SAFEGUARDING ADULTS AT RISK POLICY & PROCEDURES

Date reviewed: May 2026

Reviewed by: Mr S Lobenstein

Position: Trustee

Signature: S Lobenstein

Date of next review: May 2027

Name of Organisation: Zero Limits

Registered Charity No: 1203079

Companies House Registration Number: 13500461

Rabbinical Advisory Board: Rabbi Arran שליט"א, Rabbi Y.Y Salomon שליט"א

Trustees: Rabbi A Sugarman MBE, R' S.Z Lobenstein, R' B.Z Hofmann

Contents

1 Introduction 3
2 Policy Statement 3
3 Aims 3
4 Legislation 4
5 Key Principles for adult safeguarding 4
6 Abuse 5
6.1. Recognizing the signs of abuse 5
6.2. Forms of abuse 5
6.2.1 Physical abuse 5
6.2.2 Sexual abuse 6
6.2.3 Financial/Material abuse 6
6.2.4 Psychological and/or Emotional abuse 6
6.2.5 Online Abuse 7
6.2.6 Neglect and acts of omission 7
6.2.7 Self-neglect 7
6.2.8 Discriminatory Abuse 7
6.2.9 Institutional or Organizational Abuse 8
6.2.10 Domestic abuse 8
6.2.11 Modern slavery 9
6.2.12 Radicalization to terrorism 9
6.2.13 Exploitation 10
6.3. Who might abuse? 10
7 Promoting Adult Safeguarding within Zero Limits 10
7.1. Prevention of abuse 10
7.2. Safe Recruitment & Selection 11
7.3. Management & Support of Paid Staff & Volunteers 11
7.4. Code of Conduct 12
7.5. Training 12
7.6. Making Safeguarding Personal 12
7.7. Photographs and Videos 13
7.8. Online Safety 14
8 Responsibilities of Trustees 14
9 Managing Allegations against people in a position of trust 15
10 Whistleblowing 16
10.1. What is a whistleblower? 16
10.2 Low Level Concerns 17
10.3 Complaints that do not count as whistleblowing 17
10.4 How we will deal with disclosures 17

10.5 Further advice 18
11 Reporting procedures 18
12 Child Protection 19
13 Recording concerns 19
14 Designated Safeguarding Leads 20
15 Appendix 1 – Legislation and Guidance 21
16 Appendix 2 – Types of abuse: further reading and resources 21
17 Appendix 3 – Sample Incident Form 22

1 Introduction

Zero Limits provides full day programs and activities during school holidays and half term breaks for young people with SEND and those with additional challenging needs as well as vulnerable adults. Stimulating experiences provide positive and healthy exposure to leisure facilities building self-confidence and skills, whilst providing important respite to families.

2 Policy Statement

The policy exists to ensure that Zero Limits implements appropriate arrangements, systems, and procedures to ensure that the organization has the right skills, means and resources to protect and safeguard adults. This policy links with our Safeguarding Children, Internet Safety and Health & Safety Policies and Risk Assessments.

Zero Limits recognizes safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.
Adults at risk may be involved with Zero Limits, either as staff, volunteers, or service users. In promoting this policy, Zero Limits is keen to take reasonable steps to:

- Provide a welcoming, secure, supportive, and comfortable environment for the benefit of vulnerable people.
- Keep adults at risk who have contact with Zero Limits, staff, or volunteers safe from harm.
- Support and protect the interests of staff and volunteers who have contact with, or access to, adults who may be vulnerable.
- Comply with relevant statutory requirements.

3 Aims

The Care Act 2014 provides a definition and framework for Safeguarding Adults

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organizations 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. This must recognize that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances.

The aims of adult safeguarding are to:

- Stop abuse or neglect wherever possible
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- 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

4 Legislation

The practices and procedures within this policy are based on the relevant legislation and government guidance.

- **The Care Act 2014**

  Care and Support Statutory Guidance (especially chapter 14) 2014
  Safeguarding Adults in the UK is compliant with United Nations directives on the rights of disabled people and commitments to the rights of older people. It is covered by:

- **The Human Rights Act 1998**
- **The Data Protection Act 2018**
- **General Data Protection Regulations 2018**

Safeguarding Duties

The Care Act 2014 introduced statutory safeguarding duties. The safeguarding duties apply to any adult over the age of 18, who:

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

5 Key Principles for adult safeguarding

In the safeguarding of adults, Zero Limits is guided by the principles set out in The Care Act 2014 (See Appendix 1) and aims to demonstrate and promote these principles in its work.

