

Safeguarding Policy

1. Policy Statement

The Sheppard Trust is wholly committed to safeguarding and promoting the welfare of all people who come into contact with our work.

We believe everyone has the right to live a life that is free from harm and abuse, and that safeguarding is everyone's responsibility. Ignoring abuse or neglect is not an option.

We recognise that some of our residents may be adults at risk, and that older women are disproportionately affected by some types of abuse.

We aim to

Provide a safe and supportive living environment

Prevent abuse and neglect wherever possible

Respond promptly and appropriately to safeguarding concerns

Work in partnership with residents, staff, local authorities and other agencies.

2 Scope

This policy applies to

- Trustees
- Staff
- Volunteers
- Contractors and agency staff
- Anyone working on behalf of the charity.

The policy covers safeguarding of adults, including adults at risk, and safeguarding considerations relating to children who may visit our premises from time to time. (We do not provide any services to children.)

3 Definitions

An **adult at risk** is an adult who has care or support needs who is experiencing or is at risk of abuse or neglect and who is unable to protect themselves because of their support needs.

Safeguarding means protecting people's right to live in safety, free from abuse and neglect.

4 Legal and regulatory framework

This policy is informed by:

- Care Act 2014 and statutory guidance
- Mental Capacity Act 2005
- Charity Commission safeguarding guidance
- Regulator of Social Housing (RSH) consumer standards including the Home Standard and Tenancy Standard
- Housing, health and safety and data protection legislation.

5 Principles

Our safeguarding approach is based on the six principles of adult safeguarding (Appendix 3):

Empowerment – Prevention – Proportionality – Protection – Partnership - Accountability

6 Roles and responsibilities

Board of Trustees

- Has overall responsibility for safeguarding and resident safety
- Ensures compliance with Charity Commission and Regulator of Social Housing expectations
- Approves, reviews and monitors safeguarding arrangements
- Ensures learning from safeguarding concerns is used to improve services
- Appoints a safeguarding lead trustee who is also deputy safeguarding lead (Appendix 4).

Chief Executive

- Acts as the Trust's safeguarding lead
- Oversees safeguarding practice and reporting
- Acts as the main point of contact for safeguarding concerns
- Liases with local authority safeguarding teams and other statutory agencies
- Ensures safeguarding records are maintained and reviewed
- Reports at least annually to trustees or as required.

Staff, volunteers and contractors

- Responsible for following this policy and related procedures
- Report concerns promptly and without delay
- Undertake safeguarding training appropriate to their role.

7 Safer working practices

The Trust applies safer recruitment and working practices proportionate to its size and risk profile, including:

- Clear role descriptions and expectations
- Statement of the Trust's commitment to safeguarding in recruitment materials and safeguarding questions in all interviews
- Obtaining DBS checks for staff, trustees and volunteers for all appropriate roles
- Verification of identity, qualifications, references and right to work

- Induction and training covering safeguarding, professional boundaries and resident safety
- Use of probationary periods
- Codes of conduct for staff, trustees, volunteers and contractors.

8 Working with residents

Part of our support to residents includes supporting people to take actions in order to live their lives as they choose and reduce the risk of abuse. We aim to develop safe relationships with our residents so that they feel confident to disclose abuse.

Our safeguarding arrangements should make safeguarding personal, that is, they should keep the resident at the heart of the process, focus on involving the resident from the very beginning, asking them what they want to happen, helping them make informed choices to achieve the outcomes they want, and ensuring their voice is heard.

9 Confidentiality and information sharing

Safeguarding concerns will be handled sensitively and shared only on a need-to-know basis. However, confidentiality cannot be maintained if it would place a person at risk of harm.

10 Review

This policy and the associated procedures will be reviewed every year, and checked as and when there are changes in legislation, to keep up to date with best practice standards.

