

A Creative Transformation



A Creative Transformation Safeguarding Policy

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This policy comes into force on 10 March, 2026.
The policy was last reviewed on 10 March, 2026.
The date of the next review of the policy is 01 March, 2027.

1. Introduction

A Creative Transformation (ACT) is a UK charity supporting adults living with acquired brain injury and neurological conditions, including traumatic brain injury, stroke, aphasia, dementia, functional neurological disorder, organic psychosis and related conditions. ACT relieves need through creative, cultural and storytelling activities that promote wellbeing, self-expression and peer connection, and advances public education about acquired brain injury, neurological conditions and the role of creativity in recovery.

2. Policy statement

ACT recognises that while fulfilling their duties, members of staff and volunteers, may come into contact with children and adults at risk of harm. ACT is committed to ensuring that it can fulfil its safeguarding responsibilities both for adults at risk, and children, who may be at risk of harm or exploitation. ACT also recognises that it has a duty to report incidents or suspected safeguarding concerns, to the appropriate authorities. This document will focus on safeguarding adults at risk because ACT works only with adults over the age of 18.

3. Definitions

Safeguarding: means ‘protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect’. The term is used to refer to several areas of concern relating to adults at risk of harm, including:

- i. **Child protection issues:** harm or an act likely to harm a child or young person’s safety, well-being and development. Abuse can be physical, sexual, emotional or neglect. A child witnessing abuse in the home is a child protection issue.
- ii. **Exploitation** (abuse including sexual, psychological or financial)
Examples of sexual exploitation include rape, sexual assault, being tricked or manipulated into having sex or performing a sexual act, being trafficked into, out of, or around the UK for the purpose of sexual exploitation, being forced to take part in or watch pornography.
Financial includes theft, fraud, internet scamming, and coercion in relation to an adult’s financial affairs or arrangements.
Psychological abuse can be defined as behaviour used to control, isolate or frighten.
- iii. **Radicalisation:** the aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.
- iv. **Physical abuse or neglect:** includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.
- v. **Emotional abuse or neglect:** includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or support networks.
- vi. **Discriminatory abuse:** is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act
- vii. **Organisational abuse:** includes neglect and poor care practice within an institution or care setting, such as a hospital or care home, or in relation to care provided in one’s own home.
- viii. **Domestic abuse:** includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person’s family. It also includes so-called ‘honour’ based violence.
- ix. **Modern slavery:** encompasses slavery, human trafficking, forced labour, and domestic servitude.

- x. **Self-neglect:** refers to neglecting to care for one's own personal hygiene, health, or surroundings.

Adult at risk of harm: as per the Care Act 2014, an adult at risk is an individual over the age of 18 who:

- has needs for care and support (regardless of whether the local authority is meeting any of those needs).
- is experiencing, or is at risk of, abuse or neglect.
- as a result of their care and support needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Safeguarding and promoting the well-being of vulnerable adults covers the following areas, defined by the Care and Support Statutory Guidance, 2020:

- personal dignity (including treatment of the individual with respect)
- physical and mental health and emotional wellbeing
- protection from abuse and neglect
- control by the individual over day-to-day life (including over care and support provided and the way it is provided)
- participation in work, education, training or recreation
- social and economic wellbeing
- domestic, family and personal
- suitability of living accommodation
- the individual's contribution to society

The legal basis for this policy and definitions of safeguarding come from the following legislation:

- Children Act 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Care and Support Statutory Guidance 2018
- Working together to safeguard children 2018
- Data Protection Act 2018
- Counter-Terrorism and Security Act 2015

4. Principles

ACT will take all safeguarding concerns seriously and will fully consider and report any concerns in a timely manner to the relevant person or authority. ACT will ensure it maintains confidential records of any safeguarding concerns and any referrals made as a consequence. Any records will be kept in accordance with the Data Protection Policy and current legislation.

The statutory guidance enshrines the six principles of safeguarding:

- i. **Empowerment:** presumption of person-led decisions and informed consent.
- ii. **Prevention:** it is better to act before harm occurs.
- iii. **Proportionality:** proportionate and least intrusive response appropriate to the risk presented.
- iv. **Protection:** support and representation for those in greatest need.
- v. **Partnerships:** local solutions through services working with their communities.

- vi. **Accountability:** accountability and transparency in delivering safeguarding.

5. Scope and limitations

This policy applies to safeguarding concerns regarding any individual you may have contact with whilst carrying out your duties as an employee/ volunteer of ACT. ACT recognises that anyone, including colleagues and volunteers, can experience harm or abuse, which can be reported.

6. Responsibilities

The Founder and the board of trustees are ultimately responsible for the overall compliance of ACT in relation to safeguarding. The designated Lead Safeguarding Trustee (Anthony David) provides further expertise and support to the Designated Safeguarding Lead (Lorna Collins) and ensures we embed best practice in safeguarding.

