

Safeguarding Adults Policy 2026

THIS POLICY WILL BE APPROVED BY DEMENTIA ACTIVE TRUSTEES BOARDAND WILL HAVE EFFECT AS IF INCORPORATED INTO THE CONSTITUTION AS PART OF THE SCHEME OF DELEGATION.

Target Audience	Dementia Active Trustees Board members, sub-committee members and all staff and volunteers working for, or on behalf of Dementia Active The policy covers all services provided by Dementia Active
Brief Description	This policy provides a framework for strategic planning and provision of services that comply with relevant safeguarding legislation, statutory policy and guidance. This includes the Care Act 2014, the Mental Capacity Act 2005, relevant case law, the Adult Safeguarding Framework 2015, 2025 Charity Governance Code and other relevant or forthcoming legislation. It also defines the roles and responsibilities of Dementia Active, its partners and commissioned services
Action required	**Chief Officer** Following approval by the Dementia Active Trustees Board, the Chief Officer will ensure that the policy requirements are discussed at all team meetings. The Chief Officer will also confirm these requirements with committee chairs and Dementia Active executives. **Committee Chairs** Committee chairs will agree the programme of review with the Accountable Executive responsible for safeguarding policy within their committee remit. **Accountable Executives** Accountable Executives will identify policy owners for each policy within their area of responsibility. **Corporate Business Manager** The Corporate Business Manager will establish and maintain a corporate register of all policies and their status, and ensure the website reflects this information accurately

Date Approved: 1st September 2026

Lead Safeguarding Trustee: Kim Rhymer

Lead Manager Designated Safeguarding: Day to Day Safeguarding team - Andrew Gill, Joanne Gill and Molly Gill

Document control

Title	Safeguarding Adults Policy Standards and Procedures 2026
Policy type	Dementia Active Trustees Board Policy
Policy owner	Chief Officer
Operational safeguarding	Joint day-to-day safeguarding team: Andrew Gill, Joanne Gill and Molly Gill
Lead safeguarding trustee	Kim Rhymer
Policy author	Kim Rhymer
Approval authority	Dementia Active Trustees Board
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Supersedes	Not specified in the existing document-control record
Ratified by	Dementia Active Trustees Board (recorded authority)
Date approved	1 September 2026 (recorded on policy page 2)
Effective from	Not separately recorded in the source policy
Next scheduled review	1 September 2027; sooner where circumstances require
Target audience	Trustees, committee members, employees, volunteers, students, placements, contractors, agency workers and organisations/persons working for or on behalf of Dementia Active
Associated procedures	Dementia Active Safeguarding Adults Procedures
Associated appendices	Dementia Active Safeguarding Adults Appendices

The original approval record is retained. The website owner confirmed the current safeguarding contacts, joint-team arrangements and annual review interval on 12 October 2026. This contact/document-control update is not a new trustee approval or an operational safeguarding assessment.

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1. Status and authority

This policy is approved by the Dementia Active Trustees Board and forms part of the organisation's governance framework. It shall have effect as if incorporated into the Constitution and Scheme of Delegation, subject to the provisions of Dementia Active's governing document.

The Dementia Active Trustees Board retains overall accountability for ensuring that Dementia Active has effective arrangements in place to safeguard and protect adults from abuse, neglect and exploitation.

Operational responsibility for implementing this policy is delegated in accordance with Dementia Active's Scheme of Delegation.

This policy must be read alongside Dementia Active's safeguarding procedures and associated policies, including those relating to:

- Complaints;
- Whistleblowing;
- Health and safety;
- Information governance and data protection;
- Confidentiality;
- Recruitment and safer recruitment;
- Disciplinary procedures;
- Equality, diversity and inclusion;
- Lone working;
- Transport;
- Incident reporting;
- Risk management;
- Mental capacity;
- Financial controls;
- Professional boundaries; and
- Business continuity.

The procedures and appendices supporting this policy are separate controlled documents.

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2. Policy statement

Dementia Active is committed to safeguarding adults from abuse, neglect and exploitation and to promoting their wellbeing, dignity, rights, independence and choice.

Safeguarding is everyone's responsibility.

Dementia Active will seek to prevent harm wherever possible, respond promptly and proportionately when concerns arise, work openly and effectively with statutory and community partners, and ensure that the adult remains at the centre of safeguarding wherever possible.

The organisation will maintain clear accountability from the Dementia Active Trustees Board through to operational practice and will use safeguarding information and learning to continuously improve the safety and quality of its services.

The Dementia Active Trustees Board expects every person working for or on behalf of Dementia Active to contribute to this commitment and to speak up whenever they have a safeguarding concern.

