ARC INITIATIVE

Safeguarding Adults Policy and Procedures

Keeping adults at risk safe at Arc Initiative

Policy detail	Information
Policy owner	Chidi O'Hanekwu
Lead Safeguarding Officer	Chidi O'Hanekwu, Chief Executive Officer. Safeguarding Level 3 Designated Safeguarding Lead trained, September 2026
Deputy Safeguarding Officer	To be confirmed by the Board. Until a deputy is appointed, concerns are raised with the Chair of Trustees when the Lead Safeguarding Officer is unavailable
Version	2.0
Approved by trustees	01/09/2026
Last reviewed	September 2026
Next review due	September 2027, or sooner if law, guidance or our delivery changes
Applies to	Trustees, employees, sessional facilitators, mentors, volunteers, interns, apprentices, agency workers, consultants and anyone else acting on behalf of Arc Initiative

1. Purpose and commitment

Arc Initiative is committed to creating and maintaining a safe and positive environment, and accepts its responsibility to safeguard the welfare of all adults involved in our work, in line with the Care Act 2014.

This policy explains how we protect adults at risk, what everyone working with or on behalf of Arc Initiative must do if they are worried about an adult, and how we respond. It applies to work delivered in person, online and in partner settings.

Who this policy protects

This policy applies to everyone aged 18 and over who comes into contact with Arc Initiative, including:

- Young adults aged 18 to 25 taking part in Career Compass, Work Ready, Skills for Life, Level Up and Life Leaders mentoring
- Care leavers and care-experienced young adults, including those living independently for the first time
- Young adults who are not in education, employment or training, and those referred to us by leaving care teams, colleges, health services and community organisations
- Alumni who return as volunteers, facilitators or members of our youth board
- Parents, carers, family members and members of the public who attend our events
- Staff, volunteers, mentors, trustees and partners

> **Turning 18 is a change of policy, not a change of care**

> Most young people we work with cross from the Child Safeguarding Policy into this policy during their time with us. Care leavers hold rights to support from their local authority up to the age of 25, and many of the risks they face, such as unstable housing, exploitation and isolation, do not stop on their eighteenth birthday.
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> We plan this transition with the young person. We confirm who their leaving care personal adviser is, what support continues, and who they contact if something goes wrong. Where an adult does not meet the definition of an adult at risk, we still act on concerns about their safety and wellbeing and help them get the right support.

2. Principles

The Care Act 2014 sets out six principles that underpin adult safeguarding. We work to all six.

Principle	What it means at Arc Initiative
Empowerment	People are supported and encouraged to make their own decisions and to give informed consent. We ask what the person wants to happen and that shapes what we do
Prevention	It is better to act before harm occurs. We talk openly with young people about exploitation, money, relationships and online safety
Proportionality	We take the least intrusive response appropriate to the risk, and we explain why we are doing what we are doing
Protection	We support and represent those in greatest need, and we help people take part in the safeguarding process as much as they want to
Partnership	We work with communities, referrers, local services and the Safeguarding Adults Board, sharing only what is helpful and necessary
Accountability	We are transparent about our role, we record our decisions, and we can explain them

Making Safeguarding Personal

Safeguarding is done with people, not to them. Wherever an adult has capacity to make the decision in question, we seek their consent before making a referral, we tell them what we are doing, and we respect their wishes. We act without consent only where someone else is at risk, where a serious crime may have been committed, or where the person lacks capacity and action is in their best interests.

- All adults, whatever their age, disability, race, religion, ethnic origin, sex, gender identity, sexual orientation, care experience or relationship status, have the right to be protected from abuse and neglect
- We make reasonable adjustments so that our activities are accessible, and we keep reviewing whether they are working
- Ability and disability can change over time. Some adults are more at risk because they depend on others, have different communication needs, or have experienced trauma
- A disabled adult may or may not identify themselves as an adult at risk
- Everyone at Arc Initiative shares responsibility for the safety and wellbeing of adults, whether the concern arises inside our organisation or in the wider community
- All allegations are taken seriously and responded to quickly

- We recognise the role of statutory agencies and comply with the procedures of the local Safeguarding Adults Boards in the boroughs where we work

