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# Safeguarding Adults Policy and Procedure

## Purpose

1. The purpose of this policy and procedure is to safeguard adults at risk of harm who access Buckinghamshire Community Wellbeing (BCW) Hub including the adults of children accessing our services, through the prevention of, and protection from, harm.
2. It outlines the principles and procedures that guide our adult safeguarding efforts. We aim to:
  - Provide a safe, supportive environment for all adults
  - Ensure all staff, volunteers, students and trustees understand their safeguarding responsibilities.
  - Protect adults at risk from all forms of harm, including abuse, neglect, and exploitation, while adhering to legal and ethical obligations.
  - Create a culture of zero-tolerance for harm to adults by recognising those who may be at risk, identifying circumstances that increase risk, understanding how abuse or neglect manifests, and being prepared to act on safeguarding concerns.
  - Establish clear systems for reporting and escalating concerns internally and externally, in line with statutory and local guidance.
  - Promote a culture of vigilance, ensuring that safeguarding is embedded in all Hub activities.
  - Support adults at risk and their families by adhering to the overarching principles of safeguarding, including promoting well-being and preventing harm.
3. The BCW Hub recognises that all adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to:
  - Live safely and free from harm.
  - Equal protection from all forms of abuse, neglect, or exploitation.
  - Make their own decisions, provided they have the mental capacity to do so, even if others consider those decisions unwise.

## Scope

4. All services who have chosen to use the BCW Hub for their various activities will work within their own safeguarding procedures and policies.
5. This policy and procedure applies to anyone working on behalf of the BCW Hub, including the Board of Trustees, staff, external supervisors, consultants, sessional workers and volunteers, or undertaking a volunteering, work experience, or educational placement.
6. It covers all services and activities provided by the Hub, at all sites and through virtual platforms. It is essential that everyone is aware of its central messages and any duties/responsibilities it places on them.
7. Safeguarding adults at risk is a shared responsibility that requires effective, joint working between:
  - Health, social care, and education professionals.
  - Voluntary and community organisations.
  - Justice services and other statutory agencies.
8. In applying these principles, the BCW Hub aims to:
  - Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
  - Stop abuse or neglect wherever possible.
  - Safeguard adults in a way that supports their autonomy, helping them make choices and maintain control over their lives.
  - Promote an approach that focuses on improving life outcomes for adults concerned.
  - Act in accordance with safeguarding legislation and Buckinghamshire's statutory safeguarding procedures.
9. Safeguarding adults at risk also encompasses promoting their welfare, ensuring their well-being, and protecting their rights. Some adults may require coordinated support from multiple agencies to mitigate risk effectively.



## Definitions

### 10. **Adult at Risk:**

An adult (18 years 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.
- Is unable to protect themselves from abuse or neglect because of their care and support needs.

### 11. **Safeguarding adults** are the actions taken to prevent and respond to the abuse and neglect of adults at risk. Safeguarding involves:

- Protecting the rights of adults to live safely, free from abuse and neglect.
- Promoting the well-being, independence and inclusion of adults at risk.
- Working in partnership to prevent abuse and neglect.

### 12. **Types of Abuse:**

Abuse and neglect may include, but are not limited to:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Financial or material abuse
- Modern slavery
- Domestic violence or abuse
- Discriminatory abuse
- Neglect and acts of omission
- Self-neglect

(DHSC, 2024)

Further information regarding the categories of harm and abuse can be found in **Appendix 1**.



## Legal Framework

This policy is underpinned by key legislation and guidance, that safeguard adults at risk in England. These include:

### 13. *Care Act 2014* and the Care Support Statutory Guidance (DHSC, 2024)

- Establishes the legal and policy framework to help adults achieve their life goals, including supporting and protecting safeguarding adults at risk defining the duties of local authorities, the NHS, the police and other partners.

### 14. *Equality Act 2010*:

- Protects individuals from discrimination and ensures equality in safeguarding responses.

### 15. *Human Rights Act 1998*

- Safeguards the fundamental rights of individuals, including the right to live free from abuse and neglect.

