

## **SAFEGUARDING VULNERABLE ADULTS POLICY**

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We are committed to safeguarding adults by protecting their health, wellbeing and human rights enabling them to live free from harm, abuse and neglect. We uphold the principles of empowerment, prevention, proportionality, protection, partnership and accountability.

## Aim

The purpose of our Safeguarding Vulnerable Adults Policy is to prevent harm and reduce the risk of adults with care and support needs suffering from abuse or neglect, and to provide clear procedures for responding to concerns.

We recognise the UK Supreme Court's 2022 and 2025 rulings (For Women Scotland v Scottish Ministers), which clarify that the protected characteristic of 'sex' under the Equality Act 2010 refers to biological sex. In cases where legal sex (as defined under the Gender Recognition Act 2004) applies, such as the provision of single-sex services, we will act in accordance with relevant legislation and best practice guidance. While New Routes is fully committed to creating an inclusive, respectful, and safe environment for people of all genders, our safeguarding obligations will reflect relevant legal definitions as required.

This policy outlines the responsibilities of staff, volunteers, and trustees in safeguarding adults who engage with our services. It reflects our organisational values, current legislation, and best practice guidance.

This policy is based on the fundamental principle that all adults regardless of age, disability, gender, gender identity, ethnic, cultural, racial, national origins, religious belief/non-belief or sexual orientation have the right to live safely, free from abuse and neglect, and to be treated with dignity and respect.

This policy will give clear guidance to staff, volunteers and visitors about the behaviour we expect and our legal responsibilities to safeguard and promote the welfare of adults at risk of abuse or neglect that we come in contact with at our organisation.

## Introduction

Our organisation fully recognises the contribution we can make in protecting adults from abuse and neglect. Our policy applies to all adults at risk of abuse or neglect, staff, volunteers and visitors.

Under the Care Act 2014, 18 and older is considered to be an adult and could potentially be at risk of abuse or neglect **if** she or he:

- Has needs for care and support (regardless of the level of need and whether or not the council is meeting any of those needs)
- Is experiencing, **or** is at risk of abuse or neglect, **and**
- As a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.
- Where someone over 18 is still receiving children's services, for example in an education setting until the age of 25, and a safeguarding issue is raised the matter should be dealt with through

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adult safeguarding arrangements. Children's safeguarding and other relevant partners should be involved as appropriate. The level of need is not relevant and the young adult does not need to have eligible needs for care and support under the Care Act.

- For domestic abuse the age limit is 16 years of age.

**Note: To be considered as a safeguarding concern the adult must meet the criteria set out in the Care Act 2014 and detailed above.**

## Definitions (for the purposes of this policy)

*'Abuse is a violation of an individual's human and civil rights by another person or person's'*

Abuse of a vulnerable adult may consist of a single act or repeated acts. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.

For the purpose of this policy 'vulnerable adult' could include:

An adult who is or may be in need of community care services by reason of mental or other disability, age, or illness and who is, or may be, unable to take care of him or herself, or unable to protect him or herself, against significant harm or exploitation.

This could include people with learning disabilities, mental health problems, older people and people with a physical disability or impairment. It is important to include people whose condition and subsequent vulnerability fluctuates. It may include an individual who may be vulnerable as a consequence of their role as a carer in relation to any of the above.

It may also include victims of domestic abuse, hate crime, homeless, and anti-social abuse behaviour. The persons' need for additional support to protect themselves may be increased when complicated by additional factors, such as, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

Many vulnerable adults may not realise that they are being abused. For instance an elderly person, accepting that they are dependent on their family, may feel that they must tolerate losing control of their finances or their physical environment. They may be reluctant to assert themselves for fear of upsetting their carers or making the situation worse.



It is important to consider the meaning of 'Significant Harm'. The Law Commission, in its consultation document 'Who Decides,' issued in Dec 1997 suggested that; 'harm' must be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also 'the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development.

## Types of Abuse:

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.

Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it.

The Department of Health in its 'No Secrets' 2000 report suggests the following as the main types of abuse:

**Physical abuse** - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

**Sexual abuse** - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.

**Psychological abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

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

**Neglect and acts of omission** - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Discriminatory abuse** - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment, hate crime.

**Institutional abuse** - Institutional abuse although not a separate category of abuse in itself, requires specific mention simply to highlight that adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation. This can be especially so when care standards and practices fall below an acceptable level as detailed in the contract specification.

**Multiple forms of abuse** - Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

### **Domestic abuse - Home Office Definition**

‘Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.’

