

We Are Hope Church

Safeguarding Adults at Risk Policy



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Registered charity number: 1132992
Company number: 07027443

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We are committed to an awareness of Safeguarding Adults.

Aim

The purpose of Hope Church's safeguarding policy is to ensure every adult at risk in our organisation is safe and protected from harm.

This policy will give clear direction to staff and volunteers about the expected behaviour and our legal responsibility to safeguard and promote the welfare of all adults at risk in Hope Church.

Introduction

Hope Church fully recognises the contribution it can make to protecting and promoting the welfare of adults at risk. The elements of our policy are prevention, protection and support.

Our policy applies to all children, volunteers, visitors, staff, trustees, contractors, and anyone working on behalf of Hope Church.

Our commitment

As a Leadership we recognise the need to provide a safe and caring environment for all adults. We acknowledge that adults can be the victims of physical, sexual and emotional abuse, and neglect. As a Leadership we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and practice guidelines are based on the Safe and Secure safeguarding standards published by the Churches' thirtyone:eight (CCPAS) and prepared in consultation with Norfolk Safeguarding Children Board (NSCB) Safer Programme

Adults at risk

1. Care Act 2014

Introduces the legal duty for local authorities to carry out safeguarding enquiries.

Focuses on person-centred care and making safeguarding personal.

Both Children & Adults

1. Safeguarding Vulnerable Groups Act 2006

Provides the framework for the Disclosure and Barring Service (DBS).
Defines “regulated activity” and bars unsuitable people from working with vulnerable groups.

2. The Human Rights Act 1998

Underpins safeguarding principles such as dignity, privacy, and protection from abuse.

3. The Equality Act 2010

Protects against discrimination and ensures inclusion.

4. Mental Capacity Act 2005

Supports decision-making by adults who may lack capacity and protects them from abuse.

5. Sexual Offences Act 2003

Important for understanding offences related to abuse and consent.

6. Counter-Terrorism and Security Act 2015 (including the Prevent Duty)

Includes the Prevent Duty: safeguarding against radicalisation and extremism.

The Leadership undertakes to:

- endorse and follow all national and local safeguarding legislation and procedures.
- provide on-going safeguarding training for all its workers and will regularly review the operational guidelines attached.
- ensure that the premises meet the requirements of the Equality Act 2010 and all other relevant legislation, and that it is welcoming and inclusive.
- support the Designated Safeguarding Lead/Team in their work and in any action they may need to take in order to protect adults with care and support needs.

Hope Church will establish and maintain an ethos where our adults at risk feel secure, are encouraged to talk, are listened to and are safe. Adults at risk will be able to talk freely to any member of staff or volunteer if they are worried or concerned about something.

All staff and volunteers will, either through training or induction, know how to recognise a disclosure from an adult at risk and will know how to manage this. We will not make promises to any adult at risk and we will not keep secrets. Every adult at risk will know what the adult will do with whatever they have been told.

General Procedures

When new staff or volunteers join our team they will be informed of the safeguarding arrangements in place. They will be given a copy of our safeguarding policy and told who our Designated Safeguarding Lead/Team are.

All staff and volunteers will be asked to read this policy yearly after it has been reviewed and updated if necessary.

Training

Safeguarding awareness

The Leadership is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. All our applicable staff and volunteers will receive induction training and undertake recognised safeguarding training every two years. Every member of staff will undertake appropriate safeguarding training through Pioneer every three years. The Designated Safeguarding Team will attend specialist training every three years.

We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via www.norfolkscb.org

Safer Staff and Volunteers

All volunteers who come into contact with adults at risk have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that staff and volunteers are competent, confident and safe to do so. We ensure that we gain DBS checks where current Government guidance requires us to.

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for everyone. To help achieve this we ask all staff and volunteers to agree to Hope Church's Code of Conduct. However, we do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Responding to allegations of abuse

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse others.

We will take all possible steps in safeguarding to ensure that the volunteers in Hope Church are safe to work with any adult at risk. We will always ensure that up to date procedures are followed and advice taken from the thirtyone:eight (CCPAS).

All staff and volunteers who come into contact with adults at risk will be made aware of the steps that will be taken if an allegation is made. There are sensible steps that every adult should take in their daily professional conduct; these can be found in the NSCB Safer Programme Safer Working Practice.

The Designated Safeguarding Lead/Team should be used as a first point of contact for concerns and queries regarding any safeguarding concern in Hope Church. The same procedures will be followed as stated in the Hope Church Safeguarding & Child Protection Policy (as outlined below).

Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. Procedures should be followed as below:

- The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to Samuel Wilkes tel no: 01379 644223 / 07990988205 (Designated Lead Safeguarding Lead) or Laura Jestico email: jesticolaura@gmail.com (Designated Deputy Safeguarding Lead) who are nominated by the Leadership to act on their behalf in dealing with the

allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.

- Should an allegation be made against the Designated Safeguarding Lead/Team, this will be reported by the staff member or volunteer raising the concern directly to Local Authority Designated Officer (LADO) within 24 hours of a concern or allegation being made. The LADO can be contacted via the referral/consultation forms under 'how to make a referral' at www.norfolkscb.org or a message left on 01603 223473.
 - A report should also be made to the thirtyone:eight. Alternatively contact Social Services or the police.
 - The Designated Safeguarding Lead/Team may need to inform others depending on the circumstances and/or nature of the concern.
 - Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.
- The Leadership will support the Designated Safeguarding Lead/Team in their role, and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.
- It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from thirtyone:eight (CCPAS), although the Leadership hope that members of Hope church will use this procedure. If, however, the individual with the concern feels that the Designated Safeguarding Lead/Team has not responded appropriately, or where they have a disagreement with the Designated Safeguarding Lead/Team as to the appropriateness of a referral they are free to contact an outside agency directly. We hope by making this statement that the Leadership demonstrates its commitment to effective safeguarding and the protection of all those who are vulnerable.
- The role of the Designated Safeguarding Lead/Team is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.

Detailed procedures where there is a concern that an adult is in need of protection:

Suspicions or allegations of abuse or harm including; physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse.

If there is concern about any of the above, Designated Safeguarding Lead/Team will:

- Contact the Adult Social Care Team who have responsibility under the Care Act 2014 to investigate allegations of abuse. Alternatively thirtyone:eight (CCPAS) can be contacted for advice.
- If the adult is in immediate danger or has sustained a serious injury contact the Emergency Services, informing them of any suspicions.

If there is a concern regarding spiritual abuse, Designated Safeguarding Lead/Team will:

- Identify support services for the victim i.e. counselling or other pastoral support

- Contact thirtyone:eight (CCPAS) and in discussion with them will consider appropriate action with regards to the scale of the concern.

Allegations of abuse against a person who works with adults with care and support needs.

The Care Act places the duty upon Adult Services to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Services to decide, not the church.

Records and Confidentiality

If we are concerned about the welfare or safety of any adult in Hope Church we will record our concerns immediately and give this to the Designated Safeguarding Lead/Team.

Any information recorded will be kept in a secure cabinet or in a locked electronic file if submitted electronically. These files will be the responsibility of the Designated Safeguarding Lead/Team and information will only be shared within the organisation on a need to know basis for the protection of the adult at risk.

All information is confidential, however if there is a safeguarding concern about an adult, then information can be shared with other agencies, namely the Police or Social Services.

Reports of a concern to the Designated Safeguarding Lead/Team must be made in writing and signed and dated by the person with the concern.

Roles and Responsibilities

Our Designated Safeguarding Team will liaise with Social Services and other agencies where necessary, and make referrals to Social Services using the procedure below.

The Designated Safeguarding Team will ensure that all staff and volunteers have received appropriate safeguarding information and have been trained following guidelines from the Safer Programme.

The Designated Safeguarding Team will ensure that our safeguarding policy is in place and is reviewed annually. The content of our policy has been written following consultation with the Safer Programme and advice from thirtyone:eight (CCPAS).

Hope Church undertakes to remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

Procedures for Handling Disclosures

An adult may decide to disclose information that may indicate they are suffering from abuse or neglect. An adult at risk chooses to speak to an adult because they feel that they will listen and that they can trust them. The adult needs to listen to what the person has to say, and be very careful not to 'lead' or influence in any way what they say.

It is important that the adult remembers to:

- Stay calm
- Listen and be supportive
- Not ask any leading questions, interrogate, or put ideas in the person's head, or jump to conclusions
- Not stop or interrupt a someone who is recalling significant events
- Never promise confidentiality – it must be explained that information will need be to be passed on to help keep them safe
- Tell the person what must be done next (the safeguarding process must be followed)
- Record what was said immediately as close to what was said as possible. Also record what was happening immediately before the disclosure happened. Be sure to sign and date the record in ink.
- Contact the designated person immediately to seek support

We are clear that the Local Authority and Police must lead any investigation into any allegation regarding safeguarding where appropriate.

If we have a concern about an adult at risk we will telephone Adult Social Services on 0344 800 8020 immediately. Adult Social Services who will take all of the relevant details. We will make sure we are prepared with full details of the person, plus what our concerns are, details of any support we have provided and what we would like to happen.