### 16. *Mental Capacity Act 2005 (MCA)*

- Provides a framework for assessing an adult's capacity to make decisions and taking actions in their best interests when capacity is lacking.

### 17. *Domestic Abuse Act 2021*

- Recognises adults at risk who may be experiencing abuse in domestic settings and ensures they receive appropriate support.

### 18. Prevent Duty Guidance (*Counter-Terrorism and Security Act 2015*)

- Supports safeguarding adults at risk of radicalisation.

### 19. *Safeguarding Vulnerable Groups Act 2006*

- Prevents people who are deemed unsuitable to work with children and vulnerable adults for gaining access to them through their work or volunteering.

A summary of these and other key legislation is available

<https://www.scie.org.uk/safeguarding/adults/legislation/>

## Safeguarding Principles

20. Clear governance and leadership is central to embedding a safeguarding culture. The Board of Trustees take their responsibility to adults at risk seriously; working together with other agencies to identify and support those adults who are suffering harm or whom may be at risk of harm.
21. We are committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with the related evidence base, best practice and Buckinghamshire Safeguarding Adult Board requirements.
22. The BCW Hub adopts the six principles of adult safeguarding set out in the *Care Act 2014*:
  - Empowerment: Supporting individuals to make their own decisions with informed consent.
  - Prevention: Taking action before harm occurs.
  - Proportionality: Responding appropriately to the level of risk.
  - Protection: Safeguarding individuals in need of care and support.
  - Partnership: Working collaboratively with local services and communities.
  - Accountability: Maintaining transparency and responsibility in safeguarding practices.

## Prevent Duty

23. The Prevent Duty, part of the UK Government's counter-terrorism strategy, aims to safeguard individuals, including adults at risk, from the risk of radicalisation and extremism.
24. The BCW Hub is committed to implementing the Prevent Duty in accordance with the Buckinghamshire Safeguarding Adults Board (BSAB) guidance, ensuring all staff, volunteers, and stakeholders take appropriate action to protect adults at risk.
25. Prevent focuses on:

- Safeguarding adults at risk of being drawn into terrorism or extremist activities.
- Promoting the values of democracy, rule of law, individual liberty, and mutual respect.

26. Radicalisation refers to the process through which individuals come to support terrorism or extremist ideologies. This can occur online, in person, or through social networks.

## Responsibilities Under Prevent

27. Staff Awareness and Training:

28. All BCW Hub staff, volunteers, and trustees will complete Prevent awareness training as part of their safeguarding responsibilities.

29. Training equips staff to identify vulnerabilities and signs of radicalisation and understand the appropriate referral pathways.

30. Risk Assessment:

- The BCW Hub will evaluate activities and interactions conducted at the Hub to ensure they are inclusive, promote tolerance and do not inadvertently expose adults to extremist views.

31. Referral Process:

- If staff or volunteers identify concerns regarding radicalisation, they must report these to the DSL immediately.
- The DSL will assess the concern and refer it to the Channel programme or Adult Social Care as required, following Buckinghamshire Safeguarding Adults Board protocols.

## Safeguarding Responsibilities

### All

32. Individuals working on behalf of BCW Hub including the Board of Trustees, staff, external supervisors, consultants, sessional workers and volunteers, or undertaking a volunteering, work experience or educational placements, understand that safeguarding adults at risk is everyone's responsibility.

33. The BCW Hub will keep adults safe by:

- Valuing, listening to and respecting them.
- Appointing a Designated Safeguarding Lead (DSL) who will also act as the Prevent Lead, deputy (as appropriate) and a safeguarding Trustee/board member.
- Facilitating comprehensive safeguarding training to all staff and volunteers.
- Adopting safer recruitment practices, including DBS checks.
- Implementing a Code of conduct, IT /Online safety, Data protection/GDPR, Whistleblowing, Harassment and sexual misconduct policies and related procedures.
- Creating an anti-bullying and anti-discrimination environment and addressing complaints effectively.
- Ensuring robust reporting mechanisms are in place for all safeguarding concerns.
- Maintaining a good working knowledge of the Buckinghamshire Safeguarding Adults Multi Agency Policy and Procedures and how they should be used to inform decision making regarding a referral to First Response

## Trustees

34. Assign a DSL who holds senior authority and expertise to lead safeguarding efforts at the BCW Hub. Provide them with necessary resources, training, and support to fulfil their responsibilities effectively.