3. Purpose

The purpose of this policy is to establish Dementia Active's organisational framework for safeguarding adults who may be at risk of abuse, neglect or exploitation.

The policy provides assurance that Dementia Active will:

- Promote the safety, wellbeing, dignity and human rights of adults;
- Prevent abuse and neglect wherever possible;
- Recognise and respond appropriately to safeguarding concerns;
- Adopt a Making Safeguarding Personal approach;
- Work in partnership with Local Authorities, Safeguarding Adults Boards, the police, health services and other relevant agencies;
- Ensure that safeguarding concerns are escalated promptly and appropriately;
- Support adults to participate in safeguarding processes;
- Ensure that staff, volunteers, trustees and others working on behalf of Dementia Active understand their safeguarding responsibilities;
- Maintain effective governance, oversight and assurance; and
- Learn from safeguarding concerns, incidents, reviews and complaints.

Safeguarding is integral to the delivery of safe, effective and person-centred services and is a responsibility shared throughout Dementia Active.

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4. Scope

This policy applies to all adults who come into contact with Dementia Active, including people who use Dementia Active services, attendees, carers and other adults who may be affected by Dementia Active's activities.

It applies to:

- Dementia Active Trustees and Dementia Active Trustees Board members;
- Committee and sub-committee members;
- Employees;
- Volunteers;
- Students and work/educational placements;
- Agency workers;
- Contractors and subcontractors;
- Transport staff and volunteers;
- People working in commissioned or partnership arrangements; and
- Any person acting for or on behalf of Dementia Active.

The policy applies across all Dementia Active services and activities, including day services, community activities, transport arrangements, outreach and activities delivered at partner or other external locations.

The policy applies irrespective of whether an adult's care and support needs are being met by Dementia Active, another organisation, family members, carers or the individual themselves.

The procedures and any supporting appendices are controlled separately and form the operational framework supporting this policy.

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5. Legislative and regulatory framework

Dementia Active will comply with applicable legislation, statutory guidance and regulatory requirements.

The principal framework includes, but is not limited to:

- Care Act 2014;
- Care and Support Statutory Guidance, particularly Chapter 14;
- Mental Capacity Act 2005 and associated Code of Practice;
- Equality Act 2010;
- Human Rights Act 1998;
- Data Protection Act 2018 and UK GDPR;
- Safeguarding Vulnerable Groups Act 2006;
- Domestic Abuse Act 2021;
- Modern Slavery Act 2015;
- Health and Safety at Work etc. Act 1974;
- Relevant employment legislation;
- Relevant Disclosure and Barring Service legislation and guidance; and
- Other legislation and statutory guidance applicable to Dementia Active's services.

Dementia Active will also have regard to:

- Charity Commission safeguarding guidance;
- The Charity Governance Code;
- Relevant local Safeguarding Adults Board policies and procedures;
- Relevant multi-agency safeguarding arrangements;
- Professional regulatory requirements where applicable; and
- Recognised safeguarding good practice.

The Care Act 2014 establishes statutory adult safeguarding duties for Local Authorities. Dementia Active recognises the distinction between those statutory responsibilities and its own responsibilities as a charity, service provider and safeguarding partner.

The procedures supporting this policy will be reviewed against changes in legislation, statutory guidance and local safeguarding arrangements.

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6. Safeguarding principles

Dementia Active adopts the six principles of adult safeguarding set out in the Care Act statutory guidance:

1. **Empowerment** – supporting people to make their own decisions and give informed consent.
2. **Prevention** – taking action before harm occurs.
3. **Proportionality** – responding in the least intrusive way appropriate to the risk presented.
4. **Protection** – supporting those in greatest need of protection.
5. **Partnership** – working with people and partner organisations to achieve the best outcomes.
6. **Accountability** – ensuring transparency, responsibility and clear governance.

These principles will inform safeguarding practice, organisational decision-making and governance.

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7. Making Safeguarding Personal

Dementia Active will adopt a **Making Safeguarding Personal** approach.

Safeguarding will be person-centred and outcome-focused rather than process-led.

Wherever possible, Dementia Active will seek to understand:

- What matters to the adult;
- What they want to happen;
- What would help them feel safer;
- What outcomes they want from the safeguarding process;
- How they wish to be involved in decisions;
- What support they need to communicate their views; and
- How their rights, dignity, independence and wellbeing can be maintained.

The views, wishes and feelings of the adult will be considered throughout the safeguarding response.

Dementia Active recognises that these wishes may need to be balanced against duties to protect the adult or others, prevent serious crime, respond to significant risks and comply with legal requirements.

