



Safeguarding Adults Policy

Author: Safeguarding Manager

Owner: Head of Compliance, Risk and Governance

Approval

Approved by Board of Trustees: February 2026

Amendment

Date of amendment: November 2024

Reason for amendment: annual review and organisational changes

Amendments made: amended to refer to the DSL (replacing CSLO role), update CSO details and clarify their responsibilities; reflect changes to OSCR reporting process; add training details

Date of amendment: January 2025

Reason for amendment: amended to reflect current monitoring processes

Amendments made: monitoring and reporting section updated

Date of amendment: February 2026

Reason for amendment: annual review and organisational changes

Amendments made: alignment with Crisis' values and radical safeguarding approach; strengthened EDI lens throughout; definition of safeguarding broadened to meet Charity Commission guidance and clarify that policy refers to all adults including staff, volunteers and members of the public; addition of Safeguarding Manager role; added responsibilities flowchart; operational elements moved to new Safeguarding Adults Procedure; Appendices 1, 2 and 3 removed

Review

Frequency of review: 1 year

Next review date: February 2027



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1. Key Points Summary

Crisis's Safeguarding Adults Policy applies to every adult who interacts with the charity, including members, guests, members of the public, supporters, staff and volunteers, and must be followed by all staff, volunteers, contractors, and visitors.

The policy sets out a proactive, person-centred approach that prevents harm, takes disclosures seriously, and promotes safe, fair practice. Crisis commits to an anti-racist, anti-discriminatory approach; recognising systemic injustice and bias and encouraging holistic support.

The policy complies with UK law and guidance. Key concepts and terminology are defined and described to aid understanding for non-specialists.

Concerns are addressed through a clear seven-step process. When following this process, staff and volunteers should:

- work in a psychologically informed way
- presume capacity
- respect autonomy
- only share information without consent when there is a serious risk to an adult or a child.

The policy explains the safeguarding responsibilities of different roles within the organisation. Ultimately, safeguarding is everyone's responsibility: everyone is responsible for spotting concerns, reporting them promptly, and following Crisis' procedures.

2. Accessibility

We have balanced the need to make our policies accessible with the requirement to include clear and detailed information.

If you would like a copy of this policy in a different written format or font, please contact the Senior Compliance and Assurance Manager.

If you need support understanding any part of this policy, please book some time with your Crisis Safeguarding Officer or the Safeguarding Manager who can work with you to explain the policy in a way that best suits you. This is available to all staff to ensure inclusivity and accessibility.

Definitions of key words and phrases are included to aid understanding and clarity.

3. Criteria

This policy has been developed considering:

- Our culture and values: Reflecting our inclusive and accessible culture, prioritising care, community and anti-racist and anti-discriminatory practice. Striving to be collaborative, equitable, bold and impactful. Representative of the trust we place in our staff and our common-sense approach.

- Health, safety and wellbeing: Prioritising what is best for good team working and cohesion, and individual and organisational health, safety and wellbeing.
- Compliance and best practice: Checked by relevant expert staff to ensure compliance with relevant legislation and best practice.

4. Purpose

The purpose of this policy is to ensure Crisis protects adults from harm while actively challenging the social and structural inequalities that place people at greater risk. It sets out how we create safe, trusting, and empowering environments, and how we recognise and respond to abuse, neglect, and exclusion.

This policy also guides how Crisis builds and sustains a strong safeguarding culture across the whole organisation, where safeguarding is understood, prioritised, and embedded in everyday practice, decision-making, and relationships. It ensures staff and volunteers act early, uphold people's rights, and work in partnership with individuals and communities who have been historically marginalised or underserved.

5. Scope

This policy applies to all adults who come into contact with Crisis, including members, guests, members of the public, supporters, staff and volunteers, and must be followed by all of Crisis' staff, volunteers, contractors, and visitors.

If a member of staff or volunteer has a safeguarding concern about a child, then they must refer to the Safeguarding Children Policy and Procedure.

Diversity, equity and inclusion

Everyone who comes into contact with Crisis will be treated as an individual with unique experiences and needs. Everyone can expect to be treated with respect and dignity, and in a culturally- and psychologically-informed way and can expect any disclosure of abuse or harm, or the risk of abuse or harm, to be taken seriously.

This policy applies to all adults regardless of race, class, sex, sexual orientation, gender identity, age, religion or belief, marriage and civil partnership, and whether or not they have a disability, or any other characteristic such as neurodivergence, mental health, caring responsibilities, educational background, wealth or class.