Status of this policy:	Approved by the Board March 2026
Status of this version:	Approved by the Board March 2026
Next check and update due:	February 2027
Next full review due:	February 2027

Other documents which may be relevant

Equality and Diversity Policy (which covers harassment and bullying)
Raising Concerns ("Whistleblowing") policy and procedure
Disciplinary policy
Domestic abuse policy

Version control tracker:

Date of change	Change made	Comments
February 2026	Complete rewrite	Adopting modern best practice + move away from RBKC procedures

Safeguarding procedures

1 Recognising abuse and neglect

Abuse and neglect can take many forms. Older people and people with care and support needs are not inherently vulnerable but may come to be at risk of abuse or neglect at any point.

The Care Act 2014 defines the following ten forms of abuse and neglect that can affect adults, but this is not intended to be an exhaustive list.

- *Physical abuse*: including assault, hitting, slapping, pushing, misuse of medication and restraint.
- *Psychological abuse*: including emotional abuse, humiliation, threats of harm or abandonment, coercion, intimidation, isolation, harassment and cyber bullying.
- *Neglect or acts of omission*: including ignoring medical, emotional or physical care needs; failure to provide access to appropriate health, care, support or educational services; not meeting basic needs such as food, warmth and shelter.
- *Sexual abuse*: including rape, sexual harassment, indecent exposure, sexual assault, sexual photography and inappropriate looking, touching or sexual teasing.
- *Financial or material abuse*: including theft, fraud, coercion in relation to finances including wills, property, inheritance or transactions and misuse of possessions or benefits.
- *Domestic abuse*: including control and coercion, psychological, physical, sexual, financial abuse and so called 'honour' based violence.
- *Modern Slavery*: including forced labour and domestic servitude, human trafficking and coercing, deceiving or forcing someone into a life of abuse, servitude and inhumane treatment.
- *Discriminatory abuse*: including harassment, slurs and unfair treatment based on race, gender and gender identity, age, disability, sexual orientation or religion.
- *Organisational abuse*: including neglect and poor care as a result of the structure, policies, processes and practices within an institution, care setting, or by those providing care services in someone's own home.
- *Self-neglect*: including neglecting to care for personal hygiene, health or surroundings.

Online abuse is behaviour online which may hurt a person physically or emotionally and may happen across any device connected to the internet including computers, tablets and mobile phones. Online abuse can include crimes and offenses such as online harassment, threats, cyberbullying, grooming, cyberstalking, online impersonation, trolling, hacking, misinformation, virtual mobbing, identity theft, financial abuse, hate crime, intimate image abuse including deepfakes, sexting, sexual abuse or exploitation.

Staff, contractors and volunteers should be alert to indicators of abuse such as unexplained injuries, changes in behaviour, withdrawal, fearfulness, poor living conditions, or concerns about finances. All concerns should be reported to the Chief Executive.

Perpetrators of abuse and neglect with regards to older people are often people they trust, family members or care staff, and they also are at risk of exposure to scams.

The Sheppard Trust houses older women. Women and older people are disproportionately affected by some types of abuse, such as domestic violence. The Trust has regard to the fact that its residents are women. We also recognise that perpetrators may be of any gender.

Poor practice and poor quality services are not the same as abuse and neglect but they can in the worst cases lead to abuse and neglect. Complaints about the quality of service will be dealt with under the complaints procedure but if the impact of the poor service results in a concern about the safety of an adult at risk action may also be considered under this procedure.

2 What to do if a resident discloses abuse

If a resident or visitor discloses abuse:

- Keep calm and listen carefully to what is said
- Take the concern seriously, however unlikely it sounds
- Reassure them they have done the right thing by speaking up
- Do not promise confidentiality, as you cannot keep the information to yourself
- Do not ask questions except to clarify and ensure that you understand what is being said
- Do not make promises that you cannot keep
- Record the information as soon as possible (within an hour unless there are circumstances which make this impossible) using the person's own words as much as you can
- Report the concern immediately to the Chief Executive (safeguarding lead) or safeguarding trustee.

