

COMMUNITY LINKS BROMLEY

Safeguarding adults at risk policy and procedures

Last Reviewed January 2026

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1. Introduction

This Safeguarding Adults at risk policy and guidance sets out the approach of Community Links Bromley (CLB) to ensuring that it and its staff are compliant with legislation and statutory guidance with regards to safeguarding adults at risk.

This policy demonstrates CLB's commitment to create a positive culture of respect for all individuals, including employees, volunteers, service users and community partners. The intention is, as required by the Equality Act 2010, to identify, remove or minimise discriminatory practice in the nine named protected characteristics of age, disability sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief and marriage and civil partnership. It is also intended to promote positive practice and value the diversity of all individuals and communities.

2. Statement

Safeguarding children, young people and adults at risk is of the highest priority for CLB. This policy is specifically concerned with safeguarding adults at risk.

Adult safeguarding is based on six principles which CLB adopts:

Empowerment: people being supported and encouraged to make their own decisions and give informed consent.

Prevention: it is better to take action before harm occurs.

Proportionality: The least intrusive response appropriate to the risk presented.

Protection: Support and representation for those in greatest need.

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

Accountability: Accountability and transparency in delivering safeguarding.

CLB will deliver its duties for safeguarding adults at risk in line with The Care Act 2014, its statutory guidance and the London Multi-Agency Adult Safeguarding Policy and Procedures (2019).

CLB will ensure that its employees and volunteers are appropriately trained and skilled to comply with statutory safeguarding adults at risk responsibilities.

CLB will also have regard to safeguarding children and young people and will demonstrate the application of a holistic 'Think Family' approach to safeguarding.

CLB recognises that there is a legal framework within which organisations need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adults legislation and with local statutory safeguarding procedures. Therefore, CLB will support all VCS organisation across the Borough to do the same.

3. Purpose

Safeguarding means 'protecting an adult's right to live in safety, free from abuse and neglect'.

The aims of adult safeguarding are to:

- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- stop abuse or neglect wherever possible
- safeguard adults in a way that supports them in making choices and having control about how they want to live
- promote an approach that concentrates on improving life for the adults concerned
- raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect
- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult
- address what has caused the abuse or neglect.

Staff should work together in partnership with adults so that they are:

- safe and able to protect themselves from abuse and neglect.
- treated fairly and with dignity and respect.
- protected when they need to be.
- are able to get the support, protection and services that they need.

4. Scope

This safeguarding adults policy and its associated procedure (set out in Appendix 1) apply to all individuals involved in CLB including Trustee Board members, staff and volunteers.

Through good governance, training, supervision and support, our staff and volunteers are more likely to:

- identify an adult at risk,
- ensure concerns or allegations of abuse are always taken seriously and
- understand their responsibilities to escalate those concerns and know how to do so.

Such responsibilities include the responsibility to make a record of our actions.

Adult safeguarding work in Bromley takes place in the context of:

- the Care Act 2014: This sets out the duties and powers in law around adult safeguarding issues. It indicates that the local authority is the lead agency on responding to adult safeguarding concerns and that Safeguarding Adults Boards (SAB) have the strategic lead for their area.
- the Care and Support Statutory Guidance: This gives detail about what must and should be done in relation to adult safeguarding issues. As it is statutory guidance, it must be followed unless you have good reason not to.
- the London Multi-Agency Adult Safeguarding Policy and Procedures: This gives the framework adopted across London for multi-agency responses to adult safeguarding concerns.
- the Bromley Safeguarding Adults Board (BSAB) policy and procedures.

CLB will cooperate with any Local Authority in relation to requests made of it in respect of Adult Safeguarding.

CLB expects members and organisations funded through CLB to adopt and demonstrate their commitment to the principles and practice as set out in this safeguarding adults policy and associated procedures.

5. Definitions

Adult at Risk: safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- 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.

The Social Care Institute for Excellence (SCIE) indicates:

"An adult with care and support needs may be:

- an older person
- a person with a physical disability, a learning difficulty or a sensory impairment
- someone with mental health needs, including dementia or a personality disorder
- a person with a long-term health condition
- someone who misuses substances or alcohol to the extent that it affects their ability to manage day-to-day living".

This is not an exhaustive list.

People with care and support needs are not inherently vulnerable, but they may come to be at risk of abuse or neglect at any point due to:

- physical or mental ill-health
- becoming disabled
- getting older
- not having support networks
- inappropriate accommodation
- financial circumstances

- being socially isolated.

