



**RLSS UK
Safeguarding**

The Royal Life Saving Society UK (RLSS UK) Adult at Risk Safeguarding Policy and Procedures

“Safeguarding is everyone’s business”.

RLSS UK is committed to safeguarding and promoting the welfare of children, and adults at risk and expects everyone involved in RLSS UK activity to share this commitment.

What to do if you feel unsafe or want to report a safeguarding concern

Within RLSS UK we want to ensure that we provide you with a safe and welcoming environment where you feel you are respected and valued. If you feel unsafe or have any concerns then you should contact one of the Designated Safeguarding Leads (DSL) in the organisation (see section 7.0) or confide in a person that you trust (parent, coach or friend). These individuals can contact the DSL on your behalf. We are here to support you.

[Click here to ‘Report a Safeguarding Concern’](#)

All information regarding RLSS UK safeguarding, including supplementary policies can be found on the [RLSS UK Website](#)

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Control Sheet

Document Review

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Document Approval

Name	Title	Department	Signature	Date
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This document should be reviewed in line with the details in section 16 and updated to reflect relevant changes.



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1.0 Policy Statement

1.1 RLSS UK is committed to ensuring that adults, especially those at risk who participate in its activities including lifesaving, lifeguarding, community awards, education, sports, competitions and any other events have a safe, positive and enjoyable experience. RLSS UK recognises that through some of its activities, especially those requiring life support or casualty care, that any adult may, at any point become at risk.

All groups of people whatever their age, gender, language, disability, race, religion or belief, sexual orientation, socio-economic status and culture have the right to protection from abuse and to be treated fairly. Everyone involved with an adult who may be at risk is uniquely placed to recognise and respond to abuse and poor practice across RLSS UK.

1.2 RLSS UK recognises that the Care Act (2014) has created a legal framework for how Local Authorities, other agencies and organisations should work together to protect adults at risk of abuse, harm or neglect. In line with the Act RLSS UK also recognises that safeguarding individuals requires multi agency responsibility and partnership work.

1.3 Making Safeguarding Personal (MSP)¹ will form an essential part of this policy and the work that is undertaken by those in RLSS UK. Our aim is to empower people to speak out, with actions and outcomes tailored to the needs of the individual. All of the decisions made and the action taken will be in the best interests² of the adult at risk.

2.0 Application

2.1 This policy applies to **all** of those who occupy positions of responsibility, who work, volunteer or come into contact with adults as part of their role within RLSS UK. The policy and associated procedures will be promoted to all new staff, volunteers and participants as part of their induction process at the club, district and National level depending on their role. Organisations associated with RLSS UK will have responsibility for maintaining quality and practices through their volunteers and staff.

2.2 All organisations (including clubs, Approved Training Centre's/ Providers and trainers/ instructors who deliver non-regulated activity as a sole trader) and contractors working in partnership with RLSS UK will be expected to have their own safeguarding arrangements and policies in place. Template policies are available [here](#). It is the duty of these organisations and contractors to ensure their policies are effectively communicated to their volunteers and staff and that they maintain, and quality assure safeguarding practice. Clubs should ensure that a copy of their policy is sent to all members of staff and volunteers, and they will be required, after a reasonable time, to signify they have received it and are conversant with the content. It will be the duty of RLSS UK Safeguarding Team to be reassured that organisations are prepared.

2.3 This policy will be available via the RLSS UK website and clearly made available by each club and organisation.

¹ [Making Safeguarding Personal](#)

² [Best Interest Decisions](#)



3.0 Adult Protection Statement

- 3.1 The RLSS UK recognises that we have a moral and statutory responsibility to safeguard and promote the welfare of all adults. To achieve this, we will provide a safe environment where everyone is respected and valued. We will all be alert to the signs of abuse and neglect and follow our procedures to ensure that adults at risk receive effective support, protection and justice.
- 3.2 RLSS UK has based this policy around the six principles of Adult Protection³. These principles provide a framework that will assist staff and volunteers in supporting and protecting individuals from the risk of abuse, harm or neglect. The principles are;
- **Protection:** Ensuring that all adults at risk, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
 - **Empowerment:** Valuing individuals, listening to and respecting all adults.
 - **Prevention:** Adopting best practice and providing safeguarding policies and procedures for all RLSS UK staff and volunteers to follow.
 - **Partnership:** Sharing information about concerns with the appropriate agencies, in a confidential manner.
 - **Accountability:** Providing effective management for staff, contractors and volunteers through supervision, support and training.
 - **Proportionality:** Acting in collaboration with individuals to take a proportionate response to risk.
- 3.3 We will offer a person-centred approach and the organisation expect organisations associated with RLSS UK to adhere to local partnership⁴ safeguarding practices.
- 3.4 This policy also includes the RLSS UK stance with regards to Modern Slavery. Modern Slavery takes many forms including forced and compulsory labour, slavery, servitude and human trafficking. It is the violation of human rights and the RLSS UK has a zero-tolerance approach to Modern Slavery. We will also take any concerns in this area seriously.
- 3.5 RLSS UK will consider any request for this policy to be made available in an alternative format or language. Please contact RLSS UK HQ Safeguarding Case Officer for further information. This policy is also available on the RLSS UK website.

³ [Care Act 2014](#)

⁴ In line with the Local Adult Safeguarding Partnership arrangements and guidance for the areas where clubs are located.



4.0 Legislation & Statutory Guidance

The practices and procedures within this policy are based on the principles contained within the UK legislation and government guidance. They take the following into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 2018

5.0 Definitions in Adult Safeguarding

To assist in understanding this policy a number of key definitions need to be explained:

Adult - An **adult** is anyone aged 18 or over.

Adult at risk⁵ - An adult who has needs for care and support (whether or not the authority is meeting any of those needs), and is experiencing, or is at risk of, abuse or neglect; and as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

Whilst not an exhaustive list, an adult who may be at risk of harm or abuse may include:

- An older person.
- A person with a physical disability, a learning difficulty or a sensory impairment.
- Someone with mental health needs, including dementia or a personality disorder.
- A person with a long-term health condition.
- Someone who is substance dependant to the extent that it affects their ability to manage day to day living. In such cases the capacity of an individual to make informed decisions (due to mental capacity-see Section 11.0) may alter on a regular basis.

People with care and support needs are not inherently vulnerable, but they may become vulnerable to the risk of abuse, harm or neglect at any point due to:

- Physical or mental ill-health.
- Becoming disabled.
- Getting older.
- Not having support networks, appropriate accommodation or financial stability.
- Being socially isolated.

Adult safeguarding - is protecting a person's right to live in safety, free from abuse, harm and neglect.

Harm- The ill-treatment or impairment of the health or development of an individual, including impairment suffered from seeing or hearing the ill-treatment of another.

⁵ Defined by the Care Act 2014 and only applies to local authorities in England. Social Care in Scotland, Wales and Northern Ireland have devolved responsibility. However, the principles of good practice set out in this document apply throughout the UK.



Concern⁶ - Any situation when there is information that a Adult at risk⁷ has been harmed, or is at risk of being harmed or abused, by their own or someone else's behaviour.

Safeguarding Allegation - This will apply where a person in connection with their employment, membership or volunteering position with RLSS UK has:

- Behaved in a way that has harmed/may have harmed an adult at risk.
- Possibly committed a criminal offence against or related to an adult at risk.
- Behaved towards an adult at risk in a way that indicates he or she may pose a risk of harm to them.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with adults at risk.

Capacity (see section 11.0) - refers to the ability of an individual to make a decision at a particular time. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (Mental Capacity Act 2005).

Poor practice - Sometimes, concerns may relate to poor practice (see [RLSS UK's Low Level Concern Policy](#) for more details), where an adult or another young person's behaviour is inappropriate and may be causing distress to an adult at risk. In the application of this policy, poor practice includes any behaviour which contravenes the principles of this document or RLSS UK Code of Conduct. Where poor practice is serious or repeated this could also constitute abuse and should be reported immediately.

6.0 RLSS UK Commitment to Adults at Risk

6.1 The people that work, volunteer and represent RLSS UK recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs. They also recognise that an adult with disability may or may not identify themselves or be identified as an adult 'at risk'.

6.2 We expect all those who occupy positions of responsibility, who work, volunteer or come into contact with adults who may be at risk to;

- Protect them from abuse whilst they are participating in any activity associated with the RLSS UK.
- Promote and prioritise their safety and wellbeing.
- Create a culture where all adults at risk, parents, guardians, advocates, carers and others who may have a concern are encouraged to report their concerns about the abuse that has happened to them or others.
- Have a clear understanding of their duties and responsibilities to safeguard adults at risk.
- Take appropriate action in the event of incidents/concerns of abuse and support the individual/s who raise or disclose the concern.

⁶ [Understanding What Constitutes a Safeguarding Concern- ADASS](#)



6.3 RLSS UK will:

- provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental wellbeing and moral development of all adults.
- Appoint an Executive Lead for safeguarding and an Executive Trustee. This person will ensure that safeguarding runs as a thread throughout all our activities, both at strategic and operational levels.
- Implement a safeguarding governance structure with assigned roles and responsibilities including the identification of DSL's (and Deputies).
- Promote the RLSS UK's safeguarding arrangements to all of those who occupy positions of responsibility, who work, volunteer or come into contact with adults at risk.
- Ensure robust safeguarding arrangements and procedures are in operation.
- Maintain and securely store confidential, detailed and accurate records of all safeguarding concerns.
- Reinforce the importance of working with all partner agencies with the aim of achieving the best possible outcomes for those who we are aiming to protect from the risk of harm/abuse.
- Provide the details about the action that will be taken by the RLSS UK when a safeguarding concern is reported.
- Notify Adult Social Care as soon as there is a significant concern.
- Recognise that all of those who occupy positions of responsibility, who work with and volunteer for RLSS UK have an equal responsibility to act on any suspicion or disclosure that may suggest an adult is at risk of harm.
- Ensure that staff, members and volunteers involved in adult protection issues receive appropriate support and supervision.
- Ensure that all RLSS UK staff, volunteers, members including clubs, branches and affiliated bodies are required to adhere to the RLSS UK Code of Conduct. These policies are available on the RLSS UK Website - [RLSS UK Policies | Royal Life Saving Society UK \(RLSS UK\)](#).
- Prevent the employment/deployment of unsuitable individuals.
- Ensure that staff, members and volunteers working for RLSS UK with roles and responsibilities for adults at risk (including RLSS UK Trustees and Branch officials) will be subject to appropriate safe recruitment checks and safeguarding training.
- Ensure that all members of staff and volunteers are trained in and receive regular safeguarding updates including how to report concerns.
- Advise all DSL's to maintain current safeguard training and send them regular safeguarding updates.
- Advise all clubs and anyone representing RLSS UK to ensure that all volunteers and staff receive up to date and appropriate safeguarding training.
- Encourage clubs and anyone representing RLSS UK to engage with all parents, advocates, carers and other relevant individuals to ensure that they are made aware of the responsibilities with regard to adult protection procedures through induction packs and the publication of this policy and on the RLSS UK website;
- clearly advertise and promote the details of the designated members of staff for adults at risk

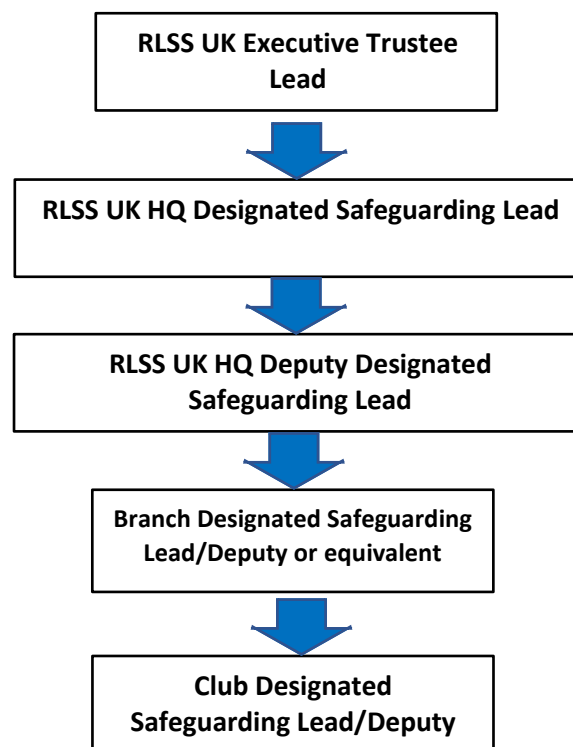


6.4 RLSS UK will support all adults at risk by:

- Allowing them to participate in activities in a way that is appropriate for their ability.
- Ensuring that they are coached and trained by appropriately qualified staff or volunteers who have been competently trained.
- Encouraging self-esteem and self-assertiveness, whilst not condoning aggression or bullying;
- Promoting a caring, safe and positive environment within all of its Clubs through training of officials;
- Recognising that an adult who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- Offering details of helplines, counselling or other avenues of external support;
- Liaising and working together with all other partnerships, support services and those agencies involved in adult safeguarding;
- Accessing and utilising the necessary resources and guidance to identify adults requiring mental health support;
- Reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- Ensuring that they know there are adults in each of the Clubs who they can approach if they are worried or feel unsafe;
- Reinforcing good safeguarding practice to equip all adults with the skills they need to stay safe from harm and to know to whom they should turn for help.

7.0 Safeguarding Structure

The structure of the RLSS UK safeguarding team is as follows:





8.0 Key Safeguarding Roles

8.1 The details and contacts of the RLSS UK Safeguarding Team are;

Role	Name	Email	Telephone
RLSS UK Executive Trustee	Joanne Young	Safeguardingadvice@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK HQ Designated Safeguarding Lead (DSL)	Lee Heard	Leeheard@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK HQ Deputy Designated Safeguarding Lead (DSL)	Richard Flavell	Richardflavell@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK Safeguarding Case Officer	Jo Barrett	Jobarrett@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK Deputy Safeguarding Case Officer	Donna Hill	Donnahill@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
Branch DSL	Names, email addresses and telephones should be published in club and approved training provider policies		
Club DSL	Names, email addresses and telephones should be published in club policies		

8.2 There is an expectation that all members of the RLSS UK Safeguarding Team will work closely together and where circumstances dictate share agreed responsibilities and functions. However, it will be the RLSS UK HQ DSL, or in their absence their deputy, that has primacy in terms of decision making around safeguarding concerns or allegations.

8.3 This Policy should be read in conjunction with the RLSS UK working practices and procedures at section 9.0.



9.0 RLSS UK Safeguarding Procedures

9.1 The aim of these procedures is to detail how RLSS UK staff, volunteers and members or others should respond if they have a safeguarding concern or suspect that an adult at risk is suffering or likely to suffer harm or abuse. It outlines what to do if:

- An individual makes a disclosure or reports that they, or someone else, has been abused.
- The behaviour of an adult or child towards an adult (sometimes referred to as elder abuse) gives them cause for concern.
- They have a safeguarding concern.
- They identify a breach of the RLSS UK Code of Conduct in relation to safeguarding

9.2 The procedures also detail the action that will be taken by the Club/Branch or RLSS UK HQ DSL or Deputy when a safeguarding concern is reported.

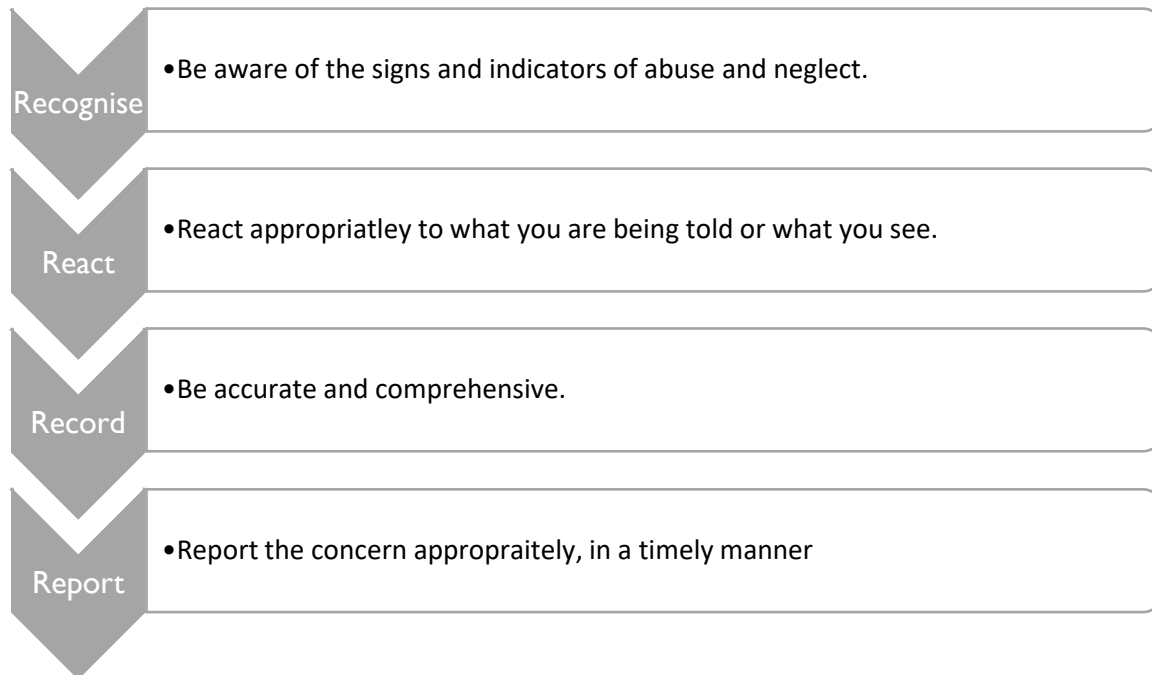
9.3 The RLSS UK [Code of Conduct](#) outlines the behaviour expected of staff, volunteers and anyone representing RLSS UK when they are interacting with all vulnerable groups including adults at risk. Following the Code of Conduct will help to protect adults at risk from abuse and will ensure that professional boundaries are maintained.

9.4 Any breach of the Code of Conduct should be reported in line with the [procedure for reporting a safeguarding concern](#). Serious breaches of the Code of Conduct may also result in a referral being made to the police or a Local Authority if it is thought the breach amounts to a risk of harm to an adult at risk and/or constitutes a crime.



10.0 Reporting a Concern

- 10.1 All staff, volunteers and those working on behalf of RLSS UK have a responsibility to be alert to the fact that vulnerable people may have been abused and that they **MUST** report safeguarding concerns.
- 10.2 By following the four simple safeguarding principles of Recognise, React, Record and Report, the RLSS UK can keep those adults at risk safe from harm.



10.3 Recognise

- 10.3.1 We should all be alert for the signs and indicators that adults at risk who interact or engage with RLSS UK may be suffering harm and/or abuse (see Appendix B) either within the organisation or in external environments (i.e. home etc). We should remember that adults may be abused by other adult and children/young people.

Indicators that an adult may be being abused may include the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- Signs of self-neglect.
- An injury for which the explanation seems inconsistent.
- The adult at risk describes what appears to be an abusive act involving him/her.
- Someone else (a young person or adult) expresses concern about the welfare of another.
- Unexplained changes in behaviour (e.g., becoming very quiet, withdrawn or displaying sudden outbursts of temper).
- Sudden or unusual distrust of adults, particularly those with whom a close relationship would normally be expected.



- Having difficulty in making friends.
- Displaying variations in eating patterns including overeating or loss of appetite; or a sudden weight change.

10.3.2 It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is actually taking place.

10.3.3 It is important to note that not all adults at risk are able to express themselves verbally. Communication difficulties, language barriers or other disabilities may mean that it is hard for the individual concerned to complain or to be understood. You should seek advice and guidance from the DSL and/or Adult Social Services about how to deal with such issues.

10.3.4 We also recognise that many adults may have experienced trauma in their past (Adverse Childhood Experiences) which could be affecting their behaviour and outcomes in life. We recognise that we have an important part to play in providing a safe environment for those who have suffered from such trauma, and we will provide help and support through signposting them to specialist help and support.

10.4 React

10.4.1 It is always difficult to hear about or witness harm or abuse experienced by an individual. The following points will be helpful for both you and the adult concerned should they choose to disclose abuse or harm to you:

- Stay calm.
- Listen carefully to what is said and try not to interrupt.
- Find an appropriate point early on to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Allow them to continue at their own pace.
- Ask questions for clarification only and avoid asking questions that suggest an answer (leading questions).
- Reassure them that they are not to blame and have done the right thing in telling you. If the concern is serious explain that you will need to get support from other trained people to help keep them safe. This must be shared even if the adult doesn't want you to tell anyone else (see section 13.0 regarding information sharing).
- Tell them what you will do next and with whom the information will be shared. Seek consent (see section 11.0). If they are adamant that they do not wish the information to be shared, explain that you will need to seek further advice from the DSL (or Deputy).
- Be aware of the possibility of forensic evidence if the disclosure relates to a recent incident of physical harm or injury and try to protect any supporting materials e.g. clothing.
- Seek medical attention where appropriate.
- Report the disclosure to the Club/Branch DSL (or Deputy) **at the earliest** opportunity. Do not wait to report such issues.
- Don't confront the alleged abuser.



10.4.2 Where the concern or allegation is about a member of staff, member of volunteer, this, must like all other instances be reported to the Designated Safeguarding Lead (DSL) or Deputy. If the DSL or Deputy considers the circumstances to relate to a 'Safeguarding Allegation', they must report the incident to the Local Authority – Adult Social Services. Depending on the circumstances it may also be necessary to inform the police.

10.5 Record

10.5.1 All records must be accurate and comprehensive. Wherever possible you should use the [RLSS UK reporting form](#) and ensure you also notify the Club/Branch DSL or Deputy DSL.

10.5.2 You must record all potential safeguarding issues including low level concerns. Such concerns may be an indicator that more complex harm is occurring and could identify patterns of abuse.

10.5.3 All records must:

- Be made as soon as possible after the event/concern is raised.
- Contain the date, time, people present, anything said (verbatim if possible).
- Detail the behaviour and demeanour of the person disclosing the safeguarding issue.
- Detail any action you have taken (for example how you have reduced risk or whether you have referred the matter to a DSL or Deputy).
- Be a factual account of what has happened.
- Adhere to confidentiality (only share with appropriate people).

Do not record any opinion about what has happened. You are not there to judge or ascertain whether what you are being told is correct.

10.5.4 In relation to consent (see section 11.0) you do not necessarily need to obtain the signature of the adult at risk, but you must record details of how the consent was provided.



10.6 Report

Remember you have a clear responsibility to report the concerns that have been raised with you immediately. Any delay in reporting could potentially cause more harm.

Appendix A outlines a process chart of the reporting procedure

10.6.1 In the first instance you must report concerns that you have to the Club/Branch DSL (or Deputy) **on the telephone, in person or where appropriate, via email**. Where you use email, please ensure that you follow this up with a telephone call. The details of all safeguarding positions will be displayed on the Club/organisation websites and other communicating functions. In addition, the RLSS UK Website will contain the details of the National Safeguarding Team. You can also report the matter to the Central Safeguarding team (RLSS UK HQ) if a local contact is unavailable. Details are included below.

Responsibility	Name	Office Hours	Out of Hours
RLSS UK HQ Designated Safeguarding Lead (DSL)	Lee Heard	Leeheard@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK HQ Deputy Designated Safeguarding Lead (DSL)	Richard Flavell	Richardflavell@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK Safeguarding Case Officer	Jo Barrett	jobarrett@rlss.org.uk	0300 323 0096 Press 0 when out of office hours
RLSS UK Deputy Safeguarding Case Officer	Donna Hill	Donnahill@rlss.org.uk	0300 323 0096 Press 0 when out of office hours

10.6.2 If a member of staff or volunteer is working away from the premises controlled by a partner organisation, then the Safeguarding Policy of that organisation should be followed. Concerns must also still be reported to the RLSS UK HQ DSL or Deputy, they will in turn offer any assistance to the other organisation.

10.6.3 Where the concern or allegation relates to the Club/Branch DSL then the matter should be referred to the RLSS UK HQ DSL or their Deputy.

10.6.4 Where the concern or allegation relates to the RLSS UK HQ DSL or their Deputy then the matter should be referred to the RLSS UK Executive Trustee or if unavailable RLSS UK Chief Executive Officer.

10.6.5 Safeguarding concerns **MUST** be reported immediately (or where this is not possible at the earliest opportunity) so that the report can be assessed, and action taken to protect the person involved. **If any person is at immediate risk of harm or requires medical attention, then the emergency services should be contacted immediately by telephoning 999.**

10.6.6 Where you are unable to contact a DSL, advice can be sought from statutory agencies or by calling or emailing the following;



- Adult Social Care - <https://www.gov.uk/find-local-council>
- Adult Social Care – NI- [NI Government](#)
- Adult Social Care – Wales [Welsh Government](#)
- Adult Social Care – Scotland -[Scottish Government](#)
- Adult Social Care – Ireland – [Safeguarding Vulnerable Adults - HSE.ie](#)
- Adult Social Care – Jersey - [Jersey Safeguarding Partnership](#)
- Adult Social Care – Guernsey - [States of Guernsey](#)
- [Hour Glass](#)
- Local Police - Telephone 101 for non-emergency referrals and 999 for emergency response.

Please note that not all Adult Social Services have the equivalent to a Multi-Agency Safeguarding Hub (MASH).



11.0 Consent

- 11.1 The issue of capacity is complex. Under the Mental Capacity Act (2005), adults should be assumed to have capacity to make decisions about their own life. As such RLSS UK staff and volunteers will seek to work proactively with individuals and involve them wherever possible in decisions about their care and safety.
- 11.2 Where there is a safeguarding concern, a referral to statutory services will be the correct course of action, and the RLSS UK staff member, member or volunteer will endeavour to speak to the individual and obtain their permission to refer to the Police, Adult Social Care or other appropriate services. To obtain consent the individual should discuss the nature of the concern with the individual (an advocate or carer may assist in this process), the reasons why a referral is appropriate and explain the potential outcomes. This will enable the person to make an informed decision about the next steps that they may wish to make.
- 11.3 Where there are questions or concerns about an individual's capacity to make a decision contact should be made with the RLSS UK HQ DSL or Adult Social Care for advice and guidance. Remember that a person's capacity may fluctuate due to such issues as drug/alcohol dependency, mental health etc.

11.4 What happens if a person does not consent?

- 11.4.1 Where an adult refuses to give consent to a referral or their information being shared, careful consideration must be given to whether there is sufficient reason to complete a referral without the adult's consent. This may be instances where:
- There are significant concerns about the adult's capacity to make decisions about their safety and/or support care needs.
 - There are concerns of coercion, threats or other pressure that may impact on their ability to make an informed decision.
 - Where others may be at risk of harm.
 - The alleged abuser has care and support needs and may also be at risk.
 - A referral to a statutory agency is in the public interest. This can include sharing information to protect adults from serious harm, promote their welfare or prevent crime and disorder.
- 11.4.2 If the person cannot be persuaded to give their consent, then unless it is considered dangerous to do so, it should be explained to them that the information will be shared without consent. The reasons should be given and **recorded**.
- 11.4.3 If the person does not give their consent to share information and there is no justifiable reason to do so (as detailed above) then the matter should be recorded locally, and no further action will be taken.
- 11.4.4 RLSS UK staff, members and volunteers or those acting on their behalf should aim to gain consent to share information but should be mindful of situations where to do so would place the adult or others at increased risk of harm. Advice concerning consent should be sought from the DSL or Deputy.



12.0 Confidentiality and sharing information

- 12.1 Effective and timely sharing of information is essential for the early identification of an Adults needs and to ensure that the most appropriate services are provided to keep them safe.
- 12.2 Those with concerns should be proactive in sharing information as early as possible to help the DSL (or the Deputy) and other professionals identify, assess, and respond to risks or concerns about the safety and welfare of the individual concerned.
- 12.3 Concerns about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of a vulnerable individual, which must always be the primary concern. The Data Protection Act (2018)⁸ and/or the General Protection Regulations (2018) **do not** prevent you from sharing information in relation to safeguarding.
- 12.4 You should not assume that someone else will pass on information.
- 12.5 The DSL (or Deputy) must always be informed before information is shared with an external organisation except in cases where there is a risk of immediate or serious harm and an emergency referral is necessary. The DSL or Deputy will manage the process of sharing information with the police, local authority services and/or any third-party organisation.
- 12.6 Information should be kept confidential and should only be shared with other staff members and those working on their behalf of RLSS UK who need to know the information. If there is any doubt about whether to share information, or who to share it with, advice should be sought from the DSL or their Deputy.

⁸ The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk



13.0 Action by the Club/Branch Designated Safeguarding Lead or Deputy

Should the Club/Branch DSL not be available or appropriate then please refer information to the RLSS UK Safeguarding Team.

- 13.1 The Designated Safeguarding Lead or Deputy, in conjunction with the other relevant leads, will manage the response to all safeguarding concerns.
- 13.2 When a safeguarding concern has been reported the Designated Safeguarding Lead or Deputy will:
- Make an initial assessment of the information received and ensure, if not already done so, the details are comprehensively recorded. If necessary, they will advise the reporting person on the quality of the submission and can ask for further detail to be added.
 - Identify any immediate risks to individuals contained within the report and respond accordingly. This could include calling 999, ensuring all possible action is taken to remove, reduce or control the risks identified.
 - Where an adult is, or may be, at risk of harm from abuse or neglect then a safeguarding adult concern referral can be made to Adult Social Care (see section 10.6.6) for contact details). Each Local Authority will have its own submission criteria.
 - Should the DSL or Deputy dispute the outcome from the Local Authority consideration will be given to follow the local escalation or professional difference policy which can be accessed on the local Adult Safeguarding Partnership website.
 - All action taken will be recorded in the RLSS UK Safeguarding records via the RLSS UK Safeguarding Team.
 - The DSL or Deputy will actively monitor all referrals that are made and will make reasonable enquiries around progress with the Local Authority.
 - Where it is decided that the information contained in the safeguarding concern constitutes a **Safeguarding Allegation** the DSL or Deputy will follow RLSS UK's procedure for complaints and they will make a referral to Adult Social Care. Internal investigations will be conducted in line with best practice ([Conducting Workplace Investigations](#)).



14.0 Case Referral Management Panel

14.1 The Case Referral Management Panel is made up of staff at RLSS UK HQ who are appropriately experienced and trained in safeguarding. The RLSS UK HQ DSL shall take the lead and oversee the operation of the Case Referral Management Panel. The role of the Case Referral Management Panel is to make an initial assessment on how to deal with all reported concerns (other than low level concerns which will be dealt with at a club and Branch Level) relating to adults at risk, what level each case will be dealt with at and give advice on the actions to be taken by the organisation. The decision will be made whether the situation is one that can be dealt with internally, or one requiring that information be shared with statutory agencies i.e. Local Authority Adult Social Care and/or the Police. Additionally, it will monitor and review progress on all safeguarding cases.

14.2 Where appropriate the Case Referral Management Panel will be responsible for reporting serious incidents to the Charity Commission. A serious incident is defined by the Commission as an adverse event, whether actual or alleged, which results in or risks significant;

- Harm to RLSS beneficiaries, staff, volunteers or others who come into contact with the organisation through its work.
- Loss of RLSS's money or assets.
- Damage to RLSS's property.
- Harm to RLSS's work or reputation.

For the purposes of this guidance, "significant" means significant in the context of the RLSS, taking account of its staff, operations, finances and/or reputation.

15.0 Safeguarding, Equality & Diversity Advisory Group (SEDAG)

15.1 This group has a key function in the Society's duty of care to all beneficiaries of RLSS UKs work, ensuring that RLSS UKs policies for safeguarding, diversity, equality and inclusion are fit for purpose and are practically applied.

15.2 Whilst it is the responsibility of the advisory group to ensure the Society has robust Safeguarding, Equality & Diversity policies in place, the Advisory Group also has a key role ensuring the policies reflect best practice across the sector and are implemented consistently across the organisation.

15.3 SEDAG will maintain an operational safeguarding risk register.



16.0 Procedural implementation and review:

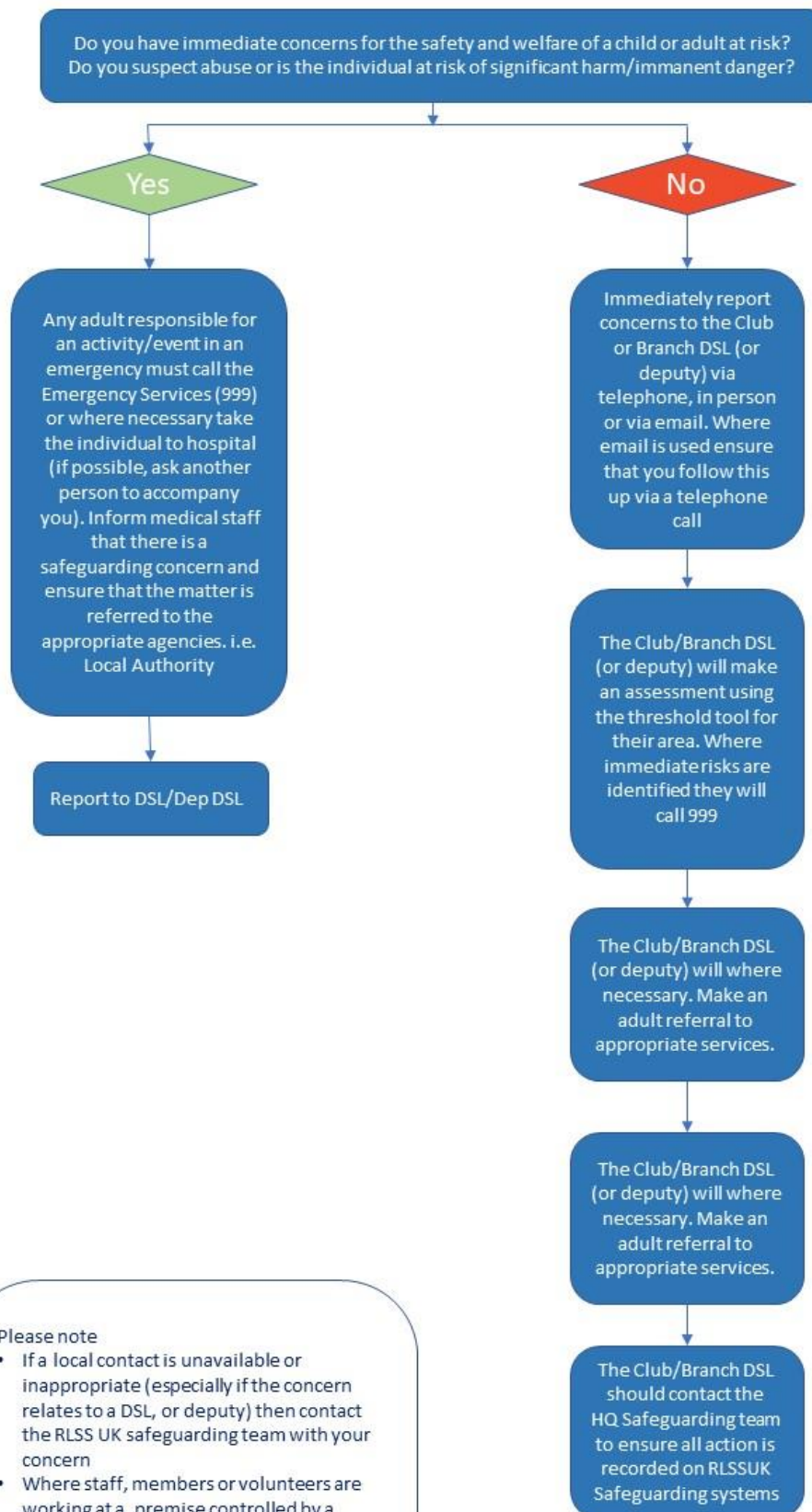
16.1 These procedures were implemented on 1st May 2023 and will be reviewed on an annual basis or in response to changes in safeguarding legislation and/or best practice.