6. Policy statement

Crisis is committed to safeguarding and protecting the welfare of everyone who comes into contact with the charity. We ensure that we have appropriate arrangements in place to provide a safe and secure environment and to recognise and deal effectively with any safeguarding concerns that arise. We encourage a proactive approach, so that where possible we prevent harm from occurring.

We understand that effective safeguarding practice is nuanced and unique to the situation and individual/s involved. Therefore, where the wording of this document may not cover every eventuality or set of circumstances, Crisis staff and volunteers will take a case-by-case approach – prioritising the wants and needs of the person being harmed, or

at risk of being harmed. Our action and decision-making will be proportionate, based on common sense, and reflect best practice.

7. Culture and values

Crisis understands that an effective safeguarding culture must be rooted in our values:

- **Impactful:** our safeguarding practice must be effective in preventing harm and responding when harm has occurred and compliant with all appropriate legislation, evidenced by best practice reporting and recording.
- **Collaborative:** we work together with and alongside individuals to support their wellbeing and ensure their safety. We follow a person-centred and strengths-based approach to consider the multitude of ways that people might feel safer. Our staff and volunteers feel supported to raise concerns and make decisions regarding safeguarding.
- **Equitable:** our approach to safeguarding recognises that individuals will require different support depending on their identity, experiences and context. All individuals have an equal right to protection from harm, and this is best achieved by safeguarding practice that is actively anti-oppressive, anti-discriminatory and anti-racist. We know that by actively centring the most marginalised in our community, we will provide the best possible support to everyone.
- **Bold:** we want to be sector leaders in safeguarding best-practice. We are prepared to challenge the status quo, try new approaches and learn from our mistakes.

Our anti-racist and anti-discriminatory approach

Crisis acknowledges that:

- social and systemic injustices cause and reinforce harm to people from marginalised groups and ethnically diverse communities, including those at risk of or experiencing homelessness.
- there are established causal and consequential links between an individual's intersectional identity, their experience of homelessness, and their exposure to risk and harm including violence and trauma.
- traditional safeguarding systems and agencies are not equitable and can themselves cause harm (particularly to those with marginalised identities and from minoritised communities) and may be a source of trauma for individuals we seek to protect.
- both individuals and systems are susceptible to bias.

Therefore:

- Crisis adopts a radical approach to anti-racist and anti-discriminatory practice.
- staff and volunteers should be alert to the potential for bias, racism, discrimination and inequity in their own actions and decision-making, and that of their colleagues, and external agencies.

- all individuals must be viewed holistically and within their full context, including their unique identity and lived experience, to ensure that they are offered support that is appropriate and effective.

8. Legislative framework

The key legislative framework supporting Crisis' Safeguarding Adults Policy includes:

- Adult Support and Protection (Scotland) Act 2007
- Age of Legal Capacity (Scotland) Act 1991
- Care Act 2014
- Data Protection Act 2018
- Domestic Abuse Act 2021
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Social Services and Well-being (Wales) Act 2014

9. Definitions and key terms

Safeguarding adults

Safeguarding adults involves people and organisations working together to prevent, identify and respond to harm and abuse, while recognising that adults have the right, capacity and agency to make their own choices and to live with a level of risk. It is about balancing protection from harm with respect for autonomy, and supporting people to stay as safe as possible in ways that reflect their views, wishes and beliefs. We all have a responsibility to take action to protect adults who are unable to keep themselves safe. Safeguarding involves both preventative and responsive actions, from listening and creating safe spaces, to safer recruitment, risk assessment and safety planning, signposting, making referrals to statutory services and involving emergency services. At Crisis, we understand that we have a duty to consider how we safeguard everyone who comes into contact with our charity, including but not limited to members and guests.

Safeguarding culture

A safeguarding culture refers to a proactive and preventative approach to ensuring the safety and wellbeing of individuals by embedding safeguarding principles into all aspects of an organisation or community. It goes beyond simply having policies and procedures; it's about creating an environment where everyone understands their role in protecting others and feels empowered to raise concerns.

Radical safeguarding

Radical safeguarding is an approach that centres on social justice, challenging power imbalances, and addressing systemic issues that contribute to harm, rather than solely

focusing on assessment of risk centred on an individual. It involves critically examining the wider context, including social inequalities, and fostering collective responsibility for safeguarding.

Safeguarding concern

A safeguarding concern is a suspicion or worry that that an individual is at risk of harm, abuse, or neglect, requiring a response and investigation.

