Safeguarding Adults Policy

Endorsement Date	10/09/2026
Next Review Date	10/09/2027
Policy Owner	Trustees of Brighter Together
Responsibility for Policy Implementation	Polly van Marken
Audience	All employees, Session Facilitators, volunteers, trustees, service users, consultants & advisors
Relevant Legislation & Statutory Guidance	Care Act 2014 (England), Adult Safeguarding: Prevention and Protection in Partnership, July 2015, Inter Agency Safeguarding Adults: Adult Protection Policy 2016-18 Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 Modern Slavery Act 2015

Purpose

Brighter Together links care homes with their local nursery/pre-schools to participate in joint, regular, structured activities aimed at improving the wellbeing of the residents whilst supporting the development of the children.

The sessions are led by Brighter Together Session Facilitators and are supported by the necessary ratio of nursery staff to children, and care home staff to residents. Where there is an Activity Coordinator at the care home, they should be present at every session where possible.

The purpose of this policy is to protect adults from any harm that may be caused from participating in the programmes run by Brighter Together. This includes harm arising from:

- The conduct of Brighter Together employees or associated personnel[1]
- The design and implementation of Brighter Together's programmes and activities

The policy lays out the commitments made by Brighter Together and informs staff and associated personnel of their responsibilities in relation to safeguarding adults.

We have a separate Safeguarding Children policy but due to the nature of our intergenerational work have developed this separate Safeguarding Adults policy to specify the boundaries that need to be in place.

What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect[2]. At Brighter Together we understand it to mean protecting adults from harm that arises from coming into contact with our staff, programmes and associated personnel, and as far as possible mitigating the risks inherent in bringing vulnerable client groups together.

Definitions

We define adults as a person as a person who is 18 years of age or over. All adults may become vulnerable at any time and by vulnerable we mean any adult who is or may be in need of community care services by reason of mental or other disability, age or illness (physical or mental) or who is or may be unable to take care of their self, or unable to protect their self against significant harm.

At Brighter Together we are particularly aware of the vulnerabilities of those with dementia and always work with the care provider to ensure we have a good understanding of each client's behaviours and trigger points and are respectful and reflective at all times. We defer to the care staff immediately if distress is triggered or if sensory overload is apparent. We always ensure that a member of the care home staff are present during the group session to support the residents and their needs.

[1] By associated personnel, we are referring to people who are connected to Brighter Together through work or visits, but are not necessarily employees. This includes people like our Session Facilitators, consultants, volunteers (including Trustees) any contractors, and project visitors or those observing a session.
[2] NHS 'What is Safeguarding? Easy Read' 2011

Scope

- All employees of Brighter Together
- Associated personnel whilst engaged with work or visits related to Brighter Together, including but not limited to the following: Session Facilitators; staff from partner organisations (care homes and nursery schools); consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

Statement of Commitment

Brighter Together believes everyone has a responsibility to promote the welfare of all adults, to keep them safe and to practise in a way that protects them, in accordance with the Care Act 2014. We believe that everyone we come into contact with, regardless of sex, sexual orientation, gender identity, gender, marital or civil partnership status, race, colour, nationality, ethnic or national origin, religion, age, disability, has the right to be protected from all forms of harm, abuse, neglect and exploitation. Brighter Together will not tolerate abuse and exploitation by staff or associated personnel.

Brighter Together commits to addressing safeguarding throughout its work, through the 6 principles of adult safeguarding:

1. **Empowerment:** People are supported and encouraged to make their own decisions and informed consent
2. **Prevention:** It is better to take action before harm occurs
3. **Proportionality**: The least intrusive response appropriate to the risk presented
4. **Protection:** Support and representation for those in greatest need
5. **Partnership:** Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
6. **Accountability:** Accountability and transparency in delivering safeguarding.

With these principles as our framework we will seek to keep adults safe by:

- Seeking to ensure that our activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review
- Respecting the rights, dignity and worth of all adults
- Recognising that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, in particular those adults with care and support needs
- Understanding that we all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within the programmes of Brighter Together
- Taking allegations seriously and responding to them quickly in line with our Safeguarding Adults Policy and Procedures
- Recognising the role and responsibilities of the statutory agencies in safeguarding adults and being committed to complying with the procedures of the Local Safeguarding Adults Boards.