- **Empowerment** – People being supported and encouraged to make their own decisions and 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 with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

6 Abuse

6.1. Recognizing the signs of abuse

Staff / volunteers may be particularly well-placed to spot abuse and neglect; the adult may say or do things that hint that all is not well. It may come in the form of a complaint, or an expression of concern. Everyone within the organization should understand what to do, and where to go locally to get help, support, and advice. It is vital that everyone within the organization is vigilant on behalf of those unable to protect themselves, including:

- Knowing about different types of abuse and neglect and their signs.
- Consideration about what is happening in the adult at risk's neighborhood and social environment when managing a concern to include any contextual risks of criminal exploitation, cuckooing, radicalization, or trafficking.
- Supporting adults to keep safe.
- Knowing who to tell about suspected abuse or neglect.
- Supporting adults to think and weigh up the risks and benefits of different options when exercising choice and control.

6.2. Forms of abuse

The Care Act 2014 (See Appendix 1) defines the following areas of abuse and neglect; they are not exhaustive but are a guide to behavior that may lead to a safeguarding enquiry. This includes:

6.2.1 Physical abuse

The physical mistreatment of one person by another which may or may not result in physical injury. This may include slapping, burning, punching, unreasonable confinement, pinching, force-feeding, misuse of medication, shaking, inappropriate moving and handling.

Signs and indicators

Over or under use of medication, burns in unusual places - hands, soles of feet, sudden incontinence, bruising at various healing stages, bite marks, bruising in the shape of objects, unexplained injuries or those that go untreated, reluctance to uncover parts of the body, disclosure.

6.2.2 Sexual abuse

Any form of sexual activity that the adult does not want or has not considered, a sexual relationship instigated by those in a position of trust, rape, 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.

Signs and indicators

Signs of being abused may include recoiling from physical contact, genital discharge, fear of males or females, inappropriate sexual behavior in presence of others, bruising to thighs, disclosure, and pregnancy. Abusers may take longer with personal care tasks, use offensive language, work alone with clients, or show favoritism to clients.

6.2.3 Financial/Material abuse

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.

Signs and indicators

This may include not allowing a person to access their money, not spending allocated allowance on the individual, theft from the individual, theft of property, misuse of benefits. There may be an over protection of money, money not available, forged signatures, disclosure, inability to pay bills, lack of money after payments of benefits, or other unexplained withdrawals. An abuser may be evasive when discussing finances, goods purchased may be in the possession of the abuser, there may be an over keenness in participating in activities involving individual's money.

6.2.4 Psychological and/or Emotional abuse

This abuse may involve the use of intimidation, indifference, hostility, rejection, threats of harm or abandonment, humiliation, verbal abuse such as shouting, swearing or the use of discriminatory and/or oppressive language. A deprivation of contact, blaming, controlling, coercion, harassment, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. There may be a restriction of freedom, restricted access to personal hygiene, name calling, threat to withdraw care or support, threat of institutional care, use of bribes or threats or choice being neglected.

Signs and indicators

Stress and/or anxiety in response to certain people, disclosure, compulsive behavior, reduction in skills and concentration, lack of trust, lack of self-esteem, fear of other individuals, changes in sleep patterns.

6.2.5 Online Abuse

Online abuse is any type of abuse that happens on the internet via any device connected to the web, like computers, tablets, and mobile phones.

Signs and indicators

Adults at risk who are being abused online may be secretive about who they are talking to and what they are doing on their phones or online. They may have multiple new numbers and contacts, spend more time online gaming, texting or WhatsApp, and can become withdrawn or outraged after using the phone or computer.

6.2.6 Neglect and acts of omission

Behavior by carers that results in the persistent or severe failure to meet the physical and/or psychological needs of an individual in their care. This may include 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, willful failure to intervene or failing to consider the implications of non-intervention in behaviors which are dangerous to them or others, failure to use agreed risk management procedures, inadequate care in residential setting, withholding affection or communication, denying access to services.

Signs and indicators

There may be disclosure. Someone being abused may have low self-esteem, deterioration, depression, isolation, continence problems, sleep disturbances, pressure ulcers. There may be seemingly uncertain attitude and cold detachment from a carer, denying individual's request, lack of consideration to the individual's request, denying others access to the individual, e.g., health care professionals.

6.2.7 Self-neglect

This covers a wide range of behavior, neglecting to care for one's personal hygiene, health, or surroundings, and includes behaviors such as hoarding.