Abuse

Abuse is defined as a violation of an individual's human and civil rights by any other person or persons. It includes acts of commission (such as an assault) and acts of omission (failing to prevent harm). Abuse may be a single act or a series of acts. The safeguarding legislation in Scotland refers to harm rather than abuse but the terms are interchangeable for the purposes of this policy.

The types of abuse covered by the adult safeguarding legislation include:

- physical abuse
- sexual abuse
- psychological or emotional abuse
- financial abuse
- neglect (including self-neglect)
- institutional abuse
- discriminatory abuse
- exploitation and modern day slavery
- domestic abuse, stalking and 'honour' based violence (DASH)
- radicalisation and being drawn into terrorism.

Adult

For the purposes of this policy, an adult is anyone aged 18 or over in England, Wales and Scotland. In Scotland, individuals aged 16 or 17 are not considered adults, even though they may have legal capacity to make certain decisions.

Young person

A young person is generally understood to be a child or young adult up to the age of 25.

We recognise that the legal distinction between a child and an adult may feel arbitrary in some respects, and very significant in others. For example:

- an 18-year-old may not feel equipped to make decisions about their lives despite no longer legally requiring the consent of a parent or carer
- young people may experience a gap in or ending of service provision at this age, for instance in health care or social care services.

In our society, the period between ages 15 and 19 may include significant changes to a young person's life including leaving school or college, starting work or going to university, and leaving the family home. These changes may present new or increased risks to a young person.

Care-experienced young people face a heightened risk of homelessness at key transition points at ages 18, 21 and 25, when statutory leaving-care support and priority need protections reduce or end, frequently before housing stability or independence is established.

When we consider safeguarding risks and responses, we must take care to ensure that we are clear about the legal definition of children and adults and guard against scenarios such as:

- adultification of under-18s when referring to them as “young people” without due consideration of their status as children
- not giving an adult appropriate control or influence over their care due to a perception of them as a “young person”.

Adult at risk

‘Adults at risk’ is the term used to refer to adults who meet the criteria set out in adult safeguarding legislation.

Crisis recognises that while ‘adult at risk’, or ‘vulnerable adult’ is the terminology used in relevant legislation and by services such as health and criminal justice, these labels should be avoided as far as possible in our day-to-day work. Our language and behaviour should:

- recognise an individual's agency and capacity for managing risk
- focus on the specific risk factors and support needed, rather than labelling the person
- be unambiguous and explicit about individuals' experiences of marginalisation, discrimination and oppression and not hide behind indeterminate words or phrases such as ‘vulnerable’.

Preferred alternative terms include:

- "Adult with care and support needs": This phrase focuses on the individual's need for assistance, which is a core aspect of safeguarding, without implying vulnerability or risk.
- "Adult experiencing vulnerability": This term acknowledges the potential for harm while also recognising that vulnerability is a dynamic state influenced by various factors, not a fixed characteristic.
- "Individual" or "person": Usually, the most appropriate term is simply to refer to the individual by name, particularly when discussing their strengths and wishes.

10. Prevention of harm and abuse

Assessing and mitigating risk

Wherever possible, Crisis undertakes preventative action to protect adults from harm. This involves assessment of risk at an individual, programme, service and governance level. Safeguarding risks are recorded in appropriate risk registers and regularly scrutinised and reviewed by staff, SLT and trustees.

Safer recruitment of staff and volunteers

Safer recruitment practices are a key protective measure. Crisis' recruitment procedures, including use of background checks, are designed to be equitable, inclusive and to make Crisis a difficult target for anyone who may wish to use a role at the organisation to perpetrate harm. Our Code of Conduct, 'Continuous Conversations' approach to line management, and related policies such as Whistleblowing and Managing Safeguarding Allegations help create a culture where unsafe behaviour is picked up and responded to effectively.

Training and learning

Individuals who are knowledgeable and confident in safeguarding are better equipped to promote a positive safeguarding culture and to recognise, prevent and respond to risk and harm. Crisis provides safeguarding training to all staff and volunteers as part of induction, with regular refresher training thereafter, proportionate to the nature of their role and level of responsibility.

Completion of mandatory safeguarding training is a requirement of all relevant roles. Where training requirements are not met, appropriate restrictions may be placed on an individual's duties until compliance is achieved. Everyone working with Crisis is expected to actively contribute to a culture of continuous learning, reflection and improvement in safeguarding practice.