The Care Act 2014 and Care and Support Statutory Guidance Chapter 14, sets out the main forms of abuse as below, supplemented by new and emerging areas of abuse highlighted by the London Safeguarding Adults Boards Network. These become a safeguarding issue when they affect an adult at risk who has care needs and who cannot protect themselves from the abuse/neglect:

Type of Abuse	Description of Abuse
Physical abuse	Including assault (slapping, hitting, pushing) misuse of medication, restraint or inappropriate physical sanctions.
Domestic abuse	Including psychological, physical, sexual, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse where such behaviour is towards another both aged 16 and over and are personally connected to each other.
Honour-based abuse	A crime or incident committed to protect or defend the perceived honour of the family and/or community or in response to individuals trying to break away from constraining 'norms' of behaviour that the family or community is trying to impose. Can include physical, emotional or psychological use.
Sexual abuse	Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography without consent, 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. Includes online sexual exploitation contexts and instances where adults at risk receive something (e.g. accommodation, affection) in return for conducting sexual acts.
Psychological abuse	Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, online romance fraud, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
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 Day Slavery	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.
Discriminatory abuse	Including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion, e.g. denying access to communication aids.
Organisational abuse	Including neglect and poor care practice within an institutional or specific care setting, i.e. a hospital or care home, or in relation to care provided in one's own home. This can range from "one off" incidents to ongoing ill-treatment and can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within the organisation.
Neglect and acts of omission	Including ignoring medical, emotional or physical needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, e.g. medication, adequate hydration or nutrition and heating.
Self-neglect	This covers a wide range of behaviours, including neglecting to care for one's personal hygiene, health or living environment and includes behaviour such as hoarding. This may present a danger to oneself and other people – vermin or risk of fire etc.

Cuckooing	The home of a vulnerable person is taken over by criminal(s) to use the home as a place to deal, store, take drugs, for sex work, financially abuse the tenant or owner of the home.
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6. Governance

The Safeguarding Lead takes strategic responsibility for all of CLB's safeguarding functions, including policy and training. They are accountable for providing assurance that CLB's safeguarding adult statutory duties are discharged and all responsibilities met.

The role of Safeguarding Lead at CLB is held by the Chief Executive Officer and included in their job description. A detailed description of the role of the Safeguarding Lead appears at Appendix 2.

The Safeguarding Lead will ensure that CLB has an appropriate internal governance framework and operating arrangements that ensure the implementation and maintenance, and oversight of robust systems and processes to monitor all safeguarding requirements.

The Trustee Board will hold the Safeguarding Lead to account for the discharge of safeguarding adult statutory duties in CLB. The Board will consider, at least annually, a report detailing how risks to adult safeguarding are being addressed and how any reports of concerns, where identified, have been addressed.

This policy and procedures are reviewed no less than on an annual basis and whenever there are changes in relevant legislation and/or government guidance or as a result of any other significant change or event.

7. Safeguarding adults training standards

CLB will ensure that:

- i) All staff, trustees and volunteers are made aware of this policy and procedures within two weeks of starting in role.
- ii) all staff and volunteers undertake Safeguarding and Prevent awareness training appropriate to Staff Group A (Alerters) in the [National Competency Framework for Safeguarding Adults](#). This group have a duty of care to adults at risk of abuse and to identify and raise a safeguarding adults concern.
- iii) The Chief Executive Officer and team managers undertake safeguarding training appropriate to Staff Group B1 (Responders). In addition to the above duties this group also has the responsibility to refer safeguarding adults concerns through the correct organisational processes.
- iv) The Safeguarding Lead and at least one member of the Trustee Board undertake safeguarding training appropriate to Staff Group D (Governance and Board roles). This group has the role to scrutinise adult safeguarding work and to challenge and hold CLB to account.

Relevant competencies for these groups are set out in appendix 3.

Training to ensure these competencies in the relevant staff and volunteers will be identified by the Safeguarding Lead in an organisational training needs analysis and training plan.

This will include training at induction and refresher training at least every three years, including information about the procedure for reporting safeguarding concerns.

CLB will ensure that its safeguarding training includes elements on the Prevent programme.

CLB will ensure that its safeguarding training for employees includes elements on Domestic Abuse, including the statutory definition in the Domestic Abuse Act 2021 and its statutory guidance, and that staff are aware of the local referral routes for Domestic Abuse victim/survivors.

The Trustee Board will nominate a Board member to attend adult safeguarding training.