Signs and indicators

Neglecting personal care as described above. Some abuse, such as psychological abuse, may cause a

person to shut down and stop functioning, leading to self-neglect. This could require monitoring and assessment as to the need for targeted interventions.

(Links in Appendix 2)

6.2.8 Discriminatory Abuse

This includes forms of harassment, slurs, or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, religion, or health status and may be the motivating factor in other forms of abuse. It can be personal, a hate crime or institutional.

Signs and indicators

There may be a withdrawal or rejection of culturally inappropriate services e.g., non-kosher food, mixed-gender groups or activities. Individual may simply agree with the abuser for an easier life, there may be disclosure, or someone may display low self-esteem. An abuser may react by saying, "I treat everyone the same", have inappropriate nicknames, be uncooperative, use derogatory language, or deny someone social and cultural contact.

6.2.9 Institutional or Organizational Abuse

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 organization.

Signs and indicators

This may include a system that condones poor practice, deprived environment, lack of procedures for staff, one commode used for a number of people, little or no evidence of training, lack of staff support/supervision, lack of privacy or personal care, repeated unaddressed incidents of poor practice, lack of homely environment, manager implicated in poor practice. There may be a lack of personal clothing, no support plan, lack of stimulation, repeated falls, repeated infections, unexplained bruises/burns, pressure ulcers, unauthorized deprivation of liberty. Abusers may have a lack of understanding of a person's disability, misuse medication, use illegal controls and restraints, display undue/inappropriate physical intervention, and inappropriately use power/control.

6.2.10 Domestic abuse

The cross-government definition of domestic violence and abuse is (Domestic Abuse Act 2021): any incident or pattern of incidents of controlling, coercive, threatening behavior, violence, or abuse between those aged 16 or over who are connected. The abuse can encompass, but is not limited to:

- Psychological
- Sexual
- Financial
- Emotional

The offence of coercive and controlling behavior in intimate and familial relationships is included in the Serious Crime Act 2015. The offence will impose a maximum 5 years' imprisonment, a fine or both.

Signs and indicators

May include many of those indicators listed under previous categories in this document, including unexplained bruising, withdrawal from activities, work, or volunteering, not being in control of finances, or decision making.

(Links in Appendix 2)

6.2.11 Modern slavery

Encompasses slavery, human trafficking, forced labor 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.

Modern Slavery Materials - Duty to Notify

From 1 November 2015, specified public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. The 'duty to notify' provision is set out in the Modern Slavery Act 2015 and applies to all police forces and local authorities in England and Wales, the Gang masters Licensing Authority, and the National Crime Agency

Voluntary notifications by agencies not covered by the duty

Other organizations, including VCSEs, are also encouraged to put forward notifications where they encounter a potential victim of modern slavery. If you are concerned, you should make a referral to the police or Local Authority to complete an NRM (National Referral Mechanism, which provides a framework for referral and support).

Signs and indicators

There may be signs of physical or psychological abuse, victims may look malnourished or unkempt, or appear withdrawn. Victims may rarely be allowed to travel on their own, seem under the control or influence of others, rarely interact, or appear unfamiliar with their neighborhood or where they work. They may be living in dirty, cramped, or overcrowded accommodation, and/or living and working at the same address. Victims may have no identification documents, have few personal possessions, and always wear the same clothes, day in day out. What clothes they do wear may not be suitable for their work. People may have little opportunity to move freely and may have had their travel documents retained, e.g. passports. They may be dropped off / collected for work on a regular basis either very early or late at night. Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

6.2.12 Radicalization to terrorism

Through its PREVENT programme, the Government has highlighted how some adults may be vulnerable to radicalization and involvement in terrorism. This can include the exploitation of vulnerable people and involve them in extremist activity. Radicalization

can be described as a process, by which a person, to an increasing extent, accepts the use of undemocratic or violent means, including terrorism, in an attempt to reach a specific political/ideological objective. Vulnerable individuals being targeted for radicalization/recruitment into violent extremism is viewed as a safeguarding issue.

Signs and indicators

May include being in contact with extremist recruiters. Articulating support for violent extremist causes or leaders. Accessing violent extremist websites, especially those with a social networking element. Possessing violent extremist literature. Using extremist narratives to explain personal disadvantage. Justifying the use of violence to solve societal issues. Joining extremist organizations. Significant changes to appearance and/or behavior.

6.2.13 Exploitation

This covers the use of an adult at risk's property for improper or illegal purposes such as cuckooing, taking over their home as a base for criminal activity, or persuading the adult at risk to act as a courier for drug dealing.