The statutory safeguarding framework specifically endorses Making Safeguarding Personal and focuses on the person rather than the process.

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8. Adults who may be at risk

For the purposes of this policy, an adult at risk is an adult aged 18 or over who:

- Has needs for care and support, whether or not the Local Authority is meeting 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, neglect or risk of it.

Dementia Active will not assume that a person is unable to protect themselves simply because they have dementia, a disability, a mental health condition or other care and support needs.

Conversely, Dementia Active will not assume that an adult is able to protect themselves simply because they appear to have capacity or independence.

Safeguarding decisions will be based on the individual circumstances, risk, wishes, capacity, communication needs and available evidence.

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9. Types of abuse and neglect

Dementia Active recognises that abuse and neglect can take many forms, including:

- Physical abuse;
- Domestic abuse;
- Sexual abuse;
- Psychological or emotional abuse;
- Financial or material abuse;
- Discriminatory abuse;
- Organisational abuse;
- Neglect and acts of omission;
- Self-neglect;
- Modern slavery;
- Coercive or controlling behaviour;
- Exploitation;
- Abuse associated with online or digital activity; and
- Other forms of harm or exploitation that may emerge.

Abuse may be perpetrated by:

- An individual;
- A family member or partner;
- A friend or carer;
- Another person using services;
- An employee or volunteer;
- A person in a position of trust;
- A professional;
- An organisation; or
- Another person unknown to the adult.

Dementia Active will not limit safeguarding responses to the categories listed above where other forms of harm or exploitation are identified.

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10. Dementia Active's safeguarding responsibilities

As a charity and provider of services, Dementia Active has a responsibility to take reasonable and proportionate steps to protect people from harm and to ensure that safeguarding is embedded within organisational practice.

Dementia Active will:

- Maintain effective safeguarding policies and procedures;
- Ensure safeguarding concerns can be raised easily and safely;
- Take immediate action where necessary to protect an adult from harm;
- Make appropriate referrals to the relevant Local Authority, police or other agency;
- Cooperate fully with statutory safeguarding enquiries and other investigations;
- Provide information requested lawfully by safeguarding partners;
- Support adults to participate in safeguarding processes;
- Consider advocacy and communication support where appropriate;
- Maintain appropriate records;
- Protect confidentiality while ensuring information is shared lawfully where necessary;
- Manage allegations against staff, volunteers and other people in positions of trust;
- Undertake appropriate internal investigations where required;
- Take disciplinary or other management action where appropriate;
- Make referrals to professional regulators or the Disclosure and Barring Service where the relevant criteria are met;
- Monitor safeguarding risks;
- Provide appropriate training and supervision;
- Learn from incidents, complaints, reviews and safeguarding activity; and
- Provide appropriate safeguarding assurance to the Dementia Active Trustees Board.

Dementia Active recognises that the statutory duty to undertake or cause a safeguarding enquiry under section 42 of the Care Act rests with the relevant Local Authority. Dementia Active will cooperate fully with such enquiries and may undertake its own organisational investigation where appropriate.

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11. Local authority and multi-agency working

Dementia Active recognises that adult safeguarding is a multi-agency responsibility.

Where a safeguarding concern arises, Dementia Active will work with the relevant Local Authority and other agencies in accordance with the safeguarding arrangements applicable to the area in which the concern arises.

Where services cross Local Authority boundaries, Dementia Active will work with the relevant safeguarding leads to establish the appropriate lead agency and ensure that information is shared between relevant authorities where necessary.

Dementia Active will cooperate with:

- Local Authorities;
- Safeguarding Adults Boards;
- Police;
- NHS and other health organisations;
- Social care providers;
- Commissioners where relevant;
- Regulators;
- Professional bodies;
- Advocacy services; and
- Other agencies involved in safeguarding adults.

Dementia Active will not seek to duplicate or replace the statutory functions of the Local Authority, police or other competent agencies.

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12. Safeguarding Adults Boards

Dementia Active will cooperate with relevant Safeguarding Adults Boards and their partner organisations where required.

Dementia Active will:

- Participate appropriately in safeguarding arrangements;
- Provide information where there is a lawful request;
- Contribute to Safeguarding Adults Reviews where required;
- Implement relevant learning and recommendations;
- Cooperate with local safeguarding strategies; and
- Provide assurance about its safeguarding arrangements where appropriate.

The statutory functions of Safeguarding Adults Boards remain with the relevant Board and its statutory partners.

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13. Raising safeguarding concerns

Everyone working for or on behalf of Dementia Active has a responsibility to act if they:

- Witness abuse or neglect;
- Receive a disclosure;
- Observe concerning behaviour;
- Become aware of a safeguarding concern;
- Receive information suggesting that an adult may be at risk; or
- Become concerned about the conduct or suitability of a person working with adults.