11. Responding to safeguarding concerns

The 7 Rs

1. Recognise

It is everybody's responsibility to be alert to the possibility of abuse and be aware of the signs and indicators. Staff and volunteers receive training on recognising potential safeguarding concerns, and further detail can be found in the Safeguarding Adults Procedure.

2. Respond

We each have an individual responsibility to take action to prevent the suffering of others. Crisis provides appropriate training to staff and volunteers so that they feel confident to respond effectively to safeguarding concerns when they occur. Crisis encourages a psychologically-informed, person-centred approach which respects the individual's dignity and confidentiality.

3. Report

Report the concern according to Crisis's Safeguarding Adults Procedure.

4. Record

All concerns must be recorded appropriately, including any subsequent actions taken, ensuring there is no delay to passing on concerns.

5. Refer

If necessary and appropriate, a referral to statutory agencies may be made or information may be shared with another organisation/service.

6. Review

All staff and volunteers take responsibility to ensure that safeguarding reports and referrals made are followed up in a timely way and take further action if not satisfied with the response.

7. Reflect

All staff and volunteers are supported to reflect on their learnings from the safeguarding process and on how to support the wellbeing of themselves and others involved.

Capacity

Capacity refers to a person's ability to:

- Understand information relevant to a decision,
- Weigh up that information to make a choice, and
- Communicate their decision clearly—whether by speech, sign, gestures, writing or other means.

All adults should be assumed to have capacity to make safeguarding decisions for themselves, until there is significant reason to believe otherwise. Crisis staff and volunteers will always respect an individual's right to make their own decisions - even unwise, risky or irrational ones.

Crisis acknowledges that capacity can fluctuate over time and with respect to different decisions. [See here](#) for situations in which an adult may not have capacity. Crisis' staff are expected to use their professional expertise to inform their assessment of an individual's capacity, and encouraged to seek support from suitably experienced colleagues.

Crisis recognises that while capacity can be a useful measure, it has also been weaponised against historically marginalised people - particularly racially marginalised, disabled and LGBTQ+ people; people experiencing mental health challenges or using substances (including alcohol); sex workers; and survivors of domestic or sexual abuse. Arguments about incapacity have too often been used to silence, control and harm. For this reason, any assessments that someone lacks capacity must be approached with great caution. Staff should actively interrogate their own biases: "What beliefs do I hold about what it means to 'have capacity'? Is this person genuinely unable to think or act for themselves, or am I simply uncomfortable with - or opposed to - their choices?"

Consent and breaking confidentiality

At the core of Crisis' approach to responding to safeguarding concerns is the principle that information should be shared if this helps to protect individuals. A person's confidentiality should always be respected, unless there is a serious risk of harm to themselves or another adult, or a risk of harm to a child. Where possible, Crisis' staff and

volunteers will always attempt to seek consent to share information about a safeguarding concern. However, this may not always be possible and/or may increase the risk of harm.

Only information relevant to the safeguarding concern should be shared. Information about someone's protected characteristics should not be shared unless relevant.

12. Safeguarding Responsibilities

The Board of Trustees

The Charity Commission expects that safeguarding should be a key governance priority for trustees.

It is part of their duty of care to ensure Crisis:

- acts in the best interests of everyone who comes into contact with the charity
- takes all reasonable steps to prevent any harm to them
- assesses and manages risk, and sets the organisation's risk appetite for safeguarding
- has up to date safeguarding policies and procedures in place
- undertakes ongoing monitoring and reviewing to ensure that safeguards are being implemented and are effective
- responds appropriately to allegations of abuse and whistleblowing cases.

In addition, at least one Designated Trustee for Safeguarding is identified who will:

- be suitably experienced and trained in safeguarding
- meet with the Designated Safeguarding Lead (DSL) and Safeguarding Manager quarterly to maintain an overview of all safeguarding measures across Crisis
- be informed of and contribute to decisions on cases that involve significant risk to Crisis and maintain oversight of any follow up to help ensure that all risks are appropriately managed
- in conjunction with the Senior Leadership Team and DSL, ensure that trustees are fully informed of safeguarding issues across the organisation and contribute to maintaining safe practice across all our operations.

The Senior Leadership Team (SLT)

It is the responsibility of SLT to satisfy itself that appropriate safeguarding policies and procedures are in place, that they have been communicated to all staff (including volunteers and agency staff) and that the policies and procedures are actually working to prevent and protect against harm.

Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is responsible for:

- ensuring that safeguarding is considered in strategic decision-making
- ensuring that the board of trustees is provided with reports on safeguarding activity as agreed

- overseeing compliance with Charity Commission guidance
- ensuring that regulators are informed of serious safeguarding incidents
- acting as the main contact and liaising with the People team and SLT regarding highly confidential safeguarding concerns involving staff and volunteers
- leading complex investigations relating to safeguarding where there is significant risk of reputational damage to the organisation
- ensuring adequate quality assurance processes are in place locally in line with strategic objectives.

Safeguarding Manager

The Safeguarding Manager has responsibility for:

- developing the organisation's safeguarding policies and procedures
- ensuring recording, monitoring and review systems are in place
- leading internal safeguarding forums
- leading on embedding a positive safeguarding culture
- offering their expert knowledge of safeguarding to staff, acting as an escalation point
- supporting directorates outside Client Services to assess safeguarding risks and formulate plans to keep people safe
- appraising the training needs of all staff and volunteers on a regular basis
- developing guidance and training to increase the level of understanding and expertise on safeguarding across all teams, including induction, refresher and safer recruitment training
- ensuring that the Continuous Conversations model includes appropriate opportunities to reflect on safeguarding practice
- supporting recruiting managers to identify the appropriate level of criminal records check for vacancies
- planning and undertaking regular internal and external audits of safeguarding practice, and supporting staff to respond to recommendations
- leading data collection and analysis for safeguarding reporting; producing reports quarterly and annually to the Board of Trustees on how Crisis has discharged its safeguarding duties
- giving feedback to SLT and Strategic Leadership Group (SLG) about safeguarding trends, concerns and emerging issues
- leading on internal serious case reviews and acting as the main point of contact for cases involving the Coroner's Office
- Supporting safeguarding cases involving staff and volunteers as appropriate and requested, alongside the DSL and People team

- keeping up to date with relevant law, guidance and case examples
- proactively engaging with other agencies and external experts to ensure that Crisis' approach is informed by and contributes to best practice within the sector.

Crisis Safeguarding Officers (CSOs)

Crisis is a unique and varied organisation. Each area of operation carries very specific safeguarding risks and is represented by a dedicated CSO.

CSOs support the DSL and Safeguarding Manager to ensure that strategic safeguarding issues are managed effectively and that proactive measures to prevent harm are in place across all areas of operation. They:

- oversee the implementation of safeguarding policies and procedures
- support line managers to monitor the performance of staff in safeguarding matters
- offer advice and guidance to staff, acting as an escalation route
- are the negotiator when differences arise between agencies and services
- ensure that, wherever possible, members are involved in the planning and implementation of their individual safeguarding plans
- create and maintain links with local statutory agencies
- ensure that safeguarding is a regular agenda in team meetings and supervision
- ensure that external referrals are of high quality and are followed up
- undertake out of hours on-call responsibilities where relevant
- immediately highlight any serious concerns to the Safeguarding Manager
- act as advocates for safeguarding and increase awareness of safeguarding measures within their specific areas of operation in conjunction with their team/line manager(s)
- assess that the partner organisations working with Crisis have appropriate safeguarding policies and procedures in place.

Line Managers

Line managers are responsible for:

- supporting, encouraging and ensuring their teams follow all appropriate safeguarding procedures
- including safeguarding as a regular agenda item in team and individual meetings
- reviewing safeguarding understanding and skills in Continuous Conversations, development assessment and objective setting for their line reports
- providing additional support and advice for a member of staff with any safeguarding concern
- following safer recruitment practices

- ensuring that all new staff and volunteers are fully inducted/trained to the appropriate level in safeguarding practices, including annual safeguarding refresher training.