3. Legal and policy framework

Primary legislation

- Care Act 2014, which places adult safeguarding on a statutory footing
- Mental Capacity Act 2005, together with its Code of Practice and the Deprivation of Liberty Safeguards
- Equality Act 2010
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Fraud Act 2006
- Modern Slavery Act 2015
- Serious Crime Act 2015, including the offence of controlling or coercive behaviour in an intimate or family relationship
- Anti-social Behaviour, Crime and Policing Act 2014, which makes forced marriage a criminal offence
- Domestic Abuse Act 2021
- Counter-Terrorism and Security Act 2015
- Online Safety Act 2023
- Data Protection Act 2018 and the UK General Data Protection Regulation, as amended by the Data (Use and Access) Act 2025
- Children's Wellbeing and Schools Act 2026, which extends corporate parenting duties and Staying Close support for care leavers up to the age of 25

Statutory guidance and sector guidance

- Care and support statutory guidance issued under the Care Act 2014, current version
- Making Safeguarding Personal, the sector-led approach to person-centred safeguarding
- Mental Capacity Act Code of Practice and the Deprivation of Liberty Safeguards Code of Practice
- Local Safeguarding Adults Board policies and procedures in Newham, Tower Hamlets, Waltham Forest and Barking and Dagenham
- Charity Commission guidance on safeguarding and protecting people for charities and trustees, and its guidance on reporting serious incidents
- Prevent duty guidance, current version

4. Definitions

Term	Meaning
Adult	Anyone aged 18 or over
Adult at risk	An adult who has needs for care and support, whether or not those needs are being met, and who because of those needs cannot protect themselves against abuse or neglect. The term replaces the older phrase vulnerable adult
Abuse	A violation of a person's human and civil rights by another person or persons
Adult safeguarding	Protecting a person's right to live safely, free from abuse and neglect
Capacity	The ability to make a particular decision at a particular time. The starting assumption is always that a person has capacity unless it is established otherwise, in line with the Mental Capacity Act 2005
Consent	Agreement given freely by someone with capacity who understands what they are agreeing to and what the alternatives are

5. Types of abuse and neglect

The Care Act 2014 identifies the following categories. This list is a guide, not a complete list of everything that could give rise to a concern.

- Self-neglect, including neglect of personal hygiene, health or surroundings, and hoarding
- Modern slavery, including human trafficking, forced labour and domestic servitude
- Domestic abuse, including psychological, physical, sexual, financial and emotional abuse, coercive control and so-called honour-based abuse
- Discriminatory abuse, including abuse based on race, religion, disability, sex, gender identity, sexual orientation or any other protected characteristic
- Organisational abuse, including neglect and poor care practice within a service or setting
- Physical abuse, including hitting, slapping, pushing, restraint, misuse of medication and inappropriate sanctions
- Sexual abuse, including rape, sexual assault, sexual harassment, indecent exposure, sexual photography and any sexual act the adult has not consented to or was pressured into
- Financial or material abuse, including theft, fraud, online scams, coercion in relation to money, benefits, property or wills, and misuse of possessions or benefits
- Neglect and acts of omission, including ignoring care or medical needs and withholding necessities such as food, heating or medication
- Emotional or psychological abuse, including threats, humiliation, blaming, intimidation, coercion, isolation and withdrawal of support

Other forms of harm we are alert to

- Criminal exploitation, including county lines and the use of young adults to move drugs, money or weapons
- Cuckooing, where someone takes over a young person's home to use it for criminal purposes. This is a particular risk for care leavers in their first tenancy
- Mate crime, where someone is befriended and then exploited by people who present themselves as friends
- Sexual exploitation, including exploitation that begins online
- Online abuse, including image-based abuse, sextortion, harassment and fraud
- Radicalisation and extremism
- Forced marriage
- Cyberbullying and harassment through messaging, social media and gaming platforms
- Serious concerns about mental health, self-harm or suicide
- Harm connected to homelessness, sofa surfing and unsafe housing

6. Signs that may indicate abuse or neglect

- Unexplained injuries, or a lack of medical attention when an injury occurs
- Money or belongings going missing, unexplained debt, or someone else controlling a person's money, benefits or bank card
- Stopping attending, or no longer enjoying sessions they valued
- Weight loss or gain, or a change in appearance and self-care
- A change in behaviour, mood or confidence, withdrawal, or signs of self-harm
- Fear of a particular person or group, or someone else answering for them
- New friends, gifts, phones or clothing that cannot be explained
- Unfamiliar people staying at their home, or a reluctance to go home
- A disclosure, whether to you or to someone else

7. What to do if you have a concern

> **If someone is in immediate danger**
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> Call 999. Stay with the person if they are with you. If they need urgent medical help, call an ambulance and use first aid while you wait. Tell the Lead Safeguarding Officer as soon as the immediate situation is safe.