The Designated Safeguarding Lead (DSL) is the staff member responsible for supporting staff and volunteers in safeguarding matters, receiving information and, when necessary, supporting staff and volunteers to make referrals.

Everyone's responsibility: Everyone at ACT has a responsibility to help keep everyone, including adults at risk safe from abuse and neglect. All staff and volunteers within ACT have a responsibility to ensure that they act in line with this policy.

7. Examples of potential safeguarding concerns

Examples of types of situations that may present a safeguarding concern and result in implementation of the procedure detailed are provided below. This list is not exhaustive, and staff and volunteers will need to exercise their best judgement in determining whether there are safeguarding concerns that need to be considered. Advice can also be sought from the contacts detailed above.

Examples include:

- i. An adult raises an allegation of current abuse, harm, neglect or other inappropriate behaviour.
- ii. A disclosure of historical sexual or physical abuse is made, where the alleged perpetrator still has access to children or adults at risk.
- iii. A volunteer, staff member or visitor discloses information involving themselves, family members or any other person that gives rise to concerns that an individual may be harming or abusing an adult at risk (or child).
- iv. There are suspicions or indications that an adult at risk is being abused or harmed, or is at risk of exploitation, harm, neglect or abuse.
- v. There are observable changes in an adult at risks' appearance or behaviour that may be related to exploitation, harm or abuse.
- vi. A concern is raised that an individual presents a risk of abuse or harm towards an adult at risk.

- vii. Concerns arise that an individual may be subject to a forced marriage. A forced marriage is defined as one in which one or both individuals do not (or, because of an individual's vulnerability or mental capacity, cannot) consent to marriage.
- viii. In the UK, forced marriage is regarded as an issue of domestic/child abuse.
- ix. Concerns arise that an individual may be subject to Female Genital Mutilation (FGM).
- x. Concerns arise that a volunteer, service user, or member of staff is vulnerable to radicalisation and there is an identifiable risk of the individual being drawn into terrorism.

The following incidents **MUST** always be reported to the Designated Safeguarding Lead:

- i. If an adult at risk injures themselves or is hurt by someone else.
- ii. If you are concerned that a relationship is developing with an adult at risk, which could represent an abuse of trust.
- iii. If there is a concern that a member of staff or a volunteer may present a risk of abuse or harm towards an adult at risk.
- iv. If an accusation is made against you, suggesting you have acted / spoken in a manner that could be seen as abusive or harmful.
- v. If an adult at risk reports an allegation of abuse regarding a member of an external organisation attending an ACT UK event.
- vi. If an adult at risk reports concerns regarding sexual abuse, financial abuse, domestic abuse, a forced marriage, FGM or other exploitative behaviour.

To volunteers and others working under the auspices of ACT: If you are concerned that an adult at risk is becoming attracted to you, or if you are concerned that a colleague or volunteer is becoming attracted to an adult at risk, you should speak with a member of the safeguarding team at the earliest opportunity. People in professional roles, who are supporting others, are prohibited by law from having intimate relationships with the people they support.

8. Making a report

The duty to investigate suspected abuse or harm rests with statutory authorities: primarily adult social care, children services, safeguarding and the police. Staff who become aware of a safeguarding matter, whether from an alleged victim or a third party, should follow these points:

In particular:

- i. Don't ignore it.
- ii. For accuracy and speed of response, it is essential that you provide records and information as soon as possible after you are first made aware.
- iii. Listen carefully, stay calm and make notes of times and details – this may need to be done after the event, so times may be approximate. If times are approximate, please clarify this in your report.

- iv. Reassure the person making the disclosure that what they have reported will be handled appropriately and confidentially. However, this may involve sharing information on a 'need to know' basis with other agencies.
- v. Keep questions to the minimum required to understand what is being reported.
- vi. Avoid the person making the disclosure feeling that they are the subject of an interrogation.
- vii. Identify any immediate health and safety concerns, **contact emergency services if required**.
- viii. Explain to the individual that you will need to report the matter and explain the process. Where possible, and appropriate, obtain the individual's consent. NB consent is not necessary in the event of a serious incident. Should the alleged abuser be an **employed carer or medical professional**, consent to report is not required as it is a matter of public protection.
- ix. Make a detailed record of the incident immediately on the ACT Safeguarding Incident Reporting Form, which is given to all ACT team members, including staff, trustees and volunteers, in their induction. If you can't find your copy of this form, email the Designated Safeguarding Lead, who will send it to you.
- x. In addition, you can report and or discuss the matter, by phone or email to the Designated Safeguarding Lead.
- xi. It is important that reports are raised with local social services safeguarding teams as soon as possible. Contact details can be found online by searching for 'report safeguarding adult concern in (add area)'. You may be able to report the concern via their website, but if you are unsure you should telephone social services to discuss or request guidance. The report should be raised as soon as possible after you are made aware of the concern. ACT's safeguarding team can support you with this during office hours, if needed.