The Adult Social Services worker will agree a way forward with us and keep us informed. They will send us a written record of our conversation within 5 working days. The outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation or to the Police. In this case we will not investigate and will be led by the Local Authority and/or the Police.

We will make careful records of all conversations, including the dates and times of who we spoke to, the information shared and the action agreed. We do not need to send a written referral.

Full details on this process can be found at www.norfolkscb.org under 'How to Raise a Concern'.

We understand if we are unhappy about a decision made by CADS or MASH we can use the Resolving Professional Disagreements policy on www.norfolkscb.org and contact the Safer Programme for more advice on this process.

What is abuse and neglect?

A form of maltreatment of an adult at risk. Somebody may abuse or neglect an adult at risk by inflicting harm, or by failing to act to prevent harm. Adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet).

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a carer fabricates the symptoms of, or deliberately induces, illness in an adult at risk.

Emotional abuse

The persistent emotional maltreatment of an adult at risk such as to cause severe and persistent adverse effects on the adult at risk's emotional development. It may involve conveying to an adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the adult at risk opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature developmentally inappropriate expectations being imposed on the adult at risk. These may include interactions that are beyond an adult at risk's developmental capability or preventing the adult at risk participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing an adult at risk frequently to feel frightened or in danger, or exploitation or corruption. Some level of emotional abuse is involved in all types of maltreatment of an adult at risk, though it may occur alone.

Sexual abuse

Involves forcing or enticing an adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the adult at risk is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as forcing adults at risk to look at, or be in the production of, sexual images, watching sexual activities, encouraging adults at risk to behave in sexually inappropriate ways, or grooming an adult at risk in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children.

Neglect & Self-Neglect

Neglect is the failure to provide necessary care, assistance, guidance, or attention, which causes, or is likely to cause, harm to the health, safety, or wellbeing of an adult at risk. It may be deliberate or due to lack of awareness or resources.

Examples of neglect include:

- Not providing adequate food, clothing, or shelter
- Failing to assist with medical care or personal hygiene
- Ignoring basic emotional or social needs
- Withholding necessary support or equipment (e.g. mobility aids)
- Allowing unsafe living conditions to persist

In a church context, neglect may also occur if a person with care responsibilities is not supported or held accountable for the welfare of someone entrusted to them.

Self-neglect is when an adult neglects to care for their own personal hygiene, health, or surroundings, placing themselves at risk of harm. This can include hoarding behaviour or an inability or unwillingness to manage essential tasks.

Signs of self-neglect may include:

- Poor personal hygiene
- Unsafe or unsanitary living conditions
- Refusal of needed health or care services
- Malnutrition or dehydration
- Unexplained deterioration in wellbeing

Self-neglect requires a sensitive, respectful response. Adults have the right to make unwise decisions, but where their actions (or inaction) put them at serious risk, a safeguarding referral may be necessary.

Organisational (Institutional) Abuse

Organisational abuse occurs when the systems, routines, or practices of an organisation cause harm, whether intentionally or through neglect. It often happens in settings where care is provided but can occur in any group environment.

Examples include:

- Lack of individual choice or voice
- Poor standards of care or supervision
- Rigid routines that disregard individual needs
- Bullying, intimidation, or misuse of power by staff or volunteers

In a church setting, organisational abuse may arise if safeguarding policies are ignored or if vulnerable individuals are treated with a lack of dignity or respect in ministry environments.

Financial or Material Abuse

Financial abuse involves the unauthorised use, control, or theft of an adult's money, possessions, or financial affairs. It may be committed by family members, carers, or others in a position of trust.

Examples include:

- Stealing money or possessions
- Misusing a person's bank account or credit cards
- Pressure to make financial decisions or change wills
- Charging excessive fees for services or donations

Churches must take care not to pressure vulnerable adults into giving money, and financial matters must always be handled with integrity and transparency.

Discriminatory Abuse

Discriminatory abuse is when someone is treated unfairly or unequally because of their age, disability, race, religion or belief, gender identity, sexual orientation, or other protected characteristic.

It may include:

- Verbal abuse, name-calling, or slurs
- Unequal access to services or opportunities
- Harassment or exclusion based on personal identity
- Prejudice dressed as theology

The church is called to reflect the love and justice of Christ to all people.

Discriminatory attitudes or actions—whether overt or subtle—must be challenged.

Forced Marriage

A forced marriage is when one or both people do not (or cannot) consent to the marriage, and pressure or abuse is used to force them into it. This is different from an arranged marriage, which is entered into freely by both parties.