16.2 The following RLSS UK additional policies are also relevant to this document:

- Child Safeguarding Policy and Procedures
- Adult at Risk Safeguarding Policy and Procedures
- Low Level Concerns Policy
- Use of Photography and Film Image
- Anti-Bullying Policy
- Professional Boundaries Guidance and Practice
- Youth Image Policy
- Safer Recruitment Policy
- Social Media and Internet Policy
- Whistleblowing Policy
- Good Practice Guidance
- Vulnerable Persons Policy
- Equality and Diversity Policy
- Complaints Policy
- Code of Conduct



Appendix A – Safeguarding Reporting Procedure



Please note

- If a local contact is unavailable or inappropriate (especially if the concern relates to a DSL, or deputy) then contact the RLSS UK safeguarding team with your concern
- Where staff, members or volunteers are working at a premise controlled by a partner organization follow their procedures
- Where the concern or allegation refers to the RLSS UK DSL or their deputy then the matter should be referred to The RLSS UK Executive Trustee



Appendix B – Types of Abuse

Based on the statutory guidance supporting the implementation of the Care Act 2014:

- Abuse is a violation of an individual's human and civil rights by another person or persons.
- Adults at risk may be abused by a wide range of people including family members, professional staff, care workers, volunteers, other service users, neighbours, friends, and individuals who deliberately exploit vulnerable people. Abuse may occur when an adult at risk lives alone or with a relative, within nursing, residential or day care settings, hospitals and other places assumed to be safe, or in public places.

The following is not intended to be an exhaustive list of types of abuse or exploitation but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

Types of abuse:

- Physical abuse - including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.
- Domestic violence – including psychological, physical, sexual, financial, emotional abuse; so, called 'honour' based violence.
- Sexual abuse - including rape, sexual assault, indecent exposure, sexual harassment, inappropriate touching, sexual teasing or innuendo, exposure to sexual images, subjections to indecent images or witnessing sexual acts. The adult may not have consented or may have been pressured into consenting.
- Psychological abuse - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal from services or supportive networks.
- 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. People with learning disabilities or dementia are particularly vulnerable to this type of abuse.
- Discriminatory abuse - including forms of harassment or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- Neglect and acts of omission - including 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.
- 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. Self-neglect might indicate that the person is not receiving adequate support or care or could be an indication of a mental health issue such as depression.



- 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 because of the structure, policies, processes and practices within an organisation.
- Modern slavery – encompasses slavery, human trafficking, 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.

Types of abuse not included in the Care Act 2014 but also relevant:

- Bullying (including 'cyber bullying' by text, e-mail, social media etc.) - may be seen as deliberately hurtful behaviour, usually repeated or sustained over a period of time, where it is difficult for those being bullied to defend themselves. The bully may be another vulnerable person. Although anyone can be the target of bullying, victims are typically shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reasons – being overweight, physically small, having a disability - or for belonging to a different race, faith or culture.
- Mate Crime – a 'mate crime' is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual. Mate Crime is carried out by someone the adult knows. There have been a number of serious cases relating to people with a learning disability who were seriously harmed by people who purported to be their friends.
- 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. Whilst there is a National Prevent agenda⁹ all concerns should be reported through normal adult protection procedures.
- Female genital mutilation (FGM)¹⁰ - is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. FGM is dangerous and a criminal offence. There are no medical reasons to carry out FGM. It does not enhance fertility and it does not make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

Disclosure The 'One Chance' rule As with Forced Marriage there is the 'One Chance' rule. It is essential that settings take action without delay and make a referral to adult services.

⁹ [Prevent Guidance](#)

¹⁰ [Forced Marriage Guidance](#)