Signs and indicators

May include any of those indicators listed under previous categories in this document, as well as being away from their home for periods of time, appearing withdrawn, fearful, or unwilling to talk or disclose information.

6.3. Who might abuse?

Abuse of adults at risk may be perpetrated by a wide range of people including relatives, family members, professional staff, paid care workers, volunteers, other service users, neighbors, friends and associates, people who deliberately exploit vulnerable people and strangers.

Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Patterns of abuse vary and include:

- Serial abusing in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse.
- Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse.
- Opportunistic abuse such as theft occurring because money or jewelry has been left lying around.

7 Promoting Adult Safeguarding within Zero Limits

7.1. Prevention of abuse

To assist in the prevention of abuse, the following factors should be considered:

- Rigorous recruitment practices (including volunteers)
- Internal guidelines for staff
- Training
- Making Safeguarding Personal and empowering service users
- A commitment to meet recommended DfE standards for filtering and monitoring including restricting access to extremist material as per our PREVENT duty

7.2. Safe Recruitment & Selection

We have a policy and procedures that covers all Trustees, paid staff and volunteers of Zero Limits which ensures that all potential new trustees, staff and volunteers:

- **Complete an application form or a letter of application**. This includes address, evidence of relevant qualifications paid work and voluntary work experience and all criminal convictions.
- **Provide two pieces of identification which confirm both identity and address.**
- **Undergo an interview** (formal or informal) involving at least two interviewers.
- **Provide at least two references** which are followed up before a post is offered. One reference is from the last employer or an organization that has knowledge of the applicant's work.
- We will advise applicants that we may carry out internet searches including social media sites as part of our assurance checks as to their suitability.
- We will also check on the right to work in the UK.
- If applicant is a qualified teacher or other professional, we will check the TRA or the licensing agency for any prohibition.
- If undertaking a regulatory activity or if the post is eligible, provide or consent **to a Disclosure and Barring Service check** and where appropriate, sign up to the update service and agree to Zero Limit requesting an annual update.
- We will advise applicants that we may carry out internet searches including social media sites as part of our assurance checks as to their suitability.

Zero Limits:

- Understands that a person who is barred from working with children or vulnerable adults is breaking the law if they work or volunteer or try to work or volunteer with these groups.
- Understands that an organization which knowingly employs someone who is barred to work with those groups will also be breaking the law.
- Understands that if our organization dismisses a member of staff or volunteer because they have harmed a child or vulnerable adult or would have done so if they had not left, we must make a referral to the Disclosure and Barring Service.

  About - Disclosure and Barring Service - Inside Government - GOV.UK

7.3. Management & Support of Paid Staff & Volunteers

Zero Limits has the following items in place for managing its staff and volunteers:

- All staff and volunteers are provided with a job description (paid staff) or a role profile (volunteers) outlining their main responsibilities. This includes a requirement to comply with the Safeguarding Policy and Procedures and to sign that they have read and agree to abide by the terms set out in the Volunteer Handbook.
- All trustees, paid staff and volunteers receive an induction, which includes information on all the organization's policies and procedures and a safeguarding briefing, as well as identifying any training needs.
- All paid staff are appraised at the end of their induction period before being confirmed in post. Inductions will be completed within 6 months.
- Volunteers apply to Zero Limits ahead of every programme series. Appraisals are carried out after each series to inform on future use and needs of volunteers.
- All paid staff have regular supervision by their line manager. The line manager reviews operations with the trustees at weekly meetings.

- All volunteers are given support sessions before and after seasonal programmes, with ample debriefing opportunities in daily catch-ups. Information is shared both ways from volunteers to head counsellors and programme co-ordinaters.
- All trustees, paid staff and volunteers attend regular ongoing safeguarding training appropriate to their role.
- Disciplinary and grievance procedures are implemented, where appropriate, for all paid staff, which comply with the ACAS Code of Practice.
- Staff and volunteers will be expected to agree to our Acceptable use of Technology agreements.