35. Maintain, led by the DSL, an up-to-date safeguarding adults at risk policy and procedure, making it accessible on the BCW Hub website and in hard copy at all BCW Hub sites.

36. Review, led by the DSL, the safeguarding adults at risk annually or sooner if new legislation, guidance or policies are introduced. Document updates and communicate changes to staff and stakeholders.

37. Implement robust safer recruitment processes, including pre-employment checks for all staff and volunteers.

38. Promote adherence to safer working practices across the BCW Hub as set out by the Code of Conduct.
39. Require all trustees, staff and volunteers to complete safeguarding training during induction and participate in regular updates. Training must align with national and local safeguarding guidance and reflect their specific roles.
40. Ensure compliance with the Data Protection Act 2018 and UK GDPR principles, supporting staff in sharing or withholding personal information when necessary to protect adults at risk.
41. Require confirmation from agencies and organisations providing services or activities at the BCW Hub that they have appropriate safeguarding policies and procedures. Maintain and periodically review these records.
42. Oversee safeguarding practices through regular monitoring, audits, and reports from the DSL. Use these findings to identify risks and drive improvements.
43. Lead by example to foster a culture of vigilance and shared responsibility for safeguarding. Emphasise the importance of safeguarding as a collective effort throughout the BCW Hub.

### Designated Safeguarding Lead

44. Leads the development implementation a regular review and update of this policy and procedure to ensure it reflects current legislation statutory guidance and best practice.
45. Acts as the primary point of contact for all safeguarding concerns raised within the BCW Hub that are not being dealt with already by workers of agencies or organisations working within or providing activities on behalf the BCW Hub.
46. Provides advice and guidance to staff, volunteers and learners of the BCW Hub on safeguarding matters. Maintains a good working knowledge of the Buckinghamshire Safeguarding Adults Multi Agency Policy and Procedures and ensures they are used effectively to inform decision-making regarding referrals to First Response as required.
47. Responds promptly and appropriately to safeguarding concerns as relevant, ensuring they are reported to relevant external agencies (e.g., Social

- Services, Police) where necessary. Maintain detailed records of safeguarding incidents and actions taken, in line with data protection regulations.
48. Develops and maintain strong working relationships with local safeguarding boards, statutory agencies and other relevant organisations.
  49. Ensures all staff, volunteers and trustees complete safeguarding training at induction and receive regular updates in line with national and local guidance.
  50. Conducts periodic audits to assess the effectiveness of safeguarding measures and recommend improvements to the Board of Trustees.
  51. Manages the safe handling, storage, and sharing of safeguarding information in accordance with the *Data Protection Act 2018* and *UK GDPR*. Oversee decisions regarding information sharing, ensuring that the welfare of the adult at risk takes precedence over confidentiality concerns where necessary.
  52. Escalates any significant safeguarding issues to the Board immediately, including allegations involving BCW Hub staff, volunteers or trustees.
  53. Must stay up-to-date with changes in safeguarding legislation, policies and best practices. Participate in appropriate safeguarding training and professional development to enhance expertise, updated on an annual basis.

## BCW Hub Manager

54. Verifies that all staff, volunteers, learners and others working on behalf of the BCW Hub have a clear understanding of their roles and responsibilities as outlined in this safeguarding adults at risk policy and procedure
55. Ensure the DSL responds promptly and appropriately to safeguarding concerns as relevant, ensuring they are reported to relevant external agencies (e.g., BNU Safeguarding Team, Social Services, Police) where necessary and maintains detailed records of safeguarding incidents and actions taken, in line with data protection regulations. Completes these actions in the absence of the DSL or appointed deputy.

*To note: It is the duty of the Safeguarding Trustee/board member to liaise with relevant agencies if any allegations are made against the DSL or the BCW Hub manager.*

## Procedural Guidance

Our procedures for all Trustees, staff, volunteers, learners and visitors in safeguarding and protecting adults at risk from harm are in line with Buckinghamshire Council and [Buckinghamshire Safeguarding Adults Board](#) safeguarding procedures.

