

Safeguarding Adults Policy

Link Up & Live CIC

This policy covers adults aged 18 and over who take part in, volunteer at, work for or visit our workshops, festivals, outreach and online activities. It sets out how we prevent and respond to abuse and neglect, with particular attention to adults with care and support needs.

Document control	Details
Policy reference	LUL SA 01
Version and document review	1.2 16 October 2026
Territorial scope	England Thamesmead, Bexley and Greenwich
Designated lead and deputy	Adult lead: Marcia Marshall Deputy: Kabichi Kabala (Ella)
Agreement	Approved effective 13 October 2026 on Marcia Marshall's instruction. Authorised typed signatures entered 16 October 2026.
Effective date	13 October 2026
Review	At least annually and after serious incidents or relevant changes. Last document review: 16 October 2026. Next review: 13 October 2027

Our commitment

We will put this policy into practice through clear responsibilities, suitable resources, staff and volunteer induction, documented decisions and regular review. The instructions addressed to staff, volunteers and contractors are organisational requirements. Legal duties depend on the activity and the role held; this document does not certify a venue, individual or service as compliant.

How to use this policy

This policy must be read with the Link Up & Live CIC Supporting safeguarding policies and procedures pack, version 1.1, approved with effect from 13 October 2026. Its sections 1 to 13 form part of our safeguarding arrangements, including recruitment, training, EDI, records and retention, health and safety, whistleblowing, complaints, anti-bullying, online safety, photography, behaviour, supervision ratios and accessible information. Section 12 requires at least two suitable adults, with minimum ratios of 1:6 for ages 4 to 8, 1:8 for ages 9 to 12 and 1:10 for ages 13 to 17; risk assessments may require more. Immediate protection and external referral take priority.

Read this policy and its supporting procedures before working on our behalf. Keep a current copy available and provide an accessible public copy. Do not publish incident records or confidential participant information. Approval and effective date: 13 October 2026, as instructed by Marcia Marshall. Last document review and entry of authorised typed signatures: 16 October 2026. Next scheduled review: 13 October 2027, or sooner after a serious incident or relevant change. Record reference: LUL SG 2026 10 13, retained as an addendum to meeting minutes 01 of 15 October 2026.

Safeguarding leads and immediate access

Kabichi Kabala (Ella) leads child safeguarding, with Marcia Marshall as deputy. Marcia Marshall leads adult safeguarding, with Kabichi Kabala (Ella) as deputy. These are the only designated leads and deputies. Each lead coordinates referrals, restricted records and follow-up in their area. Confirm trained cover and direct telephone access at every activity. Anyone may refer directly to statutory services without waiting for a director decision.

Conflicts of interest and allegations

Report a concern about one director to an uninvolved lead and the appropriate external safeguarding service. The person implicated must not manage the case, access its restricted file or decide its outcome. Where all leads are implicated or independent handling is impossible, refer directly to statutory services and obtain independent management advice. Do not wait for an internal meeting. Staff and volunteers may raise concerns externally without retaliation.

Recognising harm

- Physical, sexual, psychological, financial or material and discriminatory abuse; domestic abuse, modern slavery, neglect and acts of omission, organisational abuse and self-neglect.
- Coercive control, scams, exploitation of money or equipment access, abuse by a carer, partner, peer or worker, and abuse using social media or technology.
- Patterns such as fear, unexplained injuries, pressure around money, isolation, deteriorating wellbeing or blocked access to help require attention. A single incident can also be serious.

Inclusion and participation

Listen to people in their preferred way, provide reasonable adjustments and accessible information, and take account of disability, race, religion, sex, language, sexuality and other protected characteristics. Do not dismiss harm as culture, banter or a feature of disability. Use an appropriate interpreter rather than an alleged perpetrator. Explain how to report concerns and offer an independent route to help.

Adults at risk and the Care Act

For a local authority's section 42 safeguarding duty, the adult has care and support needs, is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves from that abuse or risk. Those needs do not have to be funded or already assessed. The local authority determines its enquiry duty; the CIC identifies and reports concerns and cooperates with enquiries. An adult who does not meet that threshold can still require police help, support or another protective response.

Person led protection

Ask what the adult wants to happen and what safety means to them. Use the safeguarding principles of empowerment, prevention, proportionality, protection, partnership and accountability. Offer choices and access to support rather than automatically removing someone from activities. A person's disability, age or diagnosis does not by itself mean they lack capacity or cannot make decisions.