7.4. Code of Conduct

We have a Code of Conduct in place for

- Trustees
- Staff and volunteers

7.5. Training

Zero Limits will promote awareness of Adult Safeguarding issues to its Trustees, Staff, Volunteers, broader membership, and services users.
Trustees, Staff and Volunteers all receive Safeguarding Adults at Risk training appropriate to their role, as outlined in line with regional guidance. Those with senior safeguarding responsibilities will attend DSL training. Training will be updated regularly.
For all staff who are working or volunteering with adults at risk, this requires them - as a minimum - to have awareness training that enables them to:

- Understand what safeguarding is and their role in Safeguarding Adults
- Recognize an adult potentially in need of safeguarding and take action
- Be alert to behaviors and communication barriers of adults at risk, and not dismiss any concerns as a result of their special needs or vulnerabilities
- Understand the procedures for making a Safeguarding Alert
- Understand dignity and respect when working with individuals, including intimate and personal care, managing challenging behavior, and consent to treatment
- Have knowledge of policy, procedures and legislation that supports safeguarding adults' activity

7.6. Making Safeguarding Personal

Making safeguarding personal means it should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding
situation in a way that enhances involvement, choice, and control, as well as improving quality of life, wellbeing, and safety.
We aim to empower our service users and provide them with the information they need to make decisions into how to be safe from abuse and reduce risks.

- Our staff are trained to respect individuals' preferences and value even where they do not seem logical or are unusual (provided they do not present risk to user or others).
- We recognize that adults may make decisions that might be perceived as risky or unwise. Whilst adults at risk have a right to make such decisions, that does not mean we will always do nothing - it is about assessing the level of risk and safety.
- Adults must be assumed to have capacity to make their own decisions and be given all practicable help before anyone treats them as not being able to make their own decisions. Where an adult is found to lack capacity to make a decision, any action taken or any decision made for, or on their behalf, must be made in their best interests.
- We need to understand and always work in line with the Mental Capacity Act 2005 (MCA) and seek support and guidance when we have concerns regarding an adult's capacity.

7.7. Photographs and Videos

Whilst it is legal to film or take photographs in a public place, we are mindful of protecting the privacy and dignity of vulnerable adults and potential exposure to risks. We also recognize that there may be situations where vulnerable adults have limited capacity to consent. This section sets out how the organization will deal with these issues.

Photography at Events or Group Activities

- We will inform all participants if photography is planned
- We will provide a clear opt-out mechanism
- We will avoid capturing identifiable images of adults at risk who have not given consent
- Photographers must follow our staff protocol
- Anyone can request not to be photographed—even if consent was previously given

Opt Out or Consent

- Vulnerable adults should always be consulted about the use of their image and agree to it being used and shared. Where use of imagery falls within the lawful basis of legitimate interest (such as a prospectus or fundraising), we may offer users to 'opt out'. (ICO guidelines) If they want their image withdrawn at a late date, previous copies do not have to be recalled.
- With regard to children with SEND, they are dealt with in our Safeguarding Policy for Children up to the age of 25 years. Where the subject of the photograph has consented and consent from the legal guardian/parent is not required, you might still consider informing parents that the child's photograph is being shared, for best practice.

How to get consent

Make sure vulnerable adults understand what they are agreeing to.

- Make them aware that a photo or video is being taken.
- Explain what the image is going to be used for.
- Ask for their consent to share their image and record this on a written consent form.
- Tell them how long their consent is valid for and how long you will keep the image for.
- Explain what you will do if they change their minds and withdraw consent at a later stage.
- Make it clear that if their image has been used online or in printed publications it will be very difficult to recall it if consent is subsequently withdrawn.
- If they lack the capacity to consent, do not use their photograph.
- If a parent has been awarded Deputyship, they can consent on behalf of their child.

Record of consent

Keep a record of the written consent that vulnerable adults have given for images being used.

If consent isn't given

If vulnerable adults don't want to have their photo taken or shared, you should respect their wishes. Vulnerable adults should never be excluded from an activity because you don't have consent to take their photograph.

7.8. Online Safety

The welfare of the young people and adults who come into contact with our services is paramount and governs our approach to the use and management of electronic communications technologies.
Working in partnership with young people, adults, their parents, carers, and other agencies is essential in promoting service users' welfare and in helping young people and adults to be responsible in their approach to e-safety.

The use of information technology is an essential part of all our lives; it is involved in how we as an organization gather and store information, as well as how we communicate with each other. It is also an intrinsic part of the experience of adults and young people. However, it can present challenges in terms of how we use it responsibly and, if misused either by an adult or a young person, can be actually or potentially harmful to them.

WE WILL SEEK TO PROMOTE ONLINE SAFETY BY:

- Examining and risk assessing any emerging new technologies before they are used within the organization. We will provide guidance for staff and volunteers for use.
- Filtering and monitoring use of IT systems and networks. We are committed to meeting all recommended DfE standards for filtering and monitoring including restricting access to extremist material as per our PREVENT duty.
- We will include AI content in the filtering system so that users are protected from inappropriate content through a 'conversation'.
- Supporting and encouraging parents and carers to do what they can to keep their children safe online and when using their mobile phones and any computer-based activities. We will encourage TAG services to support parents with this.