No person should assume that someone else will report a concern.

Concerns must be raised promptly in accordance with the Dementia Active Safeguarding Adults Procedure.

Where there is immediate danger or an emergency, emergency services should be contacted without delay.

Staff and volunteers should not undertake their own safeguarding investigation or attempt to establish whether an allegation is true before raising the concern.

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14. Confidentiality, consent and information sharing

Dementia Active respects the confidentiality and privacy of people who use its services.

However, confidentiality is not an absolute barrier to safeguarding.

Information may need to be shared without consent where there is a lawful basis for doing so, including where necessary to:

- Protect an adult or another person from serious harm;
- Prevent or detect crime;
- Comply with a legal obligation;
- Support a statutory safeguarding function; or
- Protect the vital interests of an individual where applicable.

Where consent is sought, Dementia Active will seek to ensure that the adult understands:

- What information may be shared;
- With whom;
- Why it is being shared; and
- The possible consequences of sharing or not sharing the information.

Where consent is refused, Dementia Active will consider the circumstances, including risk to the adult or others, coercion, undue influence, serious crime and other relevant factors.

Where information is shared without consent, the decision and rationale will be recorded.

Information will be shared only where necessary, proportionate, relevant, accurate and lawful, and will be handled securely.

Dementia Active will ensure that staff understand that data protection legislation does not prevent lawful information sharing for safeguarding purposes.

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15. Mental capacity

Dementia Active recognises the principles of the Mental Capacity Act 2005.

A person must be presumed to have capacity unless it is established otherwise.

Dementia Active will support adults to make their own decisions wherever possible and will not treat an unwise decision as evidence of incapacity.

Where there is reason to believe that an adult may lack capacity to make a particular decision, the requirements of the Mental Capacity Act will be followed.

Capacity is decision-specific and may fluctuate.

Where an adult lacks capacity, decisions will be made in accordance with the Mental Capacity Act, including the best interests principle where applicable.

Safeguarding concerns will not be dismissed solely because an adult lacks capacity or because another person believes they know what is best for them.

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16. Advocacy and participation

Dementia Active will support adults to participate as fully as possible in safeguarding processes.

Where an adult has substantial difficulty being involved in a safeguarding enquiry or Safeguarding Adults Review and the statutory criteria are met, Dementia Active will liaise with the relevant Local Authority to ensure that the statutory duty to consider independent advocacy is fulfilled.

Dementia Active will also consider other forms of support, including:

- Communication support;
- Accessible information;
- Interpreters;
- Trusted supporters;
- Appropriate representatives; and
- Independent advocacy.

Support will be tailored to the individual's communication and cognitive needs.

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17. Allegations involving people in positions of trust

Dementia Active will maintain arrangements for managing allegations concerning people in positions of trust.

A person in a position of trust may include an employee, volunteer, contractor, agency worker, student, trustee, driver or other person working for or on behalf of Dementia Active who has contact with adults who may be at risk.

Allegations will be taken seriously where a person in a position of trust is alleged or suspected to have:

- Been in a way that has harmed or may have harmed an adult;
- Committed or may have committed a criminal offence;
- Behaved in a way that indicates they may pose a risk to adults;
- Behaved in a way that raises concerns about their suitability to work with adults; or
- Otherwise breached professional or organisational safeguarding standards.

Dementia Active will work with the relevant Local Authority safeguarding arrangements, police and other agencies as appropriate.

Where allegations involve an employee or volunteer, Dementia Active will also consider its own employment, disciplinary and safeguarding responsibilities.

Dementia Active will ensure that internal action does not unnecessarily compromise a police or other statutory investigation.

Where the relevant criteria are met, Dementia Active will consider referral to the Disclosure and Barring Service and/or the relevant professional regulator.

Where an allegation or concern involves a trustee, the Chief Officer, the Designated Safeguarding Lead or another person with significant organisational influence, Dementia Active will ensure that the matter is escalated through a route that is sufficiently independent of the person concerned. No person will investigate, determine or control the handling of an allegation where they have an actual or perceived conflict of interest.

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18. Safer recruitment, DBS and workforce suitability

Dementia Active is committed to safer recruitment.

Recruitment and selection processes will be proportionate to the role and will include appropriate:

- Application and selection processes;
- Identity verification;

- Employment history checks;
- References;
- Qualification checks where applicable;
- Right-to-work checks;
- DBS checks where legally eligible and appropriate; and
- Assessment of safeguarding suitability.

