Safeguarding Adults
Policy and Procedure

APRIL 2026

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Safeguarding Adults Policy and Procedure

Purpose of Policy

This Safeguarding Adults Policy outlines Comfort Care Recruitment and Training Limited's policy on how we will manage safeguarding concerns and promote the safety and welfare of clients at risk of abuse and neglect.

To meet the legal requirements of the following legislation:

- Public Interest Disclosure Act 1998
- Human Rights Act 1998
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Care Quality Commission (Registration) Regulations 2009
- Equality Act 2010
- Protection of Freedoms Act 2012
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- The Care Act 2014
- The Counter Terrorism and Security Act 2015
- The Modern Slavery Act 2015
- Data Protection Act 2018
- Domestic Abuse Act 2021 To meet the following guidance:
- Local Government Association (LGA) and Association of Directors of Adult Social Care (ADASS) - Making Safeguarding Personal

Scope

The policy applies to:

- All employees, including those designated as temporary, bank staff, agency staff, volunteers or work experience
- Contractors
- Stakeholders

Objectives

The objectives of this policy are:

- To ensure compliance with legislation and regulations

- To ensure compliance with Making Safeguarding Personal and with Local Protocols
- To ensure that employees can identify signs and indicators of abuse and neglect
- To provide procedures for employees to follow in relation to reporting and managing safeguarding concerns and incidents
- To define employee roles and responsibilities in relation to safeguarding adults
- To protect clients' right to live in safety, free from abuse and neglect

The Care Act 2014

Definition of an Adult at Risk of Abuse or Neglect

Safeguarding is aimed at people with care and support needs who may be in vulnerable circumstances and at risk of abuse or neglect by others.

The Care Act defines an adult at risk as:

- An adult who may be vulnerable to abuse or maltreatment is deemed to be someone aged 18 or over
- Has needs for care and support (whether or not the Local Authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect; and
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Types of Abuse

The Care Act defines 10 types of abuse:

- Physical
- Psychological or Emotional
- Sexual
- Financial or Material
- Neglect
- Discriminatory
- Organisational
- Domestic
- Self-Neglect
- Modern Slavery

Appendix 1 of this Safeguarding Adults Policy and Procedure contains guidance on signs and symptoms of the types of abuse.

Safeguarding Principles

The Care Act sets out six safeguarding principles as set out in guidance to the Care Act 2014 and this will inform safeguarding practice:

- Empowerment – People being supported and encouraged to make their own decisions and informed consent.
- Prevention – It is better to take action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering safeguarding.

Reference: The Care Act 2014
https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted

Policy Statement

Comfort Care Recruitment and Training Limited will ensure that this Safeguarding Adults Policy dovetails with the Local Authority Safeguarding Adults Policy and that we comply with Local Safeguarding Protocols.

Comfort Care Recruitment and Training Limited will comply with the Care Act safeguarding requirements and principles.
Comfort Care Recruitment and Training Limited is committed to complying with the principles of 'Making Safeguarding Personal'.

Comfort Care Recruitment and Training Limited recognises that safeguarding adults is everybody's business. We will aim to support clients to be safe and to live free from abuse and neglect.

Comfort Care Recruitment and Training Limited is committed to ensuring robust management of safeguarding and that good safeguarding governance is maintained.

Comfort Care Recruitment and Training Limited will have robust recruitment and employment policies in place to ensure that our employees are suitable to work in adult social care.

The Registered Manager is the safeguarding lead and is responsible for embedding safeguarding practices and improving practice in line with national and local developments.

Comfort Care Recruitment and Training Limited will ensure that clients will be provided with safeguarding information to support them to report concerns to Comfort Care Recruitment and Training Limited or to external agencies.

Comfort Care Recruitment and Training Limited requires employees to report all safeguarding concerns as soon as possible using the Safeguarding Adults Policy and Procedure or the Whistle Blowing Policy and Procedure.

Comfort Care Recruitment and Training Limited will report all safeguarding concerns and incidents to the Local Authority and to the Care Quality Commission (CQC) in line with our regulatory requirements.

Comfort Care Recruitment and Training Limited will ensure that appropriate action is taken when safeguarding concerns are reported and that all concerns will be investigated.

Comfort Care Recruitment and Training Limited will work in partnership with other agencies to manage safeguarding concerns.

Comfort Care Recruitment and Training Limited recognises our responsibilities in relation to confidentiality and data protection and will share information appropriately.
Comfort Care Recruitment and Training Limited will identify areas to improve safeguarding practice by analysing all safeguarding reports to identify trends and lessons learned.

Comfort Care Recruitment and Training Limited will provide Safeguarding Training for all staff as part of the induction training and on an annual basis. It is a requirement that all employees attend Safeguarding Training.

Comfort Care Recruitment and Training Limited will have a clear Whistle Blowing Policy and Procedure in place and will ensure that employees have access to this.

Comfort Care Recruitment and Training Limited is committed to implementing this Safeguarding Adults Policy and the practices it sets out.

Procedure

Reporting Abuse or Neglect

When employees become aware of safeguarding concerns they must take the following action:

- Ensure the immediate safety of the client by assessing the immediate risk and taking action if the client, or others, are in danger
- If there is a medical emergency, imminent danger, or if a crime is being committed the Emergency Services must be called on 999
- If the situation is not life threatening but the client may need medical assistance, NHS 111 must be called
- If a crime is suspected leave the scene untouched if possible
- Reassure and support the client

The employee must inform the Registered Manager once the above actions have been taken. In the absence of the Registered Manager the employee must contact the designated person on call.

Appendix 2 of this Safeguarding Adults Policy and Procedure contains contact details for the Registered Manager, Nominated Individual and Local Authority Safeguarding Adults.

The employee must give the Registered Manager an account of what has happened and if there are any other people who could be at risk of harm.
If the concern relates to the Registered Manager the employee must contact the Provider/Nominated Individual.

The employee must provide reassurance to the client and follow the instructions and advice given by the Registered Manager.

The employee must complete a Safeguarding Report Form as soon as possible after the incident and forward this to the Registered Manager.

The Registered Manager must debrief with the employee and offer additional support if required.

Responding to a Disclosure

Comfort Care Recruitment and Training Limited recognises that responding to a disclosure of abuse or harm can be a distressing experience for employees;

however, it is important that employees are able to deal with disclosures appropriately to support the client.

When a client discloses or discusses potential abuse the employee must:

- Recognise - Identify that the client may be describing abuse
- Respond – Remain calm, listen carefully and show empathy
- Reassure - that it will be taken seriously, explain that there is a duty to report the issues to a manager and tell them what may happen next
- Record - Write a report of the conversation clearly and factually as soon as possible
- Report - in a timely manner to the Registered Manager

Preserving Evidence

If employees are supporting a client where a potential crime has been committed it is important that they leave the area as it is and keep handling to a minimum to prevent cross-contamination of evidence.

If possible, the employee should:

- Leave things as and where they are
- Secure the area if possible and do not let others enter
- Don't touch anything unless required to provide emergency assistance to a client
- Don't clear the area
- Don't wash anything
- Don't launder anything
- Don't clear any spillages
- Don't dispose of any rubbish or items
- If there are weapons or objects that may have been used in relation to the incident leave these where they are
- Try to ensure that others do not have physical contact with the client
- Encourage the client not to wash or change clothing and footwear
- If the client does change their clothing or footwear advise them, they must not be washed or disposed of, leave them untouched if possible
- If you have used an item when supporting the client, such as a blanket, this must be preserved by leaving it where it is
- Note any footprints or fingerprints and make the Police aware

Referral to the Local Authority Adult Safeguarding Team

The Registered Manager must ensure that the Local Authority Safeguarding Adults referral process is followed and should ensure they have all the required information to make the referral.

The Registered Manager is responsible for reporting the concern to the Local Authority Safeguarding Adults. In the absence of the Registered Manager another member of the Management Team is responsible for reporting the concern.

Comfort Care Recruitment and Training Limited should have the following information available when making the referral:

- Client's contact details
- Client's care and support needs
- Client's communication needs
- Details of the person who has raised the concern
- Details of the alleged perpetrator
- Details of other relevant people e.g. witnesses
- Details of the concern
- Harm caused to the client
- Immediate risks
- Action already taken by Comfort Care Recruitment and Training Limited
- If reported to Police details of crime reference number
- If the client has consented to the referral being made
- If there have been previous similar concerns

The Registered Manager must discuss with the Local Authority Safeguarding Adults what actions need to be taken by Comfort Care Recruitment and Training Limited.

Until a safeguarding referral has been closed by the Local Authority the Registered Manager must maintain contact with the Local Authority to discuss the progress and outcome of the referral.

Completing a Safeguarding Report Form

Comfort Care Recruitment and Training Limited must ensure that when completing a safeguarding report employee must:

- Write a factual report
- Record what the client actually said, using their own words and phrases
- Describe the circumstances which led to the safeguarding concern – e.g. disclosure, witnessing an incident

- Record the location of the concern
- Record details of witnesses
- Complete a Body Map if the client has physical marks or injuries
- Ensure the report is legible
- Check spelling and grammar
- Type the report or use black ink for hand written reports
- Sign and date the report

Safeguarding reports completed by employees may be used as part of investigations, disciplinary action or legal proceedings.

The Registered Manager must complete a Management Report detailing the actions they have taken to manage the safeguarding concern. The Management Report must contain details of the investigation outcome and any learning points.

The Registered Manager should maintain a log of all safeguarding concerns to enable analysis for trends.

Consent

Where possible consent should be gained from the client to report the safeguarding concerns.

However, when there are concerns about the safety of a client, or another person, consent is not required to make a referral to the Local Authority Safeguarding Adults or to the Police.

When the Registered Manager makes the safeguarding referral to the Local Authority Safeguarding Adults, they must inform the Local Authority whether the client is aware of the referral.

Supporting Clients

A client who has experienced, or is at risk of, abuse and neglect must be supported.

Comfort Care Recruitment and Training Limited will ensure that the client's confidentiality is maintained and employees will follow the organisations Confidentiality Policy and Procedure and Data Protection Policy and Procedure.

The client must be central to all discussions and decisions made about how to support them and keep them safe.

Comfort Care Recruitment and Training Limited is committed to the principles of 'Making Safeguarding Personal' and will ensure that a person-centred approach is taken to managing safeguarding concerns and that the client is involved in decisions

made. Comfort Care Recruitment and Training Limited will support clients to maintain:

- Choice
- Control
- Safety
- Health and Wellbeing
- Dignity and Respect
- Quality of Life

Employees must be vigilant to indicators and concerns that the client is under duress or influence when making decisions relating to safeguarding.
Comfort Care Recruitment and Training Limited will ensure that all relevant agencies are involved to support clients.

If the client would benefit from an independent Safeguarding Advocate to support them the Registered Manager will make a referral for this.

Clients Lacking Mental Capacity for a Specific Decision

The Mental Capacity Act (MCA) 2005 provides a statutory framework that protects the rights of people who do not have mental capacity to make decisions.

The 5 principles of the MCA must be followed in relation to safeguarding concerns:

1. A person must be assumed to have capacity unless it is established that they lack capacity

2. A person is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success

3. A person is not to be treated as unable to make a decision merely because

   they make an unwise decision

4. An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests

5. Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is least restrictive of the person's rights and freedom of action

When supporting a client who lacks capacity employees must follow Comfort Care Recruitment and Training Limited's Mental Capacity Policy and Procedure.

Confidentiality and Information Sharing

When sharing information for safeguarding purposes, Comfort Care Recruitment and Training Limited will ensure that:

- The client involved will be informed about the information that is recorded and will be asked to consent to share the information with the Local Authority or another agency. If the client declines to share their information there may be occasions when it is justified to share the information if the client or others are at risk.
- All sharing of personal and sensitive information will be shared in compliance with the legal requirement of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- Employees must follow Comfort Care Recruitment and Training Limited's Data Protection Policy and Procedure.
- All employees will receive training on Data Protection and Confidentiality.

If an employee is unsure about what information they should share, they must contact the Registered Manager for advice.

Safeguarding Meetings

Comfort Care Recruitment and Training Limited will ensure that we will attend multiagency safeguarding meetings when invited.

Where possible the Registered Manager will attend but there may be occasions when other employees are required to attend.

A written report must be prepared by the Registered Manager prior to attending multi-agency meetings.

Care Quality Commission (CQC) Notifications

The Registered Manager must notify the Care Quality Commission without delay of incidents of abuse and allegations of abuse, as well as any incident which is reported to or investigated by the Police.

The Registered Manager must notify the CQC about abuse or alleged abuse involving a client using the service, whether the client is the victim, the abuser, or both.

The Registered Manager must ensure that in their absence there is a person delegated to complete CQC notifications.

Professional Disagreements

Comfort Care Recruitment and Training Limited will work to develop professional working relationships with agencies.

If a difference of professional opinion occurs between professionals, the Registered Manager must ensure that this does not detract from the safeguarding process and must ensure that the safety and wellbeing of the client is prioritised.

The Registered Manager should refer to the Local Authority Safeguarding Adults Policy and Local Protocols for managing professional disagreements.

Managing Allegations against Employees

All allegations of abuse, neglect and maltreatment by an employee will be taken seriously and managed in accordance with Comfort Care Recruitment and Training Limited's Safeguarding Adults Policy and Procedure, Comfort Care Recruitment and Training Limited's Disciplinary Policy and Procedure and the Local Authority Safeguarding Adults Policy and Procedure.

When there are allegations about employees the Registered Manager must immediately make a decision on whether to suspend the employee. Suspension is a neutral action to allow Comfort Care Recruitment and Training Limited to carry out an investigation into the allegations. Employees suspended will receive full pay.

Suspension is not automatic but must be considered if:

- It is suspected that a client has experienced abuse or neglect
- The allegation is being investigated by the Police or Local Authority
- The allegation might be grounds for dismissal
- It is not possible to fully investigate the allegations whilst the employee remains in the workplace
- There is a risk that the employee may remove evidence or attempt to influence witnesses

If the Registered Manager decides that suspension is necessary, they must suspend the employee as soon as possible and not allow them to continue working. The Registered Manager must contact the employee and arrange to meet them as soon as possible to inform them of the allegations and the suspension. Where possible the meeting should be done face to face, in circumstances where this is not possible this can be done by telephone. If possible, the Registered Manager should have another member of the Management Team witness the meeting with the employee.

The Registered Manager must send a letter to the employee giving them the details of the suspension and allegations. This letter must be sent by recorded delivery.

The Registered Manager must record the reasons why they decided suspension was necessary. This must include reference to evidence available.

The Registered Manager must ensure that confidentiality is maintained and must not give details of the suspension to other employees unless members of the Management Team.

The suspended employee must be considered innocent unless the allegations are proven and must be offered support.

The Registered Manager must allocate a senior person in the organisation to act as a contact person for the employee. The allocated person should maintain contact with the employee to update them on the suspension and to provide sources of external support if required.

The Registered Manager must ensure that a full investigation is completed and if the allegations are founded action must be taken in accordance with Comfort Care Recruitment and Training Limited's Disciplinary Policy and Procedure.

If the employee resigns during the investigation process or refuses to co-operate in the investigation, the Registered Manager must proceed with the investigation in the employee's absence.

If the investigation concludes that the allegations are not founded the employee must be supported to return to the workplace. Comfort Care Recruitment and Training Limited recognises that suspension can be difficult for employees and will ensure the employee is supported on their return to work. The Registered Manager must meet with the employee on their return and discuss what support they require.

If the investigation concludes that the evidence is not sufficient to substantiate the allegations the Registered Manager will consider if any further action is required. The Registered Manager must contact the Local Authority Safeguarding Adults Team to discuss the investigation outcome.

If the investigation concludes that the allegations of abuse and neglect are substantiated the Registered Manager must take appropriate action under Comfort

Care Recruitment and Training Limited's Disciplinary Policy and Procedure. The Registered Manager must discuss the outcome of the investigation with the Local Authority Safeguarding Adults Team. The Registered Manager will make a referral to the Disclosure and Barring Service (DBS) for consideration for the Adult Barred List if this is required.

It is the policy of Comfort Care Recruitment and Training Limited that settlement agreements will not be provided for allegations relating to safeguarding concerns. Comfort Care Recruitment and Training Limited has statutory and contractual responsibilities in relation to safeguarding which will be adhered to.

After the investigation is completed, the Registered Manager must review the incident and identify any learning points.

