnerable adults – this includes behaviour taking place both inside and outside the community centre.

The Safeguarding Lead Person will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective vulnerable adult protection while also supporting the individual who is the subject of the allegation.

5.4 Suspension of a Staff Member following an Allegation

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a vulnerable adult or other adults is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

6. Duty to refer to the DBS

- 6.1 The Safeguarding of Vulnerable Groups Act 2006 also makes it mandatory to refer anyone known to pose a threat of harm to a child or vulnerable people to the DBS. The designated member of staff responsible for safeguarding must not knowingly employ anyone who poses a risk of harm to children or vulnerable adults. This includes anyone who is believed to have committed a relevant conduct while on the job or who has a record of such conduct.
- 6.2 The organisation has a legal duty to refer an employee or volunteer who poses a risk of harm to children or vulnerable adults to the DBS; failure to do so can result in a fine and/or up to 5 year's imprisonment. There must be sufficient and solid evidence that the employee or volunteer poses a risk of harm before they can be referred to the DBS. The DBS will not consider evidence based on rumour or unsubstantiated reports. The employer should also inform the police and other relevant authorities if they believe a relevant conduct has occurred.
- 6.3 Referral forms can be downloaded from the DBS's website <https://www.gov.uk/dbs>.

7. The DBS's barring process

- 7.1 Whenever new relevant information (such as a conviction or caution) becomes known, the information will be sent to the DBS. The DBS will consider this information, together with other information known on the individual, and decide whether it indicates that the individual poses a risk of harm to vulnerable groups. If so, the DBS will commence its barring process and the DBS will issue a disclosure certificate to the applicant with the barring information.
- 7.2 The applicant should be advised by the designated member of staff to make a representation to the DBS regarding the barring information. The DBS will assess the barring information and representation and decide whether to bar the applicant. If there is sufficient barring evidence, the applicant will be placed on either the Children's Barred List or the Vulnerable Adults Barred List or both depending on the offence. The applicant must then be removed from regulated activity.

- 7.3 The applicant has the right of appeal to a tribunal and must be advised of this right. Serious offences committed against vulnerable people will lead to automatic barring and the applicant will have no right to make representations or to appeal against a barring decision.

8. Ensuring safer recruitment and selection

Barnet Churches Action will already have recruitment and selection procedures.

These should be reviewed in order to ensure that they take account of the following:

- ♦ They should apply to staff and volunteers who may work with vulnerable adults.
- ♦ The post or role should be clearly defined.
- ♦ The key selection criteria for the post or role should be identified.
- ♦ Vacancies should be advertised widely in order to ensure a diversity of applicants.
- ♦ Obtain professional and character references.
- ♦ Verify previous employment history.
- ♦ Disclosure and Barring Service disclosure/List 99 checks (maintain sensitive and confidential use of the applicant's disclosure).

We use a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).

9. Online Safety

- 9.1 Barnet Churches Action recognises the importance of safeguarding adults from potentially harmful and inappropriate online material and criminal activity such as online scams and fraud. We understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, we aim to:

- ♦ Have robust processes in place to ensure the online safety of children, staff, volunteers and trustees.
- ♦ Protect and educate the Hope Corner community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- ♦ Set clear guidelines for the use of mobile phones, tablets, laptops, computers and other electronic devices at Hope Corner Community Centre.
- ♦ Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

- 9.2 The four key categories of risk to online safety is based on:

- ♦ Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, HSB, suicide, anti-Semitism, radicalisation and extremism.
- ♦ Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and online criminals with the intention to exploit them for sexual (HSB), criminal, financial or other purposes.
- ♦ Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images, (HSB), (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- ♦ Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

10. External visiting

Barnet Churches Action has created a separate External Visiting Policy to define 'safe procedure' when staff are visiting externally with clients / residents.

Staff making external visits to clients / residents are required to sign a copy of this document to confirm their understanding of this procedure.

11. Safeguarding and Personal Views

Safeguarding must always take priority over the personal views, beliefs or moral values of individual workers. Staff have a strict legal and professional duty of care to protect vulnerable individuals from harm, abuse and neglect.

11.1 “Safe Boundaries”.

Personal views of staff working with vulnerable people must be kept within safe boundaries. Keeping safe boundaries ensure that staff do not get drawn into arguments which can escalate, resulting in complaints from clients / residents. It also safeguards the charity from being associated with those personal views.

Keeping safe boundaries includes:

- ♦ Not sharing views which conflict with the values, morals and beliefs of the charity.
- ♦ Not sharing views which are specific to a political party or political issue. BCA is apolitical.
- ♦ Not sharing views which have specific Christian denominational differences. BCA represents Churches Together for Chipping Barnet, which is an ecumenical body, aligned on core beliefs and specific mission outreach.
- ♦ Being mindful and respectful of the other party, who may have different or conflicting views.

11.2 Procedure and Action.

- ♦ Personal views which conflict with safeguarding regulations must be reported immediately to the Safeguarding Lead Person.
- ♦ Disagreements which arise from breaching safe boundaries must be reported to the Safeguarding Lead Person and Manager (for operational purposes).
- ♦ When a worker's personal, religious, or political views conflict with their safeguarding responsibilities, organisational policies and legislation (such as the UK Care Act 2014) dictate how they must act.

12.0 Confidentiality and Data Protection

12.1 Confidentiality in safeguarding means handling personal information responsibly and sharing it only on a strict need-to-know basis to protect someone from harm. Confidentiality must be broken if a person is in danger, a child is involved or a serious crime has been committed. Public interest and safety always override a promise of secrecy. Dial emergency services (**999**) immediately if the person is in immediate danger or a crime is currently in progress.

12.2 Key principles

- ♦ Not absolute: Privacy rights must be balanced against the immediate duty to protect a vulnerable person at risk.
- ♦ No absolute secrets: Staff can never promise to keep a secret that compromises a person's safety.
- ♦ Need-to-know basis: Information is shared only with designated safeguarding leads or relevant authorities to stop abuse.

12.3 When Information Can Be Shared Without Consent

- ♦ Risk of serious harm: There is reasonable cause to believe a child or adult faces significant harm.
- ♦ Emergencies: Life-threatening situations require immediate contact with emergency services.

12.4 Legal and Governance Frameworks for Recording and Keeping Data

- ♦ Data protection: Laws like the Data Protection Act 2018 are frameworks for appropriate sharing, not barriers to safety.
- ♦ Proportionality: Only share the minimum amount of information necessary to address the specific risk.
- ♦ Record keeping: Document what was shared, with whom, and the clear justification for doing so.

This document updated September 2026, effective from September 2026.

Review date: April 2027.