Dementia Active will determine DBS eligibility based on the actual duties and activities of each role and current DBS guidance.

Where a role constitutes regulated activity with adults, the appropriate Enhanced DBS check with Adults' Barred List information will be obtained in accordance with legal requirements.

Where a role does not constitute regulated activity, Dementia Active will determine whether another level of DBS check is legally available and appropriate.

The organisation will not assume that a role is eligible for a particular DBS level solely because it is carried out in a service used by adults with care and support needs.

Current DBS guidance applies to paid and unpaid roles and requires organisations to assess the activities actually undertaken.

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19. Safeguarding training and supervision

Dementia Active will maintain a safeguarding training programme appropriate to the responsibilities of different groups.

Training will be provided to:

- Trustees and Dementia Active Trustees Board members;
- Employees;
- Volunteers;
- Managers;
- Safeguarding leads;
- Transport staff and volunteers;
- Contractors where appropriate; and
- Students and placements where relevant.

Training will include, as appropriate:

- Recognition of abuse and neglect;
- Reporting safeguarding concerns;
- Making Safeguarding Personal;
- Mental Capacity Act principles;
- Consent and information sharing;
- Professional boundaries;
- Financial abuse;
- Domestic abuse;
- Self-neglect;
- Position of trust concerns;

- Whistleblowing;
- Online/digital safeguarding; and
- Safeguarding arrangements relevant to the individual's role.

The level and frequency of training will be proportionate to role and responsibility.

Safeguarding leads will receive appropriate specialist development and supervision.

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20. Transport and drivers

Dementia Active recognises that transport arrangements may create particular safeguarding risks, including risks associated with:

- Lone working;
- Transitions between home and service;
- Mobility and physical support;
- Communication difficulties;
- Unexpected changes in circumstances;
- Delays or vehicle breakdown;
- Collection and handover arrangements; and
- Inappropriate relationships or boundaries.

Dementia Active will maintain appropriate transport and driver procedures covering:

- Safer recruitment;
- DBS eligibility;
- Driving licence and insurance checks;
- Vehicle safety and roadworthiness;
- Passenger safety;
- Emergency procedures;
- Safeguarding reporting;
- Lone working;
- Collection and handover arrangements; and
- Risk assessment.

DBS requirements for drivers and transport staff will be determined by the actual duties undertaken and applicable DBS eligibility rules rather than by a blanket assumption that all transport activity constitutes regulated activity with adults.

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21. Lone working

Dementia Active recognises that lone working can create additional safeguarding and personal safety risks.

Risk assessments and appropriate procedures will be maintained for lone working, including where staff or volunteers:

- Work in community settings;
- Undertake visits;
- Work outside normal hours;
- Transport people;
- Work alone at Dementia Active premises; or
- Undertake other activities without direct supervision.

Arrangements will include, where appropriate:

- Risk assessment;
- Check-in/check-out arrangements;
- Communication arrangements;
- Emergency procedures;
- Personal safety measures;
- Incident reporting; and
- Management oversight.

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22. Professional boundaries

Dementia Active expects all staff, volunteers, trustees and others working on its behalf to maintain appropriate professional boundaries.

Private or inappropriate relationships with people using Dementia Active services are prohibited where they create, or could create, a conflict of interest, exploitation, dependency, safeguarding risk or abuse of power.

Staff and volunteers must not, unless expressly authorised under Dementia Active procedures:

- Borrow from or lend money to people using services;
- Enter into private financial arrangements;
- Accept inappropriate gifts;
- Become involved in personal financial affairs;
- Exploit relationships for personal benefit;
- Establish inappropriate private social media relationships; or
- Undertake private care or support arrangements with people using Dementia Active services.

Any concern about boundaries must be raised promptly.

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23. Financial abuse and protection of people's property

Dementia Active recognises financial and material abuse as a significant safeguarding risk.

The organisation will maintain appropriate financial controls concerning:

- Handling money belonging to people using services;
- Petty cash;
- Purchases;
- Receipts;
- Personal belongings;
- Gifts;
- Financial transactions;
- Access to personal information; and
- Any other circumstances where staff or volunteers may have access to another person's money or property.

Any concern about financial abuse will be treated as a safeguarding concern and managed in accordance with the relevant safeguarding and financial procedures.

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24. Whistleblowing

Dementia Active will maintain an environment in which staff, volunteers, trustees and others feel able to raise genuine safeguarding concerns without fear of retaliation or disadvantage.

Whistleblowing arrangements will provide a route for raising concerns about:

- Abuse or neglect;
- Unsafe practice;
- Organisational failures;
- Inappropriate conduct;
- Failure to act on safeguarding concerns;
- Suppression or manipulation of safeguarding information; or
- Concerns about senior personnel.