### Women’s Aid Definition

‘Domestic violence is physical, sexual, psychological or financial violence that takes place within an intimate or family-type relationship and that forms a pattern of coercive and controlling behaviour. This can also include forced marriage and so-called “honour crimes”. Domestic violence may include a range of abusive behaviours, not all of which are in themselves inherently “violent”.

Most research suggests that domestic violence occurs in all sections of society irrespective of race, culture, nationality, religion, sexuality, disability, age, class or educational level.

Both definitions would therefore also include incidents where extended family members may condone or share in the pattern of abuse e.g. forced marriage, female genital mutilation and crimes rationalized as punishing women for bringing ‘dishonour’ to the family.

It is important to recognise that Vulnerable Adults may be the victims of Domestic Abuse themselves or be affected by it occurring within their household. This is likely to have a serious effect on their physical and mental wellbeing.

Where Vulnerable Adults are victims of Domestic Abuse, they may need extra support to plan their future. The violence or threat of violence may continue after a victim has separated from the abuser. It is important to ensure that all the vulnerable people in this situation have appropriate support to enable them to maintain their personal safety.

A separate Domestic Abuse Protocol is in place between Police, Social Services and Health.

Incidents reported by the police through the domestic abuse protocols will be addressed under the adult protection processes if it is considered that a vulnerable adult may be at risk of abuse.

We also recognise other risks such as **hate crime, honour-based violence, forced marriage, and female genital mutilation (FGM)**.

## Children

It is essential that the needs of any children within an abusive or domestic violence situation where there is a vulnerable adult involved are considered and acted upon. Please contact the Lead for Safeguarding and/or the local social services Safeguarding Children's team.

## Procedure in the Event of a Disclosure

It is important that vulnerable adults are protected from abuse. All complaints, allegations or suspicions must be taken seriously.

This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused.

Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.

A full record shall be made as soon as possible of the nature of the allegation and any other relevant information.

This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.

## Responding to an Allegation

Any suspicion, allegation or incident of abuse must be reported to the Designated Safeguarding Lead.

The nominated member of staff shall telephone and report the matter to the appropriate local adult social services duty social worker. A written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the relevant local authority adult social services department within 24 hours.

In the event of an incident or disclosure:

### **DO**

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Listen carefully and non-judgmentally
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them
- Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve forensic evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your manager for support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support
- Inform the Designated Safeguarding Lead

### **DON'T**

- Promise Confidentiality
- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation

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- Ask leading questions
- Assume Information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the professional adult protection agencies, following a referral from the Designated Safeguarding Lead.

## Confidentiality

Vulnerable adult protection raises issues of confidentiality which must be clearly understood by all.

Staff, volunteers and trustees have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and adult social services.

Clear boundaries of confidentiality will be communicated to all.

All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.

If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.

Within that context, the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.

Where possible, consent must be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.

Where a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result.

Staff must assure the adult that they will keep them informed of any action to be taken and why. The adults' involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.

To safeguard vulnerable adults, New Routes recognises the following key principles:

- Any vulnerable adult can be at risk and has the right to protection from abuse
- A multi-agency approach is the most effective response and is everybody's responsibility
- Choices and empowerment can involve risk
- Risk should be recognised, understood, and minimised whenever possible

In the case of New Routes, the majority of our clients over 18 should be regarded as vulnerable adults. It should also be noted that some of our programmes will focus on personal development, the process of which can periodically bring up issues of 'vulnerability' in an adult, who would otherwise not be considered at risk.

To ensure all clients' well-being and safety when attending our programmes, we shall adopt the following policy and procedures:

One member of staff acts as the Designated Safeguarding Lead, who will hold advanced DBS clearance.

Should that person cease membership or employment, their post shall be replaced within 3 months, and the Deputy Safeguarding Lead becomes the primary officer during this time.

Ensure that all new volunteer and employees have standard DBS clearance before any client contact.

All volunteers and employees within the first 6 months of work will meet the Designated Safeguarding Lead and will complete Safeguarding training with Norfolk Safeguarding Board.

c) As a result, they will have a basic understanding of:

- What is a vulnerable adult
- Awareness of different types of abuse
- Recognising general or 're-stimulated' signs of 'vulnerability'
- Identifying current signs of significant harm
- Importance of multi-agency approach

And basic knowledge of actions:

- Not to promise confidentiality
- Contacting Designated Safeguarding Lead
- Know how to fill in a 'cause for concern' form
- Preserving evidence
- Protect themselves as 'whistle blower' both in words and actions

Should there be any form of abuse alleged towards a volunteer, employee, another participant or Trustee of New Routes, the Complaints and Investigations Procedure will be followed.