If there is immediate danger, urgent medical attention is needed or a crime has just been committed, then contact emergency services (999) first.

Helpful responses

- You have done the right thing in telling
- That must have been really hard
- I am glad you have told me
- It's not your fault
- I will help you

Unhelpful responses

- Why didn't you tell anyone before?
- I can't believe it
- Are you sure they meant it that way?
- Why? How? When? Where?
- Don't tell anyone else

3 Reporting a safeguarding concern

All safeguarding concerns, suspicions, or allegations must be reported as soon as possible to the Chief Executive and recorded without delay. If the concern involves the Chief Executive, it must be reported to the safeguarding trustee. If you cannot reach one of those people in an appropriate timescale for the urgency and seriousness of the concern, you can report directly to social services.

The Chief Executive will:

- Assess risk and immediate safety needs
- Take proportionate action to protect residents
- Decide whether a referral to the local authority safeguarding team or other statutory body is required
- Make referrals promptly where thresholds are met
- Decide whether any other people need to be informed about the issue or any other action needs to be taken
- Ensure concerns are escalated to trustees where required
- Keep clear, auditable records of decisions and actions taken.

4 Referrals to the local authority

In the case of adults:

A referral to adult safeguarding should be considered where an adult at risk is experiencing or is at risk of abuse or neglect, they have care and support needs, and they may be unable to protect themselves.

Consent to refer should be sought from the adult. If an adult at risk with capacity decides they do not want action to be taken, they have been given all the information and had the opportunity to consider all the risks and fully understand the short and long term consequences of that decision, then their wishes should normally be respected.

However, there are situations in which we may override their wishes:

- a serious crime is suspected
- allegations involve a member of staff, paid carer or volunteer,
- there is a risk of serious harm to that person or anyone else
- they consented to abuse or neglect under duress or intimidation
- the adult lacks capacity to consent and a report is in their best interests.

In the case of children the advice of the local authority designated officer (LADO) for children's safeguarding or other appropriate professional should be sought and followed in all circumstances where safeguarding concerns are identified or disclosures are made.

5 Mental capacity and consent

We will presume that adults have mental capacity to make decisions about their safety, unless a person's apparent comprehension of a situation gives rise to doubt, in line with the Mental Capacity Act 2005.

It is the right of adults who have capacity to take risks and to make their own choices, irrespective of how unwise we consider their decisions to be. Our approach takes into account a person's preferences, circumstances and tolerance of risks. *"What good is it making a person safer if it merely makes them miserable?"*

If there are concerns about capacity, advice should be sought from the local authority or relevant professionals.

6 Safeguarding concerns involving staff, trustees, contractors or volunteers

If an allegation is made against anyone working for the Trust:

- The concern must be reported immediately to the Chief Executive or Chair of Trustees who will decide on the steps to be taken in the circumstances
- The safety of residents will always be the priority
- Appropriate steps may include suspension or changes to duties (suspension is a neutral act and not an assumption of guilt) or in the case of a contractor removal from the premises, whilst an investigation is carried out
- External agencies will be involved as required.

7 Children on the premises

The Sheppard Trust does not work with children, but we recognise that children may occasionally visit the premises to visit residents or to use the communal facilities when they are open to the public.

Our safeguarding expectations in relation to children and young people (aged under 18) are:

Children and young people must be accompanied by a responsible adult

Staff must not agree to take responsibility for supervising visiting children, even for very short periods of time

Any safeguarding concerns about a child must be reported to the Chief Executive, who will consider referral to children's social care taking advice as appropriate.

8 Recording and record keeping

All safeguarding concerns should be recorded promptly, accurately and objectively. Records should be stored securely and confidentially.

Safeguarding records should be sufficiently detailed to demonstrate compliance with regulatory requirements and to enable oversight and learning.