- Staff and volunteers will be expected to agree to our Acceptable use of Technology agreements.
- Use our procedures to deal firmly, fairly, and decisively with any examples of inappropriate ICT use, complaints, or allegations, whether by an adult or a young person (these may include breaches of filtering, illegal use, cyberbullying, or use of ICT to groom an adult or young person or to perpetrate abuse).
- Informing parents and carers of incidents of concern as appropriate.
- Reviewing and updating the security of our information systems regularly.
- Providing adequate physical security for ICT equipment.
- Ensuring that usernames, logins, and passwords are used effectively.
- Using only official email accounts provided via the organization and monitoring these as necessary (see staff handbook).
- Ensuring confidential information sent by emails is sent securely, and depending on the sensitivity of the data, it may need to be encrypted.
- Ensuring that the personal information of staff, volunteers, and service users (including service users' names) are not published on any online websites or promotional links.

Staff Conduct:
Staff and volunteers should never use personal accounts to communicate with individuals they support.

Individual Online Safety Practices
Where service users are active online users, we will promote personal online safety skills for adults at risk, using the "SMART" rules:

- **Safe**: Be careful not to share personal information like home addresses or phone numbers with strangers online.
- **Meeting**: Exercise caution about meeting people found online.
- **Accepting**: Be wary of accepting emails or files from unknown sources, which may contain viruses or scams.
- **Reliable**: Be aware that information and people online may not be reliable or who they claim to be.
- **Tell**: Report any uncomfortable or worrying online interactions to a trusted adult or authority.

8 Responsibilities of Trustees

As a registered charity, trustees must pay due regard to Charity Commission guidance around the safeguarding duties of trustees. These include:

8.1. Identify and manage risks

Risk Assessment processes must be in place. Trustees should consider specific risks that children may face including the risk of children being radicalized or drawn into extremist ideologies.

8.2. Have suitable policies and practices in place

These should include making sure everyone knows how to identify and report a concern or incident.

8.3. Ensure that there are processes in place to Carry out necessary checks

These include DBS, and online checks for staff and volunteers engaged in regulated activity to ensure they are suitable to work with children.

8.4. Protect volunteers and staff

Trustees must satisfy themselves that there are clear policies in place that cover bullying and harassment and whistleblowing. Also, that all necessary insurance is in place. Volunteers and staff need to be clear on how to raise any bullying or harassment concerns.

8.5. Handle and report incidents appropriately

Trustees should ensure that there are policies and procedures for handling incidents or allegations of abuse including

- managing and recording any incidents in a secure and responsible way
- acting quickly, ensuring abuse is stopped or minimised to reduce any further harm or damage
- reporting to all relevant agencies

For further details: https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees

9 Managing Allegations against people in a position of trust

The Care Act 2014 requires those providing universal care and support services to have clear policies reflecting those from the local Safeguarding Adults Board for dealing with allegations against people in positions of trust i.e., anyone working with adults with care and support needs, in either a paid or unpaid capacity. These policies should clearly distinguish between an allegation, a concern about the quality of care or practice or a complaint. See information below under Whistleblowing.

Allegations will be managed by the Trustee - Mr Lobenstein. If they are found to be substantiated, they

will be dealt with via the organization's disciplinary procedures. This may lead to retraining, supervision requirements, or dismissal and the requirement to report to DBS and agencies such as HCPC and NMC. Agencies will be advised about the outcome of allegation investigations in relation to agency staff.

The Trustee may discuss this with the safeguarding adult's duty officer, formally or informally, to arrive at a decision. (See Section 10 for details)

10 Whistleblowing

Whistleblowing is covered under the **Public Interest Disclosure Act 1998.**

An important part of providing care is ensuring a working environment that encourages people to challenge practices in their own workplace. The law offers some protection from victimization to people who "blow the whistle" under the Public Interest Disclosure Act (PIDA) 1998. The parameters of 'protected disclosure' are set out in the Employment Rights Act (ERA) 1996.

Staff and volunteers should feel able to raise concerns they observe to the Chair of the organization. Our Whistleblowing Policy sets outs procedures and staff safeguards. Should a staff member feel unable to raise an issue with their line manager or director or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them.