Responding to a disclosure

- If there is immediate danger or an urgent medical need, call 999 and take safe protective action. Do not leave the person with someone suspected of harming them.
- Listen calmly, take the concern seriously and let the person explain in their own words. Reassure them that telling you was right. Do not promise secrecy or a particular outcome.
- Use only minimal, open questions needed for immediate safety. Do not investigate, confront the alleged perpetrator or ask for repeated accounts. Do not examine injuries or take photographs of intimate areas.
- Explain that information will be shared with people who need it to help keep them safe. Record facts, exact words where possible, dates, times, observations and actions; distinguish opinion from fact.
- Tell the duty lead immediately and make a written record as soon as safe, normally before leaving the session. If a lead is unavailable, conflicted or fails to act, contact statutory services yourself.

Referral and follow through

Seek urgent adult social care safeguarding advice where abuse or neglect is suspected, and involve police where a crime may have occurred. Share the person's desired outcomes and support needs. The local authority decides whether the Care Act section 42 threshold is met; the CIC must not reject a concern solely because it is uncertain about eligibility. Follow the local referral process, record the recipient and reference, and confirm receipt.

If the response does not address a continuing risk, the duty lead follows up and uses the local safeguarding escalation or professional disagreement procedure. Any worker who remains worried can escalate directly. Record interim safety measures, responsible people and the next review time. Support the affected person and staff without compromising an investigation.

Information sharing and consent

Explain proposed sharing, seek the adult's views and consent where appropriate, and respect informed choices. A refusal does not automatically prevent sharing: consider serious danger, risk to others, coercion, relevant legal duties or a crime, and obtain safeguarding advice. Where sharing without consent is necessary and lawful, record the reason and tell the adult when safe. Do not alert an alleged perpetrator.

Share relevant, accurate information securely with people who need it. Record the purpose, recipient, legal basis and decision to share or not share. For special category or criminal offence data, identify the additional legal condition as well as the general lawful basis; document any required appropriate policy document. Data protection law is not a reason to leave a person unsafe.

Mental capacity and best interests

Presume capacity; support understanding and communication; respect that an unwise choice alone does not establish incapacity. Capacity is specific to a decision and time. Where there is a genuine concern, seek competent advice and apply the Mental Capacity Act test: an impairment or disturbance must cause inability to understand, retain, use or weigh relevant information, or communicate the decision. Do not make blanket judgments. Where a person lacks capacity, relevant decisions must be in their best interests and use the least restrictive appropriate option, with their participation and appropriate consultation. Seek urgent help where necessary and document reasons. Staff have no general power to detain someone or override their rights.

The CIC does not undertake clinical assessment or statutory safeguarding enquiries simply because a lead has a professional background. Refer decisions beyond the team's competence to appropriate services. Ask social care about independent advocacy where the adult has substantial difficulty participating and has no suitable person to support them.

Recruitment and selection

Use written role descriptions, application or structured background information, an interview, identity checks, verified references and a documented suitability decision before appointment. Explore relevant employment gaps and concerns; assess qualifications and eligibility to work where applicable. Include safeguarding expectations in advertisements, volunteer agreements and contracts. All staff, directors and volunteers must follow the same suitability process for the work they actually perform.

DBS and ongoing suitability

Assess each role against current DBS eligibility rules. Working alongside adults with disabilities or care needs does not automatically qualify for an Enhanced adult workforce or Adults' Barred List check. Adult regulated activity depends on the tasks, such as particular healthcare, personal care or assistance, rather than simply meeting an adult at risk. Require the correct check where eligible as CIC policy, and reassess if duties change. Do not commission an ineligible barred list check.

With the person's consent, use the Update Service only where the original certificate, workforce, level and barred list coverage are suitable for the new role. Check identity and the original certificate and record the outcome. A DBS result does not certify someone as safe and is not a substitute for supervision. Store disclosure information securely; normally do not retain certificate copies longer than necessary, generally no more than six months unless a justified exception applies. Keep a proportionate recruitment decision log.

Induction training and supervision

Before contact with participants, give an induction covering reporting, boundaries, emergency arrangements, equality, online safety and this policy. Leads complete appropriate safeguarding lead training before acting independently. Refresh staff awareness at least annually as CIC policy, with role-specific training and earlier updates after changes. Arrange regular supervision, wellbeing support and a clear route for reporting poor practice. Record induction, training, supervision and actions. Contractors receive relevant site and safeguarding instructions; visiting status is not an exemption.