What we undertake to do:

- We ensure that staff are aware of indicators of abuse and know how to share their concerns appropriately
- Any member of staff (paid or voluntary) are subject to rigorous recruitment procedures, including taking up references, requesting DBS checks where required and managing and supervising them on a regular basis
- All members of staff (paid or voluntary) are given appropriate support and training on safeguarding
- All allegations and suspicions of abuse will be taken seriously and responded to swiftly and appropriately
- The Nominated Safeguarding Person (NSP) will attend multi-agency training at least every 2 years.
- We ensure that all members of staff (paid and voluntary) have read and understood the Safeguarding Adults policy, are aware of the indicators of abuse and know how to respond to concerns or disclosures of abuse by vulnerable adults
- All staff (paid and voluntary) must comply with our code of conduct.

The role of the Nominated Safeguarding Person (NSP):

The NSP will:

- Refer suspected abuse/neglect of adults to the local Adult Access team. Urgent concerns must be reported directly even if the NSP is not available
- Develop and update adult and other safeguarding policies ensuring staff are made aware of their responsibilities, and participants in Brighter Together's activities know how to make a complaint or raise a concern
- Ensure that confidential records are kept of any concerns about an adult and of any conversation or referrals to statutory agencies
- Provide support and advice to all members of staff within the setting regarding safeguarding concerns
- Ensure all staff have appropriate safeguarding training

Creating a Safe Environment

When working in care settings or public venues Brighter Together is always aware of our impact on that environment, safe use of equipment we bring in, including trip hazards etc, noise levels, personal dignity, and responsible and respectful interaction including touch.

It is particularly important at Brighter Together to actively manage the risk of having adults and young children in the same group. For example, residents with dementia and other age-related mental deterioration can be very unpredictable and respond violently or excessively with no obvious trigger point. To minimise risk to everyone involved, Brighter Together will always do the following prior to a project starting:

1. A site visit to meet with the Activity Coordinator (AC) and care home manager. We discuss the purpose of the project and who would benefit from being part of the group
2. We have a site visit to the nursery to discuss the purpose of the project and how it will run
3. The nursery and a member of Brighter Together do a joint site visit so the nursery can do a risk assessment, meet with the care home staff and look at the logistics
4. The Activity Coordinator and care home manager will determine which residents should join the group based on their knowledge of the residents and having looked carefully at the session structure and types of activities involved. Any participants who have exhibited violent tendencies or unpredictable behaviour that might be distressing to children are not included in the group
5. Training is provided to the teachers from the nursery in what to expect in the care home environment and the dementia friends training from the Alzheimer's Society. This supports them in recognising possible triggers and working with the care home staff to ensure a safe, supportive environment for the activities
6. The sessions always have the necessary ratio of care home staff to residents. It Is the role of the care home staff to ensure that the residents are comfortable both physically and emotionally during the session. Brighter Together does not take responsibility for the safety, physical health, wellbeing, safety or welfare of the care home residents – this always remains the responsibility of the care home, even during a Brighter Together session, as detailed in our Project Agreement.
7. Brighter Together works closely with care home staff to monitor resident's behaviour during the sessions and this is discussed at the end of each session. If there are any concerns about a resident either during or after a session, then we carefully consider if they should remain in the group.

Managing personal data

We will only collect personal data when necessary and will never share this with third parties. We have a separate Data Protection Policy which can be seen on request.

How to report a safeguarding concern

Every member of staff is responsible for recognising and reporting an allegation of abuse. Brighter Together recognises that volunteers and staff may also be the subject of an allegation of abuse. In both cases the process to follow is:

- Listen
- Assure the person making the complaint that they will be taken seriously
- Listen to what is being said
- Stay calm
- Do not probe for detail
- Empathise but do not jump to conclusions
- Do not promise complete confidentiality. Explain that you have a duty to report the concern to your manager
- Do not attempt to question the alleged abuser
- Observe

Psychological abuse includes emotional abuse, intimidation, inappropriate language, verbal or racial abuse, isolation or withdrawal from services.

Discriminatory abuse includes racist, sexist opinions, or opinions based on an individual's disability or other forms of harassment, taunts or similar treatment.

Neglect or acts of omission by failing to act appropriately whether intentionally or negligently. This may include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational and leisure services, the withholding of the necessities of life such as; medication, adequate and appropriate nutrition, information, clothing, comfort, relationships, safety and environment.