## Recruitment, Training and Self Care

56. The BCW Hub follows the guidance provided by the Buckinghamshire Safeguarding Adults Board to ensure that all the appropriate checks have been carried out on new staff and volunteers.
57. All BCW Hub staff and volunteers are required to undergo an appropriate DBS check to ensure their suitability of involvement with BCW Hub before they begin work. In addition to this, all BCW Hub staff and long term volunteers must participate in safeguarding training on a yearly basis.
58. All workers that may be impacted by any adult safeguarding concerns or disclosures are offered extra supervision, line management and time with the DSL or deputy to ensure they feel supported and equipped for their role.

*To note: As part of our Joint Working Agreement (JWA) with Buckinghamshire New University (BNU) and Buckinghamshire Healthcare NHS Trust (BHT), safeguarding measures such as DBS checks, HR hosting and training for staff employed at the BCW Hub are supported by BNU and BHT as appropriate.*

## Visitors

59. We will ensure visitors are:
  - Met and directed by BCW Hub or BNU staff.
  - Clearly identified with relevant stickers/passes/badges.

- Signed in and out of the sites by BCW Hub or BNU staff
- Given restricted access to only specific areas of the BCW Hub, as appropriate.
- Escorted by a member of staff/representative as required.
- If an agency or organisation providing services within or on behalf of the BCW Hub - that they are aware that are expected to follow their own organisational safeguarding adults at risk policy and procedures if they have any concerns with their own clients.

## Information Sharing

60. The BCW Hub is committed to ensuring that information sharing practices comply with the principles outlined in the *Care Act 2014*, *UK GDPR*, and Buckinghamshire Safeguarding Adults Board (BSAB) guidance. Safeguarding adults at risk requires effective and appropriate sharing of information to prevent harm and promote well-being. When sharing information about adults at risk, the BCW Hub ensures that it is:

- Shared only when necessary, proportionate, and relevant to the safeguarding concern.
- Shared in a way that is lawful and respects individual rights under data protection law.
- Transparent, unless informing the individual or others increases the risk of harm.
- In line with the 7 Golden Rules for Information Sharing for safeguarding adults

### *Key Principles based on the 7 Golden Rules*

**61. Adults at risk have a right to protection:** Safeguarding their well-being and safety takes precedence over protecting privacy or confidentiality. When there is a risk of serious harm, sharing information to protect the adult is essential and lawful under the *Care Act 2014*.

**62. Engagement with the Adult at Risk:** Discuss the safeguarding concern with the individual and inform them of your intention to share information, unless

doing so increases the risk of harm to them or others. Use clear, accessible language to explain what information will be shared, with whom and why.

63. **Consent:** Is not required to share information to prevent harm. A lawful basis under data protection laws (e.g., safeguarding purposes) suffices. Transparency and cooperation are encouraged, but objections may be overridden when necessary to protect the adult at risk.
64. **Seeking Advice:** If unsure about sharing information, promptly consult the Designated Safeguarding Lead or BCW Hub Manager. Do not delay action to protect an adult at risk while awaiting advice.
65. **Protecting Identities:** Share only what is necessary to safeguard the individual or others. Take steps to protect sensitive information, especially where disclosing it could put others at risk.
66. **Relevance and Proportionality:** Share only information that is necessary, relevant and accurate with agencies or individuals directly involved in safeguarding or providing support.
67. **Recording Decisions:** Document all decisions to share or not share information, including the rationale and any subsequent updates that may influence your decision. Be prepared to explain and reconsider decisions or escalate concerns if new information emerges.