Records should include date and time, names of those involved, factual information about the concern, risk assessment and rationale for decisions, actions taken, referrals made if any, and outcomes.

9 Training and support

The Trust will provide training and support for staff.

This includes support and supervision as well as appropriate training on safeguarding issues and related issues. We will aim to provide formal training or refresher training at least every three years (or two years for online training) to staff working directly with residents at risk.

The Trust will also ensure that trustees receive appropriate safeguarding awareness training.

10 Whistleblowing

Staff and volunteers are encouraged to raise concerns about unsafe or inappropriate practice. The Sheppard Trust will respect and support staff who speak out in good faith about suspicions of abuse or inappropriate behaviour, even if it transpires that they are unfounded. For further details see the Raising Concerns – Whistleblowing policy and procedure.

Key contacts

Internal contacts:

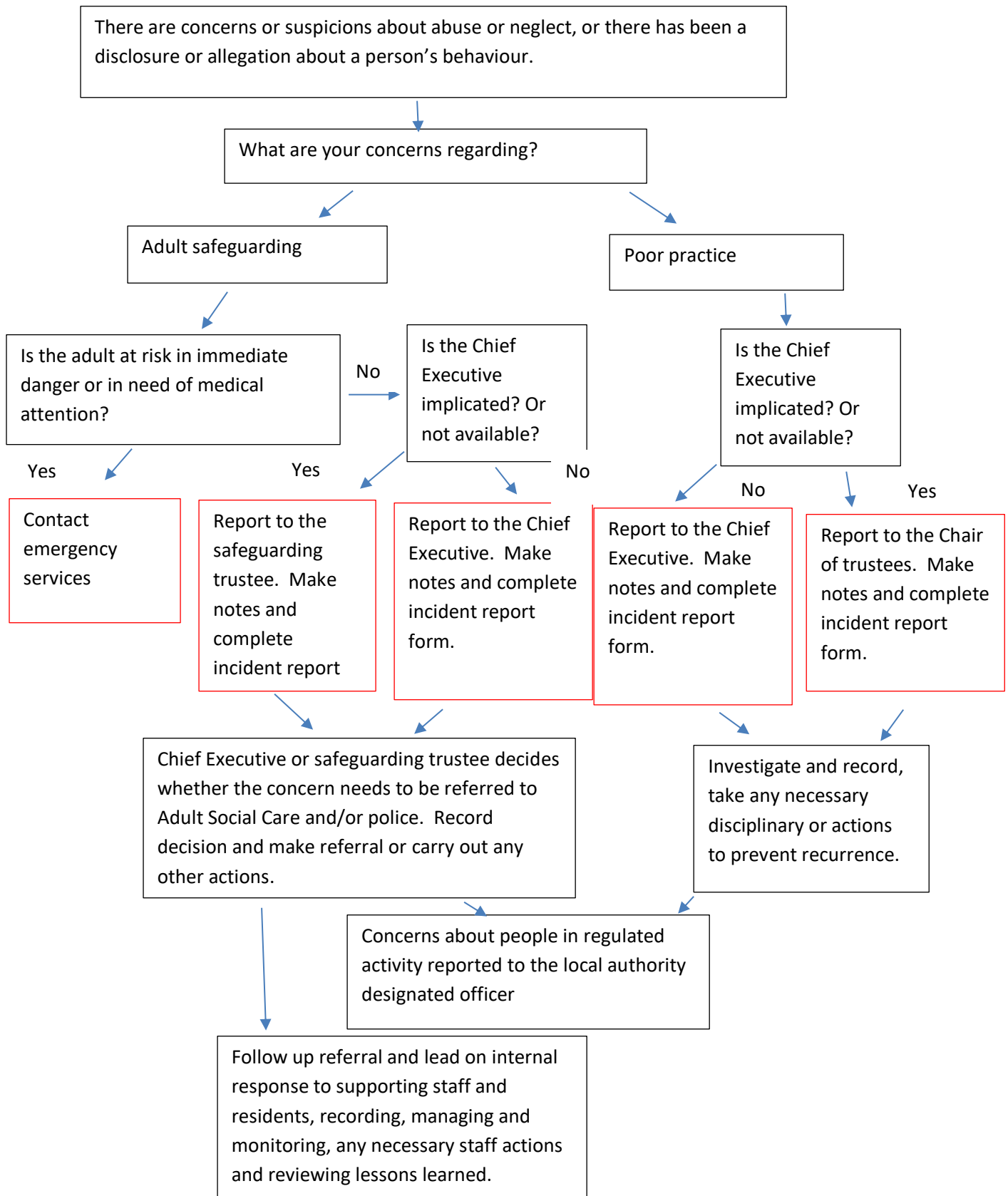
Chief Executive	Clare Scott Booth	0300 012 0382 07855 209909 clarescottbooth@sheppardtrust.org
Safeguarding Trustee	Chair of trustees	safe@sheppardtrust.org.uk