Conduct and allegations

Maintain professional boundaries. Do not bully, discriminate, exploit, humiliate, exchange sexual material or initiate sexual or romantic relationships with people receiving your support. Do not offer secret gifts, personal loans or private favours. Report conduct that falls below these standards, including low-level concerns; record patterns and escalate when harm may be involved. Provide support and fair procedures for anyone subject to an allegation without putting participants at risk.

Allegations about workers and directors

An uninvolved lead contacts adult safeguarding services and police where appropriate and follows local procedures for people in positions of trust. Consider risk to other adults or children and refer to children's services or LADO where children may be affected. Obtain advice before an internal investigation that could compromise statutory enquiries. Take proportionate protective action, document decisions and ensure fair treatment and support.

Where the CIC is a regulated activity provider and the legal conditions for a DBS barring referral are met, make that referral even if the person resigns or has already been reported to police or social care. Seek current DBS advice on the duty. Do not assume that every poor practice incident meets the referral threshold.

Safe participation and support

- Agree accessibility, communication and sensory adjustments with the adult. Provide a safe route to speak privately without isolation; explain who is available to help during each session.
- Use respectful professional contact and boundaries. Staff must not borrow money, accept significant personal gifts, become involved in an adult's finances or exploit access to their home, relationships or online accounts.
- Do not add personal care, medication support or transport without a specific written assessment, consent, competence, insurance and the correct safeguarding and DBS arrangements.
- Use authorised communication channels and obtain appropriate permission for recording and publication. Do not post identifying stories about abuse or sensitive personal circumstances.
- In a crisis, use calm de-escalation, reduce stimulation, maintain safe supervision and seek emergency help where needed. Do not restrain for convenience or punish distress. Any necessary intervention must be lawful, proportionate and within trained competence; record and review it.

Families domestic abuse and self neglect

Speak with the adult directly where safe. Do not assume a carer or relative represents their wishes, or involve a suspected perpetrator in interpretation or safety planning. Use safe methods of contact and consider whether messages or printed material could be monitored. Refer related risks to children through the Children Safeguarding Policy. Respond to self-neglect through respectful engagement and advice from adult services; it is not automatically a section 42 case, and coercion or immediate risk may alter the response.

Complaints whistleblowing and follow up

Adults can raise concerns with any worker or an uninvolved lead, with accessible communication or independent support. Treat safeguarding issues urgently even when presented as a complaint. Acknowledge ordinary non-urgent complaints within five working days as CIC policy and explain next steps. Do not retaliate against good-faith reporting or require director approval for external reports. Review the adult's safety and desired outcomes, referral responses and support needs. Where risk continues, follow up or use the local escalation procedure.

Monitoring

At least quarterly, directors review anonymised concern patterns, training, checks, access issues and improvement actions. Case reviews exclude implicated individuals and maintain confidentiality. Cooperate with safeguarding enquiries and reviews and use learning to improve delivery.

Secure records and retention

Keep safeguarding case files separately from ordinary attendance and marketing records. Limit access to the people managing the case, with conflicted individuals excluded. Use protected organisational storage, access controls, backups and secure transfer. Do not keep case files in personal messaging accounts. Log access and corrections; retain the original record rather than overwriting it.

The retention schedule in section 6 of the Supporting safeguarding policies and procedures pack, version 1.1, is approved with effect from 13 October 2026 and forms part of this policy. Apply the category-specific review points and documented preservation holds. There is no universal statutory retention period for all safeguarding files. Record lawful reasons for extensions, consider specialist and insurer advice, and securely delete or anonymise only when the documented need ends.

Concern recording form

Complete promptly and pass securely to the duty lead. Do not place completed forms on the website.

Date and time of concern and record: _____

Person concerned and safe contact details: _____

Reporter and role: _____

Location and people present: _____

Exact words and factual observations: _____

Immediate danger and protective action: _____

Person's wishes and consent or reason for sharing without it: _____

Lead and external service notified with date time and reference: _____

Decision reasons and next action owner and deadline: _____

Follow-up outcome and review date: _____

Retention decision record

Record type: _____ Reason for keeping: _____

Retention period or review trigger: _____ Approved by: _____

Legal or investigation hold: _____ Secure disposal method: _____

Reporting contacts

Use the service for the relevant area and follow its cross-boundary procedures. Where location or responsibility is uncertain, contact a safeguarding service for advice immediately rather than delaying. Check these details each term and before events. Display the lead and deputy contacts before delivery.