## Confidentiality

68. The DSL and BCW Hub Manager may disclose personal information about an adult at risk only on a strict need-to-know basis. Such decisions should always prioritise the safety and well-being of the individual concerned and adhere to statutory obligations under the Care Act 2014 and the Data Protection Act 2018.
69. Before any work takes place, workers inform residents about the limits of confidentiality, particularly in cases of significant risk to an adult. This discussion ensures service users understand the BCW Hub's commitment to safeguarding, and the agreement is documented in a written contract.
70. Adults at risk must never be promised secrecy as this may compromise their safety, well-being or that of another person. Instead adults should be

reassured that all information shared will be treated with respect and only disclosed to those who can help ensure their safety and provide appropriate support. Service users must be informed about what will happen next and who will be informed, using language they can understand.

71. Confidentiality must always be balanced with the need to act to protect an adult at risk from harm. Information may be shared for purposes such as:

- Promoting well-being.
- Preventing death or serious harm.
- Coordinating effective and efficient responses to assessed needs.
- Preventing abuse or harm that may increase the need for care and support.
- Enabling early interventions to mitigate risk escalation.
- Identifying patterns of abuse and low-level concerns to protect others at risk.

72. BCW Hub Staff, volunteers, learners and others should seek guidance from the DSL or BCW Hub Manager if they are uncertain about whether to share information. They must not assume that someone else will pass on safeguarding information. If they believe the information may be critical to the safety or well-being of an adult at risk, they have a professional duty to share it.

## Key Actions When Responding to a Disclosure

73. **Listen attentively:** Allow the adult at risk to share their story in their own words and at their own pace. Do not interrupt or respond emotionally. Remain calm, supportive and reassuring.

74. **Clarify carefully:** Avoid leading questions. Use only open-ended questions when clarification is needed, following the TED approach: Tell, Explain, Describe.

75. **Record accurately:** Document the disclosure using the BCW Hub's safeguarding record-keeping processes. Include times, dates, locations

mentioned and the individuals exact words. Avoid substituting anatomically correct names for terms the individual uses.

*See also: Decisions, Documentation and Reporting Section below.*

76. **Reassure and inform:** Let them know they did the right thing by telling someone. Explain the next steps, including the need to share the information to keep them safe.
77. **Monitor and safeguard:** Ensure the adult at risk is accompanied and supported as requested/required until a plan is in place to protect their safety.

## Recognising and Responding to Harm – Also see **Appendix 3**

### 78. **Disclosures or Concerns Identified by Agency/Organisational Staff**

#### **Using the BCW Hub:**

If a staff member or worker from an agency or organisation using the BCW Hub identifies signs or indicators of abuse, neglect, or exploitation involving an adult at risk:

- They must follow their own agency's safeguarding policy and procedures.
- Information should only be shared with the BCW Hub's Designated Safeguarding Lead (DSL) on a strict need-to-know basis to maintain confidentiality and ensure the safety of those involved.

### 79. **Disclosures or Concerns Identified by BCW Hub Staff, Volunteers, Learners, or Others:**

If a BCW Hub staff member, volunteer, learner or other individual identifies signs or indicators of abuse, neglect, or exploitation involving an adult at risk:

- The concern must be shared with the DSL immediately.
- The DSL will provide advice and/or inform the relevant agency or organisational staff member/worker as soon as possible and request confirmation of the actions they will take.
- The agency or organisational staff member/worker must follow their own safeguarding policy and procedures.
- If the DSL believes the concern is not being taken seriously or acted upon appropriately, they must escalate the issue to the relevant safeguarding

team, Adult Social Care (via Buckinghamshire Multi-Agency Safeguarding Hub), or other statutory agencies.

#### **80. Disclosures or Concerns Involving BNU or BHT Staff, Learner, or Others (and Their Children):**

If a disclosure or concern involves BNU staff, learners, or others working or volunteering within the BCW Hub:

- The concern must be reported to the DSL.
- The DSL will assess the situation and take one of the following actions, if necessary:

For BNU

- Submit a report via the BNU online **Report and Support Tool**:  
<https://reportandsupport.bnu.ac.uk/>.
- Contact the BNU Safeguarding Team at **safeguarding@bnu.ac.uk**, providing details of the concern.