8. Prevent (radicalisation)

Prevent is part of a national strategy led by the Home Office, which focuses on working with individuals and communities who may be vulnerable to the threat of violent extremism and terrorism. The Prevent Strategy (2011) has the following objectives:

- challenge the ideologies that support terrorism and those who promote it
- prevent vulnerable individuals 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

CLB employees and volunteers may have contact with adults at risk or children and young people who could become victims of radicalisation. There is no obvious profile of a person likely to become involved in terrorist-related activity, or single indicator of when a person might move to support extremism. Vulnerable individuals who may be susceptible to radicalisation can be volunteers or service users. Prevent aims to ensure that those who are at risk will receive help and support from partners best placed to meet these needs.

The CLB Safeguarding Lead will also be the operational lead for Prevent. All concerns (unless urgent in which case call the police) within CLB regarding either employees or volunteers in relation to Counterterrorism will be reported to the appropriate manager who will escalate accordingly.

9. Safe recruitment

All organisations that employ adults or volunteers to work with children or vulnerable adults should adopt a consistent thorough process of safer recruitment to ensure those recruited are the best candidates for the role and are suitable to work with vulnerable groups.

CLB will ensure that all staff members and volunteers who may have contact with adults at risk, or their records, have been subject to appropriate due diligence employment checks, including through the Disclosure & Barring Service, commensurate with their role, and in advance of commencing their role.

CLB's arrangements for safer recruitment are set out in the Recruitment Policy.

10. Preventative measures

Trustee Board members and CLB volunteers will not have unsupervised access to vulnerable adults.

When planning activities and events, CLB will include an assessment of, and risk to the safety of all adults from abuse and neglect and designate a person who will be in attendance as a safeguarding lead for that event.

11. Reporting a safeguarding concern

Local authorities have the statutory responsibility to deal with safeguarding concerns. If a safeguarding concern is raised with the local authority, it may decide to undertake a statutory safeguarding enquiry under s42 of the Care Act 2014 or other proportionate action as appropriate to safeguard or support the adult at risk. CLB will cooperate with any local authority in relation to requests made of it in relation to adult safeguarding.

Action will be taken no matter if the information received about a concern is non-recent or from an anonymous source.

If any CLB trustee, staff member or volunteer believes that a person:

- has care and support needs
- is experiencing, or is at risk of abuse and neglect
- and is unable to protect themselves from that abuse and neglect because of those care and support needs

then they will follow the procedure set out in Appendix 1.

12. Reporting/ managing allegations against staff

Where allegations of abuse are made against a staff member or volunteer, whether contemporary in nature, historical or both, the safeguarding allegation will be referred in the same way as any other incident or allegation of abuse.

The Safeguarding Lead must be informed immediately. Moving the staff member from a public or volunteer facing role or suspension of the individual may need to be considered. Suspension itself is a neutral act and allows a full investigation of the facts to take place, in accordance with the Disciplinary and Capability policy.

It is important that when allegations are made, early consideration is given to the distinction between an allegation and a complaint. Where doubt exists as to the nature of what is being referred, appropriate consultation with the Safeguarding Lead (or in cases where the allegation relates to the Safeguarding Lead, to the Chair of the Trustee Board) will take place, so that accuracy, transparency and integrity of the process are secured and any doubt clarified.

It is acknowledged that all staff may be vulnerable to malicious or mischievous allegations or complaints or simply be subject to a misunderstanding of a situation, therefore objectivity and a balanced approach to information received are essential. Staff subject to allegations will be supported whilst allegations are investigated.

13. Information sharing

There is a duty on relevant organisations to supply information to Safeguarding Adult Boards (SAB) on request (Care Act 2014 Section 45). The information must be requested for the purpose of enabling or assisting the SAB to perform its functions – which amount to doing anything it believes necessary to co-ordinate and ensure the effectiveness of all those who exercise ‘enquiry’ functions.

Adults have a general right to independent, choice and self-determination including control of information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances. Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent.

The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. The law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example where a serious crime may be prevented.

14. Following a report of a safeguarding concern

Following an incident of a safeguarding concern, the Safeguarding Lead will:

- Ensure the victim(s) of the allegation have been offered appropriate help and support
- Follow up with the police and/or council if any new relevant information is discovered.

The Chief Executive will decide, in consultation with the Chair of the Board of Trustees, whether this is a ‘serious incident’ which needs to be reported to the Charity Commission. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant harm to CLB’s beneficiaries, staff, volunteers or others who come into CLB through its work.