Pressure may include:

- Threats, emotional blackmail, or violence
- Coercion from family or faith communities
- Removal from the country or restricted communication

Forced marriage is a criminal offence in the UK. If you suspect that someone may be at risk, contact the Designated Safeguarding Lead/Team immediately—it is a safeguarding matter.

Modern Slavery

Modern slavery includes human trafficking, forced labour, domestic servitude, or sexual exploitation, where a person is controlled and exploited for another's gain. It may affect adults regardless of age, gender, or nationality.

Signs may include:

- Individuals appearing fearful, withdrawn, or unable to speak freely
- Poor living or working conditions
- No access to personal documents or earnings
- Signs of physical or emotional abuse

Churches must remain alert to the possibility that someone may be trafficked or exploited, including those who attend services or are in contact through outreach ministries.

Domestic Abuse

Domestic abuse is a pattern of controlling, coercive, threatening, or violent behaviour between adults who are (or have been) intimate partners or family members. It can include:

- Physical, emotional, sexual, financial, or spiritual abuse
- Coercive control or intimidation
- Abuse of trust or isolation from support networks

Domestic abuse can affect anyone and is a safeguarding concern if it impacts children or adults at risk.

Radicalisation and the Prevent Duty

The UK government's **Prevent strategy** is part of its counter-terrorism framework and places a duty on organisations (including churches where relevant) to safeguard individuals from being drawn into extremism or terrorism.

Radicalisation is a safeguarding issue when:

- A person (especially a young person or adult at risk) is being groomed or influenced by extremist ideologies.
- Online forums, media, or personal relationships are shaping attitudes toward hatred, violence, or extremist views.

We aim to:

- Remain alert to changes in behaviour, attitudes, or speech that may indicate radicalisation.
- Encourage open conversations about faith, doubt, and worldviews within a safe and biblical framework.
- Report serious concerns to the Designated Safeguarding Lead/Team, who will assess and (if necessary) refer to safeguarding partners or the Local Authority Prevent Team.

Note: Prevent is not about policing thought or faith—it’s about protecting people from harmful ideologies that lead to violence or coercion.

Safeguarding and promoting the welfare of adults at risk

Defined for the purposes of this guidance as:

- protecting adults at risk from maltreatment;
- preventing impairment adults at risk’s health or development; and
- taking action to enable all adults at risk to have the best outcomes.

Concerns about leadership

If you have any safeguarding concerns about leadership please contact the safeguarding trustee (Stephen Card) who will follow correct procedures to ensure that concerns are dealt with seriously and appropriately.

Safer Recruitment and DBS Checks

Hope Church is committed to safeguarding all who are part of our community, especially children, young people, and adults at risk. We recognise that safe ministry begins with safe people, and we therefore implement robust safer recruitment practices for all staff and volunteers in positions of trust.

Our safer recruitment process includes:

- Clear role descriptions and expectations for all volunteer and paid positions involving children or adults at risk.
- A formal application process, including written applications, interviews (where appropriate), and review of the individual’s suitability for the role.
- Seeking two references for paid staff, including one from someone who has seen the applicant working with children or adults at risk if applicable.
- Enhanced Disclosure and Barring Service (DBS) checks for all those in *regulated activity* or who have unsupervised or significant contact with children or adults at risk.
 - For roles requiring it, a check against the Barred Lists will also be undertaken.
- Verification of identity and the right to work in the UK (if applicable).
- Ensuring that no one begins regulated work until a satisfactory DBS check has been completed.

Ongoing Safeguarding Culture

Recruitment is not a one-time event. We commit to:

- Providing induction and safeguarding training before beginning ministry

duties.

- Ensuring all volunteers and staff are supervised and supported in their roles.
- Regularly renewing DBS checks (every 3 years).
- Addressing any concerns or breaches of conduct promptly, through appropriate safeguarding or disciplinary processes.

We believe that safe teams create safe spaces, and we aim to model the love, integrity, and accountability that reflect Christ's care for all people.

Useful Contacts

Social Services 24 hours	0344 800 8020
Norfolk Police	101
In an emergency	999
Local Authority Designated Officers (LADO)	01603 223473
There is always someone available during normal working hours	
Norfolk Safeguarding Children Board (NSCB)	
www.norfolkscb.org	
Safer Programme	01603 228966
thirtyone:eight	0845 120 4550

Named Safeguarding Leads

The following designated people are in post;

Designated Safeguarding Lead: Samuel Wilkes

- Telephone number: 01379 644223 / 07990988205
- Email: Sam@wearehopechurch.net

Designated Deputy Safeguarding Lead: Laura Jestic

- Email: jesticolaura@gmail.com

Safeguarding Trustee: Stephen Card

- Telephone number: 01379 644223
- Email: trustees@wearehopechurch.net

Additional email: safeguarding@wearehopechurch.net

Policy Review

We will always make any changes immediately to our procedures in line with Norfolk Safeguarding Board's guidance on **www.norfolkscb.org**

We will review this statement and our policy and procedures annually.