Where the concern involves the Designated Safeguarding Lead, Chief Officer or another senior person, alternative escalation arrangements will apply.

Alternative routes will include escalation to the Lead Safeguarding Trustee, Chair of the Dementia Active Trustees Board or another suitably independent person, as appropriate to the circumstances. The person who is the subject of the concern must not be able to prevent, delay or control its escalation.

Dementia Active will comply with applicable whistleblowing legislation and its own whistleblowing policy.

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25. Safeguarding children

This policy is principally concerned with safeguarding adults.

It does not replace Dementia Active's safeguarding children’s arrangements.

Where a person under 18 comes into contact with Dementia Active or a concern arises about a child, the relevant child safeguarding procedures must also be followed.

Where harm to an adult involves a child or young person as an alleged perpetrator, Dementia Active will consider both adult and child safeguarding responsibilities and liaise with the relevant agencies.

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26. Serious incidents and external reporting

Dementia Active will maintain arrangements for identifying, escalating and managing serious safeguarding incidents.

Depending on the circumstances, this may include notification or referral to:

- The Local Authority;
- Police;
- Safeguarding Adults Board;
- CQC, where applicable;
- NHS or commissioning bodies, where applicable;
- Professional regulators;
- Disclosure and Barring Service;
- Charity Commission; and
- Other relevant statutory or regulatory bodies.

Dementia Active will determine whether a serious incident is reportable to the Charity Commission in accordance with the Commission's current guidance.

The Dementia Active Trustees Board will receive appropriate information about serious safeguarding incidents, including assurance about immediate risk management, external reporting, investigation, learning and actions.

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27. Duty of Candour and openness

Where Dementia Active is subject to the statutory CQC Duty of Candour, it will comply with the applicable legal and regulatory requirements.

Irrespective of whether the statutory Duty of Candour applies, Dementia Active will promote a culture of openness, honesty and transparency.

Where appropriate, people affected by safeguarding incidents will receive clear and timely information about:

- What has happened;
- What action has been taken;
- What support is available;
- What external agencies are involved; and

- What learning or improvement action is being undertaken.

Information will be shared in accordance with confidentiality, data protection and safeguarding requirements.

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28. Records and documentation

Dementia Active will maintain accurate, contemporaneous and secure safeguarding records.

Records should:

- Distinguish fact from opinion;
- Record the adult's own words where relevant;
- Record decisions and the rationale for them;
- Identify who was involved;
- Record information shared and with whom;
- Record referrals and responses;
- Document consent and capacity considerations where relevant;
- Record actions taken to manage risk; and
- Support organisational learning and assurance.

Records will be retained and disposed of in accordance with Dementia Active's information governance and records management requirements.

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29. Safeguarding investigations and reviews

Dementia Active will cooperate fully with statutory safeguarding enquiries, police investigations, Safeguarding Adults Reviews and other relevant reviews.

Where appropriate, Dementia Active may undertake its own internal investigation to:

- Establish facts;
- Manage organisational risk;
- Identify failures or weaknesses;
- Support disciplinary or other action;
- Identify learning; and
- Prevent recurrence.

Internal investigations will not unnecessarily duplicate or compromise statutory investigations.

Investigations will be proportionate, evidence-based and appropriately independent.

Where a formal review or investigation identifies recommendations for Dementia Active, the organisation will develop and monitor an action plan.

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30. Safeguarding Adults Reviews

Dementia Active will cooperate with Safeguarding Adults Reviews where requested or required.

The purpose of participation will be to:

- Provide accurate information;
- Support understanding of what happened;
- Identify learning;
- Implement recommendations; and
- Improve safeguarding practice.

Dementia Active recognises that Safeguarding Adults Reviews are intended to promote learning and improvement rather than simply to apportion blame.

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31. Domestic abuse and related reviews

Where safeguarding concerns involve domestic abuse, Dementia Active will work with relevant specialist and statutory agencies.

Where a Domestic Homicide Review or other statutory review is commissioned and Dementia Active is required to participate, it will provide appropriate information and cooperate fully.

The organisation will ensure that safeguarding, domestic abuse and related risks are considered together where relevant.

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32. Risk management

Safeguarding risks will be incorporated into Dementia Active's organisational risk management framework.

The Dementia Active Trustees Board will receive appropriate assurance regarding:

- Safeguarding risks;
- Serious incidents;
- Themes and trends;
- Training compliance;
- Safer recruitment;
- Allegations involving people in positions of trust;
- Complaints and safeguarding-related concerns;
- Actions arising from reviews;
- Compliance with safeguarding policies and procedures; and
- Emerging safeguarding risks.