External contacts:

Social services	London Borough of Barnet	Adult safeguarding referrals: 020 8359 5000 Out of hours: 020 8359 2000 Email: socialcaredirect@barnet.gov.uk Referral forms: Report adult abuse Barnet Council
Social services	London Borough of Ealing	• telephone: 0208 825 8000 • email sscallcentre@ealing.gov.uk • report online
Social services - adults	Surrey County Council	Reporting safeguarding concerns - Surrey County Council ▪ Online: Make a safeguarding referral ▪ Telephone: 0300 200 1005 For emergency situations outside our standard lines hours: ▪ Telephone: 01483 517 898 (If this number is not working, please use the email address below) ▪ Email: edt.ssd@surreycc.gov.uk Domestic abuse concerns ▪ Telephone: 01483 776 822 (available 9am to 9pm, 7 days a week) ▪ Out of hours Telephone: 01483 517 898
Social services - children	Surrey County Council	The Surrey Children's Single Point of Access (C-SPA) Report a concern about a child or young person - Surrey County Council Advice line for professionals

		For advice on the course of action, call the C-SPA child protection line. The line is for professionals working with families who live in Surrey. Phone: 0300 470 9100, option 3 Open: 9am to 5pm, Monday to Friday Evenings, weekends and bank holidays Phone: 01483 517 898 Concerns about someone who works or volunteers with children The Local Authority Designated Officer (LADO) handles allegations against people working with children and young people. If you have concerns, contact the LADO. Phone: 0300 123 1650, 9am to 5pm Monday to Friday LADO@surreycc.gov.uk Surrey LADO Referral form
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Appendix 1: Action flowchart



Appendix 2: The six principles of adult safeguarding defined in The Care Act

Principle	Outcome	Resident experience
Empowerment	People being supported and encouraged to make their own decisions and informed consent	"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens"
Prevention	It's better to take action before harm occurs	"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help"
Proportionality	The least intrusive response appropriate to the risk presented	"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed"
Protection	Support and representation for those in greatest need	"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want
Partnership	Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.	"I know that employees treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me
Accountability	Accountability and transparency in delivering safeguarding	"I understand the role of everyone involved in my life and so do they"

