Safeguarding Adults Policy

Document reference	**SG-AD-01**
Policy owner	Board of Directors
Designated Safeguarding Lead	Jo Rusbridge
Deputy Designated Safeguarding Lead	Harry Deacon
Safeguarding Officer	Michelle Jago
Board Safeguarding Director	Tracie — independent oversight
Approved / effective	03/11/2026
Next formal review	Annually by the Board; 12 months after effective date. Next review date – 02/11/2027
Related documents	SG-CYP-01, SG-PRO-01, SG-ALG-01, SG-SWO-01, SG-ASS-01

1. Purpose, commitment and application

BLoT supports adults through its physical Community Hub, Mobile Hub, community activities, digital and practical assistance, partner sessions and occasional authorised home visits. This policy applies to directors, staff, volunteers, sessional workers, students, relevant contractors and partners acting for BLoT. All adults have the right to dignity, safety, respect, privacy and freedom from abuse. Safeguarding must never be compromised by convenience, reputation or funding considerations. The accompanying operational procedures govern recording, referral and risk controls. Where a procedure is unclear, take urgent protective action and seek appropriate safeguarding advice rather than delay a referral.

2. Adult safeguarding principles

BLoT adopts the six Care Act safeguarding principles: empowerment, prevention, proportionality, protection, partnership and accountability. Making Safeguarding Personal requires workers to ask the adult about desired outcomes, listen without judgement, support choice and participation, and take views seriously throughout the process. Responses must be trauma-informed, culturally respectful, anti-discriminatory and accessible to people with communication differences or disabilities. Use an appropriate independent interpreter where necessary. Adults are not defined by their living arrangements, poverty, age or disability; these factors alone do not demonstrate abuse or an inability to decide.

3. Legal framework and the section 42 threshold

The key framework is the Care Act 2014, especially sections 42–46 and chapter 14 of the Care and Support Statutory Guidance, with the Mental Capacity Act 2005, Human Rights Act 1998, Equality Act 2010, Domestic Abuse Act 2021, Safeguarding Vulnerable Groups Act 2006, Rehabilitation of Offenders Act 1974 and relevant exceptions, UK GDPR, Data Protection Act 2018 and applicable criminal law. Cornwall and

Isles of Scilly Safeguarding Adults Board procedures apply locally. Under Care Act section 42, the local authority must consider an enquiry where it has reasonable cause to suspect an adult (a) has care and support needs, whether or not these are being met, (b) is experiencing or at risk of abuse or neglect, and (c) as a result of those needs is unable to protect themselves. BLoT does not determine the statutory threshold; uncertainty must not prevent sharing a justified concern. Adults outside section 42 may still need other support or police protection. BLoT is a CIC, not a registered charity; obligations are assessed according to its actual activities and contracts.

4. Recognising abuse, neglect and exploitation

Safeguarding concerns may be disclosed, observed or suspected; signs are often cumulative. Categories include physical abuse, domestic abuse, sexual abuse, psychological or emotional abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational abuse, neglect and acts of omission, and self-neglect. Workers must recognise technology-facilitated control, online scams, coercion over benefits, medication or housing, threats, isolation, exploitation and unsafe care arrangements. Self-neglect requires careful attention to capacity, circumstances, risk and the adult's wishes; it does not automatically justify overriding their choices. Poverty, poor housing or refusing assistance alone do not prove abuse. Report factual observations and concerns without attempting to investigate or establish proof.

5. Consent, mental capacity and advocacy

The Mental Capacity Act principles apply: presume capacity unless established otherwise; support people to decide; an unwise decision does not itself prove incapacity; acts or decisions made for a person lacking capacity must be in their best interests and be least restrictive. Capacity is decision-specific and can fluctuate. BLoT staff must work within competence and seek appropriate professional advice where assessment is required. Ask the adult what they want to happen, explain any sharing or referral and obtain consent when safe and appropriate. A capacitous refusal matters, but may not prevent lawful information sharing where serious harm, coercion, crime, a risk to others or another lawful ground applies. Record consent, refusal, capacity concerns and reasons. Consider advocacy and communication support; statutory advocacy eligibility is decided by the responsible authority; where an adult has substantial difficulty participating in safeguarding processes and has no appropriate person to support them, the responsible authority must consider its duty to arrange an independent advocate under the Care Act.

6. Identifying levels of risk and responding

In immediate danger call 999 and act only within personal competence. For urgent or escalating abuse, contact Cornwall adult safeguarding or police without delay. For other suspected abuse or neglect, report internally on the same working day and seek advice or refer via the current Cornwall pathway. Where someone needs ordinary help rather than a safeguarding response, discuss appropriate support with their informed agreement. Do not wait for Jo or Harry if their absence or conflict would delay protection. A rejected referral is not the end of the matter where risk continues: record feedback and re-escalate with new information or seek further advice.