There are three reporting requirements -

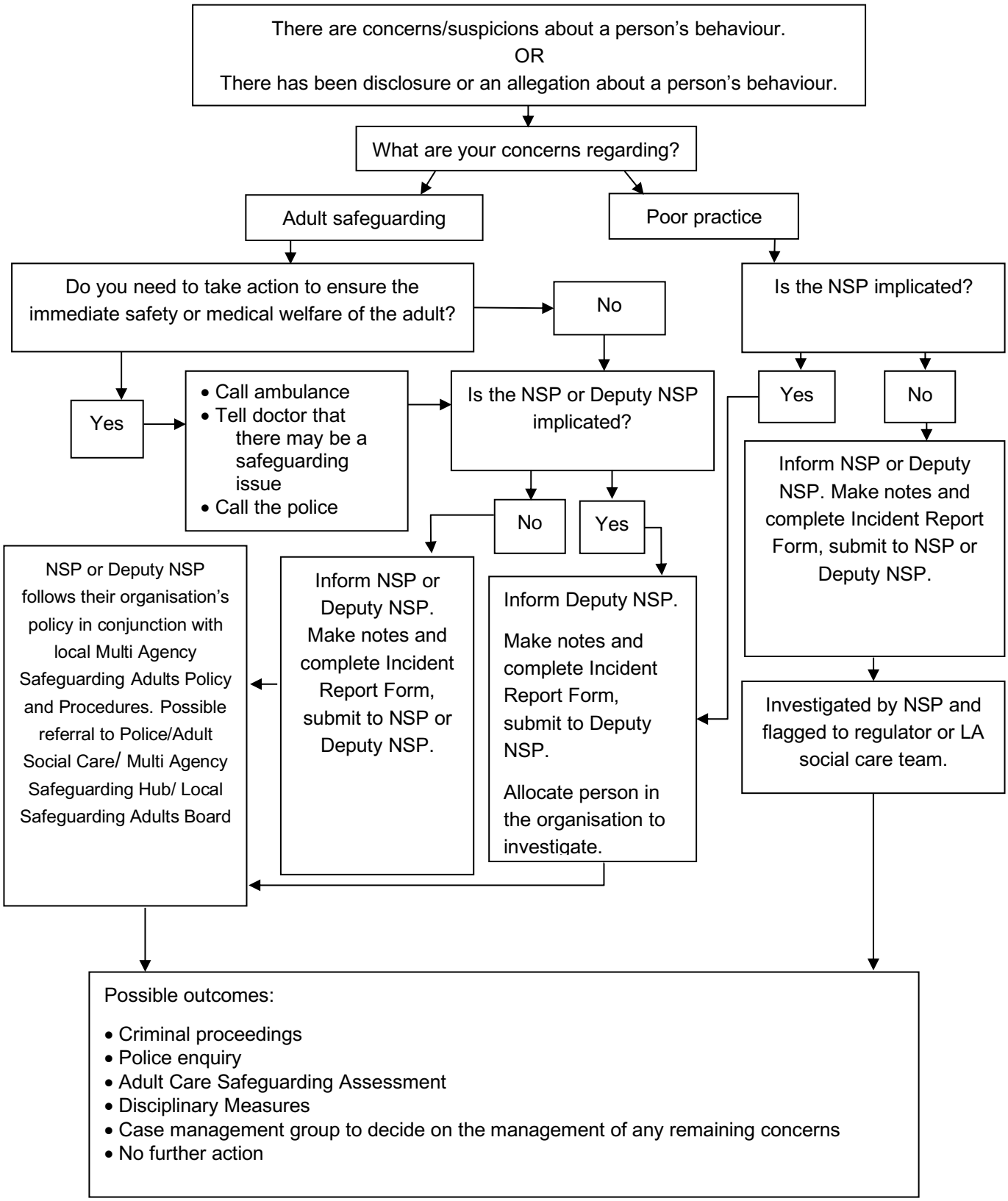
1. To Brighter Together via the NSP, or the Nominated Safeguarding Trustee if for any reason you cannot tell the NSP. You must do this as soon as is practically possible.
2. To the care home provider or nursery setting you are working with. If the NSP is not available contact the local adult access team for the borough the project is taking place in. Contact details are provided in the Appendix.
3. To the CQC if the concern is about the quality of care overall that is considered to be causing harm.