Head of People

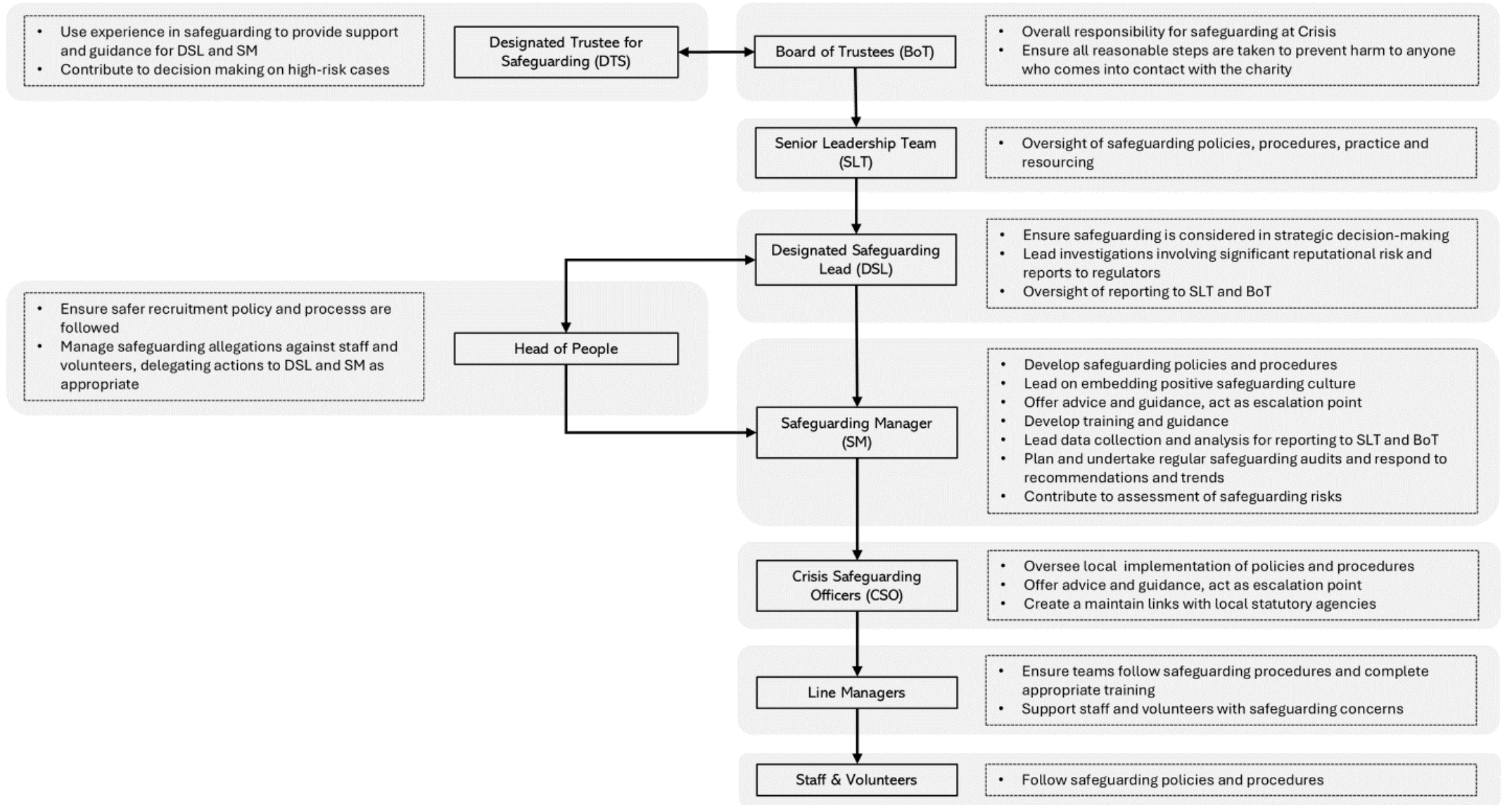
The Head of People is responsible for:

- ensuring that all members of recruitment panels have received appropriate safer recruitment training
- providing advice and guidance on safer recruitment to those recruiting staff or volunteers
- ensuring up to date criminal records checks are in place at the appropriate level in line with Crisis' criminal records checks policy
- ensuring references are taken up in accordance with the Crisis' safer recruitment policy
- managing safeguarding allegations against staff or volunteers, delegating actions to the Safeguarding Manager and DSL as appropriate.

Staff and volunteers

It is the responsibility of all staff and volunteers at Crisis to remain vigilant for any potential safeguarding issues and follow the relevant procedure to report concerns if they believe an adult has been, or is at risk of, abuse or harm. All staff and volunteers must complete the mandatory safeguarding training relevant to their role within the specified time and demonstrably embed ways of working which promote safety and wellbeing.

12.9 Responsibilities Flowchart



13. Associated Policies and Procedures

- Safeguarding Adults Procedure
- Safeguarding Children Policy and Procedure
- Managing Safeguarding Allegations
- Whistleblowing
- Complaints
- Grievance
- Lone Working
- Member and Guest Information: Gathering, Recording and Sharing
- Safer Recruitment
- Safety and Inclusion Policy and Procedure
- Criminal Records Checks
- Code of Conduct
- Crisis at Christmas policies/procedures

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