10.1. What is a whistleblower?

You are a whistle-blower if you are a worker, and you report certain types of wrongdoing. It may have happened in the past, is happening now or is to happen in the near future. This will usually be something you've seen at work - though not always a criminal offence.

Examples may include:

- fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example, it does not have the right insurance
- you believe someone is covering up wrongdoing

The wrongdoing you disclose must be in the public interest. As a whistle-blower, you are protected by law - you should not be treated unfairly or lose your job.

You are protected if you are a worker, for example you are an employee, a trainee, an agency worker; a member of a Limited Liability Partnership (LLP).

A confidentiality clause or 'gagging clause' in a settlement agreement is not valid if you are a whistleblower.

A person will not lose their rights if they make a disclosure to a prescribed body or person. They will usually lose their rights if they approach the media with their concerns.

10.2. Further advice

Protect, an independent charity, offers free confidential whistleblowing advice. They can be reached on 020 3117 2520.

10.3. Complaints that do not count as whistleblowing

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law. Report these under your employer's grievance policy.

10.4. Low Level Concerns

A low-level concern is one which does not meet the 'threshold of harm' (which requires reporting to the DBS), but raises concerns of appropriateness such as breaking rules, contravening staff code of conduct, and maverick behavior. Low- level concerns, could be about behavior not related directly to a child or adult at risk, but may nonetheless raise concerns with respect to safeguarding adults, and could call into question the adult's suitability to work with adults at risk. These should be reported to the DSL and are for the organization to case manage and decide whether to allow the staff or volunteer to continue or not.

Examples of low-level concerns are:

- being over friendly with service users
- taking photographs of adults at risk on a mobile phone, contrary to policy
- engaging with an adult at risk on a one-to-one basis in a secluded area or behind a closed door.

10.5. How we will deal with disclosures

Once a disclosure has been made, we will gather all the information needed to understand the situation. In some cases, a suitable conclusion may be reached through an initial conversation with a manager. In

more serious cases there may be a need for a formal investigation. The organization will decide what the most appropriate action to take is.
When dealing with disclosures, staff should not put themselves in danger, nor try to speak or challenge the alleged perpetrator. We will follow good practice and:

- Have a facility for anonymous reporting
- Treat all disclosures made seriously and consistently
- Provide support to the worker
- Reassure the whistleblower that their disclosure will not affect their position at work
- Document whether the whistleblower has requested confidentiality
- Produce a summary of the meeting for record keeping purposes and provide a copy to the whistleblower
- Allow the worker to be accompanied by a trade union representative or colleague at any meeting about the disclosure, if they wish to do so
- Endeavour to investigate the concern within 10 days (sooner if criminal issues may be involved) and respond to the whistleblower within 30 days.

11 Reporting procedures

The following procedure refers to abuse or suspicion of abuse that staff and volunteers become aware of during their work at Zero Limits.
Any member of staff or volunteer who becomes aware that an adult is, or is at risk of, being abused or has safeguarding needs should raise the matter immediately with their supervisor and/or with the Designated Safeguarding Lead. This includes reporting any incidents or concerns relating to online safety whether occurring in or out of the organization to the Designated Safeguarding Lead (see section 13 below).
If the Designated Safeguarding Lead is unavailable, a Safeguarding referral can be made directly to Adult Safeguarding team (see below for contact details).

Early sharing of information is the key to providing an effective response where there are emerging concerns. To ensure effective safeguarding arrangements, no staff member or volunteer should assume that someone else will pass on information which they think may be critical to the safety and wellbeing of the adult, but they should do so themselves.
Zero Limits will:

- Inform the adult of the action we propose to take.
- Seek their agreement for any referral.
- Ensure that they are kept informed about what will happen next, so they can be reassured about what to expect.
- Endeavour to ensure that they are safe and supported before proceeding with any other action.
- Inform the adult if Zero Limits is planning to seek advice from or report concerns to an external agency.

There are some cases that require an urgent response

- If you suspect a serious criminal act has taken place, telephone 999. Tell them if you think it might be adult abuse.
- If the individual is injured seek immediate medical treatment. Tell the ambulance personnel or A&E staff that this is a potential adult abuse situation.

In most situations there will not be an immediate threat and the decision about protecting the person with safeguarding needs will be taken in consultation with themselves and/or Social Services.