This policy will be reviewed on 1st June 2026

Signed by Safeguarding Lead

Signed _____

Date _____

Signed by leadership

Signed _____

Date _____

Signed by Trustee

Signed _____

Date _____

Document History & Version Control Table			
Version	Action	Approval Authority	Action Date
1.00	Policy written with guidance from NSCB Safer Programme & CCPAS	KB	June 2018
1.01	Annual check	KB	June 2019
1.02	Annual check	KB	June 2020
1.03	Annual review	KB	June 2021
1.04	Annual review	KB	June 2022
2.00	Annual review and edit	SW	Jan 2024
2.01	Annual review	SW	June 2024
3.00	Annual review and edit	SW	June 2025

Notes to maintain the above table

For minor amendments, details of those amendments are required perhaps with links, references and sources.

For reviews it is sufficient to record 'Major review of document'. Or better something like: "major review of documents in line with changes to XYZ legislation".

Major Reviews might be expected to take place no more than 3 years apart and perhaps much less in light of major legislation changes.

Minor amendments will increase 1.01, 1.02 etc.

Major Reviews will therefore be 2.00, 3.00 etc

APPENDIX - 1

Leadership Safeguarding Statement (for Children & Adults at Risk)

The Leadership of Hope Church recognises the importance of its ministry /work with children and young people and adults in need of protection and its responsibility to protect everyone entrusted to our care.

We are committed to creating and enabling a healthy culture in order to minimise any coercion and control within our church.

The following statement was agreed by the leadership/organisation on: 1st June 2020

Hope Church is committed to the safeguarding of children and adults with care and support needs and ensuring their well-being.

Specifically:

- We recognise that we all have a responsibility to help prevent the physical, sexual, emotional abuse and neglect of children and young people (those under 18 years of age) and to report any such abuse that we discover or suspect.
- We believe every child should be valued, safe and happy. We want to make sure that children we have contact with know this and are empowered to tell us if they are suffering harm.
- All children and young people have the right to be treated with respect, to be listened to and to be protected from all forms of abuse.
- We recognise that we all have a responsibility to help prevent the physical, sexual, psychological, financial and discriminatory abuse and neglect of adults who have care and support needs and to report any such abuse that we discover or suspect.
- We recognise the personal dignity and rights of adults who find themselves victims of forced marriage or modern slavery and will ensure all our policies and procedures reflect this.
- We believe all adults should enjoy and have access to every aspect of the life of the place of worship/organisation unless they pose a risk to the safety of those we serve.
- We undertake to exercise proper care in the appointment and selection of all those who will work with children and adults with care and support needs.
- We believe in the necessity of creating a healthy culture in our church where the value of all people is recognised and challenges are responded to appropriately.

We are committed to:

Following the requirements for UK legislation in relation to safeguarding children and adults and good practice recommendations.

Respecting the rights of children as described in the UN Convention on the Rights of the Child.

Implementing the requirements of legislation in regard to people with disabilities.

Ensuring that workers adhere to the agreed procedures of our safeguarding policy.

Keeping up to date with national and local developments relating to safeguarding.

Following any denominational or organisational guidelines in relation to safeguarding children and adults in need of protection.

Supporting the designated child protection officer in their work and in any action they may need to take in order to protect children/adults with care and support needs.

Ensuring that everyone agrees to abide by these recommendations and the guidelines established by Hope Church.

Supporting parents and families Nurturing, protecting and safeguarding of children and young people Supporting, resourcing, training, monitoring and providing supervision to all those who undertake this work. Supporting all in Hope Church affected by abuse.

Adopting and following the 'Safe and Secure' safeguarding standards developed by the Churches' Child Protection Advisory Service.

We recognise:

Children's Social Services (or equivalent) has the responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child. Adult Social Care (or equivalent) has the responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult with care and support needs.

Where an allegation suggests that a criminal offence may have been committed then the police should be contacted as a matter of urgency.

When working outside of the UK, concerns will be reported to the appropriate agencies in the country in which we operate, and their procedures followed, and in addition we will report concerns to our agency's headquarters.

Safeguarding is everyone's responsibility.