Safeguarding risks will be reviewed proportionately and escalated through the organisation's governance arrangements.

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33. Governance, accountability and assurance

The Dementia Active Trustees Board has overall accountability for safeguarding within Dementia Active.

Dementia Active Trustees Board

The Dementia Active Trustees Board will:

- Approve this policy;
- Ensure safeguarding is embedded within organisational governance;
- Promote an open and positive safeguarding culture;
- Ensure appropriate resources are available;
- Receive safeguarding assurance;
- Oversee significant safeguarding risks;
- Ensure appropriate action is taken following serious incidents;
- Ensure learning is implemented;
- Challenge management where safeguarding assurance is insufficient; and

Ensure concerns involving trustees, senior leaders or other persons in positions of influence can be escalated and considered independently;

Ensure conflicts of interest relevant to safeguarding are declared, recorded and appropriately managed;

Ensure whistleblowing, complaints and speak-up arrangements provide credible routes for concerns about senior personnel;

Seek independent professional advice where the Dementia Active Trustees Board cannot reasonably assure itself that a safeguarding or governance concern is being managed appropriately; and

- Ensure the policy is reviewed appropriately.

Lead Safeguarding Trustee

The Lead Safeguarding Trustee will provide strategic safeguarding oversight on behalf of the Dementia Active Trustees Board and will act as an appropriate point of escalation where required.

The Lead Safeguarding Trustee will not replace the operational responsibilities of the Designated Safeguarding Lead or Chief Officer.

Chief Officer

The Chief Officer is accountable for the operational implementation of this policy and will ensure that:

- Effective safeguarding arrangements are maintained;
- Staff and volunteers understand their responsibilities;
- Appropriate safeguarding resources are available;
- Safeguarding concerns are escalated appropriately;
- Serious incidents are reported as required;
- The Dementia Active Trustees Board receives appropriate assurance; and
- Safeguarding learning is implemented.

Designated Safeguarding Lead

The Designated Safeguarding Lead will provide operational safeguarding leadership and advice.

The Designated Safeguarding Lead will:

- Provide advice to staff and volunteers;
- Oversee safeguarding referrals and escalation;
- Liaise with Local Authority safeguarding teams and other agencies;
- Support management of allegations and position-of-trust concerns;
- Monitor safeguarding activity;
- Maintain appropriate safeguarding records;
- Support training and development;
- Identify safeguarding themes and risks; and
- Provide safeguarding assurance to senior management and the Dementia Active Trustees Board.

Managers

Managers are responsible for ensuring that safeguarding is embedded in day-to-day service delivery, including:

- Responding appropriately to concerns;
- Supporting staff and volunteers;
- Ensuring records are maintained;
- Escalating concerns;
- Implementing safeguarding actions; and
- Monitoring local risks.

Staff and volunteers

All staff and volunteers must:

- Understand their safeguarding responsibilities;
- Remain alert to signs of abuse and neglect;
- Report concerns promptly;
- Cooperate with safeguarding enquiries;
- Maintain appropriate professional boundaries;
- Maintain confidentiality;
- Complete required safeguarding training; and
- Act in the best interests of the people they support while respecting their rights, choices and dignity.

34. Independent challenge, escalation and conflicts of interest

Dementia Active recognises that effective safeguarding governance depends on the ability of trustees, staff, volunteers and others to raise concerns and challenge decisions without inappropriate influence, obstruction or retaliation.

The Dementia Active Trustees Board will maintain arrangements which ensure that:

- Safeguarding concerns can reach an appropriate decision-maker even where normal line-management routes are unsuitable;
- No individual trustee, executive or employee can prevent a genuine safeguarding or governance concern from being considered appropriately;
- Actual, potential and perceived conflicts of interest are declared and recorded;
- A person with a relevant conflict withdraws from discussion, investigation or decision-making where appropriate;
- Concerns involving related persons, family relationships, financial interests or other close connections are subject to appropriate independent scrutiny;
- The Dementia Active Trustees Board may obtain independent safeguarding, legal, HR, financial or governance advice where necessary; and
- Trustees receive sufficient information to exercise constructive challenge and are not reliant solely on assurance from the person or function whose conduct or decisions are in question.

These arrangements support, and should be read alongside, Dementia Active's Conflicts of Interest, Whistleblowing, Complaints and Serious Incident arrangements.

35. Contractors, partners and commissioned services

Dementia Active expects organisations and individuals delivering services on its behalf to meet appropriate safeguarding standards.

Contracts, service agreements and partnership arrangements will include safeguarding requirements proportionate to the service and risk.