1. Act the same day. Do not wait for the concern to repeat itself.
2. Do not investigate and do not confront the person the concern is about.
3. Listen. Let the person tell you what they want to tell you in their own words.
4. Be honest about confidentiality. Explain that you have to share the concern with the Lead Safeguarding Officer, unless doing so would increase the risk to them.
5. Record what you saw or were told, in the person's own words wherever possible, using the incident form in Appendix A, within 24 hours and ideally the same day. Separate fact, observation, allegation and opinion.
6. Give the form to the Lead Safeguarding Officer the same day. If they are unavailable, contact the Deputy Safeguarding Officer or the Chair of Trustees.
7. Keep the information confidential and share it only with those who need to know.
8. If you believe the person remains at risk and our response is not adequate, escalate to adult social care, the police or through our Whistleblowing Policy.

Consent and mental capacity

- Assume the person has capacity to make the decision unless there is evidence otherwise, and support them to make their own decision
- Where the person has capacity, seek their consent before making a safeguarding referral and respect their wishes
- Act without consent where another person, including a child, is at risk, where a serious crime may have been committed, where several people may be affected by the same person, or where the person is under duress
- Where the person may lack capacity for this decision, the Lead Safeguarding Officer takes advice from adult social care and acts in the person's best interests, in the least restrictive way
- Record what the person wanted, what was decided, and why

What the Lead Safeguarding Officer does next

- Talks with the adult about what they want to happen, unless doing so would increase risk
- Decides whether to raise a safeguarding concern with adult social care in the borough where the person lives, and whether to involve the police
- Makes urgent referrals by telephone the same day and confirms every referral in writing within two working days
- Seeks advice from adult social care where it is unclear whether the concern meets the threshold, without naming the person where possible
- Considers whether anyone else, including children in the household, may be at risk, and applies the Child Safeguarding Policy where a child is involved

- Records the decision, the reasons for it and the outcome, and follows up where there is no response
- Considers whether the incident should be reported to the Board of Trustees, to the Charity Commission as a serious incident, or to a funder, and what support the people involved need

8. Allegations against staff, volunteers or trustees

9. Report the allegation to the Lead Safeguarding Officer immediately. If it concerns the Lead Safeguarding Officer, report it to the Chair of Trustees.
10. Do not speak to the person the allegation is about and do not investigate.
11. The Lead Safeguarding Officer, or the Chair of Trustees, contacts adult social care and, where a crime may have been committed, the police.
12. Consideration is given to suspension or to changing duties while the matter is looked into. Suspension is a neutral act.
13. Where someone is removed from work with adults at risk because they have caused harm or pose a risk of harm, or would have been removed had they not resigned, a referral is made to the Disclosure and Barring Service. This is a legal duty.
14. The trustees consider whether the incident must be reported to the Charity Commission as a serious incident.
15. Records are kept confidentially, including where an allegation is not substantiated, and support is offered to everyone involved.

9. Roles, responsibilities and training

Role	Responsibility
Board of Trustees	Approves this policy, reviews safeguarding at every board meeting, provides the resources and training needed, and reports serious incidents to the Charity Commission
Lead Safeguarding Officer	Leads on all adult safeguarding concerns, decides on referrals, keeps records, supports staff and volunteers, maintains links with the Safeguarding Adults Boards, and keeps guidance and training current
Deputy Safeguarding Officer	Acts in place of the Lead Safeguarding Officer when they are unavailable or where the concern involves them
Managers and programme leads	Plan and staff sessions safely, complete risk assessments, and make sure people know how to raise a concern
All staff, volunteers, mentors and trustees	Complete training, follow the code of conduct, report concerns without delay, and never investigate
Partner organisations	Follow their own safeguarding arrangements and ours when we deliver together, agreed in writing