## Single-Sex Provision and Gender Inclusion

New Routes Integration provides services and support that are open to all adults regardless of gender identity. Where we offer women-only or single-sex spaces or services, these will be delivered in line with the Equality Act 2010 and the Supreme Court Judgement 2025, which allows for lawful single-sex services in certain circumstances.

In those cases, we may lawfully limit access based on biological sex where it is a proportionate means of achieving a legitimate aim, such as protecting the dignity, privacy, or wellbeing of participants. These decisions will always be guided by safeguarding, legal compliance, and the needs of the individuals involved.

We are committed to being inclusive, and wherever possible we will work with trans and non-binary participants to find appropriate, respectful alternatives if needed.

## Safeguarding Roles and Responsibilities

We will ensure we are aware of the legal definitions of sex and gender identity and apply them consistently in safeguarding decision-making, particularly in the provision of single-sex or gender-specific services.

- The DSL will coordinate safeguarding responses and liaise with external agencies
- The Deputy DSL will act in their absence
- A named trustee will provide oversight

All staff, volunteers, and trustees are required to:

- Complete safeguarding training
- Be familiar with this policy

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- Report concerns promptly

## Safer Staff and Volunteers

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

We ensure we adhere to the principles of safer recruitment as per our policy and also the guidance from Norfolk Safeguarding Children Board.

### **We ensure that we:**

- Carefully consider the job description and person specification
- Circulate all vacancies widely
- Prepare an information pack
- Ask for a written application form
- Define our selection criteria
- Ask for a written declaration with regards to criminal convictions, spent or otherwise
- Ask for identification
- Ask for originals of any qualifications
- Conduct interviews with at least two people present
- Ask for at least two references, including the last employer
- Gain enhanced DBS checks where current Government guidance requires us to
- Organise a comprehensive induction period which includes familiarisation with our safeguarding policies, procedures and safeguarding training through the Safer Programme.

## Safeguarding Training

We will ensure that our safeguarding training includes the following:

- A module on **Equality Act compliance**, including protected characteristics
- Understanding of **lawful single-sex services**
- Support for **trans and non-binary participants**, in a way that is trauma-informed, safe, and lawful
- Managing sensitive disclosures in line with this understanding

## Policy Governance

This policy will be reviewed annually or in response to legislative or procedural changes. Any allegations involving staff or volunteers will be managed in line with our Complaints and Disciplinary Procedures.

## Other Relevant Policies

To underpin the values and ethos of our organisation and our intent to ensure our children/young people are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

### **Code of Conduct**

### **Health and Safety Policy**

### **Complaints and Compliments Policy**

### **Safeguarding Vulnerable Adults Policy**

## Useful Contacts

**Norfolk Adults Safeguarding .....0344 800 8020**

**Children's Services 24 hours .....0344 800 8020**

**Norfolk Police .....101**

**In an emergency .....999**

**Local Authority Designated Officers (LADO) Team ..... 01603 223473**

There is always someone available during normal working hours

**Norfolk Safeguarding Children Board (NSCB) .....www.norfolkscb.org**

**Safer Programme .....01603 228966**

## Named Designated Safeguarding Lead

Designated Safeguarding Lead: Gee Cook - Telephone number: 01603 662648 / 07886274948

Deputy Designated Safeguarding Lead: Ammar Saleh - Telephone number: 01603 662648 / 07988098229

Trustee Safeguarding Lead: Mehrdad Moghaddas - Email: mehrdadmoghaddas@newroutes.org.uk

## Policy Review

We will always make any changes immediately to our procedures in line with Norfolk Safeguarding Board's

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guidance on [www.norfolklscb.org](http://www.norfolklscb.org)

### RAISING AND ESCALATING CONCERNS

All staff, volunteers and trustees have a responsibility to raise any concerns about service user safety and care, and to take appropriate action. You 'raise a concern' when you are worried about an issue that affects the people you are caring for and you are acting to protect them.

### ALLEGATIONS AGAINST MEMBER OF THE ORGANISATION

All allegations against any staff member, volunteer or trustee are taken seriously and investigated.

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APPENDIX 1

**Raising and Escalating Concerns Form**

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**Name of person at risk of  
harm**

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**Date of Incident/Concern (*if appropriate*)**

--

**Location of Incident/Concern**

--

**Summary of Incident/Concern**

--

**Action Taken (including reporting this as per local protocols, seeking medical treatment, discussion in supervision, etc)**

--



Action Log by Designated Safeguarding Lead	
DATE	ACTION
<b>Conclusion/sign off</b>	
<input type="checkbox"/> Board notified	
<input type="checkbox"/> Participant notified	
<input type="checkbox"/> Logged on to Lamplight	
<input type="checkbox"/> No further action	
Any further comments:	
Signed by Board Lead:	
Name:	
Date:	