Appendix 3

Disclosure and Barring Service checks procedure

- 1 The Trust will carry out checks to the highest level that it is legally entitled to make for each post including volunteers and trustees. This will be assessed by the Chief Executive (or in the case of the Chief Executive, by the Chair).
- 2 The Trust will carry out new checks via UCheck with which it has an arrangement, or another similar body.
- 3 The Trust will bear the cost of subscriptions to the DBS Update Service for all its staff, provided they consent to the information being checked by the Trust at any time. This means that it will be able to easily check that there is no new information on a DBS check. An update check will be made at least once every three years by the Chief Executive and the result will be recorded. If an employee withholds or withdraws consent to checking or membership of the DBS Update Service then a new DBS check will be requested at least every three years.
- 4 Records of DBS checks and Update Service checks made will be kept securely and in accordance with the requirements of the DBS code of practice. Copies of the actual disclosure belong to the individual not the Trust and will not be kept.
- 5 If a DBS check at any time before or during employment reveals any information relevant to the staff member's employment then a risk assessment will be carried out to determine whether their employment can be confirmed or continued and whether any particular procedures need to be put in place to reduce risk.
- 6 It is a contractual obligation upon all staff to inform the Trust if they have or receive any convictions or cautions or changes to their DBS status including any police investigations which might affect their suitability for employment with adults at risk.

Appendix 4

The Sheppard Trust

Role and responsibilities of the lead trustee for safeguarding

All the trustees of the charity carry collective responsibility for safeguarding. It is useful for one trustee to take the lead to support, advise and guide the Board on safeguarding matters but they should not be the only person who understands safeguarding amongst the trustees.

The lead trustee for safeguarding will be a volunteer from within the Board who has skills, experience and confidence in the area of safeguarding or who is willing to undertake the necessary training to develop these.

It is good practice to ensure that the role and responsibilities of the lead trustee are described in writing, agreed by the Board and reviewed regularly.

It is important to distinguish between the strategic, advisory and governance roles of a lead trustee, and the day to day operational designated lead for safeguarding, who in our case is the Chief Executive.

Responsibilities

Strategic

- Consider the organisation's strategic plans and make sure they reflect safeguarding.
- Work with the Chief Executive (designated safeguarding lead) to review whether the things the organisation has put in place are creating a safer culture and keeping people safe.
- Check the organisation's risk register reflects safeguarding risks properly and plan sensible measures to take.
- Make sure there is space on the agenda for safeguarding reports and help trustees understand and challenge those reports.

Creating the right culture

- Champion safeguarding throughout the organisation.
- Attend relevant safeguarding training events.
- Support the trustees in developing their individual and collective understanding of safeguarding.
- Attend meetings, activities, projects to engage with staff, volunteers and beneficiaries to understand safeguarding on the ground.
- Work with the chair and designated safeguarding lead in order to manage all serious safeguarding cases.
- Make sure you have ways of gathering the views of staff and residents in relation to safeguarding and sharing these with the board.

Effective policy and practice

- Make sure there is an annual review of safeguarding policies and procedures and that this is reported to trustees.
- Understand the monitoring your charity does to see whether policies and procedures are effective.
- Learn from case reviews locally and nationally, to improve your organisation's policies, procedures and practices.
- Oversee safeguarding allegations against staff or volunteers, together with the designated safeguarding lead.
- Act as the deputy designated safeguarding lead in the absence of the Chief Executive.
- Be a point of contact for staff or residents if someone wishes to complain about a lack of action in relation to safeguarding concerns.

Appendix 5 Policy on the recruitment of ex-offenders

The Sheppard Trust has adopted the model policy on the recruitment of ex-offenders as follows:

- as an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), The Sheppard Trust complies fully with the DBS code of practice and undertakes to treat all applicants for positions fairly
- The Sheppard Trust undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
- The Sheppard Trust can only ask an individual to provide details of convictions and cautions that The Sheppard Trust are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- The Sheppard Trust can only ask an individual about convictions and cautions that are not protected
- The Sheppard Trust is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background
- The Sheppard Trust has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process
- The Sheppard Trust actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
- The Sheppard Trust select all candidates for interview based on their skills, qualifications and experience
- an application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position
- The Sheppard Trust ensures that all those in The Sheppard Trust who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences
- The Sheppard Trust also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
- at interview, or in a separate discussion, The Sheppard Trust ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment
- The Sheppard Trust makes every subject of a criminal record check submitted to DBS aware of the existence of the DBS code of practice and makes a copy available on request
- The Sheppard Trust undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.