It is important to record the facts that you have been told or observed. Try not to give your interpretation but do share your instincts. Note the role of Brighter Together is to refer the concern or complaint to Adult Social Care and not to investigate.

Record the details of the allegation or the grounds for suspecting abuse. Include the date and time of the incident, the people involved and details of any observed injuries, as well as the appearance and behaviour of the person(s) making the complaint and what they have said. Please use the Incident Report Form (Appendix 1).

Brighter Together will co-operate, as requested in any activities relating to an adult protection enquiry.

Dealing with Concerns, Suspicions or Disclosure



Remember to involve the adult throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity

Contact Details

Details of the Nominated Safeguarding Person:

The Nominated Safeguarding Person for Brighter Together is:

Name: Kate Zilio

Job/role title: Programme Lead

Contact tel.: 07707 824889 **Email:** kate.zilio@brightertogether.org.uk

The Deputy Nominated Safeguarding Person from the Board of Trustees:

Name: Sue Allingham

Job/role title: Early Years Education Consultant

Contact tel.: 07766 352406 **Email**: sue@eyoutofthebox.com

Confidentiality

It is essential that confidentiality in maintained at all stages of the process when dealing with safeguarding concerns. Confidentiality is an issue which needs to be discussed and fully understood by all those working with adults, particularly in the context of VA protection. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern or promise to keep a secret. In accordance with statutory requirements, where there is a vulnerable adult protection concern, this must be reported to the NSP and may require further referral to and subsequent investigation by appropriate authorities. Information on individual VA protection cases may be shared by the NSP (or deputy) with other relevant staff members. This will be on a 'need to know' basis only and where it is in the VA's best interests to do so. All related material will be kept secure at all times.

Associated policies

Safeguarding and Child Protection policy

Code of Conduct

Data Protection Policy

Associated documents

Risk Log

Signature

This policy statement came into force on 2nd October 2019.

We are committed to reviewing our policy and good practice annually. This policy statement and accompanying procedures were last reviewed on 18th September 2025.

Signed by: Andrew Melia (on behalf of Brighter Together Trustees)



……

Job Title: Chair of Trustees, Brighter Together

Date: 18th September 2025

Appendix

Appendix 1: Incident Report Form:

Section 1 – details of adult at risk	
Name of adult	
Address	
Date of Birth	
Age if date of birth not known	
GP practice (if known)	
Contact number	
Section 2 – your details	
Name	
Contact phone number(s)	
Email address	
Line manager or alternative contact	
Name of organisation / club	
Your Role in organisation	
Section 3 – details of concern	
Detail what you have seen/been told/other that makes you believe the adult at risk is being abused or is at risk of abuse (include dates/times/evidence from records/photos etc.)	

Section 4 - Abuse type(s) – please tick as many as you feel may apply		
Physical	Psychological	Financial
Sexual	Discriminatory	Organisational (formerly institutional)
Neglect	Hate incident/crime	Mate Crime
Internet abuse	Modern slavery	Female genital Mutilation (FGM)
Forced Marriage	Domestic abuse	Radicalisation
Self-Neglect		

Section 5 - Have you discussed your concerns with the adult? What are their views, what outcomes have they stated they want (if any)?

Section 5A – Reasons for not discussing with the adult	
Adult lacks capacity	
Adult unable to communicate their views	
Discussion would increase the risk	
State why the risks would increase	

Section 5B - Have you discussed your concerns with anyone else? E.g. carer/ parent. What are their views?

Section 6 – What action have you taken /agreed with the adult to reduce the risks?	
Information passed to Safeguarding Officer, confirm details:	Referral to Social Care Confirm details:
Contact with the police Confirm details:	Referral to other agency – please confirm details:
Other – please state what	
No action agreed – state why	
Section 7 – Risk to others	
Are any other adults at risk Yes/No – delete as appropriate	
If yes state why and what actions have been taken to address these?	
Are any children at risk Yes/No Delete as appropriate	
If yes state why and what actions have been taken to address these?	
Signed:	
Date:	

OFFICE USE ONLY
Section 8 – sharing the concerns (To be completed by Nominated Safeguarding Person)
Details of your contact with the adult at risk. Have they consented to information being shared outside of Brighter Together?
Details of contact with the Social Care Team where the adult at risk lives – advice can be still sought without giving personal details if you do not have consent for a referral
Details of any other agencies contacted
Details of the outcome of this concern