Dementia Active will seek appropriate assurance regarding:

- Safeguarding policies;
- Safer recruitment;
- DBS arrangements;
- Training;
- Incident reporting;
- Position-of-trust arrangements;
- Information sharing;
- Complaints;
- Business continuity; and
- Cooperation with safeguarding investigations.

Dementia Active will not assume that commissioning or contracting arrangements transfer its organisational safeguarding responsibilities.

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36. Quality assurance and learning

Dementia Active will use safeguarding information to identify themes, trends, risks and opportunities for improvement.

Learning may arise from:

- Safeguarding concerns;
- Complaints;
- Incidents;
- Near misses;
- Investigations;
- Safeguarding Adults Reviews;
- Domestic Homicide Reviews;
- Audits;
- Staff and volunteer feedback;
- People using services and carer feedback; and
- External reviews or inspections.

Learning will be translated into action where appropriate and monitored through the organisation's governance arrangements.

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37. Equality, dignity and human rights

Safeguarding practice within Dementia Active will respect:

- Dignity;
- Autonomy;
- Equality;
- Privacy;
- Cultural needs;
- Communication needs;
- Disability;
- Identity;
- Beliefs;
- Relationships;
- Sexuality; and
- Individual choice.

Safeguarding responses will be proportionate and will seek to avoid unnecessary restriction of liberty or independence.

Dementia Active will consider the potential for discrimination, hate crime and discriminatory abuse within safeguarding responses.

38. Policy review and monitoring

This policy will be reviewed at least annually and sooner where:

- Legislation or statutory guidance changes;
- Relevant regulatory requirements change;
- Significant safeguarding incidents occur;
- A Safeguarding Adults Review identifies learning requiring policy change;
- Organisational services or risks materially change;
- Audit or assurance identifies weaknesses; or
- The Dementia Active Trustees Board considers a review necessary.

The policy owner will maintain oversight of the review process and will ensure that significant changes are presented to the appropriate governance body for approval.

39. Related policies and documents

This policy should be read alongside, as applicable:

- Safeguarding Adults Procedures;
- Safeguarding Adults Reporting Procedure;
- Managing Allegations / People in Positions of Trust Procedure;
- Whistleblowing Policy;
- Complaints Policy;
- Mental Capacity Policy;
- Information Governance and Data Protection Policy;
- Confidentiality Policy;
- Safer Recruitment Policy;
- DBS Policy;
- Disciplinary Policy;
- Lone Working Policy;
- Transport Policy;
- Health and Safety Policy;
- Risk Management Policy;
- Incident Reporting Procedure;
- Financial Controls Policy;
- Equality, Diversity and Inclusion Policy;
- Business Continuity Plan; and

Conflicts of Interest Policy;

Trustee Code of Conduct / Governance Code, where adopted;

- Relevant Local Safeguarding Adults Board procedures.

Reporting contacts and annual review

If someone is at immediate risk of harm, call 999. Do not wait for an email response.

Safeguarding contacts

Safeguarding trustee: Kim Rhymer.

Day-to-day safeguarding is a joint team responsibility: Andrew Gill, Joanne Gill and Molly Gill. The policy's operational safeguarding-lead responsibilities are carried out through this joint team; each concern must have an identified person handling its recording and escalation.

Email: info@dementiactive.co.uk. Ask for your concern to be passed to the safeguarding team.

Telephone: Banbury 01295 408441; Bicester/Launton 01869 713913; Chipping Norton 01608 515674; Carterton/Freeland 01993 659027. Text/WhatsApp: 07711 891028.

Do not use the transport number to report safeguarding concerns.

Concerns about the safeguarding team or management

Email info@dementiactive.co.uk and mark the message for the attention of Kim Rhymer, safeguarding trustee. The person who is the subject of a concern must not prevent, delay or control its escalation. Concerns involving a trustee must be escalated to an unconflicted trustee or another suitably independent person under the policy.

Follow the policy's external referral arrangements where needed. Internal reporting must not delay urgent protection or a necessary referral to police or the relevant local authority.

Review and update record

Recorded policy approval: 1 September 2026. Next scheduled review: 1 September 2027, or sooner under section 38. Contacts and joint-team arrangements confirmed by the website owner on 12 October 2026.

This page supplements the existing policy and does not replace the detailed operational procedures referenced in it.

Emergency reporting reference: GOV.UK, Guidance on reporting safeguarding concerns in a charity (checked 12 October 2026): https://www.gov.uk/government/publications/guidance-on-reporting-safeguarding-concerns-in-a-charity/guidance-on-reporting-safeguarding-concerns-in-a-charity