- Everyone receives a safeguarding induction, including this policy and the code of conduct, before working with adults at risk
- Safeguarding training is refreshed at least every two years, or sooner if guidance changes

- The Lead Safeguarding Officer completes designated lead training and refreshes it at least every two years
- People working directly with young adults complete awareness training on exploitation, financial abuse, online harm and Prevent
- Safeguarding is a standing item in supervision and team meetings

10. Good practice and poor practice

Good practice

- Adopt and follow the code of conduct for staff and volunteers
- Complete the training required for your role before working with adults at risk
- Build relationships based on mutual trust and respect, and support people to make their own decisions
- Be publicly open. Avoid sessions or meetings where a staff member or volunteer and an individual are completely unobserved
- Treat everyone with dignity, and give the same attention, time and respect to everyone in the group
- Maintain professional boundaries and never form an intimate relationship with someone we support
- Obtain consent from the person, and where appropriate from a carer, before providing emergency first aid or other support
- Be aware of health conditions, disabilities, injuries and access needs where the person has chosen to share them, and record any injury or accident together with the response
- Keep accurate records of agreements about travel and activities, made with the person themselves wherever they can do so

Poor practice to avoid

- Spending excessive time alone with one person
- Any inappropriate physical contact, or rough or sexually provocative behaviour
- Language that is disrespectful, hurtful or sexually suggestive, even in jest
- Using humiliation or distress as a means of control
- Leaving an allegation uninvestigated, unrecorded or not acted on
- Taking someone alone in a car, however short the journey, unless agreed and recorded in advance
- Inviting someone to your home, or being alone with them in an office with no one else present
- Doing things of a personal nature that a person can do for themselves
- Using personal phones, email accounts or social media to contact people we support

Where an exception is unavoidable, seek written consent from the person, record the reason, and make sure the Lead Safeguarding Officer knows and agrees in advance. If someone is injured, distressed or appears to misunderstand something you have done, report it to a colleague as soon as possible and make a written note.

11. Online delivery, social media and digital safety

- Send meeting links and passwords on the day of the session, and generate a new meeting room and password each time
- Where possible, two facilitators attend each session, one leading and one monitoring chat and any issues
- Use a waiting room and a pre-agreed attendance list, prevent renaming, and consider locking the room once everyone has joined
- Turn off private chat and participant screen sharing unless they are needed

- Agree ground rules at the start, including not sharing personal details and using a neutral or blurred background
- Do not record sessions unless written consent has been obtained in advance and it is clear how the recording will be used
- If the facilitator must leave, the session ends. Do not take screenshots or screen recordings
- Do not post information that could identify or locate someone without their permission, and obtain consent before sharing photographs, video or testimonials
- Do not connect with people we support through personal social media accounts
- Moderate comments on our accounts, or turn commenting off where moderation is not possible
- Do not enter personal or safeguarding information about anyone we support into artificial intelligence tools. Decisions about people are made by people

12. Safer recruitment and Disclosure and Barring Service checks

- Clear role descriptions and person specifications for every role working with children, young people or adults at risk
- Open advertising, an application form or detailed curriculum vitae, and a structured interview covering skills, values, motivation and any gaps in employment
- At least two written references, including the most recent organisation where the person worked or volunteered with children, young people or adults at risk
- Verification of identity, right to work and relevant qualifications before appointment
- Enhanced Disclosure and Barring Service checks for roles involving regular or intensive contact, and Enhanced checks with the relevant barred list where the role is regulated activity
- No unsupervised work until satisfactory checks are complete, and a risk assessment where a role does not meet the threshold for a check
- Re-checking every three years as good practice, or use of the Disclosure and Barring Service update service
- Confidential handling and secure storage of disclosure information, with positive disclosures risk assessed by the Lead Safeguarding Officer and, where appropriate, the Board

13. Records, information sharing and serious incidents

- Safeguarding records are factual, written promptly, dated, signed and stored securely, separately from general programme records
- We share information where there is a safeguarding reason to do so. Data protection law does not prevent information being shared to keep someone safe
- We record what was shared, with whom, and why, including reasons for not sharing
- Retention follows our Privacy and Data Protection Policy
- Trustees report serious incidents to the Charity Commission, including incidents that result in, or risk, significant harm to beneficiaries, staff, volunteers or others, and incidents that cause significant harm to the charity's work or reputation. Reports are made promptly rather than waiting for the outcome of an investigation