15. Policy review

This policy and procedures will be reviewed at least once a year and always following a serious incident.

Appendix 1 – Procedure for reporting a safeguarding concern

Staff should not assume that someone else will pass on information which they think may be critical to the safety and wellbeing of the adult. If staff have concerns about the adult's welfare and believes they are suffering or likely to suffer abuse or neglect, then they should take action as set out in this procedure.

If any CLB trustee, staff member or volunteer believes that a person:

- has care and support needs
- is experiencing, or is at risk of abuse and neglect
- and is unable to protect themselves from that abuse and neglect because of those care and support needs

then they will take the following actions, following guidance set out below:

1. In an emergency:

- Make an immediate evaluation of the risk and take steps to ensure that the adult is not in immediate danger
- If there is a need for emergency medical treatment, dial 999 for an ambulance
- If it is suspected that the injury is non-accidental, alert the ambulance staff so that appropriate measures are taken to preserve forensic evidence
- Wherever possible, establish with the adult at risk the action they wish to be taken (see scenario 2 below for the approach to be taken, wherever possible, to discussing alleged concerns with the adult and/or the adult's representative)
- Consider contacting the police if a crime has been or may have been committed
- Do not disturb or move articles that could be used in evidence, and secure the scene, for example by locking the door to a room
- Refer to the [Bromley Children and Families Hub](#) if a child is at risk
- As far as possible, make sure that others are not at risk
- Do not question the alleged victim any more than needed to clarify that possible abuse has taken place
- Discuss the alleged concerns with their immediate line manager or the Safeguarding Lead.
- Submit information relating to the concern via the public reporting form on the Bromley Council website - [Reporting an Adult Safeguarding Concern](#). The information submitted should include:
 - A description of the abuse, including where and when it happened
 - Where the adult is now?
 - Is the adult still at risk?
 - Information about the adult's care and support needs and why the adult cannot protect themselves
 - Details about the adult/people and/or organisation that might pose a risk to this adult
 - Whether this matter has been reported to/ discussed with anyone else - such as the Care Quality Commission or the service provider.

2. If the matter is not an emergency:

- Discuss the alleged concerns with the adult and/or the adult's representative, and where appropriate obtain consent from the adult. Consent should always be sought from the adult. Where the adult lacks the mental capacity to make a decision regarding the referral, the principles of the Mental Capacity Act 2005 should be followed and actions undertaken in the person's best interests. The adult at risk

should be asked who else they wish to inform about the referral. However, there are exceptions for when this is not appropriate, namely:

- This might increase the risk to the adult.
- Place a member of staff at risk by the response it may prompt.
- Lead to the risk of loss of evidence e.g. someone destroying evidence of a crime or influencing an adult at risk to withdraw allegations.
- Discuss the alleged concerns with their immediate line manager or the Safeguarding Lead.
- Submit information relating to the concern via the public reporting form on the Bromley Council website - [Reporting an Adult Safeguarding Concern](#). The information submitted should include:
 - A description of the abuse, including where and when it happened
 - Where the adult is now?
 - Is the adult still at risk?
 - Information about the adult's care and support needs and why the adult cannot protect themselves
 - Details about the adult/people and/or organisation that might pose a risk to this adult
 - Whether this matter has been reported to/ discussed with anyone else - such as the Care Quality Commission or the service provider.

If required, contact numbers for social workers are:

- **During office hours: 020 8461 777**
- **Outside office hours: 0300 303 8671**

Making a record

Staff or volunteers who witness or who are alerted to a situation of abuse or neglect should make a written record of any incident or allegation of crime as soon as possible, and keep a signed, dated and timed copy.

The record must reflect as accurately as possible what was said and done by the people initially involved in the incident (the victim, suspect and potential witnesses). The record will use the words actually spoken, if possible.

Responding to disclosures

Staff and volunteers should follow the following guidelines when responding to an adult at risk who is making a disclosure:

- Assure them that they are being taken seriously
- Listen carefully to what they are saying, stay calm and get as clear a picture as possible, avoiding asking too many questions at this stage
- Do not give promises of complete confidentiality
- Explain that the staff member/ volunteer has a duty to tell their manager or Safeguarding Lead and that their concerns may be shared with others who could have a part in protecting the adult at risk. An adult at risk should be asked if they consent to a safeguarding referral being made and/or reported to the police. However, if others are at risk, or a child is involved, staff have professional responsibility and obligation to report the matter forthwith. If in doubt, seek the advice of a line manager and/or the Safeguarding Lead.
- Reassure them that they will be involved in decisions about what will happen

- Explain that the staff member/ volunteer will try to take steps to protect them from further abuse or neglect
- If they have specific communication needs, provide support and information in a way that is most appropriate to them
- Do not be judgemental or jump to conclusions.