For BHT

- Submit a report here  
<https://intranet.buckshealthcare.nhs.uk/documents/safeguarding-adults-referral-form/>
- Or contact the safeguarding team 8am to 4pm, Monday to Friday  
01296 255740 or [buc-tr.adultsafeguardsbht@nhs.net](mailto:buc-tr.adultsafeguardsbht@nhs.net)

#### **81. Disclosures or Concerns Involving Non-BNU Volunteers, Learners, or Others:**

If a disclosure or concern involves non-BNU volunteers, learners, or others working or volunteering at the BCW Hub:

- The concern must be reported to the DSL in the first instance.
- The DSL will assess the situation and, if appropriate, share the information with the individual's primary contact as outlined in their placement, volunteering, or work experience documentation.

#### **82. Disclosures or Concerns Involving Visitors (External to the BCW Hub):**

If a disclosure or concern arises about a visitor to the BCW Hub who is not directly affiliated with the BCW Hub, BNU, or partner agencies:

- The concern must be reported to the DSL or the BCW Hub Manager, who will refer it to the DSL.
- The DSL will assess the situation and determine the appropriate action, consulting Buckinghamshire's safeguarding procedures, including making a referral to Adult Social Care if necessary.
- 

### **83. Disclosures or Concerns Involving BCW Hub Staff:**

If a safeguarding concern or disclosure relates to suspected harm caused by a BCW Hub staff member, volunteer or trustee:

- The DSL must be informed immediately to take appropriate action.
- If the allegation involves the DSL, the concern must be escalated to the BCW Hub Manager.
- If the allegation involves the Hub Manager, the concern must be reported to the Chair of Trustees.
- The individual will be suspended immediately, pending investigation, on the authority of a Trustee, the BCW Hub Manager, and the DSL (provided they are not implicated). This may also include a representative from the host employer (BNU or BHT).
- Suspension is a neutral act that does not assume guilt but ensures an impartial investigation can proceed.

### **84. Disclosures or Concerns Where an Adult at Risk is Perpetrating Abuse:**

If there is suspicion or knowledge that an adult at risk is perpetrating abuse:

- Report the concern to the DSL immediately.
- The DSL will assess the situation, balancing the safety and well-being of the abused individual with the needs and circumstances of the adult at risk who may be perpetrating the harm.
- If required, the DSL will seek advice from Adult Social Care to determine the most appropriate course of action.

*To note: If the DSL is unavailable, concerns must be shared with the BCW Hub manager or most senior staff member present. In cases of immediate danger, call the police on 999 without delay.*

## People in a Position of Trust (PIPOT)

85. The PIPOT framework addresses situations where concerns are raised about individuals working or volunteering. This applies when their conduct, both in and outside of the BCW Hub, indicates they may pose a risk to those they support. PIPOT ensures that appropriate action is taken to assess and mitigate risks while maintaining public confidence in safeguarding systems.

### *Initial Actions Under PIPOT framework*

86. **Immediate Reporting:** Any concerns regarding a PIPOT must be reported immediately to the DSL or the BCW Hub Manager.

87. **Referral to Buckinghamshire LASM** (Local Safeguarding Adults Manager):

- If the individual's behaviour meets the PIPOT threshold, the DSL will:
  - i. Email the LASM at [LASM@Buckinghamshire.gov.uk](mailto:LASM@Buckinghamshire.gov.uk), or
  - ii. Complete the PIPOT Referral Form as required.

These referrals ensure the concern is formally reviewed and appropriate actions are taken. See **Appendix 2** for contact details.

88. **Risk Assessment:** A multi-agency approach will be used to assess and mitigate risks. This may include restricting duties, suspending the individual, or terminating their role where necessary.

89. **Internal Procedures:** The BCW Hub will work with relevant statutory and partner agencies to investigate and respond to concerns, ensuring confidentiality and fairness throughout the process.

90. Non-recent abuse refers to allegations of neglect, physical, sexual, or emotional abuse made by or on behalf of someone aged 18 or over, relating to incidents that occurred when the individual was under 18.

91. Although Adult Safeguarding teams have limited involvement in cases of non-recent abuse, the BCW Hub will:

- Signpost individuals to appropriate support services, such as the police or adult mental health services.