7. Responding to disclosures and reporting

Listen carefully and calmly, avoid leading questions or unnecessary detail, explain that information may need to be shared, and never promise secrecy or a guaranteed outcome. Do not confront an alleged perpetrator, conduct investigative interviews, search private devices or mediate potentially abusive situations. Record date, time, exact words where possible, observations, the adult's wishes, immediate action and any advice received. Notify Jo, Harry or Michelle immediately if urgent and otherwise on the same working day. Michelle must escalate substantive concerns to Jo or Harry; every worker may contact statutory services directly if necessary. Record referrals, responses, decisions, the follow-up owner and the next review. Do not automatically contact family or carers, particularly where they may pose a risk.

8. Cornwall contacts and referral routes

Emergency services: 999. Cornwall Council adult safeguarding: 0300 1234 131 and the Council's current professional online safeguarding referral form. Professional safeguarding advice: 01872 326433. Police non-emergency: 101. Cornwall Council published general safeguarding out-of-hours service: 01208 251300, subject to verification before issue. Use Cornwall's Person in Position of Trust (PiPoT) reporting pathway where relevant to an allegation against someone working with adults with care and support needs. Contacts, secure referral mechanisms and hours must be controlled and rechecked in SG-PRO-01. If a route does not work, contact the local authority or police by an alternative published method; never delay urgent protection.

9. Safeguarding during Hub, mobile and community delivery

Each session must have an identified lead and proportionate risk assessment addressing site hazards, privacy, accessibility, worker supervision, professional boundaries, first aid and emergencies. Workers must avoid publicly exposing disclosures and remain alert to financial control, fraud, domestic abuse and coercion. Providing food, necessities or routine assistance must not be made conditional upon disclosure or referral. Partners and visiting professionals must know how to report concerns, who is responsible for statutory referrals and who supervises activities. BLoT retains responsibility for concerns encountered by its own people, even when a partner delivers specialist support.

10. Home visits and outreach safety

Every BLoT home visit requires at least two authorised workers, advance management authorisation, a clear purpose, risk screening, a recorded location, check-in/check-out and an emergency plan. A worker must never enter a home alone on BLoT business. If a second worker is unavailable, postpone or arrange safe alternative support, and call emergency services if someone faces immediate danger. Withdraw from unsafe situations; do not intervene in violence, conduct investigations or transport service users. Do not leave messages or safeguarding notes where a potentially abusive person might discover them. Follow SG-SWO-01.

11. Digital help, finances and professional boundaries

Use approved organisational communications, not private social-media relationships. Staff must not retain passwords or PINs, access accounts without appropriate authority, make undocumented financial decisions, borrow or lend money, accept inappropriate gifts or use their status for personal, sexual, social or financial advantage. Respect dignity during digital assistance and protect personal information. Record and report unsafe boundaries, suspected financial exploitation, fraud, scams or coercion. Photographs, case stories, audio or publicity require appropriate agreement, privacy safeguards and a risk assessment.

12. Adult concerns, complaints and alternative routes

An adult or supporter may report BLoT safeguarding concerns in person, by telephone, email or to Tracie as independent Board safeguarding contact. Staff will offer reasonable adjustments, accessible communication and interpreter assistance as needed. No person is required to complain through someone who may be abusive. Safeguarding issues arising in complaints are prioritised over routine complaints administration, with urgent matters reported immediately and all others on the same working day. The person complained about must not control the process. Tracie's confidential route must be accessible within SG-PRO-01.

13. Board and safeguarding leadership responsibilities

The Board approves this policy, provides resources, monitors organisational safeguarding risks, receives quarterly anonymised safeguarding assurance and ensures escalation remains independent where directors or Co-CEOs are implicated. Jo Rusbridge is the Designated Safeguarding Lead and coordinates case decisions, external liaison, records and follow-up. Harry Deacon is Deputy and acts during absence or conflicts, coordinates training and implementation assurance and escalates serious concerns to an unconflicted director. Michelle Jago is a Safeguarding Officer: she receives and records concerns, supports induction, advises within her competence and promptly escalates substantive concerns; she does not independently investigate abuse or close complex cases. Tracie independently scrutinises governance, receives escalation about leadership and ensures appropriate external action. Matters involving Tracie go to another unconflicted director and statutory services. All workers must recognise, act, record and report concerns and cooperate with lawful enquiries.

14. Allegations about staff, volunteers, partners or directors

Any allegation that a person working with adults with care and support needs harmed or may have harmed an adult or child, committed a relevant offence or acted in a way indicating risk must follow SG-ALG-01. Consider Cornwall's PiPoT process, police and adult safeguarding referrals, precautionary work restrictions, fair employment processes and statutory DBS referral obligations. Do not conduct a parallel investigation that could prejudice a statutory enquiry. Allegations about Jo go to Harry and Tracie; concerns involving both Co-CEOs go to Tracie and external services; concerns about Tracie go to an unconflicted director and appropriate statutory bodies. BLoT prohibits retaliation for good-faith reporting.