If a volunteer or staff member has an **immediate and significant** concern for an adult's or child's **immediate safety** and they cannot contact the Designated Safeguarding Lead / departmental safeguarding lead, they should normally report the matter to their line manager (**after** any necessary emergency services and/or local safeguarding team have been contacted). The matter should then be reported to the Designated Safeguarding Lead / departmental safeguarding lead or Director of Services at the earliest opportunity using the ACT Safeguarding Incident Reporting Form.

If an allegation concerns the line manager of the person making the report, or the Designated Safeguarding Lead, the report should be referred to adult social care, safeguarding, or the police where appropriate to do so.

Where no immediate and significant risk to safety has been identified, the safeguarding concern should be reported to the Designated Safeguarding Lead / Trustee Lead for Safeguarding, using the internal ACT Safeguarding Incident Reporting Form.

When a concern is reported, ACT will evaluate and assess the information received to determine any need for further action. This will be led by the Designated Safeguarding Lead.

On receipt of a referral, the Designated Safeguarding Lead will limit their enquiries to those necessary to undertake a risk assessment and:

- i. Address any serious and immediate risk to the adult at risk, child, or any other party.
- ii. Preserve any evidence likely to be lost before external agencies can respond.
- iii. Determine the need for referral to adult social care, safeguarding or the police (if not already undertaken) and provide sufficient information to the relevant external agency to enable an effective response.
- iv. Determine any further procedures that should be invoked.
- v. Identify any internal support required by the adult at risk.

This risk assessment may be carried out in conjunction with appropriate colleagues. If a referral to adult social care, safeguarding or the police is deemed appropriate, the Designated Safeguarding Lead or their nominee will support you to make the referral (if not already undertaken).

Where the suspected abuse is alleged to have been carried out by a staff member, ACT will work alongside external agencies during any investigations. If necessary, appropriate disciplinary procedures will be involved.

The Designated Safeguarding Lead will be responsible for ensuring that a full record is kept of the risk assessment process and of any subsequent action taken. This will be done in accordance with current legislation.

9. Disclosure and Barring Service (DBS)

ACT will ensure that all relevant staff working with adults at risk of harm will have an appropriate background check carried out. These checks will be renewed, every 2-5 years, depending on the role.

10. Implementation arrangements

All new members of staff and volunteers are made aware of the policy and requirements during the staff/volunteer induction process. Updated and amended procedures are disseminated in accordance with the policy review dates. Regular, mandatory training and updating of information to be completed by relevant staff.

Monitoring and review: This policy will be reviewed annually or in line with any changes to legislation.

Appendix - Sources of information and support

Emergency Police Tel: 999

Non-Emergency Police Tel: 101

NSPCC Tel: 0808 800 5000

Government helpline for extremism Tel: 020 7340 7264

Adult Social Care services:

- **England:** <https://www.nhs.uk/service-search/other-health-services/local-authority-adult-social-care>

- **Wales:** <https://111.wales.nhs.uk/?locale=en&term=A>

- **Scotland:** <https://www.mygov.scot/social-services>

- **N. Ireland:** <https://online.hscni.net/access-health-social-care/#CAP>

Action on Elder Abuse:

A national organisation based in London. It aims to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.

- Tel: 020 8765 7000

- Email: enquiries@elderabuse.org.uk

- www.elderabuse.org.uk

Ann Craft Trust:

A national organisation providing information and advice about adult safeguarding. Ann Craft Trust have a specialist Safeguarding Adults in Sport and Activity team to support the sector.

- Tel: 0115 951 5400

- Email: Ann-Craft-Trust@nottingham.ac.uk

- www.anncrafttrust.org

Men's Advice Line:

For male domestic abuse survivors.

- Tel: 0808 801 0327

National LGBT+ Domestic Abuse Helpline:

- Tel: 0800 999 5428

National 24Hour Freephone, Domestic Abuse Helplines (England):

Tel: 0808 2000 247

www.nationaldahelpline.org.uk/Contact-us

Rape Crisis Federation of England and Wales:

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.

- Email: info@rapecrisis.co.uk

- www.rapecrisis.co.uk

Respond:

Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.

- Tel: 020 7383 0700 or 0808 808 0700 (Helpline)

- Email: services@respond.org.uk

- www.respond.org.uk

Stop Hate Crime:

Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.

- 24 hours service:

- Telephone: 0800 138 1625

- Web Chat: www.stophateuk.org/talk-to-us/

- Email: talk@stophateuk.org

- Text: 07717 989 025

- Text relay: 18001 0800 138 1625

Susy Lamplugh Trust:

A leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.

- Tel: 020 8392 1839

- Fax: 020 8392 1830

- Email: info@suzylamplugh.org

- www.suzylamplugh.org

Victim Support:

Practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

- Tel: 0808 168 9111

- www.victimsupport.com

Women's Aid Federation of England and Wales

A national domestic violence charity. It also runs a domestic violence online help service.

- www.womensaid.org.uk/information-support

- Email: helpline@womensaid.org.uk