Designated lead or deputy	Telephone and initial contact email
Kabichi Kabala (Ella)	Child lead; adult deputy 07597 136755 info@linkupandlive.org
Marcia Marshall	Adult lead; child deputy 07902 950884 info@linkupandlive.org

Duty lead for this activity: _____ Deputy cover: _____

Use direct telephone contact for urgent concerns and call 999 for immediate danger. The shared info@linkupandlive.org mailbox is for initial contact and is not an emergency or confidential case-record channel. Do not send detailed allegations, sensitive records or concerns about a mailbox user to that shared address. Contact an uninvolved lead or statutory services directly; keep case records in restricted storage accessible only to authorised, unconflicted people.

External route	Contact checked on 14 October 2026
Immediate danger or urgent medical help	999
Police non-emergency	101
Bexley adults screeners	020 3045 5159 Monday to Friday 8am to 5pm screeners@bexley.gov.uk
Bexley council general route	020 8303 7777 ask for urgent adult safeguarding or emergency duty assistance
Greenwich adult safeguarding	020 8921 2304 Monday to Friday 9am to 5pm
Greenwich adults out of hours	020 8854 8888

For a new borough or venue outside these areas, record the local referral and out-of-hours contacts before delivery. Use official council referral forms where required and confirm receipt; do not rely on an unattended email for urgent action.

Key support routes

Adult social care can advise on safeguarding, care and support assessment and advocacy. Police respond to crime and immediate danger. Health services address medical needs. When an adult needs specialist domestic abuse, disability, exploitation or financial protection support, help them access an appropriate service safely and with their involvement. Do not substitute a general support organisation for an urgent statutory referral.

Implementation before delivery

- Display and test the direct lead and deputy contacts, restricted record storage and safe reporting routes before opening.
- Complete lead training, role-specific recruitment checks and clear boundaries for support tasks.
- Implement restricted record access and the approved retention schedule. Explain reporting routes in accessible formats.
- Give every worker a policy briefing; record their acknowledgement and relevant training. Identify who can stop unsafe activity and who covers absences.
- Retain approval record LUL SG 2026 10 13 with minutes 01. Review at least annually, next due 13 October 2027, and sooner after a serious incident or relevant change. Maintain a version history.

Director agreement and adoption

Approval and effective date: 13 October 2026, as instructed by Marcia Marshall. Last document review and entry of authorised typed signatures: 16 October 2026. Next scheduled review: 13 October 2027, or sooner after a serious incident or relevant change. Record reference: LUL SG 2026 10 13, retained as an addendum to meeting minutes 01 of 15 October 2026. The signatures below are entered with authority recorded on 16 October 2026.

Approver and safeguarding role	Signature	Date
Marcia Marshall Adult lead and child deputy	Marcia Marshall Authorised typed signature entered 16 October 2026	Effective approval 13 October 2026
Kabichi Kabala (Ella) Child lead and adult deputy	Kabichi Kabala (Ella) Authorised typed signature entered 16 October 2026	Effective approval 13 October 2026

Approval record: LUL SG 2026 10 13 | Minutes 01 addendum | Effective date: 13 October 2026

Next review due: 13 October 2027 | Version control: Marcia Marshall and Kabichi Kabala (Ella)

Legal framework and guidance

Prepared for activities in England using the sources below, checked on 14 October 2026. Apply legislation as amended and in force. Guidance explains practice; it is not interchangeable with a statutory duty. Recheck commencement dates and local procedures before delivery.

Care Act 2014 section 42 and statutory guidance chapter 14

<https://www.legislation.gov.uk/ukpga/2014/23/section/42>

Care and support statutory guidance

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

Mental Capacity Act 2005 and Code of Practice

<https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>

Safeguarding Vulnerable Groups Act 2006 and DBS guidance for adult roles

<https://www.gov.uk/government/collections/dbs-eligibility-guidance>

UK GDPR and Data Protection Act 2018 as amended including relevant Data Use and Access Act 2025 changes

<https://ico.org.uk/for-organisations/>

Bexley current council contact route for adults screeners

<https://www.bexley.gov.uk/contact-us>

Royal Greenwich adult safeguarding reporting route

<https://www.royalgreenwich.gov.uk/adult-care-and-health/report-your-concerns-about-adult>