Responding to allegations relating to a staff member or volunteer

Any allegation about a staff member or volunteer, whether relating to historical or recent activity should be referred in the same way as any other allegation. Do not inform the alleged perpetrator(s) until you have taken advice from the Safeguarding Lead (or in their absence, the Chair of the Trustee Board), who you should inform immediately: depending on the concern this may not be appropriate at all.

Appendix 2 - Role description – Safeguarding Lead

The designated person within CLB has primary responsibility for putting into place procedures to safeguard adults at risk, supporting welfare/safeguarding leads in other organisations where relevant and for managing concerns about adults at risk.

Duties and responsibilities include:

- Working with others within the organisation to create a positive inclusive environment within CLB's activities.
- Play a lead role in developing and establishing CLB's approach to safeguarding adults and in maintaining and reviewing the organisation's implementation plan for safeguarding adults in line with current legislation and best practice.
- Coordinate the dissemination of the safeguarding adult policy, procedures and resources throughout the organisation.
- Contribute to ensuring other policies and procedures are consistent with the organisation's commitment to safeguarding adults.
- Advise on the organisation's training needs and the development of its training strategy.
- Receive reports of and manage cases of poor practice and abuse reported to the organisation – including an appropriate recording system.
- Support the chair to co-ordinate the case management process.
- Manage liaison with, and referrals to, external agencies for example adult social care services and the police.
- Create a central point of contact for internal and external individuals and agencies concerned about the safety of adults within the organisation.
- Play a lead role in their recruitment, selection and training.
- Represent the organisation at external meetings related to safeguarding.

Appendix 3 – Safeguarding Competencies

Group	Competencies
Group A - Alerters	<p>Awareness of safeguarding adults:</p> <ul style="list-style-type: none"> ● Demonstrate what constitutes an adult at risk of experiencing abuse or neglect (Care Act 2014 definition) ● Describe what is meant by abuse and neglect ● Knowledge of CLB’s processes for safeguarding adults ● Apply duty of care to adults at risk and duty to report safeguarding adults concerns <p>Reporting safeguarding concerns:</p> <ul style="list-style-type: none"> ● Demonstrate an understanding of CLB’s procedures for supporting an adult at risk of abuse ● Able to demonstrate understanding of how to ensure immediate safety (e.g. contacting police) and maintain appropriate confidentiality ● Able to outline the processes for informing appropriate person of safeguarding adults concern ● Aware of and confidence in using ‘whistleblowing’ policies and procedures
Group B1 - Responders	<p>Inform, involve and listen:</p> <ul style="list-style-type: none"> ● Ensure the adult at risk is appropriately informed and involved in decision making around the safeguarding adult concern relating to them. <p>Respond:</p> <ul style="list-style-type: none"> ● Demonstrate accountable decision making in response to safeguarding adult concerns ● Demonstrate that all safeguarding adults practice takes account of the wellbeing adult at risk in keeping with Care Act Guidance 2014 ● Demonstrate appropriate information sharing with others and within CLB <p>Report, Refer and Record:</p> <ul style="list-style-type: none"> ● Able to apply CLB procedures and processes for reporting and documenting safeguarding adults concerns.
Group D – Governance and Board roles	<p>Lead:</p> <ul style="list-style-type: none"> ● Demonstrate and support the enabling and sustaining culture change in line with the Care Act 2014 ● Show strategic leadership and understanding of: <ul style="list-style-type: none"> ○ Outcome-focused ○ Wellbeing ○ Making Safeguarding Personal

	<ul style="list-style-type: none">● Demonstrate application and embedding of learning from Safeguarding Adults Reviews● Promote embedding of the National Competency Framework for safeguarding adults in CLB <p>Strategic planning:</p> <ul style="list-style-type: none">● Ensure and support systems are in place for safeguarding adults in respect of:<ul style="list-style-type: none">○ Annual report to Trustee Board○ Performance measures○ Challenging poor practice○ Training compliance (in line with National Competency Framework for safeguarding adults)○ Whistleblowing <p>Develop and promote:</p> <ul style="list-style-type: none">● Demonstrate public, professional and organisational awareness of safeguarding adults
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