14. Key contacts

Contact	Telephone	Email
Lead Safeguarding Officer, Chidi O'Hanekwu	07568 438 366	chidi@arcinitiative.co.uk
Emergency services, if someone is in immediate danger	999	
Police, non-emergency	101	
Tower Hamlets adult social care	020 7364 2856	
Newham adult social care	020 3373 4600	
Waltham Forest adult social care	020 8496 2310	
Barking and Dagenham adult social care	020 8227 3811	
Samaritans	116 123	
National Domestic Abuse Helpline	0808 2000 247	
Modern Slavery and Exploitation Helpline	08000 121 700	
Action Fraud, for reporting fraud and online scams	0300 123 2040	

15. Review and approval

This policy is reviewed every year by the Board of Trustees, and sooner if there is a change in the law, in statutory guidance, in our delivery, or following a safeguarding incident or a learning review.

Version	Date	Summary of changes
2.0	September 2026	Legal framework corrected and brought up to date, including the Data Protection Act 2018 and the Data (Use and Access) Act 2025, the Domestic Abuse Act 2021, the Serious Crime Act 2015, the Modern Slavery Act 2015 and the Children's Wellbeing and Schools Act 2026. Added consent and mental capacity, Making Safeguarding Personal, the transition from child to adult safeguarding at 18, exploitation, cuckooing and financial abuse, allegations against staff, training requirements, records and information sharing, serious incident reporting to the Charity Commission, and a contacts list. Web links removed
1.0	Earlier versions	Original policy and procedures

Signed on behalf of the Board of Trustees
Stephanie Nicola

Name and role
Stephanie Nicola

Date
01/09/2026

Appendix A. Adult safeguarding incident form

Use this form with the procedure set out in section 7. Complete it within 24 hours and give it to the Lead Safeguarding Officer.

Details of the adult	Information
Name	
Date of birth and age	
Gender	
Ethnicity and first language	
Additional needs, disability or communication needs	
Care experience, for example care leaver	
Address	
Next of kin, carer or leaving care personal adviser	
Referring organisation, if any	

Your details	Information
Your name and role	
Date and time of the incident or concern	
Date and time you are recording this	
Are you reporting your own concern or one raised with you by someone else	
If someone else raised it, their name and role	

What happened or what you were told. Use the person's own words where you can. Include dates, times, and whether the information is first hand or from someone else

The person's account, and what they want to happen

Does the person have capacity to make decisions about this concern, and have they given consent to share it. If consent was not sought or not given, explain why

Details of anyone alleged to have caused the harm or to be the source of the concern

Anyone who witnessed the incident or shares the concern

Are any children or other adults also at risk

Any previous concerns or existing support or risk plans that you are aware of

Summary of your discussion with the Lead Safeguarding Officer

Action taken, including any referral, who it was made to, the date and time, and the name of the person spoken to

Outcome and follow up, including feedback from the receiving service

Signed, name, role and date

Appendix B. What to do at a glance

Step	Action
Immediate danger	Call 999. Stay with the person if they are with you. Tell the Lead Safeguarding Officer as soon as it is safe
Act	Act the same day. Do not investigate and do not confront anyone
Listen and record	Listen, record what you saw or were told in the person's own words using the form in Appendix A, within 24 hours
Consent	Ask the person what they want to happen. Seek consent to share where they have capacity and it is safe to do so
Report	Give the form to the Lead Safeguarding Officer, or the Deputy or Chair of Trustees if unavailable
Decide	The Lead Safeguarding Officer decides whether to raise a concern with adult social care or the police, taking advice where the threshold is unclear
Refer	Urgent referrals are made by telephone the same day and confirmed in writing within two working days
Check for others	Consider whether children or other adults are also at risk, and apply the Child Safeguarding Policy where a child is involved
Follow up	Record the outcome, chase a response if none is received, and escalate if the person remains at risk
Review	Trustees consider learning, whether the incident is reportable to the Charity Commission, and what support the people involved need