Appendix 2: Contact Details for Reporting Safeguarding Concerns to the relevant Local Authority

Hammersmith & Fulham:

- **During office hours** (Mon-Fri, 8:45 AM-5 PM): 0800 145 6095
- **Out of hours**: 020 8748 8588
- **Email**: safeguardingadults@lbhf.gov.uk

Hounslow

Contact the First Contact Team

- **Phone**: 020 8583 3100 Monday to Friday, 9 AM to 5 PM
- **Out of hours**: 020 8583 2222
- **Email:** adultsocialcare@hounslow.gov.uk

Richmond:

Report a concern using the **online form**.

If you cannot use our online forms, you can call or email us:

- **Phone**: 020 8891 7971
- **SMS Phone**: 07860 034792
- **Email**: adultsocialcare@richmond.gov.uk (only if you cannot use other contact methods)

Wandsworth:

Report a concern using the online form.

If you cannot use our online forms you can call or email us:

- **Phone**: 020 8871 7707
- **SMS Phone**: 07860 034722 (for deaf or hard of hearing only)
- **Email**: adultsocialcare@wandsworth.gov.uk (only if you cannot use other contact methods)

Appendix 3: Procedure for Allegations Against Staff, Contractors or Volunteers:

All concerns, complaints and allegations must be recorded and brought to the attention of the Nominated Safeguarding Person.

There are circumstances when allegations are about bad practice rather than adult safeguarding. It is important that all allegations are investigated so that bad practice can be addressed. If the information relates to the harm of an adult (or the risk thereof) then the Nominated Safeguarding Person must contact the Adult Access Team **immediately** (no later than within one working day).

Though allegations of abuse can be made to anyone in an organisation, it is the role of the Nominated Safeguarding Person to take these forward and to be the link between the organisation and the Adult Access Team until the matter is resolved. It is important to bear in mind that adults, particularly vulnerable adults, can be abused in all kinds of settings and therefore all allegations must be taken seriously**. They should not be ignored but should be acted on immediately.**

Role of staff member, contractor or volunteer to whom allegation is made:

Allegations may be made directly by the adult, a parent, a friend of the adult or indeed by another staff member, contractor or volunteer. It is important to listen to what is said, to reassure the person that what they have said will be taken seriously but that you need to report the matter to the NSP to deal with such matters.

It is extremely important that all aspects of any allegation and the following investigation are carefully recorded. These records will be helpful if any future allegations arise, and ensure transparency and accountability when dealing with complex and emotive issues.

Appendix 4: Glossary of Terms

Adult: In line with the UN Convention on the Rights of the Child and the definition of a child in child protection guidance across England, Wales, Northern Ireland and Scotland, we define an adult as anyone who is 18 years old and over.

Associated Personnel: We are referring to people who are connected to Brighter Together through work or visits, but are not necessarily employees. This includes people like our Session Facilitators, consultants, volunteers (including Trustees) any contractors, and project visitors or those observing a session.

Multi-agency working: A commitment to working with other agencies to safeguard adults at risk.

Safeguarding "should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety." (Care Act, 2014).

Safeguarding adults: The term used to describe all the work we (and others) do to help adults to keep themselves safe including taking or prompting action when people are not able to keep themselves safe which we refer is to us as statutory safeguarding or adult protection.

Taking a person centred approach: An initiative which supports us to have conversations with people about how we might respond in safeguarding situations in ways that enhance involvement, informed choice and control as well as improving people's quality of life, wellbeing and safety. It is about seeing people as experts in their own lives and working alongside them with the aim of enabling them to reach better resolution of their circumstances and recovery. It is a shift from a process supported by conversations to a series of conversations supported by a process. We work preventatively, ensure that robust procedures are in place and respond to each vulnerable adult as a unique and valued individual, in ways which advance the person's rights, dignity and wellbeing and are legal, proportionate and reasonable; mindful at all times that we are working to safeguard adults who have the right to be involved in and informed of all safeguarding decisions which affect them.

Vulnerable adult: The safeguarding duties in the (Care) act apply to an adult who:

> (a) has needs for care and support (whether or not the local authority is meeting any of those needs)
>
> (b) is experiencing, or at risk of, abuse or neglect
>
> (c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.