In Gateshead:

To raise a safeguarding concern, call Adult Social Care Direct on 0191 433 7033, 24 hours a day, 7 days a week.
For safeguarding adults' queries speak to the Safeguarding Adults duty worker on 0191 433 2222 or email them on safeguardingduty@gateshead.gov.uk.This service is for safeguarding queries not referrals. Safeguarding Adults Duty operates between 9.00 am and 4.30 pm, Monday to Friday.
Safeguarding Adults' concerns can be raised online on the Gateshead Safeguarding Adults website.
For non-emergencies you can call Northumbria Police on 101.

12 Child Protection

If at any time you become concerned that a child might be at risk, you need to follow the Child Protection Procedures outlined in Zero Limit's Safeguarding Children Policy and Procedures.
Contact your supervisor or one of the Designated Safeguarding Leads. If you cannot contact them, go straight to Children's Social Care in the region which the child resides.
Every child and young person has the right to be safe.
If a child is in immediate danger of being harmed or is home alone, call the police on 999.
Worried about a child in Gateshead?
Contact Gateshead Council's Children's Social Care: 0191 433 2653 during office hours, Mon-Fri 8.30 am - 5.00 pm or
Out of Hours at night, at weekends and bank holidays: 0191 477 0844 if you are worried about a child.
Email: R&Aduty@gateshead.gov.uk
Postal address: Gateshead Local Safeguarding Children Board, Gateshead Civic Centre, Regents Road, Gateshead, NE8 1HH
All referrals from professionals must be made in writing, for online forms go to: https://www.gateshead.gov.uk/article/3948/Worried-about-a-child-in-Gateshead

13 Recording concerns

Whenever there is a safeguarding concern raised by a member of staff or volunteer at Zero Limits, a written record should be compiled. (See Appendix 3 for sample incident form.)

- Record all relevant facts and information, including details of the person involved and the nature of the concern and the actions taken.
- Records should be signed and dated and filed securely and confidentially.
- Tell the person involved what you are going to do and note any views they may have regarding how they wish the matter to be dealt with.
- Seek consent from the person concerned, but if they do not have capacity to consent, you can act without consent, but you need to log your decision. Consider the balance between listening to their wishes and the need to refer information where they or others may be at risk.
- Information should only be shared on a "need to know basis".
- Inform the person involved about the outcome of any process.
- Information should be processed and stored in line with GDPR requirements.
- Follow this link for further guidance on recording procedures.

https://www.anncrafttrust.org/safeguarding-checklist-reporting-recording/

14 Designated Safeguarding Leads

Position	Name	Contact Details
Designated Safeguarding Lead	**Mr SZ Lobenstein**	**07415669756** **slobenstein@zerolimits.org.uk**
Deputy Designated Safeguarding Lead	**Mrs S Karnowsky**	**07759157110** **skarnowsky@zerolimits.org.uk**

Should either of these named people be unavailable, management committee members, trustees, staff, or volunteers should contact Adults Social Services directly. See contact details in Section 10 above.

15 Appendix 1 – Legislation and Guidance

Chapter 14 of the Care Act 2014. Care and Support Statutory Guidance: Safeguarding - Care and support statutory guidance - Guidance - GOV.UK

Safeguarding Adults Competency Framework

Adult Safeguarding Policy and Procedures for Salford

https://safeguardingadults.salford.gov.uk/professionals/policies-and-procedures/safeguarding-policy/
Data Protection Act
Guide to GDPR
Human Rights Act
Mental Capacity Act

16 Appendix 2 – Types of abuse: further reading and resources Self-Neglect

Salford Self–Neglect Policy and Procedures
https://safeguardingadults.salford.gov.uk/professionals/policies-and-procedures/self-neglect/

Domestic Abuse
https://safeguardingadults.salford.gov.uk/guidance-archive/domestic-abuse/ Fact Sheet on Domestic Abuse
https://safeguardingadults.salford.gov.uk/media/1066/pt-domestic-abuse-fact-sheet-final-version-july-2020.pdf

Government Website
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/328096/Modern_slavery_booklet_v12_WEB 2_.pdf

Mental Capacity Act
Conviction of Care Home staff under Mental Capacity Act
https://safeguardingadults.salford.gov.uk/media/1071/7-min-briefing-mca-prosecution-final.pdf

17 Appendix 3 – Sample Incident Form INCIDENT RECORD FORM

Organisation:
Person completing this form: (Observing Officer)
Your Position: (Observing Officer)
Adult's Name
Adult's Address:
Parents/Carers Name and Address:
Adult's Date of Birth:
Date and Time of any Incident: Area where incident/harm took place: Who reported the alert:
Your Observations:
Actions taken, by whom and date: