Safeguarding Policy and Procedure

Owner: Designated Safeguarding Lead
Relevant to: Staff, Volunteers and trustees

Office Use only:

Department Family:	**SLT Owner:**	**Approval/Re-approval Date:**	**Implementation Date:**	**Next Review Date:**
Governance	Ruth Owens	July 2026	May 2024	July 2027

Headway
the brain injury association

New Policy or Substantive Policy Review

Version	Date	Policy Development Agreed by *(SLT Owner)*	Policy Development Author	Draft Policy Verified by	Policy Approval	Impact Assessment *(if applicable)*
V1	November 2023	CEO	Alex Power Designated Safeguarding Lead	Director of Services	CEO	N/a

Rationale for new or substantive policy review	As part of the 2023 review of all policies it was determined that the Safeguarding Policy and Procedure should be rewritten to reflect changes in legislation and best practice.

Please make explicit if change/review relates to procedures, guidelines and associated documents only

Periodic Policy Review / Change History

Version	Date of Review / Revision	Description of Change	Reviewed By	Approved By *(SLT Owner)*
V2	March 2025	General policy review	AP	RHB
V3	August 2025	Links updated in Appendix	AP	RHB
V4	July 2026	General policy review	AP	RHB

Communication

To be agreed by SLT Team

All Staff Email		Team Meetings	
Newsletter		External website	

Contents Page

1. Policy statement 3
2. Definitions 3
3. Principles 5
4. Scope and limitations 5
5. Responsibilities 5
6. Examples of potential safeguarding concerns 6
7. Making a report 8
8. Disclosure and Barring Service (DBS), Disclosure Scotland and Access NI. . 10
9. Implementation arrangements 10
10. Monitoring and review 11

Appendix one - Devolved Nations and legal guidance 12

Appendix two – Flow chart 13

Appendix three - Sources of information and support 14

1. Policy statement

Headway – the brain injury association (Headway UK) recognises that while fulfilling their duties, members of staff and volunteers, will come into contact with children and adults at risk of harm.

Headway UK is committed to ensuring that it can fulfil its safeguarding responsibilities both for adults at risk, and children, who may be at risk of harm or exploitation. Headway UK also recognises that it has a duty to report incidents or suspected safeguarding concerns, to the appropriate authorities.

This document will focus on safeguarding adults at risk – please refer to the Headway Child Safeguarding policy for issues relating to people under the age of 18.

2. Definitions

Safeguarding: means 'protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect'.

The term is used to refer to several areas of concern relating to adults at risk of harm, including:

i. **Child protection issues:** harm or an act likely to harm a child or young person's safety, well-being and development. Abuse can be physical, sexual, emotional or neglect. A child witnessing abuse in the home is a child protection issue.

ii. **Exploitation** (abuse including sexual, psychological or financial)

- Examples of sexual exploitation include rape, sexual assault, being tricked or manipulated into having sex or performing a sexual act, being trafficked into, out of, or around the UK for the purpose of sexual exploitation, being forced to take part in or watch pornography.
- Financial includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements.
- Psychological abuse can be defined as behaviour used to control, isolate or frighten.

iii. **Radicalisation:** the aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

iv. **Physical abuse or neglect:** includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.

v. **Emotional abuse or neglect:** includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or support networks.

vi. **Discriminatory abuse:** is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act

vii. **Organisational abuse:** includes neglect and poor care practice within an institution or care setting, such as a hospital or care home, or in relation to care provided in one's own home.

viii. **Domestic abuse:** includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called 'honour' based violence.

ix. **Modern slavery:** encompasses slavery, human trafficking, forced labour, and domestic servitude.

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

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

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

The law says that to make a decision we need to:

- Understand information.
- Remember it for long enough.
- Think about the information.
- Communicate our decision.

Each home nation has legislation about the circumstances in which decisions can be made on behalf of an adult who is unable to make decisions for themselves:

- England and Wales – Mental Capacity Act 2005
- Scotland – Adults with Incapacity Act 2000
- Mental Capacity (Northern Ireland) 2016

Further information available is available for each devolved nation is available here and in Appendix three:

- England and Wales
- Scotland guide to incapacity and Mental Health Act
- Northern Ireland

3. Principles

Headway UK will take all safeguarding concerns seriously and will fully consider and report any concerns in a timely manner to the relevant person or authority.

Headway UK will ensure it maintains confidential records of any safeguarding concerns and any referrals made as a consequence. Any records will be kept in accordance with the Data Protection Policy and current legislation.

The statutory guidance enshrines the six principles of safeguarding:

i. Empowerment: presumption of person-led decisions and informed consent.

ii. Prevention: it is better to act before harm occurs.

iii. Proportionality: proportionate and least intrusive response appropriate to the risk presented.

iv. Protection: support and representation for those in greatest need.

v. Partnerships: local solutions through services working with their communities.

vi. Accountability: accountability and transparency in delivering safeguarding.

4. Scope and limitations

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

5. Responsibilities

The Chief Executive and the board of trustees are ultimately responsible for the overall compliance of Headway UK in relation to safeguarding.

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

Role	Name	Email	Phone Number
Designated Safeguarding Lead	Alex Power	alex.power@headway.org.uk	07765 352042

The departmental/deputy safeguarding leads are responsible for:

Role	Name	Email	Phone Number
Groups and branches	Ffion Jones	ffion.jones@headway.org.uk	0115 695 0389
Retail	David Byrne	david.byrne@headway.org.uk	07917 214956
Director of Services	Ruth Owens	ruth.owens@headway.org.uk	07887 454289

If you wish to report a safeguarding concern directly to the Chief Executive:

Chief Executive	Luke Griggs	luke.griggs@headway.org.uk	07912 668551

Everyone's responsibility: Everyone at Headway has a responsibility to help keep everyone, including adults at risk safe from abuse and neglect.

All staff and volunteers within Headway UK have a responsibility to ensure that they act in line with this policy. Safeguarding training for all staff will be provided on commencement of employment, and refresher training sessions will be given according to role.

6. Examples of potential safeguarding concerns

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

Line managers should be informed of concerns as soon as possible, and where necessary, advice sought. Advice can also be sought from the contacts detailed above.

Examples include:

i. An adult raises an allegation of current abuse, harm, neglect or other inappropriate behaviour.

ii. A disclosure of historical sexual or physical abuse is made, where the alleged perpetrator still has access to children or adults at risk.

iii. A volunteer, staff member or visitor discloses information involving themselves, family members or any other person that gives rise to concerns that an individual may be harming or abusing an adult at risk (or child).

iv. There are suspicions or indications that an adult at risk is being abused or harmed, or is at risk of exploitation, harm, neglect or abuse.

v. There are observable changes in an adult at risks' appearance or behaviour that may be related to exploitation, harm or abuse.

vi. A concern is raised that an individual presents a risk of abuse or harm towards an adult at risk.

vii. Concerns arise that an individual may be subject to a forced marriage. A forced marriage is defined as one in which one or both individuals do not (or, because of an individual's vulnerability or mental capacity, cannot) consent to marriage. In the UK, forced marriage is regarded as an issue of domestic/child abuse.

viii. Concerns arise that an individual may be subject to Female Genital Mutilation (FGM).

ix. Concerns arise that a volunteer, service user, or member of staff is vulnerable to radicalisation and there is an identifiable risk of the individual being drawn into terrorism.

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

i. If an adult at risk injures themselves or is hurt by someone else.

ii. If you are concerned that a relationship is developing with an adult at risk, which could represent an abuse of trust.

iii. If there is a concern that a member of staff or a volunteer may present a risk of abuse or harm towards an adult at risk.

iv. If an accusation is made against you, suggesting you have acted / spoken in a manner that could be seen as abusive or harmful.

v. If an adult at risk reports an allegation of abuse regarding a member of an external organisation attending Headway UK facilities, or at a Headway UK event.

vi. If an adult at risk reports concerns regarding sexual abuse, financial abuse, domestic abuse, a forced marriage, FGM or other exploitative behaviour.

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

7. Making a report

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

In particular:

i. Don't ignore it.

ii. For accuracy and speed of response, it is essential that you provide records and information as soon as possible after you are first made aware.

iii. Listen carefully, stay calm and make notes of times and details – this may need to be done after the event, so times may be approximate. If times are approximate, please clarify this in your report.

iv. Reassure the person making the disclosure that what they have reported will be handled appropriately and confidentially. However, this may involve sharing information on a 'need to know' basis with other agencies.

v. Keep questions to the minimum required to understand what is being reported. Avoid the person making the disclosure feeling that they are the subject of an interrogation.

vi. Identify any immediate health and safety concerns, **contact emergency services if required**.

vii. Explain to the individual that you will need to report the matter and explain the process. Where possible, and appropriate, obtain the individual's consent. NB – consent is not necessary in the event of a serious incident. Should the alleged

abuser be an **employed carer or medical professional**, consent to report is not required as it is a matter of public protection.

viii. Make a detailed record of the incident immediately. You should do so on the Headway UK internal safeguarding reporting form http://headway.org.uk/safeguarding. In addition, you can report and or discuss the matter, by phone or email to the Designated Safeguarding Lead/ departmental safeguarding lead, or your line manager.

ix. It is important that reports are raised with local social services safeguarding teams as soon as possible. Contact details can be found online by searching for 'report safeguarding adult concern in (add area)'. You may be able to report the concern via their website, but if you are unsure you should telephone social services to discuss or request guidance. The report should be raised as soon as possible after you are made aware of the concern. Headway UK's safeguarding team can support you with this during office hours, if needed.

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

If an allegation concerns the line manager of the person making the report, or the Designated Safeguarding Lead, the report should be made to the Director of Services or the Chief Executive. The Designated Safeguarding Lead, the Director of Services or the Chief Executive will refer the matter directly to adult social care, safeguarding, or the police where appropriate to do so. If you remain concerned that your allegation is not being acted upon appropriately, please refer to Headway UK's Whistleblowing Policy for clarification on next steps.

Where no immediate and significant risk to safety has been identified, the safeguarding concern should be reported to the Designated Safeguarding Lead / departmental safeguarding lead using the internal safeguarding reporting form (http://headway.org.uk/safeguarding).

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

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

i. Address any serious and immediate risk to the adult at risk, child, or any other party.

ii. Preserve any evidence likely to be lost before external agencies can respond.

iii. Determine the need for referral to adult social care, safeguarding or the police (if not already undertaken) and provide sufficient information to the relevant external agency to enable an effective response.

iv. Determine any further procedures that should be invoked.

v. Identify any internal support required by the adult at risk.

This risk assessment may be carried out in conjunction with appropriate colleagues.

If a referral to adult social care, safeguarding or the police is deemed appropriate, the Designated Safeguarding Lead or their nominee will support you to make the referral (if not already undertaken).

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

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

8. Disclosure and Barring Service (DBS), Disclosure Scotland and Access NI.

Headway UK will ensure that all relevant staff working with adults at risk of harm will have an appropriate background check carried out. These checks will be renewed, every 2-5 years, depending on the role, for further information, see the safer recruitment process.

9. Implementation arrangements

All new members of staff and volunteers are made aware of the policy and requirements during the staff/volunteer induction process. Updated and amended procedures are disseminated in accordance with the policy review dates.

Regular, mandatory training and updating of information to be completed by relevant staff

10. Monitoring and review

This policy will be reviewed annually or in line with any changes to legislation.

Supporting/related documents

The Data Protection Policy provides guidance in relation to Headway UK's approach to the General Data Protection Regulation.

Appendix one - Devolved Nations and legal guidance

Appendix two – Flow chart

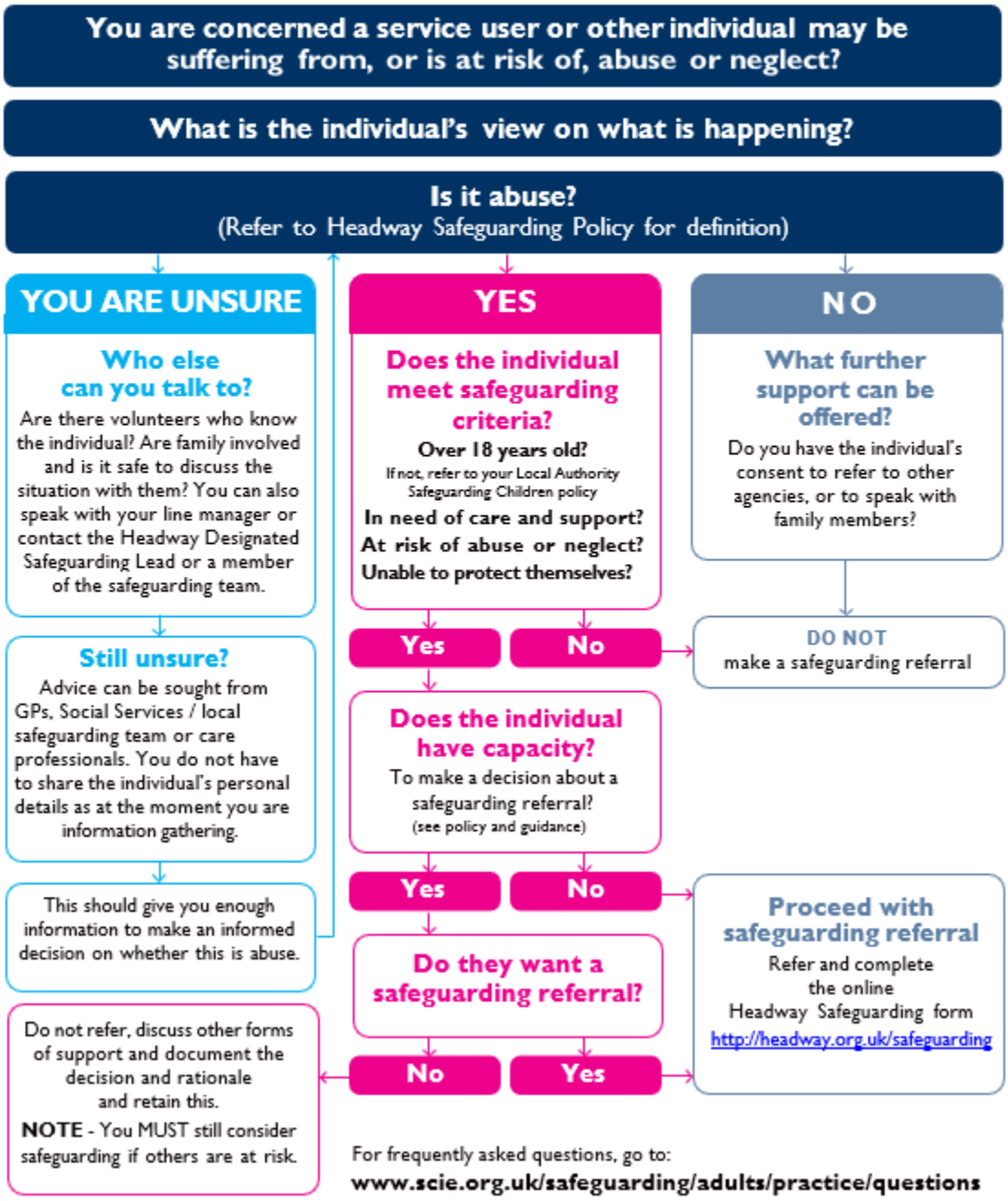
Appendix three – Sources of information and support

Appendix one - Devolved Nations and legal guidance

England (Care Act 2014)	*Northern Ireland (Adult Safeguarding Prevention and Protection in Partnership 2015)*
An **adult at risk** is an individual aged 18 years and over who: (a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND: (b) is experiencing, or at risk of, abuse or neglect, AND: (c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.	An **adult at risk of harm** is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their a) personal characteristics and/or b) life circumstances. a) **Personal characteristics** may include, but are not limited to age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain. b) **Life circumstances** may include, but are not limited to, isolation, socio-economic factors and environmental living conditions. An **adult in need of protection** is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their: Personal characteristics *AND/OR* Life circumstances *AND:* c) who is unable to protect their own well-being, property, assets, rights or other interests; *AND* d) where the action or inaction of another person or persons is causing, or is likely to cause, him/her to be harmed. In order to meet the definition of an 'adult in need of protection' either (a) or (b) must be present, in addition to both elements (c), and (d).
Scotland (Adult Support and Protection Act 2007)	
An **adult at risk** is an individual aged 16 years and over who: a) is unable to safeguard their own well-being, property, rights or other interests, b) is at risk of harm, and c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, is more vulnerable to being harmed than adults who are not so affected.	
Wales (Social Services and Well Being Act 2014)	
An **adult at risk** is an individual aged 18 years and over who: a) is experiencing or is at risk of abuse or neglect, AND: b) has needs for care and support (whether or not the authority is meeting any of those needs) AND: c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.	

Appendix two – Flow chart

Headway UK's safeguarding for adults flow chart



Appendix three - Sources of information and support

(a) Headway helpline
- 0808 800 2244
- helpline@headway.org.uk

(b) Find your nearest Adult Social Care service:
- **England:** https://www.nhs.uk/service-search/other-health-services/local-authority-adult-social-care
- **Wales:** https://111.wales.nhs.uk/?locale=en&term=A
- **Scotland:** https://www.mygov.scot/social-services
- **N. Ireland:** https://online.hscni.net/access-health-social-care/#CAP

Advocacy services -

Adult Social Care in your area can provide details of advocacy services, in addition to:

https://www.disabilityrightsuk.org/resources/advocacy-get-your-voice-heard

England - https://www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/someone-to-speak-up-for-you-advocate/

Wales - https://www.agecymru.wales/our-work/advocacy/hope---helping-others-participate-and-engage/advocacy-services-in-wales/

Scotland - https://www.siaa.org.uk/find-an-advocate/

N. Ireland -https://www.disabilityaction.org/Pages/Category/advocacy

(c) Hourglass A national organisation - it aims to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.
- Tel: 0808 808 8141
- Email: enquiries@wearehourglass.org.uk
  www.wearehourglass.org

(d) Ann Craft Trust (ACT) A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults in Sport and Activity team to support the sector.
- Tel: 0115 951 5400
- Email: Ann-Craft-Trust@nottingham.ac.uk
- www.anncrafttrust.org

(e) Men's Advice Line, for male domestic abuse survivors.
- Tel: 0808 801 0327

(f) National LGBT+ Domestic Abuse Helpline
- Tel: 0800 999 5428

(g) National 24Hour Freephone, Domestic Abuse Helplines

England	**Northern Ireland**
Refuge Tel: 0808 2000 247 www.nationaldahelpline.org.uk/Contact-us	Tel: 0808 802 1414 www.dsahelpline.org Twitter: www.twitter.com/dsahelpline Facebook: www.facebook.com/dsahelpline
Scotland	**Wales**
Tel: 0800 027 1234 Email: helpline@sdafmh.org.uk Web chat: sdafmh.org.uk	Llinell Gymorth Byw HebOfn/ Live free from fear helpline Tel: 0808 8010 800 Type Talk: 18001 0808 801 0800 Text: 078600 77 333

(h) Rape Crisis Federation of England and Wales. Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.
- Email: info@rapecrisis.co.uk
- www.rapecrisis.co.uk

(i) Respond. Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.
- Tel: 020 7383 0700 or
- 0808 808 0700 (Helpline)
- Email: services@respond.org.uk
- www.respond.org.uk

(j) Stop Hate Crime works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.
- 24 hours service:
- Telephone: 0800 138 1625
- Web Chat: www.stophateuk.org/talk-to-us/
- E mail: talk@stophateuk.org
- Text: 07717 989 025
- Text relay: 18001 0800 138 1625

(k) Susy Lamplugh Trust is a leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.

- Tel: 020 8392 1839
- Fax: 020 8392 1830
- Email: info@suzylamplugh.org
- www.suzylamplugh.org

(l) Victim Support provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

- Tel: 0808 168 9111
  Home - Victim Support

(m) Women's Aid Federation of England and Wales is a national domestic violence charity. It also runs a domestic violence online help service.

- www.womensaid.org.uk/information-support
- Email: helpline@womensaid.org.uk