15. Safer recruitment, vetting and supervision

Each role must have an appropriate description, safeguarding risk assessment, identity and reference checks, role-relevant qualifications and lawful right-to-work controls. DBS eligibility is determined by the precise duties and relevant legislative criteria, not simply by working with "vulnerable adults". Enhanced and adults' barred-list checks are requested only where eligible. Roles changing significantly must be reassessed. No one should begin unsupervised or higher-risk tasks until necessary vetting, induction and controls are complete; interim arrangements must be supervised and recorded.

16. Induction, training and safeguarding culture

Volunteers receive introductory safeguarding training, staff more detailed role-based training, and Jo, Harry and Michelle enhanced safeguarding leadership training; Tracie receives appropriate Board oversight training. All directors, employees and volunteers receive formal role-appropriate refresher training annually as BLoT's internal policy standard. SG-ASS-01 records completion, training provider, due dates, supervision, competencies and action plans. Provide further briefings when services change or concerns reveal gaps. Support staff following difficult cases without compromising confidentiality.

17. Confidential records and lawful information sharing

Keep identifiable safeguarding case records in a separate restricted-access BLoT WorkDrive folder away from general policies and compliance materials, accessible only to safeguarding personnel authorised for that case. Apply permission reviews, audit trails, secure transfer, documented retention and data-breach processes. Include the adult's wishes and relevant consent or capacity considerations, the concern, exact words where possible, referrals, advice, decisions, outcomes and follow-up. Share only necessary, accurate and lawful information on a need-to-know basis, considering UK GDPR lawful bases and special category conditions where applicable. Do not disclose case details in group chats or general shared files. The Board normally receives anonymised assurance.

18. Multi-agency working and accountability

BLoT will cooperate proportionately with Cornwall Council, police, health services, specialist domestic abuse services, advocates, care providers and other community partners as needed. Agreements must allocate supervision, referrals, safeguarding contacts, information-sharing mechanisms, allegation handling and follow-up. Verify another agency has received and is managing a referral rather than assuming handover ends BLoT's responsibility. Consider learning from relevant safeguarding adults reviews and case findings.

19. Oversight, breaches and annual Board review

The Board receives quarterly anonymised updates covering referrals, emerging concerns, training, vetting, partner risks, case follow-up and improvements. Serious safeguarding incidents or allegations affecting leadership must be reported promptly to an unconflicted director, outside the quarterly cycle. BLoT conducts one scheduled formal Board review of this policy annually. Urgent safeguarding action, operational procedure corrections, statutory updates and any material amendments needing Board approval must nevertheless occur when required; the annual review schedule does not justify

postponement. Breaches prompt proportionate immediate protection, external reporting where needed and appropriate employment, volunteer or contractual action.

Appendix A — One-minute action guide

- DANGER NOW: call 999 and act safely.
- LISTEN: ask the adult's wishes; never investigate or promise secrecy.
- REPORT: urgent immediately, otherwise the same working day to Jo, Harry or Michelle.
- REFER: Cornwall adult safeguarding 0300 1234 131 or police as appropriate.
- RECORD: facts, wishes, consent and capacity considerations, advice, decisions and follow-up.
- FOLLOW UP: check that concerns have been addressed; escalate again if needed.

Appendix B — Controlled supporting documents

SG-CYP-01	**Safeguarding Children and Young People Policy**
SG-PRO-01	Safeguarding Procedures and Reporting
SG-ALG-01	Allegations Management including PiPoT
SG-SWO-01	Safe Working and Outreach
SG-ASS-01	Safeguarding Compliance and Assurance

Appendix C — Sources and guidance

Care Act 2014 section 42: https://www.legislation.gov.uk/ukpga/2014/23/section/42

Care and Support Statutory Guidance, chapter 14: https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

Cornwall adult safeguarding and PiPoT: https://www.cornwall.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults/

DBS adults eligibility guidance (September 2026): https://www.gov.uk/government/publications/eligibility-for-roles-working-with-adults

Mental Capacity Act Code of Practice: https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice

Appendix D — Implementation approval record

Board meeting/date	**03/11/2026**
Minute reference	R11-03-11-26
Effective date	04/11/2026
Next review date	Annually by the Board; 12 months after effective

	date. Next review date – 02/11/2027
Confirmed contacts	Jo Rusbridge (DSL); Harry Deacon (Deputy); Michelle Jago (Safeguarding Officer); Tracie (Board oversight). Secure direct contact details in SG-PRO-01.
Training and delegation	Role-based induction and formal annual refresher training. Confirm training completion, competency and documented delegation for Michelle before implementation.

Drafting note: Board approval draft, not legal advice. Verify local referral arrangements, safeguarding roles, eligibility and access controls prior to adoption.