Local Area Protocols

Comfort Care Recruitment and Training Limited will refer to the Local Authority Safeguarding Adults Multi-Agency Policy and Procedure and follow protocols relating to:

- Falls
- Medication errors
- Pressure ulcers
- Priority for raising concerns and making decisions
- Acting in an emergency
- Pre-referral consultation process
- Recording outcomes of a consultation
- Making a safeguarding referral
- Possible responses
- Lead responsibility
- Sharing confidential information – Including Duty of Candour
- Making decisions about sharing confidential information
- Local Authority response to an allegation of abuse and/or neglect
- Decision to proceed
- Decision not to proceed
- If the adult does not want any action taken
- Record keeping and safeguarding
- Levels of Risk and Response
- Risk assessment
- Section 42 Enquiry Process, Roles and Responsibilities
- Protocols between Police and the Local Authority
- Immediate Threat, Risk and Harm Considerations

- Adult Safeguarding within regulated/Commissioned Services
- Commissioning Responsibilities
- CQC responsibilities
- Provider responsibilities

Roles and Responsibilities

All employees are responsible for:

- Following the Safeguarding Adults Policy and Procedure.
- Completing Safeguarding Training.
- Recognising and reporting safeguarding concerns and incidents to the Registered Manager without delay.
- Reporting concerns of poor practice to the Registered Manager.
- Reporting Whistle Blowing concerns and understanding the Whistle Blowing Policy and Procedure.
- Working within the framework of the Mental Capacity Act.
- Being aware of the Local Authority's Safeguarding Adults Board's Policies and Procedures for safeguarding adults.
- Understanding the principles of confidentiality and information sharing in line with local and government guidance.
- Contributing, when requested to do so, to multi-agency meetings.

The Registered Manager is responsible for:

- Ensuring this Safeguarding Adults Policy and Procedure is implemented.
- Keeping up to date with local safeguarding policies and protocols and ensuring that they are adhered to.
- Ensuring good governance and management of Safeguarding within Comfort Care Recruitment and Training Limited.
- Ensuring that contractual requirements relating to safeguarding are met.
- Managing safeguarding concerns and incidents and identifying learning points from these.
- Being a point of contact for clients, relatives and others to contact to report concerns.
- Reporting Safeguarding Adults concerns to the Local Authority.
- Completing CQC Notifications relating to safeguarding.
- Ensuring that employees receive Safeguarding Training appropriate for their role.
- Ensuring that safeguarding responsibilities are reflected in all Job Descriptions.

- Ensuring that safe recruitment processes are in place.
- Making referrals to the Disclosure and Barring Service (DBS) when required.
- Updating the Provider/Nominated Individual about safeguarding concerns and incidents.

The Provider/Nominated Individual is responsible for:

- Maintaining oversight of how safeguarding is managed.
- Reviewing learning points with the Registered Manager.
- Providing appropriate supervision and support to the Registered Manager.

Breaches of Policy

For employees, failure to adhere to the Safeguarding Adults Policy could lead to possible disciplinary action being taken.

For others (volunteers, agency staff, contractors) their individual relationship with the organisation may be terminated.

Monitoring and Review

This Policy will be reviewed annually or sooner, if necessary, due to legislative or regulatory requirements.

Appendix 1 – Categories of Abuse

Physical Abuse: including assault, hitting, slapping, pushing and misuse of medication, restraint or inappropriate physical sanctions, unexplained injuries.

Psychological Abuse**:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Sexual Abuse: including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Financial or Material Abuse**:** including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect and Acts of Omission: includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory Abuse: including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational Abuse**:** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Self-Neglect: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Domestic Abuse: including psychological, physical, sexual, financial, emotional abuse; so, called 'honour' based violence.

Modern Slavery: encompasses slavery, human trafficking and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

The above 10 categories of abuse are defined under the Care Act 2014. Employees must also be aware of Prevent and Adult Criminal Exploitation.

Prevent: about safeguarding and supporting those vulnerable to radicalisation. Prevent is 1 of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

Adult Criminal Exploitation/County Lines: ` County Lines' is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. 'Cuckooing' is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing.

Appendix 2 – Safeguarding Reporting

Safeguarding Lead - Registered Manager Benson Ozour

Address:
COMFORT CARE RECRUITMENT AND TRAINING LIMITED
310 High Street
Croydon
CR0 1NG

Telephone: 07538 722071

Nominated Individual - Mr Benson Ozour

Address:
COMFORT CARE RECRUITMENT AND TRAINING LIMITED
310 High Street
Croydon
CR0 1NG

Telephone: 07538 722071

Local Authority Safeguarding Adults - Croydon Council

Address:
Croydon Council
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

Telephone: 020 8726 6500

Police

Emergencies: 999

Non-Emergencies: 101