- If the alleged perpetrator is still working with children or adults at risk, make a referral to the Buckinghamshire Multi-Agency Safeguarding Hub (MASH) for consideration under the PIPOT framework.

## Escalation of Concerns

92. If the DSL is unavailable, report concerns to the Deputy DSL, the BCW Hub manager or the most senior staff member present.
93. For immediate risks, contact emergency services (999) or Buckinghamshire Adult Social Care directly via First Response- Multi-Agency Safeguarding Hub (MASH).
94. Once immediate safety is ensured, the DSL must be informed as soon as possible.

See **Appendix 2** for contact details.

## Decisions, Documentation and Reporting

95. Any decisions made, actions taken by any discussions had or meetings attended by BCW Hub or BNU staff, learners or others working or volunteering within the BCW Hub must be documented on the appropriate documentation and stored securely.
96. This will be done with the knowledge of the person making the allegation or disclosure or sharing their concerns. This information is kept for 5 years and if any of the information is used as evidence and shared with the relevant authorities then it will be kept in line with their policies and procedures.

*See also: Key Actions When Responding to a Disclosure Section above.*

## Whistleblowing and Raising Complaints

The BCW Hub is committed to fostering a culture of openness, accountability and safety. We ensure that robust procedures are in place for raising complaints and whistleblowing to address concerns about safeguarding or unethical conduct.

97. While whistleblowing and safeguarding are distinct concepts, they may occasionally intersect:

- Safeguarding involves measures to prevent harm, abuse, or neglect and to protect the health, well-being and rights of individuals.
- Whistleblowing is the reporting of illegal, unethical or improper conduct by internal members of an organisation.

98. In some situations, such as when harm to an adult at risk is caused by a BCW Hub staff member, volunteer, or trustee, both safeguarding and whistleblowing policies may apply. For example, concerns about organisational practices or suspected abuse by a staff member may require escalation under both frameworks to ensure the appropriate response.

99. A complaint or whistleblowing concern should be raised if you believe that a BCW Hub staff member, volunteer, or trustee has:

- Behaved in a way that has caused harm to an individual or exposed them to harm.
- Behaved in a way that indicates they are unsuitable to work with adults at risk.
- Engaged in illegal, unethical, or improper conduct that compromises safeguarding practices or organisational integrity.

100. Support will be provided to anyone raising concerns, and all concerns will be treated confidentially wherever possible, with protection from reprisal in line with the *Public Interest Disclosure Act 1998*.

101. For detailed guidance, refer to the Complaints Policy and Whistleblowing Policy.

Also see the **PIPOT Section** above.

## Supporting Individuals

102. We recognise that BCW Hub staff, volunteers, trustees or those undertaking placements at the BCW Hub who become involved with an adult at risk who has suffered harm, or appears to be likely to suffer harm, could find the situation stressful and upsetting.

103. Support will be provided such as an opportunity to talk through their feelings with the DSL who will signpost to further support if necessary.

## Appendix 1 Key Definitions

Everyone who works with adults at risk has a duty to safeguard and promote their well-being. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about an adult or if an adult at risk discloses to them.

The Care Act 2014 defines abuse as when an adult with care and support needs is experiencing, or is at risk of, abuse or neglect, and is unable to protect themselves because of those needs. Ten categories of abuse are identified:

- **Physical Abuse:** This involves causing physical harm to an adult, such as hitting, slapping, pushing, or misuse of medication. It can result in injuries like bruises, fractures, or other physical ailments.
- **Sexual Abuse:** This involves any non-consensual sexual activity, including rape, sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.
- **Neglect:** This involves failing to provide necessary care, support, or medical treatment, leading to harm or distress. It can include ignoring medical, emotional, or physical needs.
- **Financial Abuse or material abuse:** This involves the illegal or improper use of an adult's funds, property, or resources. Examples include theft, fraud, exploitation, or coercion in relation to financial affairs.
- **Psychological Abuse or emotional abuse:** This includes threats of harm or abandonment, humiliation, verbal abuse, harassment, or isolation. It can severely impact an individual's mental health and well-being.
- **Discriminatory Abuse:** This includes harassment, slurs, or similar treatment based on race, gender, age, disability, sexual orientation, or religion. It can lead to significant emotional and psychological harm.

- **Domestic violence or abuse:** This includes any incident of controlling, coercive, threatening behaviour, violence, or abuse between intimate partners or family members. It can be physical, emotional, sexual, financial, or psychological.
- **Organisational or institutional abuse:** This occurs within care settings such as hospitals, care homes, or other institutions. It involves poor care practices, neglect, or rigid routines that disregard the individual's needs and rights.
- **Modern Slavery:** This encompasses human trafficking, forced labour, domestic servitude, and other forms of exploitation where individuals are coerced, deceived, or forced into situations against their will.
- **Self-Neglect:** This occurs when an individual neglects their own health, hygiene, or living conditions, often due to mental health issues, substance abuse, or other factors. It can lead to serious health and safety risks. (e.g., hoarding).

## Appendix 2 Important Contacts

<p><b>BCW Hub Designated Safeguarding and Prevent Lead</b></p>	<p>Claire Tilson <a href="mailto:claire.tilson@bnu.ac.uk">claire.tilson@bnu.ac.uk</a>  07834 406268</p>
<p><b>BCW Hub Nominated Safeguarding Trustee</b>  (if the DSL is unavailable:)</p>	<p>Karen Buckwell – Nutt  <a href="mailto:Karen.buckwell-Nutt@bucks.ac.uk">Karen.buckwell-Nutt@bucks.ac.uk</a></p>
<p><b>BCW Hub Manager</b></p>	<p>Claire Tilson <a href="mailto:claire.tilson@bnu.ac.uk">claire.tilson@bnu.ac.uk</a>  07834 406268</p>
<p><b>Buckinghamshire New University Safeguarding Team</b></p>	<p>Submit a report via the BNU online <b>Report and Support Tool</b>: <a href="https://reportandsupport.bnu.ac.uk/">https://reportandsupport.bnu.ac.uk/</a>.  Contact the BNU Safeguarding Team at <a href="mailto:safeguarding@bnu.ac.uk">safeguarding@bnu.ac.uk</a>, providing details of the concern.</p>
<p><b>Buckinghamshire Healthcare NHS Trust Safeguarding Team</b></p>	<p>Submit a report here <a href="https://intranet.buckshealthcare.nhs.uk/documents/safeguarding-adults-referral-form/">https://intranet.buckshealthcare.nhs.uk/documents/safeguarding-adults-referral-form/</a>  Or contact the safeguarding team 8am to 4pm, Monday to Friday on 01296 255740 or <a href="mailto:buc-tr.adultsafeguardsbht@nhs.net">buc-tr.adultsafeguardsbht@nhs.net</a></p>
<p><b>First Response Team (aka MASH) (including Adult Social Care, Channel)</b>  If you have concerns about an adult you can call the Safeguarding Adults</p>	<p>Working Hours: 0800 137915 or 01296 383204  Out of Hours: 0800 999 7677 (Emergency Duty Team)  Email: <a href="mailto:ascfirstresponse@buckinghamshire.gov.uk">ascfirstresponse@buckinghamshire.gov.uk</a>  Portal: <a href="https://www.buckssafeguarding.org.uk/adults-board/report-a-concern/">https://www.buckssafeguarding.org.uk/adults-board/report-a-concern/</a></p>

<p>Team via MASH. Upon receipt of a concern into the MASH, information will be collated to build up a picture of the circumstances of the person(s) subject to the concerns and in order to assess whether intervention under the safeguarding The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.</p>	
<p><b>People In A Position of Trust (PIPOT)</b> If you wish to make a referral regarding someone in a position of trust.</p>	<p>Email the Local Safeguarding Adults Manager <a href="mailto:LASM@Buckinghamshire.gov.uk">LASM@Buckinghamshire.gov.uk</a> <a href="#">Referral form PIPOT</a> <a href="#">BSAB PIPOT Protocol</a></p>
<p><b><u>Buckinghamshire Safeguarding Adults Board (BSAB)</u></b> Procedures, policies and practice guidelines</p>	

**Appendix 3 Recognising and Responding to Harm**

